

## Proposal for a revised Energy Performance of Buildings Directive GCP Europe statement

GCP Europe, the leading representative of mechanical installers in Europe, welcomes the European Commission's proposal for the revision of the Energy Performance of Buildings Directive (EPBD).

The proposed amendments are a natural development of the legislative act, reacting to the ever-growing importance of energy efficient, clean and smart buildings to achieve the EU's climate and energy objectives.

Contractors have a crucial role to play in the decarbonisation of buildings thanks to their indepth knowledge of the installation, maintenance and inspection of the heating, cooling, and ventilation systems.

On this matter, we welcome the intention to apply minimum energy performance standards to tackle the worst performing part of the building stock.

The Commission's push for more frequent and encompassing inspections of heating, ventilation and air-conditioning systems, combined with renovation passports and Energy Performance Certificates (EPCs) issued by qualified experts, will also ensure that building systems operate efficiently and allow for achieving the Union's goals.

With the evolving ambition and targets of the EU, and the high-level technicality of heating, cooling, ventilation and air condition systems, it is highly necessary to have corresponding support for the role of installers. Without proper design of the respective systems, energy savings of efficient equipment can be totally negated. Therefore, we fully support the proposal aimed at requiring Member States to provide measures and financing to promote education and training to ensure that there is a sufficient workforce with the appropriate level of skills corresponding to the needs in the building, construction, and energy efficiency sector.

However, the draft Directive has much more potential to address indoor environmental quality. Although the Commissions touches upon the issue with a provision to support the integration of measuring and control devices for the monitoring and regulation of indoor air quality, we believe that mandatory minimum requirements are a must.

Digitalisation and technological development will be vital in the decarbonisation of the building stock by enabling functions such as demand-response, and the integration of more

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energy efficient systems. Despite the positive step that the Commission plans to further strengthen the application of Smart Readiness Indicator (SRI), we still see the gap of not having a definition for "smart buildings". Although smart technologies and energy efficiency are closely linked, distinct definitions are vital. We believe that a smart building is not only energy efficient, but should also address its adaptability to the needs of the user, including healthy IEQ criteria.

## About GCP Europe:

GCP Europe is the voice of the efficient building engineering services. The association represents the interests of 17 member associations in 13 countries in the Building Services Engineering Sector: plumbing and HVAC at the European Union level.

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