Environmental Association “Za Zemiata” - Friends of the Earth Bulgaria

We would like to share with you our evaluation and recommendations for improvements of the:
Directive of the European Parliament and of the council on the energy performance of
buildings (EPBD) (recast).

The idea of achieving net-zero for all new buildings and pushing the deep renovation of the existing
building stock is central to the proposed changes in the EPBD. However, for the directive to be a
useful addition to the Renovation Wave, and the overall 2030 and 2050 climate targets, we strongly
suggest further improvements to be implemented.

Long Term Goal (2050):

Improvements to the energy performance levels of the building stock is coupled with reduction of
GHGs emissions from the building sector. All new buildings must be zero emission buildings (ZEBs)
by 2030, and by 2050 all the existing buildings should be ZEBs too. This should be reached by
achieving high energy performance levels, with the addition of providing the remaining low energy
demand with renewable energy. In order for EPBD recast to be well adjusted to the long term
decarbonization goal of the EU, we propose strengthening the directive with inclusion of “step by step”
goals for reduction of the embodied emissions by whole-life carbon standpoint, and the solidification
of the “energy efficiency first” principle. Our proposal is that ZEBs definition should be rephrased as
“cradle to cradle net zero carbon operational and embodied emissions”.

The current rates of building renovations across the EU should be accelerated to reach the 3%
renovation rate per year, as otherwise we would not reach the long term objectives. Moreover, the
level of deep renovations are not adequate to hit the set climate target for 2030. We see that the
“energy efficiency first” principle should be at the heart of the renovation of the building stock.
Currently, limiting the operational emissions is seen as pivotal for the revised EPBD. The emissions
resulting from extraction, production and transportation of building materials, as well as the
preservation of the existing building stock, demolition and circularity principles including sustainable
sourcing and procurement of construction materials and energy efficient technologies are not
sufficiently developed. The circular economy principles in the construction and renovation should be
clearly stated on a EU level, and intertwined with the EPBD and the Fit for 55 package.

Whole-life Carbon:

Reduction of the operational emissions by only incorporating renewable energy sources, can not
result in the needed transformation of the building stock. The proposed ZEB definition is limited and
does not include to a sufficient level the whole-life carbon. Life-cycle GHGs emissions and the
life-cycle global warming potential have to be calculated and incorporated into the energy
performance certificate (EPC), but there are no measures for reducing them. Rules for whole-life
carbon emissions must be set on an EU level into EPBD, and not only in the renovation plans of the
member states (MS). Moreover, whole-life carbon reduction efforts of MS should be able to be easily
compared. Our recommendation is for an establishment of ambitious Whole Life Carbon roadmaps
applicable on MS and EU level.
New Buildings:

The proposed new ZEB definition is a definite upgrade to the current nZEB definition, with an addition of on-site generated renewables, energy generated by a renewable energy community or from a district heating and cooling system (that should be also mainly RES-based). However, there shall be stricter levels of annual primary energy use applied, as in practice they are the same as in the current nZEB definition. Moreover, the 2030 deadline date should be moved to 2025. The EPBD recast should have higher ambition on strengthening the “energy efficiency first” principle on new buildings, and that final energy consumption indicators shall be added on top of the primary energy consumption ones. We see that the document is favourably tilted to the shift from fossil to renewable energy sources, but not enough effort is placed on improving the energy efficiency of new builds.

Deep Renovation:

In the EPBD recast we can see a definition for deep renovation. However, this definition could be made clearer, as several descriptions such as ZEB, nZEB, and EPC class A are being used in order to explain it. There are uncertainties on the definition of deep renovations which shall be addressed. As an example both renovation from class B to A, and from D to A, are currently considered deep renovation, although they are resulting in completely different levels of energy savings. Thus they are not really comparable. It is a good sign that now we have legally-binding definition of deep renovation, but it is not being used as the underlying guiding principle for the ambition of all energy renovations or financing programs. National programs should provide proportionately greater financial incentives for deep renovations, including staged deep renovations, compared to less deep renovations (or shallow renovations as under the first and ongoing National Renovation Programme of Bulgaria, aiming at energy class C).

Minimum Energy Performance Standards (MEPS):

Za Zemiata supports the provision to set up MEPS, but the EPBD shall be strengthened by widening the scope (not only applying to G and F, a higher EPC level can be the level where a building is ‘ready’ for low-temperature heating, i.e. a heat pump). Strengthening the MEPS (our proposal is for a minimum level of C instead of E to 2027) could result in achieving significantly more energy savings on a national and EU level, and could amplify the numbers of earlier renovations standard that have to be met, as well as renovation to a higher EPC level. Moreover, expanding the scope of MEPS to all buildings shall be made mandatory, and not only optional by 2027, with clear targets for MS set for 2030 and 2040.

Accelerating the application of MEPS shall also require a supportive framework including funding, monitoring & social safeguards, such as rent caps, a ban on renovictions, monitoring rental increases, social rental agencies and other successful programmes.

Heating and cooling decarbonization:

Za Zemiata’s recommendation is that the definition of ‘renewable district heating’ should be strengthened in order to ensure zero GHG emissions from the source.
Furthermore, MS should include and implement clear steps and timeline for phase-out of using fossil fuels from heating and cooling in their National Buildings Renovation Plans (BRPs) till 2040 at the latest. Moreover, the plan should be obligatory and not only optional as in the current proposal.

**National Building Renovation Plans (BRPs):**

Za Zemiata supports the proposition for Building Renovation Plans (BRPs) to replace the Long-term Renovation Strategies. The BRPs will be important planning and reporting tools for MS and shall provide clear trajectories for reduction of energy use and full decarbonisation of all building segments. BRPs should include renovation targets for 2030, 2040 and 2050, with a view to achieve a climate neutral building stock, and phase out the use of fossil fuels for heating buildings by 2040. We would like to remind you about our calls within the European Civil Society Gas Manifesto for [phasing out fossil gas by 2035](#) in all sectors, including buildings. With regards to the energy security implications from the gas dependency and vulnerabilities, the decarbonisation of the building stock needs to be accelerated further. Nevertheless, further synergies with local heat planning and Fit for 55 are needed. Furthermore, incentives and penalties must be put in place for MS to reach the targets set in their BRPs. As MS have a history of underperformance in the Long-term Renovation Strategies, governments shall be obliged to reach the targets set in the BRPs.

**Energy Performance Certificates:**

The robustness of the Energy Performance Certificates (EPCs) framework will determine the success of many of the other provisions in the EPBD that rely on it. Boosting the compatibility of EPCs across the MS is a long-awaited step. Widening the requirements for the cases when EPCs shall be issued is another small step in the right direction. Therefore EPCs coverage should be boosted by, for instance, introducing an obligation for all buildings to have an EPC in place before 2028. Without a wide coverage, all the positive changes suggested by the Commission might end up having little to no impact in boosting renovations, improving sharing of information on the energy performance parameters of buildings, with a potential to lead to knowledge-based decision making.

**Renovation Passport:**

Za Zemiata supports the introduction of building renovation passports (BRPs) and the timescale for their implementation (MS to introduce BRPs by outlining the necessary steps towards achieving the A energy class within a set timeframe by the end of 2024). BRPs shall ensure that all renovations are achieving the maximum possible energy savings as well as highest energy efficiency levels, and zero emissions targets, must ensure that any renovation plan considers all elements of a building with a view to achieving maximum energy efficiency and a zero emission target. However, we recommend that sufficient technical, financial and administrative support in connection with BRPs is provided to households through “One Stop Shops” or another viable Fit for 55 mechanism.

**Financial instruments & Technical Assistance:**

A well-balanced “One Stop Shop” network working at municipal level is vital for the dissemination and outreach of the building renovation programmes, especially for the energy poor and vulnerable households. The One Stop Shop network shall blend support on renovation and renewable programmes, with tailored energy advice. For the fringe communities the One Stop Shops should be connected with social workers in order to further its impact.
Increased funding is needed to deliver the results of the Renovation Wave. Targeted programmes for energy poor households should be a priority, including with participation in renewable energy communities. Moreover, the benefits of energy efficiency and deep renovation should be widely popularised by targeted campaigns to different societal groups.

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