

on

## Revision of Energy Performance of Buildings Directive (EPBD)

Frankfurt am Main, 20.06.2021

### General appreciation

**AGFW**, the German association for DHC (district heating and cooling) and CHP (Combined Heat and Power), welcomes the possibility to voice its opinion on the revision of the Energy Performance of Buildings Directive (EPBD). AGFW is convinced that a revision of EPBD poses an important opportunity to develop a suitable framework that is positioned to promote the necessary decarbonisation of Europe's building sector, by especially drawing the focus on the decarbonisation of Europe's existing building stock- the sectors most carbon intensive segment.

In order to support these efforts, AGFW would like to emphasize a couple of aspects that should be considered in the upcoming revision process:

### Establishing a non-discriminatory level playing field in buildings decarbonization

The revision process of the EPBD should focus on promoting fuel switches from fossil to carbon neutral energy sources. This demands a non-discriminatory level playing field between grid supplied heat and cold and on-site sources as well as an equal treatment of renewable and waste heat.

As already mentioned in Annex I of the EPBD (Directive (EU) 2018/844) and reiterated in the Renovation Wave Initiative, both on-site and grid supplied renewable energy sources equally contribute to the decarbonisation of buildings and districts and should thus be treated on non-discriminatory basis. The Renovation Wave Initiative furthermore rightly outlined that both renewable energy sources and waste heat recovery play a key role in the decarbonisation of the EU building stock. Therefore, they should be treated equally when it comes to meeting the renewable targets for heating and cooling, DHC and buildings, especially in the framework of MEPS and Renovation Passports.

### Promoting a district approach to energy renovation

The upcoming EPBD revision should furthermore put a central emphasis on the implementation of the district approach-concept, which was first introduced in the EPBD (Directive (EU) 2018/844) under Art. 19 and was further reiterated in the Renovation Wave Initiative. This approach has numerous advantages when compared to building-by-building renovation: it can accelerate renovation efforts, promote faster decarbonisation of heating and cooling through the development and modernization of DHC networks and can help to identify possible interactions between various types of infrastructures and fuels, contributing towards the realization of smart sector integration. Thus, in unlocking further efficiency benefits for the overall energy intensiveness of Europe's building stock, the implementation of district approaches would thereby also help to support the mainstreaming of the Energy-Efficiency-First-Principle across the European energy framework.

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## **Mandatory Minimum Energy Performance Standards (MEPS)**

The introduction of MEPS can play an important part in driving the decarbonisation of buildings. The effectiveness of these standards will however depend on their technical design as well as their subsequent implementation by Member States.

In this context it is hence crucial to underline several important features that should be considered in the design of the MEPS framework:

**Firstly**, MEPS should be based on primary energy, as this would guarantee a greater emphasis on the energy efficient decarbonisation of the building.

**Secondly**, the possibility to connect to an efficient DHC network, where and when possible, should also be systematically evaluated and guaranteed within MEPS, since efficient heat supply is an essential component of a decarbonised building stock. Especially regarding the existing urban building stock – which remains the most carbon intensive building segment – efficient DHC continues to be the only accessible technology with a viable pathway to support 2030 ambitions.

**Thirdly**, MEPS must furthermore be accompanied by a financial framework that comprises public and private subsidies, funding, and incentives.

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AGFW is the German energy efficiency association for heating, cooling and cogeneration. We represent more than 550 utility companies (national and regional), energy service providers as well as industrial companies of the sector across Germany and Europe. As rule-setting body we represent over 95 % of Germany's DHC market.

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