

World Green Building Council Response to Energy Efficiency Directive (EED) Review

Introduction

[WorldGBC Europe](#) represents Green Building Councils (GBCs) in over 20 countries and works with eight Regional Partners and over 4,500 diverse members across the construction and real estate sector. Our vision is for a sustainable built environment at the heart of Europe's future.

We are deeply committed to supporting the deep renovation of our building stock, and have supported since 2015 the work of national governments on the long term renovation strategies with the BUILD UPON project. Since 2018, we are again deeply involved, through the BUILD UPON² project, in develop local impact frameworks supportive of national long term renovation strategies (LTRS), and de facto helping local administration with implementing article 5 of the EED.

Additionally, we have recently launched #BuildingLife, a project which brings together a coalition of [Green Building Councils](#) across Europe to drive decarbonisation of the building sector through private sector action and public sector policy. This will include convening a European Leadership Forum to build consensus and steer the direction of an EU Policy Whole Life Carbon Roadmap that will set out how whole life carbon can be integrated into the EU policy framework.

Please find below a summary of our position on review of the Energy Efficiency Directive (EED) and our recommendations to ensure that the full potential of the buildings sector in delivering on EU goals is recognised.

The Impact of Buildings

In Europe, buildings are responsible for approximately 40% of energy consumption and 36% of CO₂ emissions. The EU has led the world in addressing the operational emissions from buildings but needs to accelerate the deployment of impactful renovation strategies. Over 90% of our building are consuming too much energy and most of them need to be deeply renovated. This inefficiency results in wasted energy, reduced productivity in schools and offices, and energy poverty. By renovating our buildings, we can address these issues and realise the multiple benefits of renovation including the creation of jobs.

In addition, one needs to bear in mind that focusing on operational emissions alone means we are only addressing part of our sector's impact. Emissions are also released during the manufacturing, transportation, construction, and end of life phases of all built assets – buildings and infrastructure.

These emissions, often referred to as 'embodied carbon', contribute to around 11% of all global carbon emissions. To meet Europe's ambitious climate goals, both operational and embodied carbon ('whole life carbon') must be considered in an integrated manner. Such an approach will optimise carbon reduction and avoid the unintended consequences of assessing each in isolation.

This approach is also supported by our network of stakeholders across Europe as it considers the full life cycle of how a building will be used over a defined time (50-60 years) and sets out ways to reduce the overall carbon impact of a building in a cost efficient way.

Europe must lead the way

Under the proposed EU Climate Law, Europe must achieve climate neutrality by 2050. This will not be possible unless the Commission:

- 1) Further commits to accelerating building renovation, namely via stronger regulatory requirements on existing buildings including the introduction of minimum energy performance requirements supported by well aligned financing schemes that leverage public and private sources (including green mortgages). Article 5 of the EED is essential in accelerating the rate of renovation in public buildings.
- 2) Supports policies that address the whole life cycle impact of a building. The European Commission has already made some progress on the move towards life cycle thinking with the publication of the Level(s) framework.

However, more must be done to move this agenda forward.

Recommendations for the European Commission

The European Commission must act with a sense of urgency so that the building and construction sector is playing its optimal role in delivering on EU climate goals. If the EU does not commit to ambitious policies now that support the transformation of our built environment, it will simply not achieve climate neutrality.

The forthcoming reviews of the Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD) provide an opportunity for the European Commission to demonstrate leadership and take the necessary action to address these key issues.

Recommendations for the review of the Energy Efficiency Directive

Buildings have a huge role to play in delivering on European climate goals, and the EED should clarify – or set out a target – for the contribution that the buildings sector plays in delivering on 2030 energy efficiency target.

On article 5 (Exemplary role of public bodies' building)

- The absolute priority for a revision would be to make it effectively deliver renovation of public buildings because this is currently not the case.
- The scope of article 5 should be expanded to cover all public buildings – not just central buildings. In some cases, the definition of 'central' buildings is quite narrow and therefore not all buildings are captured.
- The level of ambition – in regard to the rate and depth of renovation – of article 5 should align and link with the level of ambition in the Renovation Wave and EPBD.
- The alternative approach under article 5 does not trigger actions that are compatible with our climate and energy efficiency objective. Such alternative approach should be deleted.

The WGBC network can support the design of robust strategies at local level encompassing public buildings. The renovation strategy framework being developed via the BUILD UPON² project will help local authorities to measure the impact of these strategies across environmental, social and economic indicators. [Read about the framework here.](#)

The EED also provides an opportunity to take the first steps in the move towards a lifecycle approach in the buildings sector. This can be achieved via changes to Article 5 and 6 of the EED.

- Reporting on the Life Cycle Emissions (via the Level(s) framework) should be made mandatory where it makes sense for all new public buildings (and large renovations) that follow similar contracting processes, whilst avoiding putting additional burden to smaller renovation measures.

On article 6 (purchasing by public bodies)

- Article 6 should be updated to stipulate that purchased buildings have had a Level(s) assessment (or as a starting point the indicators under macro-objective 1).