

# World Green Building Council Feedback to Energy Performance of Buildings Directive (EPBD) 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 BuildUpon project. Since 2018, we have been again deeply involved, through the [BUILD UPON<sup>2</sup>](#) project, in developing local impact frameworks supportive of national long term renovation strategies (LTRS). Many European GBCs are also involved in projects to support the implementation of their LTRS, such as [Turnkey Retrofit](#). In this way we will be closely involved with the implementation of a revised Energy Performance of Buildings Directive, especially one which drives greater rates of renovation through the implementation of Minimum Energy Performance Standards (MEPS).

Additionally, we have recently launched [#BuildingLife](#), a project bringing 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 WorldGBC summary of our position on review of the Energy Performance of Buildings Directive (EPBD) and our recommendations to ensure that the full potential of the buildings sector in delivering on EU goals is recognised.

## Option 3 pathway, supported by non-regulatory measures

In order to meet EU climate goals of climate neutrality by 2050 and to make EU legislation 'fit for 55', WorldGBC supports a comprehensive review of the EPBD. This should entail an implementation of the Option 3 pathway, supported by the non-regulatory measures outlined in option 2.

WorldGBC supports the **Option 3 pathway** for the review of the EPBD, namely: *"Amend the EPBD to translate the actions proposed in the Renovation Wave and the increased ambition towards building decarbonisation into legislation"*.

In Europe, buildings are responsible for approximately 40% of energy consumption and 36% of CO<sub>2</sub> 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, results in wasted energy, fuel poverty, reduced productivity in schools and offices, and has significant health impacts. By renovating our buildings, we can address these issues and realise the multiple benefits of renovation including the creation of jobs.

The **Renovation Wave** action plan released by the European Commission in October 2020 planned to at least double the renovation rate in the EU by 2030. As part of this ambition, the Commission committed to proposing the introduction of **Minimum Energy Performance Standards (MEPS)** in the EPBD revision. We would urge the Commission to go further and aim to triple the renovation rate in the EU, while renovation depth, another important metric, needs to be increased sixfold.

**The Option 3 pathway of the EPBD review** promises the **phased introduction of MEPS**, which WorldGBC supports, having raised this as a key recommendation in our consultation response, as it has the potential to drive up building standards and encourage a greater uptake of renovation projects. This will be crucial to any successful delivery of the Renovation Wave, not to mention the EU's goal of a greenhouse gas net 55% emission reduction target by 2030, which will require the reduction of buildings' energy-related greenhouse gas emissions by 60% compared to 2015 levels.

The European Commission should also implement non-regulatory measures as outlined in the **Option 2 pathway**. This would boost renovation rates in the EU by using “non-regulatory policy instruments and additional guidance and support measures, such as technical assistance, information campaigns, training, project financing”. In addition to complementing the regulatory pathway offered by Option 3, it can translate to a full embrace of the '**Neighbourhood based approach**' promised by the Commission in its Renovation Wave action plan. This is because non-regulatory measures like training and one-stop-shops can build capacity for renovation schemes on the local scale.

### Digitisation and Finance

As the Commission acknowledges in Option 3 with the mention of digitalisation, data must play a central role in informing renovation best-practice and allowing successful local initiatives to 'scale up'. This data should not only encompass the environmental benefits of renovation but also social and economic factors<sup>1</sup>.

We therefore urge the Commission to use the EPBD review to set in motion its plan to introduce **Building Renovation Passports (BRPs)**, essential to boosting renovation. The review should also deploy **Digital Building Logbooks** that will integrate all building related data provided by the BRPs, the Level(s) framework and EPCs, as is also alluded to in Option 3. The potential role of the **European Building Stock Observatory** to become a central repository for building data is another exciting development announced in the action plan.

We also support the role of the Renovation Wave in strengthening access to private financing through the **Renewed Sustainable Finance Strategy**.

### Whole Life Carbon

In addition, as we expressed in our response to the EED Review, 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 the building will be used over a defined time and sets out ways to reduce the overall carbon impact of a building in a cost-efficient way. And importantly, such a life cycle approach is at the core of the recently published Level(s) framework, based on agreed methodologies. Our GBCs across Europe are working with their network of stakeholders to support the implementation of Level(s).

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<sup>1</sup> The Renovation Strategy Framework being developed via the BUILD UPON<sup>2</sup> project will serve as a tool to deliver the Renovation Wave by helping local authorities to measure the impact of renovation across environmental, social and economic indicators. [Read about the framework here.](#)

WorldGBC notes that the Option 3 Pathway mentions “*Addressing resource efficiency and circularity principles in order to reduce whole lifecycle emissions*” as another consideration for the EPBD Review. We commended the Commission for its commitment to developing a **2050 roadmap for reducing whole life-cycle carbon emissions in buildings** in the Renovation Wave action plan. We therefore urge the Commission to seize the opportunity of the EPBD review to kickstart this process of tackling the whole-life impact of the built environment.