



The Voice of European Air-Conditioning, Refrigeration and Heat Pumps Contractors

27 June 2018

AREA recommendations for an effective EPBD implementation

AREA (www.area-eur.be) the European association of refrigeration, air conditioning and heat pump (RACHP) contractors, welcomes the adoption of the revised Energy Performance of Buildings Directive [2018/844](#) (EPBD). This Directive will help bring about the necessary changes to achieve a more decarbonised economy and help Europe fulfil its obligations under the Paris Agreement.

Heating and cooling is one of the largest sources of energy consumption in Europe, accounting for almost half of it. The updating of the EPBD comes at a crucial time, and as the contractors for RACHP we would like to share with Member States a series of recommendation on the EPBD implementation to help make it a success.

1. Inspections as a key instrument for European goals

Inspections of heating and cooling systems help ensure that energy efficiency performances are maintained. One of the key challenges will be to entice house or building owners to follow-through with the advice reports developed by inspectors. Customers may be hesitant to take actions for financial reasons. Therefore, supportive measures would be welcome so that full performance potential may be attained.

2. Ensuring a higher rate of compliance

Saving on inspection and maintenance costs is a serious issue in view of achieving energy efficiency targets. In countries hit hardest by the economic crisis, cost-saving measures adopted by consumers have led to a reduction of the quality and service of facilities as a result of reduced maintenance and replacement of equipment.

Another issue is the development of underground markets in certain Member States, where contractors operating outside the law are able to offer reduced budgets for maintenance and repairs which cannot be matched by law-abiding contractors. Therefore, we invite Member States to develop a single database where summaries and records of inspections can be published, for contractors to review the available data on the systems and the historical records of the previous work done on the systems, as well as making statistics publicly available.

One way of increasing the inspection rate is to rationalise the scope of inspections to include additional parameters to performance and energy efficiency. For example, having all inspections (heating, cooling, energy performance, etc) in one go would potentially be less invasive and more economical for consumers, thus improving compliance.

Other measures to improve the compliance with inspections would be the offering of tax rebates for companies or consumers who implement the installer recommendations and who can prove gains in efficiency, or linking business licenses at the local levels with compliance with mandatory inspections.

3. Making inspections for BACS mandatory

Building Automation Control Services (BACS) reflect positive technological development for building inhabitants. They can provide a streamlined management of building functions, including regulation of heating and cooling, as well as monitoring of and adaptation to optimal indoor conditions. Nevertheless, like all technologies BACS need to be regularly maintained and calibrated in order to ensure their constant proper functioning.

Therefore, AREA recommends that Member States implement regular inspections of BACS into their national legislations. This is currently not in practice, and even though “self-analysing BACS” are currently under development, the technology is not matured enough to properly self-correct current dysfunctionalities.

4. A harmonised understanding of ‘advice’

The provision of ‘advice’ to users as an alternative to physical inspections as defined under Articles 14 and 15 of the newly agreed EPBD is very vague. In several European countries, recommendations or advice reports are issued by inspectors or certified advisors, and in some countries, they are included in the Energy Performance Certificate (EPC). The key issue is that under the legislation, Member States need to prove that the advice provided has an equivalent effect to physical inspections. However, in many instances it is not mandatory for customers to follow the advice given to them to increase their energy performance, and these recommendations and advice are not being implemented. Consequently, the provision on “advice” instead of physical inspections has not proven effective.

AREA believes that not only is the provision on advice as stated in the EPBD only partly effective, but it also takes away work opportunities for contractors. In addition, the diverging understanding of the requirement makes it more complicated for those who have operations in more than one Member State. A solution to this issue could be developing an EN standard on the provisions of advice, or for the Commission to provide guidance on how this provision should be implemented in practice.

Additionally, there needs to be an increased awareness of the importance of maintaining cooling equipment in optimal conditions through regular inspections and maintenance. The benefits include lower energy bills and improved indoor air quality. AREA thus welcomes the ongoing information campaigns in Ireland encouraging regular inspections and maintenance, and replacement of inefficient heating systems and encourages other Member States to develop similar awareness campaigns.

5. Recommendations for long-term strategies

AREA believes that Europe's commitments on CO₂ emissions under the Paris Agreement should be the cornerstone of any long-term renovation strategy. A holistic approach will thus be necessary to develop systemic changes. In AREA, we have identified two main challenges that the long-term strategies must address:

1) Financing for renovating the European building stock

Europe has the challenge of renovating an ageing and generally energy inefficient building stock. We therefore welcome the fact that the EPBD introduces mandatory long-term renovation strategies that will lead to a more decarbonised building stock. Member States must include in their renovation strategies fiscal incentives for building-owners for the rehabilitation of buildings.

These incentives can be positive such as subsidies, tax deductions or privileged forms of financing for activity promoters. Member States may also choose to make renovations mandatory for the least performing buildings and impose penalties on those that are underperforming and do not undertake renovations.

2) Emphasising human health

Indoor air quality is known to impact on human health. As it has now been included in the EPBD, it needs to be promoted towards consumers, for instance through national awareness-raising campaigns.

Such campaigns should be complemented with information from Member States' administrative bodies on the full range of technologies available.