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AIE Comments on the Recast of the Directive 2002/91/EC on the Energy Performance of Buildings

With its member associations, the AIE - the European Association of Electrical Contractors – is most committed to the EU's 20-20-20 targets and fully supports the Commission's initiatives to achieve these.

The implementation of the EPBD at national level by Member States has however been a long and difficult process and far from being as successful as expected. Nevertheless this should encourage us to do better and make proposals that help realise the full potential of possible energy savings.

Hence the AIE fully supports the recast of the Directive and with the following considerations, is willing to contribute and clarify its concerns to the European Commission and European Parliament.

The EPDB and Energy Services Directives are most important Directives for AIE's member associations and their 175.000 electrical contractors companies in Europe. Each day these companies are in direct contact with their clients playing a major role in the optimisation of the energy usage by implementing energy efficient measures.

Scope of the Directive

The AIE welcomes the enlargement of the scope of the Directive both for new buildings (extension) and for existing buildings (the deletion of 1000m²).

Obviously the major challenge is to address the installed base. The current existing building stock represents some more than 70%. Unless these buildings are properly adapted, maintained and renovated, their technical installations become progressively less suited to the higher standards of functionality, security and safety required by today's society.

Regarding article 4.3, buildings such as those used less than four months of the year, and those stand-alone buildings with a total useful floor area of less than 50 m², should be included.

The reasons are:

- "The use or the size" of a building is not an argument. A minimum energy performance requirement is a "value" for the building. The main message is that most of the energy consumption is depending on people's behaviour rather than the building itself. That's why EU should take more action on regulation of end-users energy consumption.
- It will allow users of these buildings both, to "save money and help the environment", even if the size of its building is small or is used for only four months.
- Using minimum energy performance requirements and control systems in these buildings will equally be an important awareness tool for their users to help them change their behaviour.
- In this point Electrical contractors are ready to help customers to optimize their energy use with smart metering and peak-cutting.

Technical building systems

The AIE warmly welcomes the introduction of the new definition "technical building system" but regrets that in the overall legislative recast not more focus is given to the electrical consumption of a building. Indeed today's technologies can play a major role in the control and optimisation of the energy use.

As mentioned in the ELECTRA report, tertiary buildings with their related services represent some 20% of the overall final energy demand of which more than 50% is in the form of electricity.

The buildings segment covers a large scope of applications such as office buildings, hospitals, commercial malls, train stations etc. Some of them contain heavy processes like data centres, lighting systems, and will have to be concerned by the present buildings and industry segment proposals.

As technology advances, electrical contractors carry out an ever-increasing proportion of the value of construction work. Their advisory expertise in providing cost-effective design solutions that best meet clients' needs is a vital contribution for delivering efficiency and quality.

The accessible energy savings generally range between 10% and 20%, based on addressing the active part of the installations and using existing technologies, which directly or indirectly allow the control and optimisation of most energy usage.

To not carefully address the promotion or stimulation of active control systems, automation, energy management systems and smart metering systems would definitely impede a full implementation of the energy saving potential in Europe. Today's technologies allow the measurement, displaying and monitoring the energy use by type of energy which can rapidly change customers' behaviour. Well informed, the customer will make the appropriate choices regarding their energy consumption, in particular in the current difficult economic period.

Likewise in the residential sector, smart metering will be an important awareness tool resulting in a financial incentive for the customer to help them change their behaviour towards their energy consumption.

Implementing compulsory smart meters in our view should equally have an impact on the peak load resulting in cheaper electricity prices for end-users.

Maintenance and inspection

Buildings are subject to frequent changes and their installations and control systems should be upgraded each time the pattern of electricity consumption changes significantly. Long term maintenance of the control systems with inspection of the installation is therefore an essential condition to avoid the progressive deterioration of energy performance of an installation during its life cycle.

Limiting however the accreditation of experts to very specific professional groups or companies does not necessarily guarantee sufficiently skilled experts. Efforts should be done in order to form qualified technical personnel. This would:

- help users rely on 'expert' electricians
- and governments to allow them to carry out the buildings' certification.

Finally, efforts should be done to provide information to building owners/users on energy performance inspection and the importance of a good maintenance, as it is mentioned in the article 12. Generally users are not aware of the economic benefits of the good maintenance of a building and the disadvantages of not having the facilities in good conditions.

Conclusion:

As the aim of this directive is to promote the energy performance of a building, the AIE recommends the following to realise the full potential of possible energy savings:

1. The AIE agrees with the current text regarding the scope of the Directive to foster both on new buildings as on the extension for existing buildings. This will stimulate early renovation or retrofitting where the biggest energy savings can be achieved.
2. Article 2 and 8 of the Directive should include smart metering for all householders, intelligent energy management and control systems as to strive for an optimal energy usage.
3. A new article should be drafted to include proper monitoring and maintenance of the installations and energy management systems by skilled contractors to have the best cost-energy-efficient solution for the customer. It will equally improve the general reliability of the installation.
4. Member States should find solutions to make mandatory and fund audits and diagnostics of the installed base and develop energy services and energy efficiency performance contracting services.
5. Article 8 should equally promote renewable energy solutions as technical building systems as to further reduce energy consumption.
6. Certification of buildings should be linked to fiscal incentives for householders.
7. Member States should, when possible, apply lower VAT rates for energy services.

The European Association of Electrical Contractors – AIE – comprises 20 national associations representing 175.000 contractors, a workforce of 900.000 and a turnover of Euro 60 billion.

Electrical contractors design, install and maintain intelligent systems for all kinds of industrial, commercial and domestic purposes alongside the well-known power and lighting applications. They know how to deal with telecommunications, highway and street lighting, energy management systems and renewable energy systems, access, fire and security control equipment, lightning protection systems, advertising and identification signs and emergency power generating systems.