

Til  
European Commission  
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## **Energy efficiency – Revision of the Energy Performance of Buildings Directive 2010/31/EU**

The Norwegian Green Building Council and Norwegian Property Federation hereby wish to provide input to the EU Commission initiative to a revision of the Energy Performance of Buildings Directive. The aim of the revision is to focus on and implement provisions that are central to boosting building renovation.

**We strongly support the proposal to amend and tighten up the Energy Performance of Building Directive to boost building renovation. However, this cannot be done without the support of non-regulatory measures. Energy efficiency must not be seen as a goal alone but should be seen in the context with other sources of CO<sub>2</sub> emissions such as the material use, and over the life span of the building from construction to operation and disposal/renovation/reuse.**

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The Norwegian Green Building Council and Norwegian Property Federation welcomes the European Commission's plan to improve energy efficiency of the EU's building stock through the revision of the Energy Performance of Buildings Directive. We believe it is necessary with both 2) Non-regulatory measures and 3) reinforced regulatory measures to boost the energy renovation of buildings in the EU and fulfil the objectives. The aim should be following the option 3 with ***amend the EPBD to translate the actions proposed in the Renovation Wave and the increased ambition towards building decarbonisation into legislation***. However, one will not be able to follow this pathway without the support and reinforcement through option 2) ***Non-regulatory measures*** that contribute to increase the knowledge and competence among various target groups.

We support a phased introduction of mandatory minimum energy performance standards for different types of buildings. Denmark has had a predictable phased introduction for many years. However, we believe the time is ripe for minimum standards for CO<sub>2</sub> emissions which then includes the sum of emissions related to energy use in operation, to construction site work and to materials.

Minimum energy performance standards for residential buildings, with the change of ownership or with rental, can be difficult to implement for older buildings. However, for residential, the seller or real estate agent may be required to provide an energy label as required for commercial buildings. This is practice in Norway. Everyone who is going to sell or rent a residential building must energy-label the building and get an energy certificate. New built residential buildings must always be energy labelled.

With the introduction of Building Renovation Passports it is essential to see energy efficiency and material use in context. A CO<sub>2</sub>-calculation should be required that includes both energy efficiency and materials in order to prevent sub-optimization. We support the introduction of a 'deep renovation' standard in the context of financing and building decarbonisation objectives. We also support addressing resource efficiency and circularity principles in order to reduce whole lifecycle emissions. However, we will point out that by focusing only on energy consumption, we can achieve sub-optimization. If the energy requirement for rehabilitation of buildings becomes too strict, it could lead to unnecessary demolition / new construction, which results in both a waste of resources and increased CO<sub>2</sub> emissions.

Our opinion is coincident with the feedback from World Green Building Council to Energy Performance of Buildings Directive (EPBD) and we hereby support their input.

Norwegian Property Federation (Norsk Eiendom) is the association of leading commercial real estate businesses in Norway. The members are large and small real estate companies.

The Norwegian Green Building Council (Grønn Byggallianse) is a non-profit member association in Norway. Businesses and organisations throughout the entire value chain of construction, property, and installation can be members. The Norwegian Green Building Council aims to promote processes of change so that sustainability becomes second nature for more and more people. We want to be one of the most important catalysts for a more sustainable built environment. We want to be a driving force that helps the industry to change attitudes, increase knowledge, and show that thinking, wanting, and operating sustainably is good, profitable, and fun.

Best regards,

Katharina Th. Bramslev  
CEO  
Norwegian Green Building Council

Tone Tellevik Dahl  
CEO  
Norsk Eiendom