



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

## **Inception Impact Assessment on the review of the Energy Performance of Buildings Directive**

### **AREA Position**

With cooling needs expected to increase in the years to come, the refrigeration, air conditioning and heat pump (RACHP) sector has an important role to play in delivering on the Renovation Wave targets for 2030.

In this context, AREA members, as the architects of RACHP systems, responsible for their design, installation, maintenance and repair, welcome the revision of the Energy Performance of Buildings Directive. The decarbonisation of the buildings sector is indeed vital to achieve the EU's climate and energy objectives, given that buildings are responsible for 40% of total energy consumption.

We would like to take this opportunity to set out what we believe are key elements to be considered when revising this legislation.

#### **The crucial role of RACHP contractors**

RACHP contractors have in-depth knowledge on the design of systems, proper maintenance and operation and can provide tailor-made solutions to consumers based on users' specific needs. They use every available solution with complete technology neutrality and with the sole aim of ensuring the highest level of reliability, energy efficiency and cost-effectiveness.

Without proper design of the cooling system, energy savings of efficient equipment can be totally negated. Indeed, proper system design, effective installation, as well as regular maintenance and servicing are of the utmost importance to ensure that expected energy savings turn into reality.

Heating and cooling systems cannot be properly operated without constant monitoring, maintenance and improvements where needed. In fact, proper and regular maintenance carried out by competent people are an important factor to achieve energy savings and reduce operating costs. It is also the occasion to provide advice on further energy savings. Periodic inspections of heating and cooling systems are indeed necessary to ensure the efficient functioning of the system, and this even in the presence of automated monitoring systems.

#### **Contractors' skills and knowledge**

To create new jobs and to address existing shortages of qualified staff, investments in skills will be needed.

Delivering the necessary deep renovations will depend on the knowledge and expertise of building professionals. The services of our industries are vital for achieving the objectives of the Energy Performance of Buildings Directive. However, our sectors face challenges in attracting and retaining talent in the industry.

In addition, refrigeration and air conditioning is a very innovative and constantly evolving industry. The high level of technicality of RACHP systems makes it necessary to have a corresponding level of competence from installers.

Therefore, maintaining contractors' skills and knowledge is of utmost necessity to ensure the deployment of decarbonised and energy efficient technologies. We are fully supportive of harmonised initiatives fulfilling this objective, as long as they are coordinated.

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## **Growing demand for cooling**

Whereas focus is traditionally put on heating, the growing demand for cooling in summertime for both residential and non-residential buildings should be taken into consideration when revising the EPBD. Indeed, the increasing need for cooling that is witnessed already now, is predicted to continue going forward. This is particularly visible in modern buildings that are better insulated and usually have more equipment generating heat (like computers and servers). In this context, contractors have an important role to play in achieving the EU energy efficiency targets.

## **Improving indoor environmental quality (IEQ)**

Renovation can also improve comfort and sanitary conditions, making buildings healthier and improving wellbeing.

In addition to improving the energy efficiency of buildings, the Energy Performance of Buildings Directive should also aim at delivering improvements in indoor environmental quality (IEQ). This can be achieved by setting harmonised mandatory minimum requirements for IEQ and for accelerating the replacement of old systems.