



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

Proposal for the revised Energy Performance of Buildings Directive

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 vital to achieve the EU's climate and energy objectives, given that buildings are responsible for 40% of total energy consumption. 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 energy efficiency and decarbonisation targets for 2030.

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 become a reality. Periodic inspections of heating and cooling systems are necessary to ensure the efficient functioning of the system, even in the presence of automated monitoring systems.

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.

On this matter, we welcome the European Commission's proposal to introduce "National building renovation plans" and their increased scope and ambition in comparison to their "Long-term renovation strategies" predecessor. Furthermore, we fully support the intention to apply minimum energy performance standards to tackle the worst performing part of the building stock.

The Commission's push for more frequent and encompassing inspections of heating, ventilation and air-conditioning systems, combined with renovation passports and energy performance certificates (EPCs) issued by qualified and accredited experts, will also ensure that building systems operate efficiently and allow for achieving the Union's goals.

During the COVID-19 crisis, the shortages of qualified staff and investment in skill became even more evident. With the evolving ambition and targets of the EU, and the high-level technicality of RACHP systems, it is highly necessary to have a corresponding support for the role of installers. Therefore, we fully support the proposal aimed at requiring Member States to provide measures and financing to promote education and training to ensure that there is a sufficient workforce with the appropriate level of skills corresponding to the needs in the building, construction, and energy efficiency sector.

However, the draft Directive has much more potential to address indoor environmental quality. Although the European Commission touches upon the issues with a provision to support the integration of measuring and control devices for the monitoring and regulation of indoor air quality, we believe that mandatory minimum requirements are a must.