

LINK TO EUROPE

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FEEDBACK

Revision of the EPB-Directive (2010/31/EU)

Local and regional authorities are committed to tackle climate change and are well aware of their responsibility to act as role models as well as to ensure a concrete implementation of the EU Green Deal on the ground. In this sense, the FrankfurtRheinMain Metropolitan Region is siding with the EU's ambition to make Europe a climate neutral continent by 2050 and reduce CO2-emissions by 55 percent until 2030.

MUNICIPAL RENOVATIONS NOT A MATTER OF AMBITION, BUT OF PRACTICAL POSSIBILITIES

Without any doubt, the factor of energy efficiency and more concretely the need to increase the energy performance also in existing buildings is highly relevant to achieve these targets. The Commission's roadmap and consultation on the upcoming revision of the Energy Performance of Buildings Directive (EPBD) as cornerstone of the "Fit for 55"-package now considers introducing "mandatory minimum energy performance standards" for public buildings or publicly owned houses on the sub-national level. This could potentially result in quota obligations when it comes to the energetic renovation of those buildings. Given the aforementioned common ground in terms of policy goals, we kindly like to stimulate second thoughts on the choice of regulative tools. More concretely, we doubt that the extension of the renovation quota-obligations on local authorities is an efficient and effective way forward.

Energy saving by the renovation of the publicly owned building stock (residential and non-residential buildings alike) is already actively done in our municipalities. Local and regional authorities have an intrinsic motivation to do so and know quite exactly which measures are most effective and cost-efficient in practice. The choice of how and in which way to pursue this goal should therefore be left to local administrations and policy makers - in the best sense of subsidiarity. Where progress is slow, this is often not caused by a lack of ambition or political will, but by very practical and place-specific reasons. Those factors are budget availability, technical expertise, administrative and workforce capacities, availability of space or aggravating rules like monument protection. A mere obligation to fulfil a renovation quota will not help to ease or dissolve any of these practical barriers.

GETTING THE FOCUS RIGHT

The marginal costs of ambitious efficiency standards are also much higher than the marginal benefit by the envisaged CO2-reduction, as in practice those are very often lower than predicted. Reaching a climate neutral building stock is in this light easier achieved by the use of renewable energies than by forcing too ambitious

energy reduction goals for a single building. Therefore, the renovation of buildings has to be assessed in an integrated, sector-crossing way on the neighborhood or quarter level. This is also best embedded in a strategy for district heating and closely linked with the electricity and mobility sector.

A differentiated approach based upon the typology of buildings is needed. Any regulation should make sure buildings with the highest efficiency potential and GHG-emissions are targeted first – independent of their ownership and usage.

NEW EU MEASURES SHOULD CAREFULLY AVOID NEW TRADE-OFFS

We would furthermore like to highlight that new “mandatory minimum energy performance standards” for public buildings or publicly owned houses on the sub-national level can have diametrically opposite effects: Too rigid obligations and standards might cause higher costs of renovations. In Metropolitan Regions like ours, building and renovation is already very cost-intensive for private persons, companies and the public hand. Any added burden in financial regards or by additional bureaucracy (like e.g. monitoring and reporting obligations, need to collect data) has to be avoided. Otherwise, this per se well-meant regulation will lead to deepen the cleavage between sustainability and social goals on the ground.

Given all this, we hope that the European Commission will carefully assess during the ongoing EPBD-revision and re-drafting process in how far certain measures will really support energetic renovations in daily administrative practice. Those measures must also keep the relation of potential results and added costs in mind. Furthermore, they should rather strengthen the capability to act locally than threaten to limit it. Potential new obligations on the supra-local level would therefore also call for meaningful financial incentives in form of direct grants. Additional national but also European funding instruments (besides “Next Generation EU” and the Recovery and Resilience Facility) are needed.