

Nearly Zero Energy Buildings: The vision for 2020



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Public statements

2. Position on the Practical Implementation of the Cost-Optimal Regulation for establishing national Minimum Requirements

2. Position on the Practical Implementation of the **Cost-Optimal Regulation**



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> CECODHAS

It is difficult to comment on the Methodology as the final text has not yet been released. In what has been released to the public so far the following can be said. Any pan-European approach must consider the diversity of conditions and climates and financial capacity across the EU. The flexibility of the approach so far taken in the cost-optimal methodology is therefore appropriate. The option to gradually increase standards also takes into consideration time needed for market adaptation.

Related: Although it is not tackled within the scope of the methodology, it is also vital for the EU to also give clear messages on ways to tackle the split-incentive, the role of public subsidies and private finance and to address the fact that currently, the business model of commercial ESCOs is not in line with the needs of housing managers. One of the reasons for this is that the market rules dictate the need for emphasis on fast payback and not those of 'trias energetica'.

2. Position on the Practical Implementation of the **Cost-Optimal Regulation**



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> Buildings Performance Institute Europe (BPIE)

The framework for the cost-optimal (C-O) methodology is expected to shift the European building codes towards low-energy buildings. However, the current final proposal raises legitimate questions regarding the effectiveness of its practical implementation at national level. Some implications of the current proposal should be considered:

1. the discount rate specified at national level (including taxes such as VAT), but excluding fiscal incentives, could dramatically moderate cost-optimal levels;
2. there are too many opportunities for opting out of the C-O requirements;
3. the packages resulting from C-O could enter in collision with the EPC recommendations (or could only partially overlap) or lead to very soft measures;
4. the first C-O levels should practically match the 2015 milestone of the nZEB roadmap.

2. Position on the Practical Implementation of the **Cost-Optimal Regulation**



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> Energy Cities

As we haven't seen the regulation, our statement is limited to a general assesment. The degree of implementation towards NEZB in our members' different countries is very different. This is based on past regulations, but also on local building technologies and the role of actors. Since the market for building technologies and materials is increasingly European, cost optimal solutions should easier penetrate the national markets. However, instead of a sophisticated calculation scheme to accelerate the implementation we ask for an increased emphasis on stimulating active cooperation between local authorities and the building (technology) industries. Even though some of Energy Cities members have already built or renovated buildings according the Passive House standard, architects and companies are still not prepared to construct or renovate NZEB. Thus to reach the Cost-Optimal criteria strong support (training, demo-projects, incentives, R&D) from the MS to the building sector is required.

2. Position on the Practical Implementation of the **Cost-Optimal Regulation**



> European Solar-Shading Organization (ES-SO)

The Solar Shading industry is favorable to the Cost-Optimal framework, designed to create a balance between energy savings and economics. It offers opportunities to innovate in order to improve the life cycle of products and their functional reliability. It will be a challenge in an industry of mostly SME's who may not have the daily practice nor the tools. The ESCORP study, commissioned by ES-SO the European Solar Shading Organization in 2006, concluded that almost 10 percent of the energy used in typical buildings could be saved by solar shading. Mainly produced in Europe in accordance with the applicable CEN- Standards, our industry offers the same wide range of systems worldwide. Installation of solar shading suits regional and local needs and each building type. Cost Optimal Exercise elements such as Life Cycle Analysis of the solar shading systems are important and will require proper education. Promoting good quality systems plays a key role in the cost optimal regulation.