

Position Paper

Recast of Energy Performance of Buildings Directive (EPBD)



PROPOSAL FOR EPBD RECAST

The European Automobile Manufacturers' Association (ACEA) welcomes the European Commission's proposal for a review of the Energy Performance of Buildings Directive (EPBD) as part of the 'Fit for 55' climate package. Focusing on private/non-public charging requirements in both existing and new buildings, this complements the proposal for the Alternative Fuels Infrastructure Regulation (AFIR).

ACEA welcomes the overall scope of the proposal as it clearly marks an improvement on the current Directive. However, we believe that it needs to be more ambitious to allow the electric vehicle market to ramp-up to the level necessary to meet the proposed CO2 targets for cars and vans.

GENERAL REMARKS

- A much higher market share of electrified vehicles will be essential to achieve higher CO2 fleet targets for 2030 and beyond.
- A lack of recharging and refuelling infrastructure risks being a limiting factor for a fast ramp-up of zero-emission mobility.
- Private charging is a necessary complement to public charging. Alongside AFIR – which addresses public charging – EPBD is one of the most important tools to boost market uptake of electrically-chargeable vehicles.
- EPBD supports the energy efficiency of residential and non-residential buildings enabling them to decarbonise by 2050. It sets obligations for private charging infrastructure in both new and majorly renovated buildings, as well as minimum energy performance standard targets.
- A revised EPBD should strongly increase the availability of recharging infrastructure in private/non-public parking places, speeding up the decarbonisation of the transport sector.
- However, EPBD must not be seen as a pretext to lower the ambitions for publicly-available charging infrastructure. Customers need a dense network of reliable charging infrastructure, so robust requirements for both AFIR and EPBD must be put in place.
- ACEA welcomes the mandatory requirements for smart infrastructure in the EPBD as it will enable additional technological development in the way electric vehicle charging works in the future.

CONCERNS

ACEA has critical concerns on the following:

1. The lack of ambitious requirements for existing buildings which are not undergoing major renovations.

In every existing residential building, the users of electrified vehicles must be able to install charging points without high administrative hurdles. This is the so-called 'right to plug' as specified in Article 12.8. More demanding requests should be applied for non-residential buildings, including those owned or occupied by public authorities.

2. The lack of ambition for existing buildings (both residential and non-residential) which are undergoing major renovations.
3. The low ambition for requirements to equip parking spaces with charging points.

ACEA therefore recommends setting clear targets for all three different types of buildings – existing ones, those undergoing major renovations, and new buildings – in order to speed up the readiness of buildings to charge the future wave of electrified vehicles.

SPECIFIC REMARKS

ACEA members have identified several points in the proposed EPBD review that they believe require fine-tuning and modifications.

Definitions

ACEA believes that there is scope to improve the clarity of the overall proposal.

ACEA assessment and proposal

New Article 2, para 58 on definition of 'pre-cabling'

"Pre-cabling of buildings should mean both the technical cabling (cable path, technical sheaths, drilling) and the electrical pre-equipment in collective electrical installations (switchboard, horizontal electrical column, bus cable)."

New Article 2, para 59 on definition of 'load management system'

"If multiple charging points using the same distribution grid connection without sufficient overall grid capacity are being installed in one building, a mandatory installation of a load or charging management system behind the meter of that building should be implemented. Such a requirement avoids an extensive enhancement of the grid connection and reduces overall installation costs."

Charging infrastructure in non-residential buildings (new or majorly renovated) – Article 12.1 and 12.2

The Commission proposes several targets for non-residential buildings:

- In non-residential buildings with more than five parking places (new buildings or those undergoing major renovations), at least one installed charging point should be mandatory, and pre-cabling should be installed for every parking space.
- In non-residential buildings with more than 20 parking places, member states should ensure the installation of at least one charging point for every 10 parking spaces by 2027.
- In buildings owned or occupied by public authorities, there should be pre-cabling for at least every second parking space by 2033.

ACEA assessment and proposal

ACEA welcomes that the proposal asks for mandatory ducting infrastructure at every parking space in non-residential buildings and sets (higher) additional requirements for office buildings. However, on the whole we believe that the targets are not ambitious enough to enable the ramp up of e-mobility.

- There is no regulation for buildings with less than five parking spaces.
- There are only mandatory requirements for buildings with big parking lots.
- For public authority buildings the requirements take effect too late.
- Given the very low renovation rates across Europe (around 1% per year), charging infrastructure would not be adequately covered in buildings.

ACEA therefore suggests modifying Article 12.1 as follows:

- The requirements should apply to every single parking space, not only to buildings with more than five parking spaces.
- The requirements should have a clear timeline (as from 2025).

With respect to Article 12.2 (existing buildings):

- The compliance threshold should be lowered from 20 to 10 parking places.
- There should be pre-cabling for at least every second parking space by 2030 in the existing stock of buildings owned or occupied by public authorities. Member states should also ensure the installation of at least one charging point for every fifth parking space.

Charging infrastructure in residential buildings (new or majorly renovated) – Article 12.4

The Commission proposes several targets for residential buildings:

- Pre-cabling should be installed for every parking space in residential buildings which have more than three parking spaces (new or undergoing major renovations).
- Member states shall ensure that pre-cabling is dimensioned to enable the simultaneous use of charging points on all parking spaces.

ACEA assessment and proposal

ACEA welcomes the proposal for a more ambitious threshold than the existing EPBD and for mandatory ducting infrastructure. However, there are no ambitious requirements for mandatory charging points, nor targets for existing residential buildings. In addition, load management provisions are not mandatory.

ACEA therefore suggests to:

- Require residential buildings (new or undergoing major renovations) to have mandatory pre-cabling for every single parking space, irrespective of the number of parking spaces, as from 2025.
- Require all buildings to have a load management system if multiple charging points are installed.

Smart charging – Article 12.6

The Commission proposes a definition of smart charging requirements:

- All mandated charging points should be capable of smart charging and, where appropriate, bidirectional charging.
- Operation based on non-proprietary and non-discriminatory communication protocols and standards, in an interoperable manner, and in compliance with any legal standards and protocols in the delegated acts.

ACEA assessment and proposal

We welcome the binding requirement for every mandated charging point to be smart immediately, and capable of bidirectional charging in future. This future-proofs the build-up of non-public charging infrastructure, and enables electrically-chargeable vehicles to play a role in the energy system through smart charging.

We also welcome a non-proprietary and non-discriminatory approach towards communication protocols and standards.

Right to plug – Article 12.8

ACEA welcomes the guarantee of a 'right to plug' in all buildings, as well as the removal of regulatory barriers and the provision for technical assistance. We highly welcome the proposal to strengthen the right to plug (usually at own expenses).

In many member states, regulatory barriers make it very complicated to install private charging points for own use in residential buildings, as the consent from the landlord or co-owners is often required. ACEA therefore supports the proposal's aim to remove regulatory barriers.

In order to reinforce this right to plug, ACEA suggests that the whole process from request for a charging point to its installation should not exceed three months. In addition, the right should be fixed within any renovation of buildings co-funded by public financial resources (both national and European).



ABOUT THE EU AUTOMOBILE INDUSTRY

- 12.7 million Europeans work in the auto industry (directly and indirectly), accounting for 6.6% of all EU jobs
- 11.5% of EU manufacturing jobs – some 3.5 million – are in the automotive sector
- Motor vehicles are responsible for €398.4 billion of tax revenue for governments across key European markets
- The automobile industry generates a trade surplus of €76.3 billion for the European Union
- The turnover generated by the auto industry represents more than 8% of the EU's GDP
- Investing €58.8 billion in R&D per year, automotive is Europe's largest private contributor to innovation, accounting for 32% of the EU total

ACEA REPRESENTS EUROPE'S 16 MAJOR CAR, VAN, TRUCK AND BUS MANUFACTURERS

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