

**Comments on the proposal for a revised Energy Performance Buildings Directive  
COM(2021) 802 final**

*On 15 December 2021, the European Commission published its proposal for a revised Energy Performance Buildings Directive. Cerame-Unie shares below some comments as a contribution to the feedback period on the proposal running until 31 March 2022.*

The revised EPBD proposal considers whole life-cycle greenhouse gas emissions associated with the building, including **reuse, recycling and other recovery of building materials**. Therefore, the proposal should promote the **“cradle-to-cradle” approach**, not the “cradle-to-grave” [sic] approach.<sup>1</sup> The latter does not explicitly include Module D of the EN 15804, i.e. “Benefits and loads beyond the system boundary” (reuse, recovery, recycling potential). Building materials should be assessed and promoted with respect to their reusability and recyclability potentials. Therefore, the proposal should highlight more strongly the **circular economy**, i.e. ways to prolong the products’ service life by reuse and recycle.

For the **calculation of the life-cycle GWP of new buildings**, the GWP is communicated as a numeric indicator for each life-cycle stage expressed as kg CO<sub>2</sub>e/m<sup>2</sup> (useful floor area) averaged for one year of a reference study period of **50 years**.<sup>2</sup>

- The average lifespan of a brick house amounts up to 150 years, so **longevity and sustainability advantages** resulting thereof need to be considered in possible calculation methods for buildings by increasing the reference study period.
- Choosing a GWP calculation period of 50 years would unfairly disregard the significant sustainability advantages associated with longevity. Thus, if a 50-year span is adopted for GWP calculation, there needs to be a possibility **to account for the longer service life of brick buildings** (aliquot GWP reduction), by including, for example, an “ecological residual value” or other compensatory calculation methods.
- **The other indicators of the horizontal standard EN 15804+A2 should also be taken into consideration.** Only focusing on GWP gives a partial/distorted understanding of the environmental impacts.

The calculation of cost-optimal levels is now aligned to the Green Deal, specifying that the costs of greenhouse gas allowances as well as environmental and health externalities of energy use are to be

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<sup>1</sup> Proposal for a revised EPBD (2021), Art. 2, paragraph 23

<sup>2</sup> Proposal for a revised EPBD (2021), Annex III, paragraph II

considered when determining the lowest costs. The Commission will revise the cost-optimal methodology by 30 June 2026.<sup>3</sup> **During the revision process, it is crucial to include concerned industry sectors** in the discussion. As set out in the proposal, the setting of **cost-optimal levels** of minimum energy performance requirements should remain within the competence of the **Member States**.

For the purpose of expressing the energy performance of a building, the **designation of detailed indicators** should be made mandatory by Member States, including the following proposed amendment: “Member States *shall* define additional numeric indicators of total, non-renewable and renewable primary energy use, and of operational greenhouse emissions produced in kgCO<sub>2</sub>eq/(m<sup>2</sup> .y).”<sup>4</sup>

Besides energy-related issues, the **National Building Renovation Plan** should focus on the technical performance of buildings. Therefore, certain policies and measures should be considered as **mandatory indicators**, such as those with regard to the increase of climate resilience of buildings; the increase of fire safety; the increase of resilience against disaster risks, including risks related to intense seismic activity (template)<sup>5</sup>. In addition, the proposal requires that for **new buildings**, healthy indoor climate conditions, adaptation to climate change, fire safety, and risks related to intense seismic activity need to be addressed.<sup>6</sup> Brick buildings can deliver optimal and cost-effective solutions for the technical properties required.

Regarding **data exchange**, the meaning of “building systems’ data” needs to clarify if other data is concerned (e.g. Building Information Modelling), besides data related to energy performance and building automation.

Considering the fact that renovation is strongly promoted, the proposal should also **support assessments** to determine whether deep renovation (purely energetic renovation) or demolition and subsequent rebuilding is ecologically and economically more reasonable. In some cases, it might be more efficient to entirely rebuild a building instead of renovating an old one. For this purpose, the proposal should contain a paragraph specifying the implementation of such assessments which take into account the performance of the entire building in the long term.

### **About Cerame-Unie**

*Cerame-Unie is the European Ceramic Industry Association, representing interests of all major European ceramic producers. The EU Ceramic Industry is a world leader in producing value added, uniquely designed, high quality ceramic products manufactured by flexible and innovative companies, the majority of which are SMEs. The ceramics industry represents an annual production value of around €30 billion, accounting for approximately 25% of the global production, and over 200,000 direct jobs throughout the EU.*

*The major producing countries in the EU are Italy, Germany, Spain, France, the UK, Portugal and Austria. Production is also strong in the Czech Republic, Poland, and Hungary, all of which have growing and dynamic ceramic sectors that traditionally export to other EU countries.*

*The EU Ceramic Industry is export-oriented with 30% of its production sold outside the EU market. It is competitive, both domestically and internationally.*

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<sup>3</sup> Proposal for a revised EPBD (2021), Art. 6, paragraph 1

<sup>4</sup> Proposal for a revised EPBD (2021), Annex I, paragraph 3

<sup>5</sup> Proposal for a r EPBD (2021), Annex II, p. 6

<sup>6</sup> Proposal for a revised EPBD (2021), Art. 7, paragraph 4