

Commenting position on the European Commission's “Evaluation of the Energy Labelling Directive (ELD, 2010/30/EU) and certain aspects of the Ecodesign Directive (EDD, 2009/125/EG)”

The Federal Chamber of German Architects is the national organisation of the 16 architects' chambers of the German states, which are the competent authorities for the profession. It represents the interests of more than 125,000 architects, landscape architects, interior designers and urban planners in Germany.

The chambers of architects of the German states' mission is inter alia, to ascertain the interest of the general public in public safety of buildings and the quality of architects' services.

The Federal Chamber of German Architects welcomes the European Commission's efforts in enhancing the energy efficiency of products within the single market. The evaluation of the existing Energy Labelling Directive and certain aspects of the Ecodesign Directive is an important step towards a more energy efficient and sustainable future of Europe and its citizens.

Please note: *In the current evaluation only the questions mentioned under “Scope Expansion” have an impact on the profession of architects. The Federal Chamber of German Architects therefore choses to answer only to those questions*

Positions:

(1) The ELD and EDD should not apply to buildings and to non Energy related (nEr) Products associated with the construction of buildings.

NEr include construction products which are used in the process of erecting buildings. A single construction product – e.g. a solid brick – will never be used on its own by consumers. The energy consumption and efficiency of a building is not dependent on the energetic value of a single product but on the effect of a sustainable and integrated design process. A construction product with the highest rating in a labelling-scheme used in the wrong manner, could lead to an energy inefficient building, if not used the right way.

Buildings do not only consist of a number of construction products but also on the interplay of customer needs, geographical and climatic conditions as well as their direct surroundings. Architects due to their education and training are able to conduct and coordinate the design- and building process in a way that the maximum in energy efficiency and sustainability is achieved in a finished building which in the end is tailored to the exact needs of the user and the environment. This is even true for partially prefabricated buildings that still need to be completed with manual labour. An eventual building therefore is always a prototype and cannot be compared with the products falling under the ELD so far (such as refrigerators or electric devices).

Introducing energy labelling for construction products or buildings would not give the user or customer any added value or security. The involvement of an architect who by education and training has the knowledge of product specifications and their interaction with each other and the environment is in our view the most important prerequisite in achieving the goals of energy efficiency and sustainability.

With regard to the ELD it needs to be pointed out that energy efficiency of buildings, including a labelling-scheme is already covered by the Energy Efficiency Directive (2012/27/EU) and the Energy Performance of Buildings Directive (2010/31/EU). Construction products are already regulated by the Construction Products Directive (2011/305/EU), which deals with their distribution within the European single market. Regulation of construction products or buildings by the ELD and EDD consequently, is unnecessary and leads to overregulation and confusion.



Additional regulation will also increase the administrative burden on those working with the affected products. It would put more pressure on architects who mainly work in small and micro sized enterprises without offering benefits to the customer side as explained above.

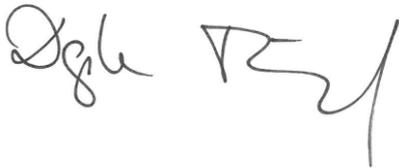
Therefore, the Federal Chamber of German Architects rejects the notion of expanding the ELD and EDD on construction products and buildings.

(2) The merging of the existing EU Directives related to product groups is highly welcomed provided there is no collision between product-related and building-related Directives.

The Federal Chamber of German Architects highly welcomes the initiative of the Commission to reduce administrative burden and red tape. The merging of existing Directives and/or documents and information would be a right step in this direction.

However, keeping in mind the above position it has to be ensured that any regulation regarding buildings will not merged with regulations that cover products because – as explained above – buildings are never products and therefore cannot be treated as such.

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