

Commenting position on the European Commission's "Public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework"

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 to improve energy efficiency in Europe. The review of existing frameworks and policies is an important step towards a more energy efficient and sustainable future of Europe and its citizens.

Please note: *This position paper is a complement to the BAK answer to the above mentioned consultation which has been submitted on 23 April 2014 under the case number 847460038091311314.*

Position:

Further policy measures at EU level to foster energy efficiency in buildings are not needed.

Energy efficiency in buildings is adequately addressed by the EU and national legislation (EED/EPBD and national implementations). To foster a holistic view on energy efficiency and sustainability it is not enough to focus on singular assets such as buildings. Moreover the emphasis should be put on city or town quarters and urban and rural communities. Within these of course buildings and construction play an important role but issues of infrastructure, energy supply, industry, transport and agriculture are not to be forgotten and thus need to be included in any measures dealing with energy efficiency. A sustainable future can only be achieved with combined efforts in urban and rural areas.

In regard to the recent EU policy in the area of energy efficiency in the building sector and in addition to the submitted consultation the BAK would like to add following recommendations:

The very ambitious focus on Nearly Zero Energy Buildings together with an increasing raise of requirements for existing buildings has to be viewed critically. The resulting high-tech solutions are extremely prone for defects, they become more and more difficult to implement and they danger of contradiction with other requirements (e.g. fire safety, sound protection) increases. It is noticeable that the construction methods needed for energy efficient design eventually lead to ever shorter lifetimes of the single building components and thus to shorter service life of buildings. As a result, the economic feasibility is not secured for the building owner, which fosters a continuing low willingness to invest in upgrading the energy efficiency of their buildings. Increasing restrictions will rather be viewed as barriers by building owners and prospective clients. Furthermore there are already noticeable and increasing social tensions resulting from rising rental costs due to the expenses for energetic refurbishments.

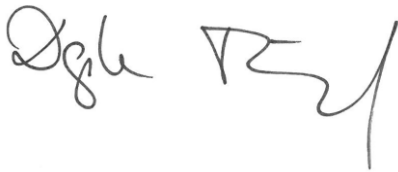
It should be of major importance to shape measures in energy efficiency in a way that accommodates the construction process and which complies with the skills of the construction workers. The tendency to view energy efficiency as a field



exclusively for specialists and to introduce certification- and control-systems for it limits the chance of reaching the ambitious efficiency targets.

The legal requirements in the building sector are already exceeding an agreeable level. In order to achieve higher and constant energy and carbon dioxide reduction rates in the building sector, cost-effective and average-oriented requirements in energy efficiency should be preferred over the sole focusing on best practice examples. These would not need to be strained with additional control systems as stipulated within the EPBD (Energy Performance of Buildings Directive 2010/31/EU).

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