REHVA opinion
the perspective of building services engineers

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Focus on existing building stock

• REHVA welcomes the binding 30% energy efficiency target, buildings can contribute more to achieving it.

• EPBD shall focus on existing building stock, including the replacement and upgrade of inefficient technical building systems that don’t deliver good indoor environment quality.
Indoor environment quality to be strengthened in the revised EPBD

- Good improvements in Annex I that mandates Member states to ensure minimum indoor environment quality (IEQ) levels
- IEQ criteria shall be part of the inspection
- EPBD shall mandate MS to define IEQ requirements that are monitored and reported in a transparent way in the energy performance certificates
- Need for harmonised IEQ criteria across Europe

Quality, and compliance through mandatory inspection and quality management

- EPBD shall maintain and **improve Articles 14-15**
- EPBD shall mandate MS to set up and enforce a **transparent inspection process** with clearly defined criteria and framework
- Current criteria on alternative measure confuse different competences and responsibility for good operation and of the inspection process testing it.
Quality, and compliance through mandatory inspection and quality management

- Continuous monitoring and BAC are an important mean to improve the energy efficiency operation of buildings.

- **Third party testing** through well-defined regular inspections or continuous monitoring shall be a mandatory requirement for new buildings and deep retrofits. This can close the performance gap.

- QUANTUM: “design for testability” specifying transparent performance targets with cost effective testing methodologies.

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