



## Deep renovation? Consider rebuilding!

The role of the EU is to set common targets and ensure coordination in their achievement. Public bodies should be free to assess and opt for the best solution in achieving them when it comes to energy efficiency in buildings.

BIBM welcomes the proposal for a Directive of the European Parliament and of the Council on energy efficiency and repealing Directives 2004/8/EC and 2006/32/EC and supports the targets addressed to the construction sector.

However, we would like to draw the attention to the fact that rebuilding should be an option when it comes to major<sup>1</sup> or deep<sup>2</sup> renovation. BIBM regrets that the proposal in question doesn't mention this alternative.

Compared to renovation, rebuilding can answer to several challenges such as energy efficiency, internal comfort, high standard of living, fire safety or social integration. Even though that rebuilding has higher initial costs than refurbishing, the investment is soon recovered by a lower running cost of the building; consequently, rebuilding can be the most cost effective solution for long-term. Moreover, in case of poor building conditions, refurbishment costs can be higher than the costs of a new building.

For that reason, BIBM calls the policy makers not to favour any options (refurbishment or rebuilding) but provide a level playing field for the most reasonable choice.

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BIBM (from the French acronym "Bureau International du Béton Manufacturé") is the European Federation of Precast Concrete Industry, established in 1954, represents the interest of precast concrete industry of 18 European countries with a combined industry turnover of 26 billion Euro, directly employing approximately 210,000 European citizens.

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<sup>1</sup> 'major renovation' means the renovation of a building where:

- (a) the total cost of the renovation relating to the building envelope or the technical building systems is higher than 25 % of the value of the building, excluding the value of the land upon which the building is situated; or
  - (b) more than 25 % of the surface of the building envelope undergoes renovation;
- Member States may choose to apply option (a) or (b).

Source: EPBD 2010/31/EC

<sup>2</sup> 'deep renovation' means a refurbishment or a rebuilding that reduce both the delivered and the final energy consumption of a building by at least 75%



## Amendments to proposal for a directive of the European Parliament and of the Council on energy efficiency and repealing Directives 2004/8/EC and 2006/32/EC

### Amendment 1

#### Proposal for a directive

#### Recital 15

The rate of building renovation needs to be increased, as the existing building stock represents the single biggest potential sector for energy savings. Moreover, buildings are crucial to achieving the EU objective of reducing greenhouse gas emissions by 80-95% by 2050 compared to 1990. Buildings owned by public bodies account for a considerable share of the building stock and have high visibility in public life. It is therefore appropriate to set an annual rate of renovation of all buildings owned by public bodies to upgrade their energy performance. This renovation rate should be without prejudice to the obligations with regard to nearly-zero energy buildings set in Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings<sup>3</sup>. The obligation to renovate public buildings complements the provisions of that Directive, which requires Member States to ensure that when existing buildings undergo major renovation their energy performance is upgraded so that they meet minimum energy performance requirements.

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During the last decade, construction sector has noticeably progressed, especially due to the introduction of new techniques of industrialized construction. Thanks to these innovations rebuilding has become a real alternative when considering deep renovations, instead of the traditional refurbishment. Member States should ensure a level playing field when the relevant public authority chooses to build a new building in place of an existing one with poor energy performance.

<sup>3</sup> OJ L 153, 18.6.2010, p. 13.

<sup>4</sup> OJ L 153, 18.6.2010, p. 13.



**Amendment 2**  
**Proposal for a directive**  
**Article 2 27a. (new)**

Text proposed by the Commission	<b><i>'deep renovation' means a refurbishment or a rebuilding that reduce both the delivered and the final energy consumption of a building by at least 75%;</i></b>
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Rebuilding similar to deep renovation, improve the energy performance of buildings and in case of poor building conditions, rebuilding can be the most cost effective way considering the whole life-cycle cost of the building.

**Amendment 3**  
**Proposal for a directive**  
**Article 4 point 1**

Without prejudice to Article 7 of Directive 2010/31/EU, Member States shall ensure that as from 1 January 2014, 3% of the total floor area owned by their public bodies is renovated each year to meet at least the minimum energy performance requirements set by the Member State concerned in application of Article 4 of Directive 2010/31/EU. The 3% rate shall be calculated on the total floor area of buildings with a total useful floor area over 250 m <sup>2</sup> owned by the public bodies of the Member State concerned that, on 1 January of each year, does not meet the national minimum energy performance requirements set in application of Article 4 of Directive 2010/31/EU.	Without prejudice to Article 7 of Directive 2010/31/EU, Member States shall ensure that as from 1 January 2014, 3% of the total floor area owned by their public bodies is renovated each year to meet at least the minimum energy performance requirements set by the Member State concerned in application of Article 4 of Directive 2010/31/EU. <b><i>New buildings built in place of existing ones with poor energy performance should be taken into account into the calculation of the 3%. This rate</i></b> shall be calculated on the total floor area of buildings with a total useful floor area over 250 m <sup>2</sup> owned by the public bodies of the Member State concerned that, on 1 January of each year, does not meet the national minimum energy performance requirements set in application of Article 4 of Directive 2010/31/EU.
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Similar to amendment 1, the option of “rebuilding” should be considered as an option when calculating the 3% annual renovation rate. Rebuilding can provide a real solution to several challenges such as energy efficiency, internal comfort or fire safety.

Enclosed: BIBM Paper "Drivers for a responsible choice"