

Position

# Energy Performance of Buildings

VDA recommendations for the revision of the EPBD



Berlin, June 2022

## Summary

The availability of an appropriate charging infrastructure is of fundamental importance for the expansion of electromobility. The revision of the EPBD and its infrastructure provisions for sustainable mobility in the building sector set the framework for the roll-out of a non-public charging infrastructure in Europe. While it is to be welcomed that many of the Commission's proposals are more ambitious than the current EPBD targets, there is still a need for further improvements in some areas. In particular, a more ambitious timeframe should be envisaged, with targets similar to those set out in the Alternative Fuels Infrastructure Regulation (AFIR), which is currently being negotiated in the Council and the European Parliament. The scope of the EPBD should be extended beyond the proposals presented by the Commission. The rapid deployment of a comprehensive charging infrastructure in Europe, both public and private, is a basic prerequisite for expanding electromobility and achieving the 2030 climate targets in the road transport sector.

## Background

On 15 December 2021, the European Commission published a proposal to revise the Energy Performance of Buildings Directive (EPBD). The aim is to contribute to achieving the Green Deal objectives in the buildings sector and to adapt the existing legal framework to the challenges of the current transformation. The EPBD lays the foundation for the expansion of the charging infrastructure in private, public and commercial buildings and is therefore an important complement to the AFIR. While the German automotive industry welcomes the fact that the Commission is pursuing more ambitious targets in its new proposal, there is also a need for more action in some areas.

## Recommendations

- Pre-wiring for the charging infrastructure in non-residential buildings and substantially renovated buildings, starting with the first parking space. Charging points should be provided for at least 20% of all parking spaces.
- The Commission's target of equipping all non-residential buildings featuring more than 20 parking spaces with at least one charging point for every ten parking spaces by 2027 is not ambitious enough. We recommend reducing the number of parking spaces and equipping at least 20% of parking spaces with charging points by as early as 2025.
- The planned targets for buildings owned or used by public authorities are inadequate and do not go far enough in setting an example. Instead of pre-wiring only one out of every two parking spaces by 2033, the targets should be the same as for other non-residential buildings. In other words, all parking spaces in all buildings should be pre-wired, and at least 20% of all parking spaces should be equipped with charging points by 2025.

- The proposal does not contain any targets for existing residential buildings. This needs to be rectified in order to ensure a user-oriented charging infrastructure. We therefore recommend that least 10% of the parking spaces in buildings with more 10 parking spaces be equipped with charging points by 2027, with the requirement of installing at least one charging point in all buildings.
- In the case of residential buildings (new and extensively renovated), at least 20% of parking spaces should be equipped with charging points from 2025 onwards, with at least one charging point per building. In addition, each parking space should be pre-wired.
- In principle, the provision of a charging infrastructure in buildings should follow the expansion of electromobility, meaning the number of electrified parking spaces should correspond to the market share of electric vehicles (if one third of the existing fleet consists of electric vehicles, one third of parking spaces should also be electrified).
- In order to ensure implementation in all member states, the situation needs to be assessed and monitored, with reporting requirements along the lines of the AFIR standard.
- This should be based on the right to plug, with no restrictions on the implementation by landlords or (co-)owners.
- The pre-wiring should consist of more than just empty conduits, i.e. cables/power rails, mains connection, space for meter cabinets (including circuit protection/protection plans) and the enablement of load management systems (controlled and bidirectional charging). This would enable the quick and easy commissioning of charging facilities.

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Version Version 1.0, Juni 2022