

Input paper

SET Plan Action 5 on energy efficiency solutions for buildings

REHVA welcomes the general scope and the following points and approaches of the strategy:

- It is very important that indoor environment quality is mentioned in the document. This aspect should be kept and strengthened in every relevant priority and action.
- The system approach, as well as the integration and interoperability of energy efficient technical solutions, together with building automation, control and monitoring are a key to achieve high energy performance and healthy buildings.
- Stressing the importance of refurbishing the existing building stock, which will be the biggest challenge in achieving the buildings energy efficiency related targets of the Energy Union.

REHVA comments on specific issues of the strategic document:

- Ventilation is not considered in the strategy sufficiently and appropriately. The scope is on envelope, heating and cooling. However ventilation is not covered by H/C terms. Considering the EPBD/nZEB performance objectives and their effect to build high energy performing and tighter buildings ventilation has to be considered separately. This ensures also that indoor environment quality won't be deteriorated by energy efficiency measures implemented in buildings. For example instead of writing: "innovative heating and cooling systems" the strategy shall define: "innovative heating, cooling and ventilation systems". It is not sufficient to list as separate objective: "ventilation products tailored to the renovation market", the systemic approach shall be followed here as well, and all technical building



systems listed everywhere where relevant.

- The integration and development of innovative ventilation technologies (demand control, heat recovery) and tools shall be stressed within every related actions from building / HVAC design to operation.

- To the poor indoor environment quality (IEQ) due to energy efficiency measures problem: this should be stressed more specifically in every relevant measure/action by including the integration of clean air tech solutions (filters, IAQ controls) and control tools for ventilation rates and healthy indoor condition besides controlling energy efficient operation of a building. E.g. when talking about intelligent automation and control, the document shall refer to energy use AND indoor environment quality control.

- Design phase of the building: design tools shall integrate and automatize the aspect of considering the actual (individual) building use to ensure the correct sizing and appropriate design of technical building systems according to the building use. Oversizing of technical building systems is a general problem.

- There is a need for training and capacity development of engineers and construction sector professionals, eg. about the upcoming European NZEB standards and skills needed to the design and refurbishment of buildings to nZEB level. Also for harmonised certification/quality management schemes for the process from design till operation phase based on EN standards. This is a non-technological aspect, but important to be mentioned.

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