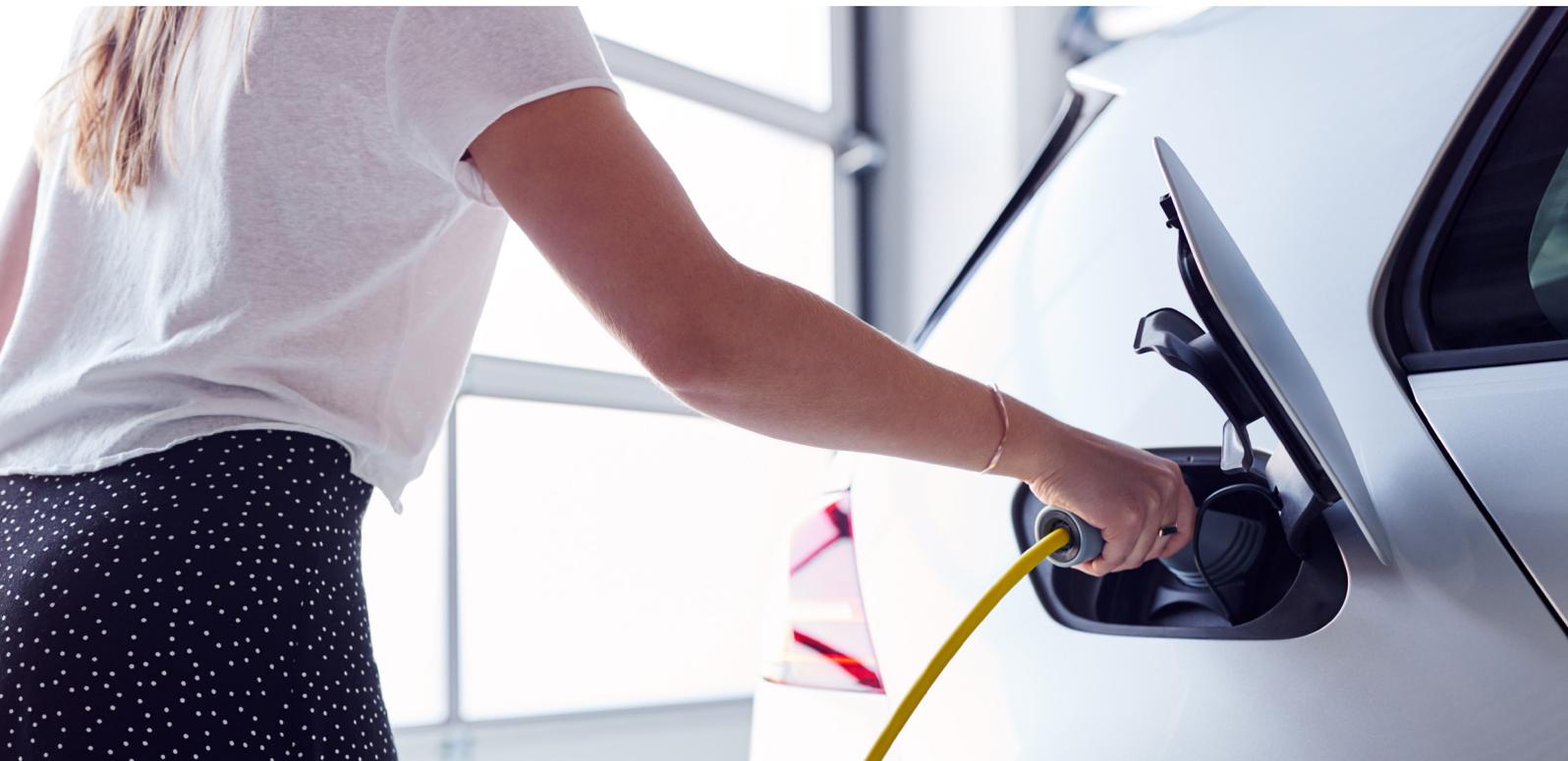


REACTION PAPER

Revised Energy Performance of Buildings Directive (EPBD)



AVERE welcomes the European Commission's initiative to revise the Energy Performance of Buildings Directive (EPBD), which will be key to enabling home and destination charging in the EU and thus to allowing drivers everywhere to charge where it is most convenient for them, as well as to enabling the smart integration of EVs into the energy system.

EV users tend to follow a charging hierarchy that begins at home, as the most convenient and cheapest location to recharge an EV. 75% of EV owners in Europe had access to home charging in 2020, covering 75% of their charging needs, and while this share is set to decline in coming years, home charging will still cover 40%-45% of all charging needs in 2030¹. Similarly, many EV users charge while at work (24% share projected for 2030), or top up while visiting destinations such as malls and supermarkets.

AVERE thus welcomes the increased requirements for pre-cabling and the installation of charging points, and the introduction of a "right to charge" for residents of multi-dwelling

¹ McKinsey & Company, Charging ahead: Electric-vehicle infrastructure demand, 8.8.2018

buildings, which ensures consumers can never be denied the opportunity to charge at home. Still, further improvements are needed, notably in regard to requirements for existing buildings and when it comes to including charging opportunities for heavy duty vehicles at depots and logistics hubs.

This paper thus sets out AVERE's position and policy recommendations regarding the revised Directive. AVERE stands ready to engage with EU policymakers as to how to make the European Building stock ready for electric mobility in time for the upcoming mass uptake in coming years.

AVERE's Recommendations

Strengthen charging requirements and introduce additional requirements for existing buildings

AVERE welcomes the obligation to pre-cable parking spaces in residential buildings with more than three parking spots and in non-residential buildings with more than five parking spots, and the requirement to install a minimum number of chargers in the latter. However, a clear definition of "pre-cabing", which would be helpful to ensure measures taken are sufficient for the seamless installation of charging points at a later point, is missing from the proposal. AVERE proposes the following definition: "Pre-cabing: Includes all measures that are necessary to enable the installation of recharging points at a later date. This includes cable routes, space for transformers and electricity meters as well as grid capacities."



In addition, the targets for the installation of charging points in non-residential buildings seem to be set conservatively and are not set up to grow in line with EV market uptake. Instead of a one-time target, binding percentage targets for the number of parking spaces equipped with charging points should be set, in line with EV market uptake, however at least 10% in 2025, 20% in 2030, and 40% in 2035.

Lastly, the current scope of the provisions is too narrow: only covering new builds and renovations if they "include the car park or its electricity infrastructure" for all but the very biggest non-residential buildings means only a small share of the EU's building stock will be covered. Stronger requirements are needed to ensure the EU's entire building stock will be ready for EV charging in time for the upcoming mass uptake of EVs: all renovations of buildings with parking facilities should have to include these facilities, and parking in all EU new and existing buildings with more than ten parking spaces should be pre-equipped for the installation of EV charging points by 2030, regardless of other planned renovations.

Tackle bureaucratic hurdles and further strengthen the proposed “right to plug”

AVERE strongly welcomes the obligation on member states to remove administrative hurdles and other barriers to the installation of charging points in buildings, and particularly the introduction of a “right to plug” for tenants of condominiums, which has been one of its main demands in the run-up to the proposal.

However, these provisions need to be further strengthened, for example by explicitly requiring member states to remove existing administrative barriers, streamline permitting and installation procedures, and setting maximum time frames for the approval of charging points. The “right to plug” should also be further supplemented, notably with an explicit right to have a recharging point installed within a set time frame at or near drivers’ home, and provisions to ensure early adopters within a given (new or existing) building do not have to pay for pre-cabling the entire building (i.e.; the building owner should bear the cost of cabling and grid connection).

Include heavy-duty vehicles



One significant oversight in the proposed revision is a complete lack of provisions for the charging of heavy-duty vehicles. While the proposed AFIR revision will introduce a minimum of recharging stations along key motorways for en-route charging, heavy duty vehicles are most conveniently charged with minimal disruptions to their schedule when stationary during their regular operating patterns - i.e. while being loaded and unloaded at logistics hubs and distribution centres, or while parked overnight at private truck depots.

The revision proposal should therefore be amended to cover new or renovated private truck depots (150 kW+ chargers with at least V1G smart charging functionalities), as well as logistic hubs and distribution centres (350 kW+ chargers), requiring them to be ready for battery electric truck charging. This should include pre-equipment as well as an appropriate grid connection.

Facilitate integrated planning of public and private charging infrastructure by Member States

Public and private charging solutions are mutually complementary, and should therefore be subject to an integrated and comprehensive planning approach at the national level. National plans under AFIR and EPBD, as well as reporting provisions, should therefore be strongly interlinked between the two files.

Member states should be encouraged to support the roll-out of private charging infrastructure through an indicative capacity target for private charging in their building stock. They should also be subject to reporting requirements every two years (in line with the national progress

reports on public charging under AFIR), making transparent at a minimum the share of parking spaces pre-equipped for charging infrastructure, and the number and capacity of actual chargers installed.

Enable smart charging

Home and destination charging, due to the extended periods in which vehicles are stationary, constitute prime opportunities to make ideal use of smart charging. AVERE welcomes the fact that charging points deployed under the EPBD are required to be capable of V1G smart charging.

V2G capabilities can further contribute to grid balancing and to maximising the share of renewable energy in the energy system, whilst offering economic benefits to operators and users. Deployment of V2G technologies should be subject to in-depth cost-benefit analyses, as well as assessments of their technical feasibility and maturity of available solutions.

Lastly, the definition of “zero-emission buildings” currently does not allow for these buildings to cover their low residual energy needs from decentralised sources of flexibility such as electric vehicles. This possibility should be explicitly included.

Closely evaluate appropriate protocols and standards

AVERE shares the Commission’s vision of facilitating an open market and enabling interoperability, based on non-proprietary and non-discriminatory communication protocols and standards. However, at the current stage, a number of competing protocols and solutions are available, not all of which are widely accepted throughout the entire industry, helpful to facilitating better user experience and interoperability, or sufficiently mature at this stage. Mandating “non-proprietary and non-discriminatory communication protocols and standards”, as in article 12(6), should thus not be done without first carefully evaluating available open protocols and market maturity, and, on this basis, more closely specifying suitable protocols and standards. This could be done through the adoption of a Commission delegated act in 2026.

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