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Ai Consigli degli Ordini degli Architetti  
Pianificatori, Paesaggisti e Conservatori  
**LORO SEDI**

**OGGETTO:** “Clean Energy for all Europeans”: the Architects’ Council of Europe advances three guiding principles to deliver a step change in building performances”

Lo scorso 30 novembre, La Commissione Europea ha presentato un importante pacchetto di misure dal titolo “Clean Energy for All Europeans” che contiene proposte per la revisione delle direttive sull’Energy Efficiency (EED) e dell’Energy Performance of Buildings (EPBD). L’Architects’ Council of Europe ha espresso parere favorevole per detta pubblicazione, ritenendola un’opportunità per migliorare il quadro normativo e propone tre principi che sostengano il lavoro della Commissione, per tutta la durata della procedura legislativa.

In allegato il testo di risposta dell’Architects Council of Europe alla Consultazione della Commissione in materia di EPBD.

Nel richiedere la massima diffusione della nota a tutti gli iscritti, attraverso i consueti canali di comunicazione, porgiamo i nostri migliori saluti.

Il Coordinatore del Dipartimento Esteri  
(arch. Livio Sacchi)

Il Consigliere Segretario  
(arch. Fabrizio Pistolesi)

Il Presidente  
(arch. Giuseppe Cappochin)

All.: c.s.



9 December 2016

**'Clean Energy for All Europeans': the Architects' Council of Europe advances three guiding principles to deliver a step change in building performance**

**On 30 November 2016, the EU Commission unveiled an important package of measures entitled '*Clean Energy for All Europeans*' which notably includes proposals for reviewing the Energy Efficiency (EED) and the Energy Performance of Buildings (EPBD) Directives. The Architects' Council of Europe (ACE) welcomes this publication as an opportunity to improve the regulatory framework and advances three principles that will guide its work throughout the legislative procedure.**

ACE welcomes the Commission's proposal to set a binding 2030 energy efficiency target at the EU level of at least 30%, as well as the emphasis put on the Energy Efficiency First principle. If 30% is a step in the right direction, it is not enough to accelerate the pace at which Europe is currently upgrading its building stock. While ACE welcomes the inclusion of a long-term vision until 2050, it believes that this should be further developed and specified.

ACE is committed to work with the European Council and Parliament for a greater recognition of the role of architecture in delivering a step change in the environmental performance of buildings. Architects design and coordinate the spatial and technological features that govern a building's functionality, adaptability and long-term resilience. A building's architecture, its connection to its site and users, its configuration and materiality are all major determinants of resource efficiency and occupant well-being.

ACE advocates that the legislative framework for energy efficiency should give far greater priority to architectural means of improving long term building performance, including better prioritisation of passive, low-tech, locally tested solutions that do not consume energy in operation and carry a lower risk of under-performance.

Three principles guide ACE's position:

1. The credibility of EPCs needs improving if they are to be used to underpin any financial and legislative incentives for energy efficiency. ACE calls for the urgent modernisation of EPCs that includes the validation of achieved performance in use and is underpinned by a standardised methodology for comparing compliance calculations with measured energy use. Feedback from buildings in use has to sit at the heart of the legislation to prevent any further unintended consequences. The proposed disclosure of operational energy use for public buildings is an important first step towards creating a virtuous feedback loop to stimulate continuous improvement but the EPBD must go further.

2. In recent years the financing of energy efficiency measures, in particular the retrofit of the existing stock, has been decoupled from investment in the spatial and architectural design of buildings. With legislation focusing on technical solutions to energy efficiency, the business case to undertake spatial and architectural renovation as part of an energy efficient retrofit has been reduced. Any new financial and legislative incentives proposed in the Clean Energy package need to join up the functional / architectural renovation with efficiency retrofits.

3. To effectively reduce the consumption of natural resources that are needed to achieve healthy, comfortable and productive indoor environments, it is crucial to measure what we strive to control. Harmonised and transparent metrics applicable across all life-cycle stages are needed to cover all three pillars of building performance: the consumption of natural resources, indoor environmental quality and occupant satisfaction.

ACE looks forward to working with the co-legislators and the other stakeholders of the sector to translate these principles into concrete recommendations for amendments, in order to improve the Commission's proposal and deliver a step change in building energy performance.

[Download the ACE response to the Commission's consultation on the EPBD \(October 2015\).](#)

The Architects' Council of Europe (ACE) is the representative organisation for the architectural profession at European level: it aspires to speak with a single voice on its behalf in order to achieve its aims. Its membership currently consists of 43 Member Organisations, which are the regulatory and professional representative bodies in all European Union (EU) Member States, Accession Countries, Switzerland and Norway. Through them, the ACE represents the interests of over 565.000 architects from 31 countries in Europe.

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