



Position Paper

Fire Safe Europe's position on the review of the Energy Performance of Buildings Directive - EPBD (2010/31/EU)

Europeans spend about 90% of their lives inside buildings. We want those buildings to be comfortable and safe. Moreover, due to climate, energy security and economic concerns, we increasingly need them to be sustainable.

These considerations are spurring important innovations in new buildings and driving renovation programs throughout the EU, and this is significantly changing the fabric of buildings.

The EPBD has been an important driver in the EU's efforts to modernize European buildings. It has put in place important policies such as requirements for new buildings to be nearly zero energy (NZEB) level by 2020, increasing awareness of energy performance of buildings through the introduction of Energy Performance Certificates (EPCs) and initiating efforts to increase renovation by putting in place minimum requirements for when a major renovation takes place. That said, given the current imperative to save energy, and in view of the huge potential for energy efficiency gains in existing buildings, the EPBD needs an urgent revision.

Fire Safe Europe would like to draw the attention of the European Commission to the following important points:

- At first glance, it might seem natural to assume that modern, more energy efficient buildings are likely to be more fire-safe than their predecessors. However, the design of a building and the materials used in its construction can increase its inherent fire load and dramatically change the way fire propagates.
- As buildings across Europe are renovated, their fire safety characteristics may also change significantly, depending on the materials used. This may compromise the safety of building occupants and users, especially in case of a fire during the renovation.
- Most European countries have not adequately updated their fire regulations to keep up with the rapid innovation of construction materials coming onto the market. Even the harmonized fire testing and classification standards have not been adequately updated to handle modern construction materials. If this situation does not change, this upcoming period of renovation will be a huge missed opportunity to improve fire safety.
- Social sustainability should be recognized and the safety, wellbeing and comfort (thermal comfort and indoor air quality) of the occupants should be a priority.

Our recommendation: This exciting period of change and energy renovation offers the EU an unprecedented opportunity to champion a truly sustainable building policy, which will improve the safety of buildings as well as their energy performance. We call on the European Commission to ensure that future provisions for improving the energy efficiency of buildings under the EPBD explicitly take account of the need for fire safety planning in their texts. We draw the European Commission's attention in particular to provisions for public buildings such as schools and hospitals, and high-rise and commercial buildings - buildings where citizens are at a higher risk in case of fire.

Creating an energy-efficient building is an exciting event. If buildings are also resilient to fire, they will be truly sustainable and can be enjoyed for years to come.