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Revision of the Energy Performance of Buildings Directive Feedback on Inception Impact Assessment

We believe that the EPBD Revision offers a once in a decade opportunity to capitalise on renovation investments by simultaneously improving energy-efficiency and fire-safety. Hence, we are in favour of an upgrade of the EPBD through Option 3.

Fire safety matters for optimal energy-efficient renovation:

The 2021 EPBD Revision is a chance to improve people's living environment, reduce energy-poverty and fire-safety inequalities. The Renovation Wave provides us not only with a unique opportunity to advance buildings' sustainability and resilience but also people's comfort and safety. The amount of public money that will be invested into building energy performance is unprecedented, thus we must take full advantage of this opportunity by simultaneously addressing energy-efficiency and fire safety.

Fire safety should not be weakened when enhancing energy-efficiency. The more fatal, devastating and increased fire accidents we have been witnessing these past years, show that existing fire safety regulation and their implementation do not sufficiently address the fire risk in today's buildings. That's why it is crucial to adequately take into account the existing fire risks in connection with building renovations.

Improving buildings' energy performance comes with a growing share of renewables and innovative energy-efficient solutions which in turn increase the inherent fire risk. De facto, fire risk is permanently changing. That's why we constantly have to pay attention to new risks and ensure that the green solutions used to increase energy-efficiency do not weaken a building's fire resilience.

The renovation of public buildings such as schools, hospitals, social housing entities and offices must be exemplary both in term of energy-efficiency and safety. These types of buildings are high-risk buildings, where people, in case of fire, have limited evacuation capabilities (children, sick or elderly) and where firefighting can be more time consuming and complex. We must ensure that increased energy-efficiency does not threaten the building's fire resilience. It is also essential to consider the danger of toxic smoke and spread of fire. Ideally, these requirements should be extended to the rest of the EU building stock.

Within the emergence of new tools such as the minimum energy performance standards, the deep renovation standards, etc. it is crucial to factor in fire-safety. Energy-efficient renovations



must integrate fire-safety to avoid “shallow” and unsafe renovations.

To reach a net 55% emission reduction target by 2030, not only the volume of renovations but also their depth is critical. Buildings’ fires can have substantial impacts on the environment, including GHG emissions. Research shows that failing to factor risks, such as fire risks, in buildings’ design and 1 construction can nullify the benefits of energy-efficiency and sustainability measures .

The 2018 EPBD encouraged Member States to account for fire safety in major renovations and long- term renovation strategies (LTRS). On the LTRS available, only one third mention fire safety. Yet, this would have been the opportunity for Member States to demonstrate their views on the permanent evolution of fire risk and integrate this risk in their LTRS policy planning.

The 2021 Revision must build on and improve the 2018 fire safety provisions. Taking a holistic approach to energy-efficiency that accounts for other factors, such as fire safety, is key to harness the power of energy- efficient renovations in a safe manner. Thus, fire safety must be addressed as an integral part of energy efficiency.