

EUMEPS considerations: EPBD

Like many companies and associations who have already commented positively on this important piece of legislation, EUMEPS fully supports the ambition expressed in the **Energy Performance of Buildings Directive** (EPBD) and were very pleased to see the recent positive vote in the European Parliament. We hope that negotiations with the Council progress smoothly and rapidly, such that a final version of the bill can be agreed, and Member States can then be encouraged to update and enforce implementation of the necessary national renovation plans.

As the European Commission have pointed out, buildings are responsible for 40% of European energy consumption, and for 36% of energy related greenhouse gas emissions. Buildings are therefore the single largest consumer of energy in Europe, with heating, cooling and domestic hot water accounting for 80% of the energy used. They have also highlighted that 75% of existing building stock is energy inefficient, and yet only 1% is renovated each year. There needs to be a **huge ramp up in renovation** activity to reduce energy consumption, and finalisation of the EPBD will be a good first step.

Better insulation of building stock is the most effective way to improve energy efficiency, provided of course that the insulation material used **retains its insulating performance for the duration of the lifetime** of the building, and is not negatively impacted by moisture ingress, mould growth, settlement of mineral fibres, or other aging effects. One of the most widely used and effective ways to improve the energy performance of a building is to install an External Thermal Insulation Composite System (ETICS) with Expanded Polystyrene (EPS) as the insulation material.

EUMEPS also support the European Parliament in their call for Member States to put in place **financial measures to enable cost neutral renovation schemes**. Whilst the recent "super-bonus" scheme in Italy may have had room for further improvement and optimization, it certainly created a huge up-lift in insulation renovation activity, as well as generating economic growth and job creation. And as the European Commission has highlighted there is money available, for example in the Cohesion and Recovery funds, and the Social and Climate funds, which Member States can look to benefit from.

The successful achievement of the goals expressed in the EPBD rely, in part, on the continued effective use of EPS insulation. EPS is the most durable, as well as the most sustainable insulation material. Its manufacture consumes far less energy than the production of alternative insulation materials, and it never has to be transported very far to a construction site, because there are SME EPS production sites at many locations throughout all European countries. It is not unusual for the use of EPS insulation to save as much energy in just 1 year as was required to manufacture it and transport it to the construction site. Use of EPS also ensures that excellent thermal insulation performance is maintained over the lifetime of the building. An additional environmental benefit of the use of EPS is that recycled material can be integrated into the insulation boards in increasing amounts as the availability of recycled material becomes more available. And when a building finally must be demolished, the EPS can be separated and recycled again, an indefinite number of times, making a real and very significant contribution to the circular economy.

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It will be important to keep in mind the major objective to reduce energy consumption and greenhouse gas emissions when considering any mandatory recycled content requirement. Incorporating recycled content is technically possible, but the availability of recycled material is currently limited, because, again as highlighted by the European commission, **85 – 95% of existing buildings will still be standing in 2050**. Therefore, the feasibility of any mandatory recycled content requirement should be assessed well in advance in cooperation with Industry, and it will also be important that recycled content for EPS insulation should not be limited to recycled construction products but also enable the use of recycled EPS packaging.

In summary, the completion of a final EPBD will be a **major step forward toward the achievement of European climate change goals;** good communication with Member States and follow-up of National Renovation Plans is the next challenge, along with delivery of the following during the implementation phase:

- Durability and use of long-term performing insulation materials
- Use of Digital Product Passports to ensure the use of the most sustainable solutions and avoid potential greenwashing.
- Setting up of appropriate certification schemes, and ensuring availability of sufficient reliable competent professionals in the field of energy renovation

EUMEPS remains at your disposal to discuss all aspects of the EPBD from the perspective of insulation products. We are committed to supporting full implementation of the EPBD.

Jürgen Lang Managing Director

Our association - <u>EUMEPS</u> is the voice of European Manufacturers of Expanded Polystyrene (EPS) in the European Union. Our material – EPS – is widely used in insulation products. We represent the interests of leading market players such as: Knauf Industries, BEWI and Austrotherm but also speak for small and medium-sized enterprises.

EUMEPS covers the entire EPS value chain, from raw material suppliers to EPS converters and recyclers, as well as supporting industries including machinery and additive suppliers. Our members include both individual companies and 23 national EPS associations in Europe. EPS sector generates an annual turnover of 5-6 billion EUR and directly employs over 80,000 people in Europe. The future of our industry will be directly affected by the ongoing revision of the EPBD.

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