

To: Members of the European Parliament Committee on Industry, Research and Energy

Driving Ambition in the Energy Performance of Buildings Directive revision

With the Energy Performance of Buildings Directive (EPBD) revision reaching a crucial stage, we - a coalition of 35 built environment stakeholder groups representing over 6,000 organisations across Europe - are calling on Members of European Parliament to seize a once-in-a-generation opportunity to eliminate carbon emissions from Europe's building stock.

An ambitious EPBD revision will make EU building compatible with EU climate targets, take 35 million citizens out of energy poverty¹ and unlock the economic benefits of creating up to 3.3 million green jobs in the EU every year² while boosting local communities.

In the upcoming ITRE committee vote this week your constituents need you to take a decisive and ambitious approach that delivers a decarbonised building stock in Europe. Therefore we are calling on you to support an EPBD revision which will:

1. **Accelerate building renovation and address energy use and efficiency** via the introduction of Minimum Energy Performance Standards and harmonisation of Energy Performance Certificates.
2. **Address total lifecycle emissions of buildings**, including both operational and embodied emissions by supporting provisions regarding Whole Life Carbon reporting, targets, and thresholds.

The climate impact of Europe's buildings

In Europe, buildings account for around 40% of energy consumption and 36% of CO₂ emissions³. Embodied carbon, which refers to emissions from the construction, renovation, deconstruction or demolition and the wider supply chain of a building, contributes typically between 10-20% of the EU building carbon footprint⁴. This means that before a building is even

¹ European Commission (2022) [Energy Poverty in the EU](#)

² Renovate Europe (2020) [Building Renovation: a kick-starter for the EU economy](#)

³ European Commission (2020) [In focus: Energy efficiency in buildings](#)

⁴ Material Economics (2019) [The Circular Economy - a Powerful Force for Climate Mitigation](#)

in use, it has already contributed significant carbon emissions and depleted the EU's 'carbon budget'.

The EPBD is a key legislative instrument to maximise the carbon-saving potential of Europe's buildings and achieve the EU's near-term and 2050 decarbonisation objectives. Updating building regulations to tackle both operational and embodied carbon - 'Whole Life Carbon' (WLC) - is a crucial way to mandate low-carbon construction and renovation. The revision of the EPBD must respect the 'energy efficiency first' principle to address the built environment's operational impact whilst also accelerating actions to address WLC.

Industry and national governments support Whole Life Carbon measures

In 2022, WorldGBC launched an [EU Whole Life Carbon Roadmap](#) for the building sector with the support of a coalition of over 35 leading industry bodies through WorldGBC's flagship #BuildingLife project, demonstrating widespread support for the introduction of WLC policy. This was the first roadmap of its kind at EU scale to address the WLC impact of the built environment, across multiple policy routes.

Alongside this EU Roadmap, ten Green Building Councils across Europe have now developed their own national Roadmaps (see Annex below) with recommendations to policymakers and industry on how to decarbonise the built environment sector. These Roadmaps were developed with input from over 600 experts and organisations across Europe, and leading businesses in the construction sector are already committed to tackling the WLC impact of their projects. An increasing number of European building labelling schemes are also driving the market by introducing WLC indicators.

Furthermore, the support for these Roadmaps is reflected in the introduction of WLC policy measures in countries such as France, the Netherlands, Denmark and Finland, where national policymakers are demonstrating that the implementation of such measures is feasible and necessary for delivering on climate goals.

WorldGBC and the 35 organisations below support a high level of ambition in the EPBD revision. We must act now to embrace the full range of benefits of a sustainable building stock.



⁵ DISCLAIMER: This letter was developed in collaboration with a number of IIGCC members but does not necessarily represent the views of the entire membership, either individually or collectively

Annex - links to national WLC Roadmaps

- [Croatian WLC Roadmap with support of 25 organisations](#)
- [Finnish WLC Roadmap with support of 39 organisations](#)
- [French WLC Roadmap](#)
- [German WLC Roadmap with support of 150 organisations](#)
- [Irish WLC Roadmap developed with support of over 100 organisations](#)
- [Italian WLC Roadmap](#)
- [Netherlands WLC Roadmap with support of over 50 organisations](#)
- [Polish WLC Roadmap with support of 67 organisations](#)
- [Spanish WLC Roadmap with support of 93 organisations](#)
- [UK WLC Roadmap developed with support of over 50 organisations](#)