

## **Consultation feedback: Energy efficiency – Revision of the Energy Performance of Buildings Directive**

The Bioenergy Association of Finland sees energy efficiency as paramount for the resilience of the European energy system.

Building sector is very versatile spanning from urban public buildings to rural residential buildings. Therefore, it is crucial to find efficiency solutions to serve all building types. It is to be noted that inclusion of renewable and waste-based district heating and cooling is seen as one option for zero energy building. This is an important choice as district heating should be seen as infrastructure that in higher density areas serves as energy network or platform for many energy carriers.

The proposal for revision builds on elements that mainly can be supported. We for instance welcome the carbon emissions life cycle approach of the whole building and the de-facto ban on investments for new fossil fuel-based boilers.

However, we would like to raise one issue: Primary energy factor. Primary energy factors of different energy forms are also dependent on the geographic location and the national energy systems. It is necessary to leave room for national competence on the definition of primary energy factors. The Commission can produce guidance on the calculation of primary energy factors for consistency, though.