

From: [EPE](#)**To:** ["EPF Energy & Environment Committee"](#)**Date:** 9/16/2011 2:47:01 PM**Subject:** Water Performance of Buildings - epf11-92**Attachments:** WPB Policy Briefs.docx

Water Performance of Buildings - input on quantitative data.xlsx

To: Energy & Environment Committee

For information: President, Managing Committee, Emmanuelle Causse (UIPI)

Dear Ladies, Sirs

Run-up to Possible Legislation on Water Performance of Buildings

You may recall from previous mail that the Commission, not content with the first consultant's report, ordered another one which is being worked on now. A first meeting at the Commission with the consultant and a small number of interested parties took place on 8 September, attended by Aart Hordijk, me and Emmanuelle Causse of UIPI. The discussions were based on a first analysis / discussion paper (attached) which the consultant hoisted on us the day before and which covers:

- Minimum water efficiency requirements for water-using products
- Mandatory or voluntary water performance rating/auditing of buildings
- Minimum water performance requirements of buildings
- Voluntary certification scheme for water reuse and harvesting
- Financial incentives (for the purchase of water-efficient devices, water meters, or the installation of water reuse systems)
- Information and education campaigns targeting consumer behaviour, public perception and dissemination of best practices

It's a good report, non-prescriptive and quite balanced. For example, on water performance requirements:

"There is a misalignment between owner costs and tenant benefits. Under usual leasing arrangements, landlords pay for the capital costs of efficiency requirements while many of the benefits of green buildings apply to the user of the property, and tenants generally may not fully compensate landlords for the value of these benefits. The implementation of the EPBD has generated high costs for property owners without any benefits and thereby some resentment has been observed. Requirements for water-using products (see policy option on minimum requirements for water-efficient products) are generally better understood and would cost the users, no matter if tenant or owner." (2nd page of Part 4 of this unpage-numbered doc)

At the meeting, early on, I made the point that, unlike energy efficiency, water scarcity may well not be a pan-European concern. For Northern European countries it could be a non-problem which could make any binding EU legislation hard to justify.

The Commission Head of Unit said that this can be dealt with by legislation containing a provision that the Directive's requirements are only triggered in areas where the water basin reaches a certain specific low level. That's fine. However, some Portuguese Maldonado type [private joke between me and Sierra; pay no heed] said that water use requires energy, so this is a pan-European problem requiring binding legislation. I retorted that the amount of effort and cash that can be devoted to energy efficiency being finite, the energy consumption parameters of water performance may be too marginal to merit special EU legislation. To be continued.

Water performance certificates: Aart, Emmanuelle and I all said the same: that nobody wants multiple certificates and in a single certificate the energy component may be so dominant that the water element becomes of little use. We added that EPCs are not working well in many places and this is a reason why much more time is needed to see how EPCs pan out before doing anything about water performance certificates which should anyway be voluntary and limited to commercial property.

Lots of people seemed to agree and the Head of Unit took good note.

Aart made good friends with the consultants, one result being their attached half baked, not very well explained excel request for quantitative data to support the impact assessment of the potential policy options. Aart would be grateful if you could respond to this by next week, but he realises that's a tough deadline and that anyway many of you may not have easy access to that kind of data. Simply, if some of you can contribute, please do, as helping the consultant at this stage could pay off down the line.

There will be plenty more opportunity to interact with consultant and Commission. If the Commission opts for legislation, it will be for end 2012.

Sincerely

Michael MacBrien
Director General

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