



## **Display – ahead of its time**

Voluntary common EU public building certification

*Energie-Cités' opinion paper on the EPBD policy process  
based on the Display Campaign experience*

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## Abstract

*The European Directive on the Energy Performance of Buildings (EPBD - 2002/91/EC) was adopted on the 16<sup>th</sup> of December 2002 and entered into force on 4<sup>th</sup> of January 2003. All Member States had a period of three years in order to build up relevant systems and measures to transpose and implement the requirements. On the 4<sup>th</sup> of January 2006, the minimum requirements for energy performance were legally binding in Member States. In reality Member States found it very difficult to transpose the EPBD. Because of the delay in implementing the EPBD in existing public buildings, useful processes such as the Concerted Action and the EPBD Buildings Platform/BUILD UP were not able to be as effective as they could be.*

*Today in 2009, more than three years after the EPBD became legally binding, the effects are finally being seen on the ground. Contrary to the legal requirements concerning household appliances, Member States have been free to define the form and use of their national building's certificates. As a result absolutely no national energy certificate looks the same or uses the same method to calculate the performance. Globally local authorities and citizens are confused with the outcomes of the current EPBD's national transpositions.*

*This fact is of particular concern for existing public buildings in Europe. Article 7 of the EPBD specifies that certificates be "placed in a prominent place clearly visible to the public". But why? A fridge can be sold anywhere in Europe. Energy certificates have strongly influenced the public's purchasing decisions and transformed the market for more energy efficient products. As existing public buildings are rarely sold or rented they are not subject to normal market forces. This means that the lack of pressure from the market be compensated by pressure from the public. For this to be successful the certificates need to be used not only as a legal requirement but also as a means of communicating with the public and politicians i.e. the certificate needs to be eye-catching and easy to understand.*

*This paper strongly supports the recently accepted EU parliament amendment 94 of the EPBD recast. The idea to implement a voluntary common European Union certification for the energy performance of non-residential buildings in 2012 is something that has (since 2004) and continues to be carried out by Display Campaign participants. It is felt that this common approach will go a long way to reducing confusion and it is hoped that the gulf between Europe and its citizens be reduced.*

*Thus Energie-Cités as initiators of the Display Campaign would like to take this opportunity to promote the following points which will be essential for the success of the EPBD recast:*

- *Local authority members of the Display Campaign have gained a lot of experience so consult them instead of recreating the wheel*
- *National energy performance certificates need to be harmonised and the certificates made more attractive so that they can be used for effective communication purposes*
- *Local authorities are willing and able to continue to lead by example*

## About Energie-Cités

Energie-Cités is the association of European local authorities promoting local sustainable energy policies. From 2009 to 2011, Energie-Cités is under the Presidency of the City of Heidelberg (DE) with a Board of Directors of 11 European cities. The association created in 1990 now represents more than 1000 towns and cities in 26 countries. [www.energie-cites.eu](http://www.energie-cites.eu)

## Introduction

More than three years after the European Directive on the Energy Performance of Buildings (EPBD - 2002/91/EC) became legally binding in Member States the effects are finally being seen on the ground. However when it comes to existing public buildings, apart from the Display Energy Certificates (DEC) in England and Wales, very few national energy certificates are really being displayed. In addition, any European citizen who has been used to seeing Energy certificates for household appliances would be completely confused if they walked into a museum in different EU countries as there is absolutely no national energy certificate that looks the same or uses the same method to calculate the performance.



Figure 1 - Existing Energy Certificates for public buildings in over 10 Member States and the Display label

In 2007, as part of the ambitious EU climate and energy package which identifies the significant untapped potential for cost effective energy savings in buildings, the European Commission started the legislative process of the EPBD recast. Thanks to the constructive opinion papers from associations of local authorities such as Energie-Cités and the CEMR the central role of local

authorities in the elaboration process as well as in the implementation has been strengthened by the European Parliament's recast amendments in a legislative resolution in April 2009. Already during the initial implementation process of the EPBD the Display Campaign participants expressed their opinion during Concerted Action meetings with very little success. As far as we know it is only in France, thanks to the French Display Users Club, that local authorities played an active role in the development of the National Energy certificate and even then it was late in the process. Globally local authorities and citizens are not at all satisfied with the outcomes of the current EPBD's national transposition process.

Via this paper Energie-Cités would like to express the following:

1. Local authority members of the Display Campaign have gained a lot of experience so benefit from this instead of recreating the wheel
2. National energy performance certificates need to be harmonised and the certificates more attractive so that they can be used effectively for communication purposes
3. Local authorities are willing and able to continue to lead by example
4. National governments and local authorities be encouraged to work together and that networking processes at all public administration levels be supported. To do this they need the support of the European Commission.

## Status quo of the EPBD implementation in existing public buildings

The European Directive on the Energy Performance of Buildings (EPBD) was adopted, after a lively discussion at all levels and with overwhelming support from Member States and the European Parliament, on the 16<sup>th</sup> of December 2002 and entered into force on the 4<sup>th</sup> of January 2003.

All Member States had a period of three years in order to build up relevant systems and measures to transpose and implement the requirements. On the 4<sup>th</sup> of January 2006, the minimum requirements for energy performance were legally binding in Member States, including energy certificates.

*"The transposition of the EPBD is a real challenge for the Member States. At the end of February 2006, 3 countries had notified full transposition and 7 countries partial transposition. All 10 countries requested an extension for certification and inspection, most up to the maximum 3 years, others are phasing in gradually."* (CA-Webzine 11)

In Spring 2008, the European Commission launched a public consultation on the recasting of the Energy Performance of Buildings Directive, which closed on the 20<sup>th</sup> June 2008.

This process resulted in a number of opinion papers from various organisations including Energie-Cités contribution (see [http://www.energie-cites.eu/IMG/pdf/opinion\\_recasting\\_epbd\\_2008\\_final.pdf](http://www.energie-cites.eu/IMG/pdf/opinion_recasting_epbd_2008_final.pdf)).

The next important event in the recasting process will be in December 2009 when a common position with the Council of Ministers is expected. Hopefully in early 2010 there will be a negotiated accelerated 2<sup>nd</sup> reading agreement between the Council and the Parliament, based to a large extent on the 1<sup>st</sup> reading amendments.

The combined lack of concrete examples, pressure from the Commission to transpose and the fact that in many Member States certification systems for existing public buildings were not a priority meant that a number of Member States were forced to adapt their National system to the one used for private buildings.

## The Display Campaign

### A seed planted in 2001

In Energie-Cités' opinion (adopted on 9<sup>th</sup> October 2001) on the proposal for a Directive on the Energy Performance of Buildings [COM(2001) 226 final 2001/0098 (COD)], the association insisted on *“the necessity for those in charge of public buildings to set an example by Displaying their own energy performance”*. Energie-Cités suggested that:

- *“without waiting for the Directive to be passed, municipalities start to Display the energy performance of their buildings frequented by the general public,*
- *the experience of our network be used by the Commission to set up comprehensive and meaningful indicators for the citizens.”*

In late 2001 Energie-Cités submitted the first Display project proposal, the 30-month pilot phase started in January 2003 and the public Display Campaign launched in April 2004. Since 2005 the Campaign is co-financed by the European Commission under the Intelligent Energy - Europe Programme. From 2005 to 2007 under the project title **"Towards Class A"** and since 2008 as **\*C\*ommunicate \*Y\*our \*B\*uildings \*E\*nergy \*R\*ating (CYBER) Display** with 16 partners including De Montfort University, EuroACE, 7 cities, 4 local energy agencies and the Healthy Cities Czech Republic network.

### Objectives

The objective of the European Display Campaign was and is to accelerate the Directive's implementation and provide European municipalities with an opportunity to take a strategic approach - and be one step ahead. The Display Campaign is a voluntary scheme designed via a networking process involving municipal energy experts from towns and cities across Europe. It has provided local authorities with a rare opportunity to contribute to the development of an EU-wide toolkit used at the local level, to implement a European Directive. As a result, something pragmatic and appropriate for municipal managers has been created: this being the Display poster, the calculation tool and the unique extra – local communication campaigns to encourage behaviour change.

The Display poster was and continues (with a design review in November 2009) to be developed via a creative and participative process involving communication experts and local energy managers. It is a simple and colourful poster and has the “Towards a Class A buildings” section that encourages action from building users, managers and the public. The poster (available in 25 European languages) in the form of a high quality PDF file is produced annually using an easy to use calculation tool. The tool also allows municipal building managers to monitor the progress of their building stock. For more information please see [www.display-campaign.org](http://www.display-campaign.org).

### Achievements

Today nearly 400 local or district authorities and 20 private companies have created Display posters for over 10,000 buildings and are committed to communicate their buildings' performances. There is a database of over 100 “shining examples” of local communication campaigns and technical measures to improve one's buildings performances. Three Towards Class A Awards have taken place “celebrating” the original local communication campaigns of 30 local authorities in 12 European countries. National Display Users Clubs are now active in over 5 European Countries and in France and Switzerland they have been active for more than three years and are increasing in popularity in countries such as the Ukraine and Hungary.

In Candidate Countries or European neighbours where there is no constraint of “imminent” transposition, many of the local authorities have greater freedom and are more motivated to implement highly visible communication campaigns. This is seen in Croatia where in 2008 the municipality of Ivanić-Grad produced a poster covering the entire façade of a municipal building undergoing renovation (see Figure 2 below). In 2008 the building was rated G G G, in 2009 thanks to the renovation it is now rated D E E.



Figure 2 - A "clearly visible GGG" Display poster

Now that the EPBD has been transposed in most Member States a significant number of cities continue to use the Display poster – either for their buildings that are smaller than 1,000 square metres or as complimentary communication for their National certification systems. In some Member States, such as Finland, there is no compulsory system for existing public buildings so Helsinki is free to continue using Display. In Durham County Council they were already three years in advance when the official national system became obligatory. In this time they had been able to focus extra attention on their “G” buildings and improve the overall energy and water performance of their building stock (see Away from Class G Display Campaign shining example <http://www.display-campaign.org/rubrique571.html>). In this time the council was able to reduce the percentage of G buildings from 34% in 2004 to 11% in 2007.

In May 2009, local authority or local energy agency from 8 countries compared their National Energy Certification requirements for existing public buildings with the Display poster. For many countries this was a lot more complicated than expected and a number of participants struggled to obtain information such as simple primary energy conversion factors. This process highlighted the gulf that still exists between the national authorities responsible for transposition and the local authorities that are required to carry out the EPBD in reality and the fact that no two national systems are the same. Despite their experience in using voluntary energy Labels (i.e. Display) local authorities were not or poorly consulted during the development of the national transposition process. Even when Display Campaign representatives were invited to present their experience during Concerted Action meetings these key findings were not integrated into any national processes. It was only thanks to the significantly high number of posters already produced by French and English local and district authorities where these national authorities were compelled (lobbied) to hear the voices from the ground. Unfortunately it was late in the process and in France slight changes could be made and in England it was already too late.

## A brighter future?

### The legislation process

The European Parliament legislative resolution of 23<sup>rd</sup> April 2009 shows that some of the ideas “from the ground” from the Display Campaign experience proposed by Energie-Cités during the recast participation process are beginning to be taken seriously. The table below summarises some of the key “suggestions” from Energie-Cités’ opinion that have been taken into account in the proposal for a Directive of the European Parliament and of the Council on the Energy Performance of Buildings (recast).

<b>Energie-Cités’ opinion on the recasting (June 2008)</b>	<b>Proposal for a Directive of the European Parliament and of the Council on the Energy Performance of Buildings (recast) (April 2009)</b>
Involve local authorities during the development of the national certification process – local energy managers have a wealth of knowledge and they are ultimately the people that have to implement national laws on the ground, thus ensuring ex-ante acceptance of these measures.	<i>Adopted amendment 20 Proposal for a directive Recital 21 a</i> Local and regional authorities are critical for the successful implementation of this Directive. Their representatives should be consulted on every aspect of its implementation at national or regional level. <i>Amendment 100 Proposal for a directive Article 4 - paragraph 1</i> When setting requirements, Member States shall consult public authorities and other relevant stakeholders
Use primary energy as this represents real consumption and can influence building managers to choose cleaner, decentralised and more efficient energy sources to improve their overall building performance.	<i>Amendment 35 Proposal for a directive Article 2 - point 3</i> "energy performance of a building" means the calculated or measured amount of energy needed to meet the primary energy demand associated with a typical use of the building, expressed in kWh/m <sup>2</sup> per year,
For existing public buildings one needs to have a common European methodology	<i>Amendment 94 Proposal for a directive Article 10 – paragraph 7 b</i> By 2011, on the basis of information received from Member States and in consultation with the relevant sectors, a voluntary common European Union certification for the energy performance of non-residential buildings shall be developed through the Committee procedure referred to in Article 21. By 2012, Member States shall introduce the European Union voluntary certification system referred to in paragraph 1 in their countries to function alongside the national certification scheme.
Calculate the performance of buildings of all sizes (including those <1,000 m <sup>2</sup> )	<i>Amendment 65 Proposal for a directive Article 12</i> Member States shall take measures to ensure that where a building is occupied by public authorities or where a building with a total useful floor area over 250 m <sup>2</sup> is frequently visited by the public the energy performance certificate is displayed in a prominent place clearly visible to the public.

**Display Campaign Cities at your service**

Display Campaign participants are more than ready to help their Countries/States in the implementation of the current EPBD Directive and prepare them for the challenges of the recast. They feel that with their experience in the only existing pan-European Campaign, they are in a unique position to offer advice to the Commission in the development of the voluntary common European Union certification for the energy performance of non-residential buildings. They are convinced that the European Union certification be developed using a participatory and bottom up process and that the system of Users Clubs meetings both at a National and European level are the best way for local authorities to meet and discuss their experiences. At these meetings it is very important that the people responsible for the transposition of the EPBD are present and that local authority representatives are represented by elected members, communication departments and technicians.

As this voluntary common European Union certification will be placed alongside the national system it is also felt that the Concerted Action could be used to harmonise the national certification system and especially improve the communication aspect of certificates in existing public buildings. Here once again the experience of the Display Campaign could be used. The recast of the Directive could also provide the opportunity for Member States to harmonise their certification systems as when they are obliged to make changes imposed by the recast they will be able to make broader scale changes too.

## Conclusion

### Communication

One of the main roles of a directive is to bridge the gap between Europe and its citizens. Local authorities can play an important role in this process but in order to do this they require simple and clear tools such as energy certificates. When it comes to producing energy certificates in public buildings the role of communication is critical as these buildings are rarely sold or rented. Thus there needs to be transparency from the public sector i.e. they display an energy certificate to allow for the public to create its own “market force” to stimulate change. In addition public pressure is not going to be created only if they see an energy certificate once. Dynamic and participative local communication campaigns are thus required to allow them to understand the importance of efficient buildings and ultimately be linked to the overall objectives of the EPBD – improving the energy performance of buildings in Europe.

### Leading by example

Thanks to the Display Campaign local authorities continue to be at the forefront of Energy Certification and go beyond the EPBD recast requirements as they not only “display” their Buildings' performances but also organise original and dynamic local communication campaigns to encourage local citizens to be involved in the energy consumption reduction of public buildings in Europe. Many of the Display Campaign cities have already signed the Covenant of Mayors and are using Display as one key action in their 2020 Sustainable Energy Action Plan thus leading to a reduction of at least 20% in the CO<sub>2</sub> emissions.

### A creative and participative bottom up process

The transpositions of directives are often very “top down” or centralised. It is very important to note that the structures involved in actually carrying out directives on “the ground” be involved in a bottom up participative process that is not solely a technical and administrative process but involves creativity. The Display Campaign provides a chance for many local authorities to prepare for the EPBD and even go beyond the expectations of the EPBD by initiating dynamic local communication campaigns with European citizens. The success of these local campaigns is due to the creativity and originality of each local authority.

## **Networking**

It should also be stressed that national governments and local authorities be encouraged to work together and that networking processes at all public administration levels be supported. To do this they need the support of the European Commission.

## **Strong support for the recent EU Parliament amendment n°94**

Any European citizen who has been used to seeing energy certificates for household appliances would be completely confused if they walked into a museum in different EU countries as there is absolutely no national energy certificate that looks the same or uses the same method to calculate the performance. Display Campaign participants with over 5 years of experience in carrying out a European voluntary public building labelling system thus strongly support the EU parliament amendment 94 of the EPBD recast to implement a voluntary common European Union certification for the energy performance of non-residential buildings in 2012.

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