

# **EDF statement on the Commission Roadmap for the revision of the Directive on Energy Performance of Buildings (2010/13)**

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## Introduction

The EU Directive on Energy Performance of Buildings (EPBD) has been in force since 2010. After the publication of the EU’s “Green Deal” strategy to reduce carbon emissions, several initiatives were proposed on how to achieve this reduction, namely by renovating buildings and making them more energy efficient. This initiative is called the “Renovation Wave” and the revision of the EPBD is one of the concrete actions to achieve the EU’s goal.

Disabled Persons’ Organisations have demanded from the very start that any action under the “Green Deal” needs to be inclusive of persons with disabilities and that accessibility is a key aspect of sustainability. This is especially true for construction and renovation of buildings and infrastructure. With the revision of the EPBD it is therefore important that when renovations are planned and financed, accessibility is automatically included. This will ensure that the buildings are “future proof” – with an ageing population, there will also be more persons with disabilities that require accessibility.

Including accessibility in renovations now is more expensive, but it is in fact an investment. Including accessibility from the planning and concept phase reduces costs and leads to a better outcome.[[1]](#footnote-1)

We are replying to the Commission’s consultation on the Roadmap to ensure that the vision is inclusive and accessibility will be part of the renovation strategy and this Directive in particular because **sustainability is not just about energy efficiency!**

## Why the EPBD is relevant for persons with disabilities

Considering that almost 100 Million persons with disabilities live in the EU plus the even greater number of older persons, which will increase in the coming years, accessibility must be a priority. Making buildings accessible from the beginning or as part of a bigger renovation project is less costly and should be routine procedure. Accessible buildings do not have any negative impact on persons without disabilities so why not make all buildings accessible?

Separate solutions to ‘fix’ accessibly are more expensive and unsustainable. Including accessibility from the planning and concept phase reduces costs and leads to a better outcome. While renovation is still relatively more expensive than accessibility in new buildings, there will still be economies of scale and the opportunity cost of doing a “complete” renovation instead of several small ones.

The Structural Funds Regulations already have the obligation to ensure accessibility – the EU must include the same provisions in the EPBD. Most importantly, no EU funding should be spent to create new inaccessible buildings and infrastructure.

There are different dimensions of the EPBD that have to be addressed:

1. First of all, persons with disabilities are consumers, tenants, and landlords among others that use the buildings. They often spend disproportionately more time in their homes, resulting in higher energy use. The additional cost of using electricity-powered medical equipment, mobility devices, or assistive devices can increase energy cost as well. Not all persons with disabilities are automatically “vulnerable” but they can be, especially financially. This puts them at higher risk of energy poverty. Living in badly insulated and low efficiency housing exacerbates this risk.
2. But in a second instance, energy efficiency is not the only thing that has to be considered to increase sustainability of the building stock. Accessibility of the housing is equally, if not more important to ensure that the buildings we renovate now will be “future proof” and still be usable in 10, 20, or 30 years’ time. With an ageing population the amount of persons who will require accessible housing and buildings is only increasing. Therefore, considering accessibility now when we are also making buildings more energy efficient is crucial.
3. Thirdly, the design of the buildings and the use of construction material to increase energy efficiency also has to make the building more accessible and safe and not obstruct accessibility. The use of different types of flooring material can for example make it more difficult to circulate with wheeled mobility devices such as wheelchairs. But the choice of flooring also affects acoustics which is crucial for persons who are deaf or hard of hearing, or for blind persons that need tactile walking surface indicators for orientation. Therefore, the entire construction sector needs to be adequately trained to be aware of the consequences of those choices.
4. Fourthly, while buildings are also vulnerable to the impact of climate change, this affects persons with disabilities directly. If the risk of flooding, earthquakes, or other natural disaster increases for example, safe and accessible evacuation is crucial. This needs to be taken into account as well.
5. There is currently also a lack of incentives to renovate sustainably and accessibility is still considered a “luxury” which is expensive. Incentives both financial as well as regulatory (e.g. easier application procedure for building renovation related to accessibility and sustainability) should be given at EU, national, as well as regional and local level.
6. On top of the lack of incentives, there is already a lack of compliance with existing rules, even when there are rules on built environment accessibility (here is a very recent example: <https://www.brusselstimes.com/all-news/belgium-all-news/118299/147-buildings-tested-for-accessibility-in-flanders-all-fail/> )
7. Last but not least: making buildings accessible is an obligation under the UN Convention on the Rights of Persons with Disabilities (CRPD) which has been ratified by all EU Member States as well as the EU itself.

## Recommendations

* **Including accessibility in renovations now saves money later**. When investing in renovation particularly the long-term usability and sustainability should be considered. Only looking at one aspect of sustainability is not enough, if money is invested now in making buildings more energy-efficient, they should also be made more accessible. Otherwise resources are wasted if a second “renovation wave” has to be done in a few years to improve other aspects of the building, such as accessibility. It is more resource and time efficient to do both at the same time.
* A “**building renovation passport”** should include a mandatory section on accessibility and “future proofing” buildings in light of the demographic change
* **Use and choice of construction material** must also take into account accessibility for persons with disabilities. For example, flooring material such as carpets or rugs, etc. must consider persons using walking frames, or wheeled mobility devices but also the effect on acoustics is important for persons who are deaf or hard of hearing. EN 17210 can provide guidance on materials for ensuring accessibility of building interiors for example.
* A “**Deep Renovation” Standard** has to be aligned with existing European and International Standards on accessibility of the built environment such as EN 17210 and ideally have a specific section on accessibility requirements for renovated buildings.
* **Clear legal requirements** will drive building renovation in a more efficient way. There is urgent need for coherent EU rules on accessibility of buildings, to ensure a harmonised approach to accessibility and concrete action across the Union, making all new and existing public buildings, including public housing, accessible.
* There should also be **incentives and quotas** for private buildings. Strong EU legal requirements must be supported by robust funding and enforcement mechanisms.
* All **public funding from Member States and EU must set accessibility as a requirement**. If a residential building or hospital is being renovated to improve its energy efficiency, accessibility of the building should be ensured as well. Otherwise, the building will become not usable for millions of people in the near future, given increasing numbers of persons with disabilities and older persons in Europe. Additionally, targeted funding for accessibility improvement would also be useful. In any case accessibility’s improvement should be included among the eligible costs of EU funding of the improvement of energy performance of buildings.
* Sufficiently high **quotas for accessible private and public housing stock** should be mandatory in all EU Member States. New or renovated housing should be constructed to be accessible from the beginning. Accessibility is an asset to make housing “future-proof” in an ageing society and will increase its demand. Residents will be able to stay in their homes for longer and live more independently. Accessibility is essential for persons with disabilities and beneficial for larger society (e.g. step-free access to or lift in a building is vital for a wheelchair-user but also helpful for parents with strollers).
* **Building skills and capacity of public authorities and professionals** should include expertise on accessibility. Only with comprehensive knowledge can the project be successful and not risk of wasting resources by neglecting accessibility during renovation. Accessibility must be done correctly by experts on the subject. Authorities must also have at least basic understanding of accessibility, its importance and ways to improve it during renovation.

* Policy priorities and funding should continue increased focus on improving accessibility of buildings during **post-Covid-19 recovery**. Accessible infrastructure can in addition support public health measures: for example, automatic doors will ensure greater access for many persons with disabilities but also help reduce transmission of virus through door handle surfaces in case of coming pandemic waves
* **Public procurement** is key to achieve the goal of more sustainable buildings. According to EU procurement rules, accessibility is already one of the criteria that has to be fulfilled. However, lack of practical guidance and monitoring has led to a situation which is not transparent and it is not clear, in how far the rules on public procurement are being applied correctly as regards accessibility. Therefore, active support of the authorities in the implementation of the rules is very important, together with the other factors highlighted above.

## Conclusion

Accessibility for 100 million persons with disabilities is not a small aspect of sustainability. It is a key aspect of making buildings more sustainable! Wasting resources by investing primarily in energy efficiency and then being forced to retro-fit and start a new renovation wave in a few years to make the same buildings accessible does not make sense. Therefore, accessibility must already be considered an integral part of the revised EPBD to ensure that the buildings are future-proof once and for all

## Related EDF publications

* EDF position paper: “[An inclusive Green Deal for Europe](https://www.edf-feph.org/publications/eu-green-deal-2/)”

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1. “Barrierefreies Bauen im Kostenvergleich”, Terragon Wohnbau and the German Network of Municipalities and Cities (Deutscher Städte und Gemeindebund), 2017 [↑](#footnote-ref-1)