



Ms Eva Hoos, Policy Officer, Renewables and Energy System Integration Policy Unit (ENER.C.1), Directorates C Green Transition and Energy System Integration, Directorate-General for Energy, European Commission.

Mr. Stefan Moser, Head of Unit, Buildings and Products Unit (ENER.B.3), Directorate B Just Transition, Consumers, Energy Efficiency and Innovation, Directorate-General for Energy, European Commission.

Brussels, 23rd April 2021

Dear Ms Hoos,

Dear Mr. Moser,

The European Ventilation Industry Association (EVIA), the European Copper Institute (ECI) and the European Association for Wastewater Heat Recovery (euroWWHR) are writing to you in the context of the upcoming proposals for revision of Directives (EU) 2018/2001 on the promotion of the use of energy from renewable sources, 2012/27/EU on energy efficiency and 2018/844/EU on the energy performance of buildings, to invite the European Commission to an open dialogue on the recognition of energy recovery from ventilation and wastewater systems in buildings as a renewable energy technology and their potential as a contributor to delivering the necessary efficiency gains and emission reductions in the built environment. Given the European Commission's intention to publish the proposals for revision at different moments this year, we would appreciate opening such a dialogue at your earliest opportunity.

Our associations are persuaded that, in light of the concerted effort required to reduce emissions by at least 55% by 2030 and to subsequently attain climate neutrality by 2050, an integrated approach towards buildings, drawing on the synergies between these key pieces of legislation, is imperative. The transition to renewable energies is central to the EU's climate neutrality pledge.

However, an approach that omits to recognise important technologies using ventilation energy recovery (with or without heat pumps) and wastewater heat recovery would not be technologically neutral and would be a barrier rather than an accelerator in this respect, with repercussions on the overall energy performance of buildings.

The definitions provided for in the RED exclude ventilation energy recovery and wastewater heat recovery by categorising them as waste heat technology. In our view, this approach is incorrect. We believe that the European Commission should adopt a primary energy approach as a basis for determining the renewable energy contribution from different technologies in analogy with the heat pump principle already implemented in the current regulation. In our view, an extended primary energy-based coefficient of performance would enable a fully technologically neutral calculation of the renewable share and would provide transparency in reporting and recalculation when needed, as well as clarity in policymaking. Therefore, the list of definitions in the RED and the EED should encompass heat and cold recovered from ventilation and wastewater in all buildings, which would then be factored in energy performance calculations in the EPBD.

The recognition of ventilation and wastewater heat recovery as a renewable energy technology in the RED would de facto increase energy efficiency simply because it would cover the primary water and

space heating and cooling demand by renewing what would otherwise be lost as waste heat/energy. Bearing in mind the centrality of heating and cooling in decarbonisation efforts and the sector's unflinching commitment, the recovery of heat and cold from indoor air in buildings merits to be one of the available paths to reduce energy consumption. Statistically, less than 5%¹ of buildings in the EU are equipped with ventilation energy recovery systems. Thus, recognising the potential of this simple measure would contribute significantly to reaching the EU's climate goals and incentivise consumers to opt for such a system.

Every day, more than 22 million m³ of hot water are consumed by European homes, accounting for 495 TWh final energy per year. It is the main source of energy consumption for new housing, and yet 80% of this heat ends up in sewers and is wasted. Considering 80% of hot water is used in showers, harvesting heat from shower drains in buildings could be a simple and cost-effective way to save at least 40% of wasted energy and related CO₂ emissions. The revision of European legislation should define the best route to acknowledge the full potential of the system, e.g. by defining recovered wastewater heat as a renewable source of energy and take its contribution into account in energy performance calculations, as well as in improving recommendations in Building Renovation Passports (BRPs).

We recognise that the implementation will require a harmonised methodology to be established for calculating energy recovery performance and contribution and suggest that delegated powers are bestowed on the European Commission in the revisions in this regard. Our associations stand ready to fully support the development of the calculation methodology. We would therefore like to organise an online meeting to elaborate on the most efficient way forward.

We would like to thank you in advance for your attention and we look forward to hearing from you soon.

Kind regards,

Mr. Russell Patten
EVIA Secretary General



Mr. Bernard Respaut
ECI Chief Executive



Mr. Hugo Durou
EuroWWHR president



¹ Review study on the Ecodesign and Energy Regulations on ventilation units (ENTR Lot 6), Phase 1.1 and phase 1.2, Final Report, Task 2 Markets, fig. 2 Residential and fig. 3 Non-residential, <https://www.ecoventilation-review.eu/downloads/Ventilation%20Units%20TASK%202%20Final%20Report%202020-09-10.pdf>



About EVIA

The European Ventilation Industry Association ([EVIA](#)) was established in Brussels in July 2010. EVIA's mission is to represent the views and interests of the ventilation industry and serve as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States.

Our membership is composed of more than 40 member companies and 6 national associations across Europe realising an annual turnover of over 7 Billion Euros and employing more than 45,000 people in Europe.

EVIA aims to promote highly energy efficient ventilation applications across Europe, with high consideration for health and comfort aspects. Fresh and good indoor air quality is a critical element of comfort and contributes to keeping people healthy in buildings.

About ECI

The European Copper Institute ([ECI](#)) is the voice of the International Copper Association (ICA) in Europe. The International Copper Association, with its 35 members, represents a majority of the world's primary copper producers, some of the largest mid-stream smelters/refiners, and 10 of the world's largest copper fabricators. It aims to bring together the global copper industry to make a positive contribution to the UN sustainable development goals and to support markets for copper.

About euroWWHR

Since 2018, the European association for wastewater heat recovery ([EuroWWHR](#)) gathers inventors, manufacturers and distributors that all have in common the thrive for durability.

All waste water heat recovery systems sold by members of the association have been tested by an independent laboratory and meet EU and national water safety codes.