Brussels, 15th March 2022.

Joint letter from the French, Czech and Swedish solar shading industry to demand for a better recognition of solar shading in the Energy Performance of Building Directive recast 2022

Dear Members of the European Parliament,
Dear Commission,
Dear Council of the European Union, from which our countries will successively take the rotating EU Presidency,

We would like to share our concerns about the urgent need to raise the level of ambition of the Energy Performance of Building Directive by integrating solar shading. Futureproof buildings are in desperate need for energy efficiency, it is time to make solar shading mandatory part of the European Energy Performance of Buildings Directive.

The building sector is one of the main emitters of greenhouse gases. The EPBD, in line with the objectives of the Green Deal, should make it possible to give members states the essential tools to achieve carbon neutrality by 2050. Climate change effects, such as higher temperatures and heatwaves, are increasing the need for cooling in buildings, not only in the southern countries of the European Union. In order to avoid a rush to install air conditioning units, which would only increase the emission of greenhouse gases and thus global warming, the energy efficiency first principle must be respected. Solar shading must be considered prior to the installation of an air conditioning system. This to avoid further energy consumption with electricity peak load issues but also as their use creates new greenhouse gas emissions, and especially in cities will increase the heat island effect.

A new Guidehouse study, focused on the Green Deal pathway towards 2050 (see French, Czech, Swedish), has once again confirmed the potential of solar shading to help decarbonizing the European building stock. It shows that by 2050, automated solar shading, as it doesn't use energy, can reduce the energy consumption in buildings by 60%. Solar shading is a cost-effective investment as it reaches 285 billion € accumulated savings from 2020 till 2050 (14,6 billion €/year in 2050) compared to installing active space cooling. Finally, installing solar shading in all buildings which need cooling will avoid up to 100 million tonnes of greenhouse gas emissions from now to 2050, which is equivalent to reducing the annual CO_2 emission of 22 million cars!

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Today, the first "fuel" is energy efficiency and this principle is key for the EPBD to comply with the GHG mitigation objective. Solar shading is an essential contributor to the "energy efficiency first" strategy and should always be applied first to achieve the reduction of both cooling and heating energy consumption. Solar shading is essential for all new buildings to be Zero Emission Buildings (ZEB) after 2030.

We urge the MEPs, as well as our respective governments, who will have a major role to play in the recast of the EPBD to:

- Apply energy efficiency first in all relevant Green Deal legislation (EPBD, EED...)
- Make solar shading mandatory before applying active cooling (AC) in new and renovated buildings
- Integrate solar shading into Technical Building Systems (TBS) in the article 2 of EPBD
- Recognize automated solar shading as a Building Automation and Control System (BACS)

See further our recommendations on the EPBD recast in attached document (position paper added).

We thank you for your attention and are available for more information.

Sincerely yours

Ann Van Eycken
Secretary General of ES-SO

The three associations are a member of ES-SO, European Solar Shading Organisation

ES-SO is a not-for-profit organization to Belgian Law (ES-SO vzw) established in Brussels. It is the umbrella organisation of the professional solar shading associations in the European member states. Dynamic solar shading is a low carbon emission technology designed and manufactured in Europe. The industry consists of thousands of small to medium-sized companies, employing more than 450,000 people across the member states and generating annual sales of over € 22 billion.

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