

# Dear member of parliament

We write you to ask the parliament to incorporate regulation of whole life carbon in the EPBD, and to ask for your support to the rapporteur Mr. Cuffe's current amendments.

Buildings account for 40% of the GHG emissions in EU, and approximately a third of this is embodied in the materials. This share is expected to rise as we tighten the regulation of operational emissions, and so does the need to introduce regulation of Whole Life Carbon (WLC).

The current revision of the Energy Performance of Buildings Directive is an important part of the 2030 goals of EU and happening in a crucial time of the fight against climate change. If we don't incorporate regulation of WLC in this revision, it will not be possible to secure reductions before 2030 in all life stages of buildings, and the construction sector remains without foreseeable thresholds for its emissions for another decade.

The commission has proposed to implement calculation of WLC, which the Council has not changed in their position, but we believe it's important to take the next step. In ITRE, the lead committee of the parliament, the draft amendments of Mr. Cuffe are not yet passed, but has gained support from ENVI. It is important that ITRE and the parliament carry out the efforts to add thresholds. To ensure an implementation of WLC regulation in the current revision, we advise you to support the amendments, of which the most important are:

## **Amendment 111**

### **Article 7 – paragraph 2 a (new)**

By 31 December 2026, the Commission shall adopt a delegated act in accordance with Article 29 to supplement this Directive by setting out a harmonised methodology for the calculation of lifecycle GWP, developed in an inclusive stakeholder process and building on the LEVELs framework, as well as the EU-wide Life-carbon Roadmap and the Bill of Materials.

## **Amendment 115**

### **Article 7 – paragraph 4 c (new)**

Member States shall set limits for life-cycle GWP of new buildings that decrease every five years, by 2030 based on the harmonised methodology at Union level.

## **Amendment 117**

### **Article 8 – paragraph 2 a (new)**

Member States shall ensure that the life-cycle GWP is calculated in accordance with Annex III and disclosed through the energy performance certificate of the building:

(a) from 1 January 2027, for all buildings undergoing major renovation;

(b) from 1 January 2030, for all buildings that are being issued Energy Performance Certificates.

## **Amendment 220**

### **Article 25 – paragraph 1 a (new)**

As part of that review, the Commission shall assess the adequate level and timeline of reduction targets for the EU building stock life-cycle GWP based on the harmonised methodology.

Kind regards,



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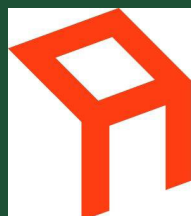
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