

Statement of the Republic of Croatia
on the draft general approach proposal for the Energy Performance of Buildings Directive
(recast)

Croatia considers it necessary to point out that the EPBD recast proposal should clearly reflect that the goal of the EPBD is to achieve decarbonized national buildings stocks with a view to achieving zero-emission building stocks by 2050, since each building cannot be renovated to reach the zero-emission buildings standard.

Croatia reiterates that the provisions on MEPS for non-residential buildings in Article 9 do not encompass enough flexibility for Member States to determine their own priorities of renovation. Croatia does not bring into question the ambition of the MEPS for non-residential buildings in Article 9 but stresses that the proposed implementation method is inadequate for Croatian specific circumstances. After devastating earthquakes in 2020 Croatia is focused on comprehensive and deep renovations that include energy renovation of buildings, but also the structural renovation and improvement of seismic resistance of buildings. Comprehensive renovations are several times more expensive and more complex, but the resulting energy savings and emissions reductions are the same as if only the energy renovation was performed. For this reason, Croatia has repeatedly proposed the introduction of an alternative approach to MEPS for non-residential buildings (following the principles of the trajectory approach for residential buildings) which would allow for adapting of the renovation priorities to national circumstances without any lowering of the ambition.

Croatia also points out that the definition of deep renovation from Article 2 is not based on clear energy-saving foundation and it allows for unfair awarding of favourable financing conditions to renovations that in essence are not deep renovations.

Croatia does not oppose provisions of Article 12 on sustainable mobility for new buildings but believes that the provisions for existing buildings are too demanding and hardly implementable.