



Infrastrukturdepartementet
i.remissvar@regeringskansliet.se
ie.remissvar@regeringskansliet.se
katarina.bandel@regeringskansliet.se
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Review of the Proposal for a directive of the European parliament and of the council on the energy performance of buildings

BIL Sweden hereby wishes to comment on the proposal for a directive of the European parliament and of the council on the energy performance of buildings (EPBD). As our main area is transport, we will only be commenting on the parts of the directive concerning charging infrastructure.

BIL Sweden has developed roadmaps for how the vehicle fleet can meet high global and domestic requirements and targets for reducing carbon dioxide emissions, but the outcome also depends on factors that the car industry cannot control. To meet EU's legal requirement, the CO₂-emissions from passenger cars must be reduced by 37,5 per cent by 2030, compared with 2021. The targets are currently being revised and proposed to be 100% by 2035. The automotive industry can, and will do, its part to meet these targets. But our industry cannot control such factors as charging infrastructure which is important, and needed, to meet the targets.

40 per cent of the Swedish household lives in private houses. It is mainly households living in private houses that have the possibility to install a charging box at home and charge their electric vehicles overnight, which is the most common way of charging electric vehicles and therefore most important. But for 49 per cent of the Swedish households who live in apartment buildings, it is not at all certain that they have access to home charging. This depends entirely on what parking options are nearby and whether the person or company decides over the parking surface has agreed to prepare charging possibilities. Due to that so many households in Sweden do not have access to home charging and that by 2030 and 2045 we have great ambitions to increase the electrification in the transport sector, the union must rapidly start promoting at-home charging options and to enable the shift to electrification.

Summary

BIL Sweden welcomes a revision of the EPBD directive as a part of the "Fit for 55" package with the vision for achieving a zero-emission building stock in the European Union by 2050. By 2045, almost all cars will be electric or plug-in hybrids. It will therefore be particularly important to try to meet the need for electric car charging for residents in apartment buildings, as this is a great challenge compared to the households living in private houses. Unless this group has access to reasonably comfortable electric car charging, they will never choose an electric car. For this scenario, we think that a comprehensive preparation for charging infrastructure is important, in terms of pre-cabling. Another important step in enabling a rapid transition to electrified transports is the "right to plug" in residential buildings.

Proposal

(36) The role of electric vehicles in decarbonization

BIL Sweden agrees that electric vehicles can play a crucial role in the decarbonization by providing flexibility to the electricity grid and that this potential should be exploited, but within what is acceptable without interrupting the guarantee from the vehicle manufacturer.

(37) Removal of barriers

BIL Sweden agrees that member states should remove any type of barriers which individual owners encounter when trying to install recharging points at their parking space.

(38) Pre-cabling

BIL Sweden agrees that pre-cabling for charging infrastructure in newly built and renovated buildings will decrease the cost of installation of charging points for individual owners. It is also a good way to promote

electric vehicles to those who haven't yet decided to choose an electric car as their next car. But we would like to see a detailed definition of the word pre-cabing. Does it mean actual cables, or does it mean preparing with empty pipes? BIL Sweden would like to see separate definitions for the two techniques by using the words "pre-cabing" and "pre-piping".

(39) Smart Charging and bidirectional charging

BIL Sweden agrees that smart charging and bidirectional charging functionalities should be ensured and available already today. This type of technology would enable us to create better conditions for the electric vehicles and their owners, while at the same time reducing the load on the electricity grid if necessary.

Article 2

1. BIL Sweden suggest broadening of the definition of the word "Building" to include all roofed constructions having walls.

Article 12

1. Even residents in smaller buildings will in the future drive electric vehicles. Therefore, the requirements should not only be set for buildings with more than five parking spaces, but for all new buildings and buildings undergoing major renovation regardless of the number of parking spaces.

(a) The installation of at least one charging point is not enough. BIL Sweden proposes that at least 10 per cent of the parking spaces should be equipped with charging points.

(b) BIL Sweden proposes to define the word pre-cabing in detail. We propose to also add a definition for pre-piping, without cables, which should be available for every parking space.

BIL Sweden proposes a minimum charging effect of at least 1,4 kW (1-phase 6A) for charging stations and for dimensioning the pre-cabing in new buildings and buildings undergoing major renovations.

2. To require installation of at least one charging point for every ten parking space for all non-residential buildings with more than twenty parking spaces is not enough. The requirement should be set for all non-residential buildings, regardless of the number of parking spaces. In case of buildings owned or occupied by public authorities, BIL Sweden proposes pre-piping for all the parking spaces.

4. The requirements should not only be set for buildings with more than three parking spaces, but for all new buildings and buildings undergoing major renovation, regardless of the number of parking spaces.

(a) BIL Sweden agrees that all parking spaces should be prepared for charging points. At least 60 per cent of the parking spaces should be prepared with pre-piping, 20 per cent should be prepared with pre-cabing and at least 20 per cent of the parking spaces should be equipped with charging points.

BIL Sweden would like to propose a minimum charging effect of at least 1,4 kW (1-phase 6A) for charging stations and for dimensioning the pre-cabing in new buildings and buildings undergoing major renovations.

6. BIL Sweden agrees that the above recharging points should be capable of smart charging and, where appropriate, bidirectional charging.

7. BIL Sweden agrees that member states should encourage operators of non-publicly accessible recharging points to operate them in accordance with article 5(4) of AFIR where applicable.

8. BIL Sweden agrees that member states shall provide measures to simplify the deployment of recharging points in new and existing residential and non-residential buildings and remove regulatory barriers, such as permitting and approval procedures and the need to obtain consent from the landlord or the co-owners for a private recharging point for own use, so called "right-to-plug".

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Mazdak Haghanipour
BIL Sweden