

TIC Council recommendations for improving inspections for the Energy Performance of Buildings

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Introduction

TIC Council welcomes the Commission's proposal for revising the Energy Performance of Building's Directive (EPBD). We warmly support the introduction of renovation passports, as well as the provisions to make more robust the Energy Performance Certificates (EPCs) and inspections on heating, ventilation and air-conditioning systems. We consider that the EPBD can play an important role in reducing emissions together with the revision of the Energy Efficiency Directive.

Proper inspection of buildings is crucial for the successful implementation of the Directive. They enable consumers, investors, constructors, communities, and authorities to take informed decisions. They are also necessary for ensuring the renovation of buildings based on their actual energy performance (article 9).

Currently, we encounter diverse levels of quality and independence in the inspections for EPCs. We consider that inspections of buildings and the recognition of qualified experts and inspection bodies could follow a single set of minimum criteria that would ensure their impartiality and technical expertise throughout the EU.

Set minimum requirements for inspections

We recommend setting further minimum requirements for the inspections (article 16.3 and 20) besides the onsite visit. This could include the inspection of building isolation systems, an analysis of building energy consumption, an inspection of building heating, air conditioning and ventilation equipment, as well as an assessment of the building's energy management systems.

Ensure the impartiality and technical expertise of all inspectors through accreditation

We recommend requesting the accreditation of all conformity assessment bodies and individual experts (article 22). Equally, we recommend that inspections for EPCs should be conducted by accredited inspection bodies and not by qualified or certified experts (article 22.2).

Inspection is a conformity assessment activity. Accreditation covers the demonstration of competence, impartiality and consistent operation of inspection bodies, including single-person-organizations.

According to Regulation 765/2008 and the [EU's Blue Guide](#), accreditation is the standards-based activity to ensure and attest that conformity assessment bodies have the technical competence to perform their duties as is required by the relevant regulations and standards.

Accreditation assesses the technical competence, reliability and integrity of conformity assessment bodies. It does this through a process of transparent and impartial evaluation against internationally recognised standards and other relevant normative documents with applicable requirements.

Regulation (EC) No 765/2008 obliges national accreditation bodies to verify that conformity assessments are carried out in an appropriate manner and that account is taken of the size and structure of undertakings and the degree of complexity of the product technology in question and the nature of the production process.

Therefore, we recommend all companies are accredited. Equally, independent experts shall be accredited as single-person inspection bodies (legal entities) to ensure that their accreditation requirements are adjusted to their size, without compromising the controls on their impartiality and competence.

Particularly, all inspectors should demonstrate impartiality from the organisation whose buildings are accredited. As such, they should not be employed as in-house experts.

Entrust conformity assessment bodies for independent control systems

We recommend that accredited conformity assessment bodies would be used by the Member States who wish to delegate the responsibilities of the independent control systems to non-governmental bodies (article 24.2).

This would ensure a higher impartiality of controls than the existing provision requiring third-party verification only for the evaluation of 25% of controlled buildings (Annex VI).

TIC sector's contribution to EPBD

The TIC sector views are based on our long experience with EPBD's implementation, including inspections for the delivery of EPCs. Moreover, the sector conducts audits, design review, inspections, technical controls, diagnostics, as well as the certification of management system regarding their environmental, energy and facility management aspects. The sector also conducts testing and certification of construction products, as well as the verification of greenhouse gas emissions and carbon footprints.

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TIC Council is a global association representing over 90 international independent third-party testing, inspection, certification and verification organisations. Testing, Inspection and Certification (TIC) companies cater to a diverse range of industry sectors and a variety of standards and legislation. The industry represents an estimated one million employees across the world with annual sales of approximately USD 200 billion. For further information please see the [Report on the TIC sector](#).