Position Paper
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EUMEPS considerations: National Building Renovation Plans under the Energy Performance of Buildings Directive (EPBD)

EUMEPS strongly supports the European Commission's commitment to achieving a climate-neutral building stock by 2050. Renovating Europe's building sector offers significant opportunities for both environmental and economic improvements, especially when considering the integration of energy-efficient materials such as Expanded Polystyrene (EPS). We believe that national building renovation plans (NBRPs) are key to achieving these goals, and we urge the European Commission and Member States to focus on the following priorities to ensure a successful implementation of the EPBD:

1. **Thermal Improvements of Building Envelopes**
   National renovation plans must ensure that the thermal performance of building envelopes is given sufficient attention. Improving the insulation of buildings, particularly through the use of EPS, is the most effective way to reduce energy consumption and greenhouse gas emissions. It is essential that these plans prioritise insulation measures before transitioning to alternative heating sources.

2. **Energy Efficiency as the First Fuel**
   Energy efficiency must be considered the primary solution to meeting the EU's climate goals. The cleanest and cheapest energy is the one that is not used. Therefore, the NBRPs should prioritise energy-saving measures such as building envelope renovations, as they provide both immediate environmental and economic benefits.

3. **Multiple Benefits of EPS Insulation**
   EPS offers numerous advantages, including:

   - **Energy Security**: By improving the thermal efficiency of buildings, EPS reduces dependency on imported energy, contributing to energy security.
   - **Electricity Grid Stability**: Reduced energy demand helps prevent peak loads that could strain local electricity grids.
   - **Prevention of Energy Poverty**: Well-insulated buildings reduce heating costs, helping to alleviate energy poverty, particularly among vulnerable populations.
   - **Health & Comfort**: Better insulation leads to improved indoor comfort, contributing to better health and well-being for building occupants.
   - **European Value Chains**: EPS production is based entirely within Europe, supporting local economies and ensuring sustainable, low-carbon supply chains.
   - **Cost efficiency:** Insulating with EPS is the cheapest option of all insulation materials. Additionally, it boasts one of the lowest thermal conductivity values on the market, further enhancing its efficiency. These advantages make the return on investment significantly faster compared to other insulation options.

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- **Recyclability:** EPS is made up of 98% air and 2% polystyrene, making it fully recyclable. Its recycling process is widely practised across the EU.

4. **Commitment to Low-Carbon Targets**
   EUMEPS urges that national renovation plans set ambitious, yet achievable, milestones for while-life-carbon reduction. EPS is a low-carbon material that can play a key role in helping to meet these milestones, and we recommend further reductions in the overall life-cycle carbon targets for renovation plans, focusing on the use of low-carbon materials such as EPS.

Conclusion

The renovation of Europe's building stock is essential for achieving both climate neutrality and a stable, sustainable economy. EUMEPS is committed to supporting the implementation of the EPBD through the promotion of energy-efficient insulation materials, particularly EPS. By prioritising building envelope renovations, fostering innovation, and setting ambitious carbon reduction targets, national renovation plans can drive economic recovery, improve living conditions, and help the EU achieve its climate goals.

EUMEPS stands ready to work with the European Commission, Member States, and other stakeholders to further discuss these and other aspects of the EPBD and contribute to the success of the EU's building renovation initiatives.

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About EUMEPS

EUMEPS, the unified European voice of the Expanded Polystyrene (EPS) industry, is the premier advocate for EPS solutions. Representing every link of the EPS value chain, from large companies to SMEs, we are committed to fulfilling European environmental objectives. Through our 23 national associations and numerous recycling initiatives, we strive to elevate the circularity of our industry.

As a contributor to making Europe climate-neutral and resource-efficient, we showcase EPS as a smart choice in packaging and insulation. Stand by us in building a more resilient and sustainable tomorrow. www.eumeps.eu