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Høringssvar på Commission delegated regulation on supplementing Directive (EU) 2010/31/EU of the European Parliament and of the council by establishing an optional common Union Scheme for rating the smart readiness of buildings

TEKNIQ Arbejdsgiverne, the association representing 4.300 mechanical and electrical contractors in the electrical, plumbing, heating, ventilation and metals industries in Denmark welcomes this initiative on smart readiness indicator scheme (SRI) as digitalisation and modernisation of buildings and the building installations play an active role in achieving energy efficiency in buildings and as part of giving flexibility in the energy system.

It is important that the SRI experts are well qualified within the fields of the technical domains listed in Annex IV. We notice and welcome that the regulations Article 8 specifies competence criteria within the ICT field but suggest that the regulation includes competence criteria on building installations and building control systems as these qualifications are important to achieve a correct and useful SRI.

We welcome that the SRI will supplement the EPBD and give information on perspectives of new technologies in the buildings. However, we notice that the content of the SRI listed in Annex IX does not include recommendations to the building owner on how to improve the smart readiness of the building and further that scores of each technical domain is optionally. We are concerned that this will devalue the SRI as it will make the actions needed to improve the smart readiness of the building unclear to the building owner and communications with installers and other energy service companies may not be assisted by the scheme.

The potential for heat savings by intelligent management is estimated in Denmark to be approx. 8%, while for Trade & Service it is estimated to be 14%. In practice, the effect will largely depend on how the control technologies are used and on the settings of controls etc. In order to achieve the expected energy savings and CO2 reductions, it is essential that, in addition

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to proper installation, intelligent building installations are regularly serviced to ensure that the installations function and as expected.

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