

SHORT POSITION PAPER - RECHARGING POINTS AND SOLAR PANELS ON RETAIL PREMISES

ENERGY PERFORMANCE OF BUILDINGS DIRECTIVE

1. Background

The EU Commission's proposal for a Directive on the Energy Performance of Buildings requires that for new or significantly renovated non-residential buildings with parking of five spaces or more, a charging point be installed and that every parking space has to be pre-wired. For existing buildings with more than 20 parking spaces, the Directive will require the installation of at least one recharging point for every ten parking spaces. The draft reports from the ITRE & TRAN-Committees both aim to further increase the amount of charging stations (one for every five & one for every two parking spaces, respectively). Furthermore, in May 2022 the Commission added an obligation for member states to its proposal, according to which solar energy installations will have to be deployed on commercial buildings with useful floor areas larger than 250 square meters. New buildings will have to do so by 2026 and existing ones will follow in 2027.

2. Our suggestions for improvement of the proposal

1. On recharging stations

- **We propose that the Directive should not take a one-size-fits-all approach for all non-residential buildings:** Short-term parking spaces, like retailer parkings are not the most indicated place for car chargers. Clients spend on average only 30 minutes in a shop. With a conventional charging station (11kW), this will make clients gain an average range of 5 km. Only more powerful charging stations (50kW) will be purposeful for short-term parking, but carry a very high initial cost, which retailers are impossible to offset if implemented as proposed by the rapporteurs of ITRE and TRAN. These proposals therefore require an impact assessment. More chargers in places where people are likely to park more long-term e.g. at places of work, in public parkings, would be more useful.
- **We propose that objectives of capacity be set rather than fixed numbers of recharging stations:** A higher number of parking spaces is not necessarily reflective of the affluence or size of the retailer. Often this has to do with the availability of space and local cost of terrain. Certain SME retailers can have a relatively large amount of parking spaces, particularly in rural areas, leading to disproportionate installation costs (also when taking into account that chargers are less intensely used in rural areas). By focusing on capacity, retailers can choose to have a higher number of slow charging stations, or fewer high performing stations.
- **We propose that the Directive take account of high variations in use rates:** The use rate of recharging stations is very different from place to place, and usually much higher in urban areas than in the countryside. In the countryside most electrical cars are charged at home. Even in urban areas, such as in Germany for e.g. for roughly only 25% of the charging stations, the use rate is very high. The more

recharging stations are installed, less intensive will be their usage, particularly in short-term parking spaces. Still in Germany, the use rate of recharging stations has decreased for one third of the charging stations, showing that the demand is not growing yet everywhere, and making it more difficult for retailers to earn return on investment. It should therefore be possible to adapt the capacity of charging stations in function of need or demand.

- **We propose that the Directive take sustainability and technological development better into account:** Requiring unnecessary installations from economic operators will lead to unnecessary price increases for consumers. The existing requirement in the Energy Performance of Buildings Directive 2010/31/EU, to pre-install only the tubing is more sustainable and cost-efficient. The need and cost for electrical materials, which include raw materials like copper, are extremely high, and demand -and thus costs- is likely to grow exponentially with the obligation to pre-equip parking spaces. It would be a waste of resources to bury these in the ground with no immediate use. Furthermore, as the technique of car chargers is likely to advance, prewired parking spots will inevitably fall behind technical advance. Pre-installed tubes will enable to rapidly respond to growing demand with state of the art charging systems. Last but not least, the Directive should only ask to increase electrified spaces, when there is a need and proof of sufficient use of the infrastructure, to avoid inefficiencies and a disproportionate burden on retailers, particularly SME retailers, which undermines their economic sustainability.
- **We propose that the Directive exempt SMEs and allow groups of independent retailers to adapt supply to demand:** Requiring fixed numbers of recharging stations per retailer without addressing infrastructural predispositions will bring retailers in a difficult position. SMEs should not be required to bear such substantial investments. If SMEs are not excluded, then cooperative business models of SMEs, such as groups of independent retailers, which enable SMEs to pool their resources, reduce their burdens and maximise their efficiency, should be able to distribute car chargers among member SME retailers in function of demand by customers. The business model of cooperative groups of retailers is very common in EU Member States.

2. On solar panels

- Overall, we welcome that the Commission **recognises the necessity for an exemption of certain buildings, as certainly not all buildings are suitable for the installation of solar panels**. We are convinced that in the consideration for mandating solar panels, the following criteria should be taken into consideration:
 - The exposition of a building to the sun: There is no use in installing solar panels on a building that will not produce enough energy to offset an initial investment for the company;
 - The general energy situation of a country or region: mandating the installation of solar panels in a region that already over-produces renewable energy and where the energy grid is not able to absorb this energy, is inefficient and will only create additional costs for companies. [Examples from Germany](#) have shown that on sunny days, operators of solar panel installations were shut from the grid, due do a situation of oversupply. We consider that member states should carefully consider these infrastructural constraints when issuing solar panel mandates.

Established in 1963, **Independent Retail Europe** (formerly UGAL – the Union of groups of independent retailers of Europe) is the European association that acts as an umbrella organisation for groups of independent retailers in the food and non-food sectors.

Independent Retail Europe represents retail groups characterised by the provision of a support network to independent SME retail entrepreneurs; joint purchasing of goods and services to attain efficiencies and economies of scale, as well as respect for the independent character of the individual retailer. Our members are groups of independent retailers, associations representing them as well as wider service organizations built to support independent retailers.

Independent Retail Europe represents 23 groups and their over 403.900 independent retailers, who manage more than 759.000 sales outlets, with a combined retail turnover of more than 1,314 billion euros and generating a combined wholesale turnover of 484 billion euros. This represents a total employment of more than 6.620.000 persons.

Find more information on [our website](#), on [Twitter](#), and on [LinkedIn](#).