

Collection of comments and suggestions on

EPB Standard: EN ISO 52018-1:2017

Energy performance of buildings —

Indicators for partial EPB requirements related to thermal energy balance and fabric features —

Part 1: Overview of options

and

EPB Technical Report: CEN ISO/TR 52018-2:2017

Energy performance of buildings —

Indicators for partial EPB requirements related to thermal energy balance and fabric features —

Part 2: Explanation and justification of ISO 52018-1

Date of report: 2022-09-15

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1 Introduction

The EPB Center is a user platform for the EPB Standards and EPB Technical Reports, in short "the EPB documents". These EPB documents are developed and published by CEN and ISO, the European and international standards bodies. Therefore the EPBD Center works closely with CEN and ISO. Among various other activities, the EPB Center collects questions and comments on these EPB documents.

Based on the enquiries and suggestions received, the EPB Center experts prepare, to the best of their knowledge, clarifications and/or proposals for corrections.

1. Clarifications are given in the form of short texts, directly shown on the website (FAQ). When necessary, the short answer is complemented by a more extensive explanation as a [pdf] file.
2. Proposals (comments and suggestions) that could be taken into consideration in the context of future revisions of EPB documents are published in the form of the CEN/ISO commenting table. This standardized format ensures an efficient communication with CEN or ISO later.
For each EPB document for which there is feedback, there is an autonomous file.

The present document is one of the series of proposals mentioned under point 2.

The comments and suggestions are published anonymously for reasons of privacy. The EPB Center has the responsibility to review and (optionally) generalise each received comment and add a proposal. The EPB Center experts aim at the best possible support for the implementation and application of the EPB documents in practice.

Additional information

To see whether there already exist clarifications and/or a comment table for any of the other EPB documents, please consult the corresponding link on this [webpage](#).

Additional feedback on any of the EPB documents can be submitted via the [contact form](#) on the EPB Center website. Please describe the issue clearly.

NOTE Also technologies not yet covered by the EPB standard can be reported. Please describe the technology clearly, e.g. via a link to a webpage. If possible, also add existing (for instance national) assessment methodologies for the technology (by means of web links, etc.).

The EPB Center intends, at the appropriate time, to forward all clarifications and proposals to CEN or ISO for potential use in future updates of the EPB documents.

Acknowledgement

Although the issues are published anonymously, the EPB Center gratefully acknowledges all contributions.

2 Table with comments and proposed changes

2.1 Comments on EN ISO 52018-1:2017

NOTE ISO Commenting template guidelines can be found at:

<https://helpdesk-docs.iso.org/article/299-commenting-template-guidelines>

Comments and suggestions

Date: 2022-09-15

Document: EPB Center comment sheet

Project: EN ISO 52018-1:2017 &
CEN ISO/TR 52018-2:2017

MB/ NC ¹	Comment No (for ref.)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	<i>In this EPB Center document, this column is for internal use only</i>
EPB Center	1	entire text		ed	There are a number of minor editorial imperfections.	Doublecheck the full text, and improve. Once there is a new draft, further editorial feedback will become productive.	
EPB Center	2	Intro- duction		te	The text may not be fully clear for people not yet familiar with the context.	Critically review the introduction, where needed also updating it to the evolved present societal context.	
EPB Center	3	Annexes A & B		te	Following the European Directive EPBD:2018, the EU Member States had to report their own choices according to this template. A first furtive look at some of these documents (when public) readily reveals that there are several issues.	If the standard would be revised, make a systematic analysis of how the EU Member States (MS) applied the tables, and apply any lessons learned (misunderstandings when filling in, need for extra options, etc.). This also may hold true to a greater or lesser extent for all other EPB standards (10 or so) that needed reporting by the MS in execution of the EPBD.	
EPB Center	4	Annexes A & B		te	It may be interesting to list the features and indicators that are shown on the EPB label or certificate just for information, and not only the ones used for requirements.	Add extra tables for this purpose (preferred option?) or foresee extra columns in the existing tables.	
EPB Center	5	Annex B		te	The European Directive on the Energy Performance of Buildings (EPBD) is being revised (2021-2022). Check which parts of the content need to be revised to align with (at least: to avoid conflict with) the EPBD, while maintaining global relevance (if necessary: by offering different options in Annex A).	Check	
EPB Center	6	Annexes A & B	various Tables	ed	When tables are split over several pages, it is not always necessary to replicate the column headers on the 2 nd page. It may actually cause confusion.	If possible, omit whenever superfluous.	
EPB Center	7	Annexes A and B	Table A.2 Table B.2a	te	In these tables, for the row "Airtightness of the thermal envelope: mandatory measurement: ...",	Remove in each of the 3 Tables the reference "Table A.12/B.12" in the last column	

¹ **MB** = Member body / **NC** = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/CS editing unit are identified by **)

² **Type of comment:** **ge** = general **te** = technical **ed** = editorial

Comments and suggestions

Date: 2022-09-15

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ter			Table B.2b		there is no need for a reference to a further table, as there is no indicator for which a quantitative requirement is set (unlike the following row). The specifications how the measurement is to be performed and processed, are to be given below the table: see point (4) in example Table B.2a. (In retrospect, it appears that this anomaly slipped in during the final stages of the editorial process.)	(A.12/B.12 are only applicable when numeric air tightness requirements are set.)	
EPB Center	8	Annex B	Table B.2a and b	ed	The last column shall be shaded, as in Table A.2, because it is part of the template	Shade the last column, as in Table A.2	
EPB Center	9	Annex B	Table B.2a	te	For unconditioned buildings (that have neither active heating nor active cooling at the time of construction), it might still be desired to set public requirements in order have a high probability of good year-round thermal comfort (in a first instance for the mere sake of the well-being of the building users), and thus also in order reduce in a 2 nd instance the chance of a posteriori installation/use of active heating and/or cooling in the building (e.g. mobile appliances, such as electric resistance heaters).	Consider adding an extra mix E for this case, corresponding to the general philosophy, i.e. requirements for both summer & winter thermal comfort (and yes or no thermal insulation?).	
EPB Center	10	B.4	Tables B.3 and B.4	te	Thermal comfort becomes an increasingly important parameter, especially in case of absent or undersized systems or bad design.	It is strongly advised to introduce a harmonized calculation procedure for a thermal comfort indicator in EN ISO 52016-1 , when revised, based on ISO 17772-1 cq EN 16798-1, as source for Tables 3 and 4. Consider also to introduce an overall (year-around) thermal comfort indicator	
EPB Center	11	B.4	Tables B.3 and B.4	ed	The words "Not applicable" are superfluous.	Remove.	
EPB	12	Annex	Table B.7	te	In the EU ALDREN project, it is advised to add	Discuss the pro's and con's of including lighting	

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Cen ter		B.4.1			energy need for lighting to the energy needs for heating, cooling	needs	
EPB Cen ter	13	Annex B.4.1	Table B.12	te	See also comment above, for Table B.2a: as there is no quantitative requirement for the airtightness in Table B.2a, this table B.12 is superfluous here.	Remove Table B.12, and write instead: "Table B.12a is not applicable for any of the requirement mixes A to D."	

2.2 Comments on CEN ISO/TR 52018-2:2017

EPB Cen ter	1		Intro- duction		te	The text may not be fully clear for people not yet familiar with the context.	Critically review the introduction, where needed also updating it to the evolved present societal context.	
EPB Cen ter	2		Annex D	1 st paragraph	ed	The phrasing of the introductory paragraph is not very clear.	Improve	
EPB Cen ter	3		Annex E	Figures E.1 & E.2	ed	In the Y-axis the symbol f (for the building shape factor) is used inappropriately.	Remove the f from the Y-label	

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3 Longer explanations

All comments are fully discussed in the tables above. Longer explanations are not needed in this document.