

Collection of comments and suggestions on

EPB Standard: EN ISO 52003-1:2017
Energy performance of buildings —
Indicators, requirements, ratings and certificates —
Part 1: General aspects and application to the overall energy performance

and

EPB Technical Report: CEN ISO/TR 52003-2:2017
Energy performance of buildings —
Indicators, requirements, ratings and certificates —
Part 2: Explanation and justification of ISO 52003-1

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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 ISO 52003-1:2017

NOTE ISO Commenting template guidelines can be found at:

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

Comments and suggestions

Date: 2022-09-14

Document: EPB Center comment sheet

Project: EN ISO 52003-1:2017 &
CEN ISO/TR 52003-2:2017

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		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).	For example: The introduction of Zero Carbon Emission Buildings (ZEB) and Minimum Energy Performance Standards (MEPS = threshold values). More attention for healthy indoor climate conditions. The possible specification of harmonized scale of EP classes. Template for EP certificates.	
EPB Center	2	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	3	entire text		gen	A posteriori, the distribution of content between ISO 52000-1 and ISO/TR 52000-2 on the one hand, and ISO 52003-1 and ISO 52003-2 on the other hand does not always seem optimal.	Mutually move pieces of texts: General matters from ISO 52003-1 and ISO/TR 52003-2 to ISO 52000-1 and ISO/TR 52000-2 (e.g. Fig.4 in Clause 6 of the TR) Requirement & rating/certificate related aspects from ISO 52000-1 and ISO/TR 52000-2 to ISO 52003-1 and ISO/TR 52003-2 (e.g. Annex H on NZEB in ISO 52000-1)	
EPB Center	4	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	5	7.3.1	2 nd half	te	The text on "Assumed system and Presence of system" may not be clear to the uninitiated.	Clarify	
EPB Center	6	8.1	last sentence	te	Ref. to Subclause 8.2 doesn't seem to make sense.	Other reference intended. Perhaps 9.2?	
EPB Center	7	10.1	Note	ed	"NOTE See ISO/TR 52003-2:2017, Figure 2" Check if the reference should not be to Figure 6	Check	

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

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EPB Center	8	10.2	On 2) Default energy rating method with a single reference point:	ed	“The energy performance regulation reference, R_r , shall be placed at the boundary between two classes, for instance classes 4 and 5 ($n_{ref} = 4$).” Check if the term “ regulation reference” is correct in case of a single reference point. Check also consistency with 10.3	Check	
EPB Center	9	Annexes A & B		ed/te	In general: some issues with shaded/non-shaded areas, and improper application in Annex B (unnecessary duplication of text, ...). If the content of a table cell is part of the template. Then it shall be shaded in Annex A and be replicated in Annex B without any changes	Doublecheck all	
EPB Center	10	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 of 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	11	Annexes A & B		te	It may be interesting to know whether a requirement or a reference for a rating is a constant or variable numeric value (cf.Clause 8 & Subclause 9.3)	Add extra column to the pertinent tables	
EPB Center	12	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	13	Annexes A & B	Table A/B.3 and Table	te	Useful floor area maybe needs to be reference floor area.	Once the discussion is decided there, make it consistent here.	

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			A/B.4 and Table A/B.5:		But see also on-going discussion concerning reference floor area in the context of ISO 52000- 1.		
EPB Center	14	Annex A	Table A.2	te	"Default" (in the title of the table) is only applicable in Annex B.	Omit "Default" from the title of the table. Also in the title of Table B.2.	
EPB Center	15	Annex B	Table B.2	te	In Table A/B.2 Greenhouse gas emissions is an option that is explicitly mentioned. But unlike the options for primary energy, there is no follow up table to specify the indicator	Consider to add Table to specify the indicator	
EPB Center	16	Annex B	Table B.5	te	As this option is not chosen in Table B.2a, there is no need to copy the empty table here.	Omit Table B.5 and write (as in ISO 52018-1) "Table B.5 is not applicable because there is no requirement for renewable primary energy use (cf. Table B.2a."	
EPB Center	17	French title		ed	Is "appréciations" the best translation of "rating" in the present context (of EPB labels, etc.)? See similar comment for the TR below (where a different French word was used)..	Improve if appropriate. To be reviewed by a native French speaker and EPB expert	

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2.2 Comments on CEN ISO/TR 52003-2:2017

EPB Center	1	entire text		te	The corresponding standard (EN ISO 52003-1) is subject to systematic review.	If EN ISO 52003-1:2017 will be revised: adapt this technical report accordingly	
EPB Center	2	entire text		te	There are several references to the European Directive on the EP of Buildings (EPBD). The EPBD is being revised (2021-2022). In addition, even if a technical report is only informative, references to European regulations should preferably be limited to notes. More details may be given in the European Foreword.	Update all references to the EPBD and demote these references to notes.	
EPB Center	3	entire text		ed	There are a number of minor editorial imperfections.	At the time of a revision: doublecheck the full text, and improve.	
EPB Center	4	entire text			It may not be readily clear to all readers what is practically meant by the wording "accompanying document"	Change by exact reference? e.g. ISO 52003-1 in this instance.	
EPB Center	5	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	6	10.2		ed	The beginning of the text is a hanging paragraph	Give it a title, e.g. "10.2.1 General".	
EPB Center	7	10.2.2		te	The text on minimum requirements would rather belong to the Clause 9 on that topic (?)	Move.	
EPB Center	8	10.2.3		te	On Figure 7 — Method 2 - illustration of the class boundaries: the vertical lines (separating the classes) do not	Adjust Figure 7 to become in line with Table 3 of EN ISO 52003-1 (or vice versa).	

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					match the boundaries in Table 3 of EN ISO 52003-1. For instance: Table 3: Class 2 = 0,35 Ref < EP ≤ 0,50 Ref Fig.7: Class B = 0,35 ± .., class C = 0,50 ± .. "NOTE 2 EN 15217 places mandatory minimum legal requirements on the limit of classes 2 and 3." is outdated.	Delete Note 2.	
EPB Center	9	French title			in the ISO version: <ul style="list-style-type: none"> • is the French "classification" the best translation of the English "rating" in this context? in the CEN version: <ul style="list-style-type: none"> • "ratings" is missing • "certification" ==> "certificats" • no German title? 	To be reviewed by a native French speaker who is also an EPB expert	

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3 Longer explanations

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