

Water Performance in Buildings : Initial Comments on the Consultation paper

We have studied the Consultation Paper analysis in more depth and looked for supporting documentation where we had our doubts. We have the following remarks, following the order of the document (unfortunately no numbering of pages and/or paragraphs), also based on input from members:

- The paper concentrates on 4 different policies to achieve water performance :
 - a. A certification scheme to label each individual building with regard to water performance
 - b. An audit of all buildings to identify the water performance
 - c. A smart metering system to make owners/tenants aware of their water consumption
 - d. Voluntary replacement of water consuming products like toilets and shower heads by more water efficient and water saving productsWe strongly suggest the 4th option for reasons explained below
- Economic impacts: the analysis refers to an economic paper from Germany, calculating the water savings because of replacement. The conclusion was that replacing water-using products by more efficient ones is not economically sound as a stand-alone option and should be combined with a refurbishment.
- Eventual problems with drainage because of lower flows will depend of the usage and also of the number of people living in the house. Replacing the exit pipes will most probably not be cost effective. We don't know if this will be a serious problem, and are not aware of one now.
- Public acceptance of water savings programs: in my country the public isn't that interested in water saving programs since water is very cheap, living in a delta area and rainy climate. The EPF delegation raised this problem at the meeting. As the Commission suggested, the solution may indeed be provisions that are only triggered under certain delta basin conditions.
- Water rating and auditing: given the very low cost of water on an individual household basis, this would be overkill: a generic approach for homogeneous groups of properties could foster public awareness.
- Water metering : in my country almost all households have individual metering systems, smart metering systems don't make sense in the Netherlands and in many other member states because of the earlier mentioned very low price of water.
- Energy savings : lessons from the EPBD to be learnt first before implementing water savings programs: very wise
- The paper of Fuest and Mc Allister concluding 35% value growth for energy efficient buildings: A first look already shows that it was a working paper only and was never published (so never reviewed by other researchers) and it was based on a comparison with a randomly chosen sample of buildings from nearby locations without determining if, as far as the location was concerned, that had been a fair comparison. Also, other papers by Norm Miller et al(2008) and Jennen and Kok(2011) came to a much lower value increase, between 8% and 10% and those papers have been reviewed and published. We would be very reluctant to support the 35% value increase. For water alone, it should be much lower.
- Voluntary certification scheme for water reuse and harvesting : we consider that a certification scheme is not a priority. The large users like market gardeners with greenhouses already have water reservoirs in place. It might be applicable in countries with a water shortage as mentioned in the analysis.
- Financial incentives : payback periods can be reasonably short and the investments are not all that high in the case of replacing a toilet reservoir or a showerhead. Replacing a washing machine is already more costly and will probably not payback very soon. Much is dependent

upon usage and temperature as well in the case of showerheads. Specific financing for water savings measures might be difficult since it doesn't create sufficient value increase for the property.

- Main conclusion : as far as the environment is concerned it is good to have a look at water performance as well. The point is if we need a directive or shall we leave it to the market and best practices to achieve water savings. The answer probably needs more research.

Kind regards,

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