

Please specify your response b)

There is a lack of effective and rigorous implementation of existing EU legislation on buildings. The recast EPBD is still not completely implemented across Europe. This includes the definition of nearly zero energy buildings, the use of energy performance certificates, the setting of component requirements, the application of the concept of major renovations and the adjustment of building code requirements to cost optimal levels.

As regards the EED, many Member States are unlikely to develop and implement meaningful long-term building renovation roadmaps in time and apply the three percent renovation rate for central government buildings. A complete transposition of article 7 on energy efficiency obligations is also questionable.

Please specify your response c)

As to buildings, no new directive is needed but both EPBD and EED should be strengthened in order to realise the substantial savings potential of the existing building stock. In particular, the EPBD needs to become far more detailed on renovation with a view to reducing the energy demand of existing buildings by 80% by 2050 and stimulating (staged) deep renovation.

The EED should include binding 2020 and 2030 energy efficiency targets for buildings and determine an annual renovation rate of 3% p.a for the EU's building stock.

B. Energy efficiency sectors

2. Do you think that further policy measures are needed at EU level to foster energy efficiency in buildings?

Yes No No opinion

Please give details:

Buildings offer the highest saving potential but market failures prevent implementation in practice. Renovation must be addressed in a coherent way providing a clear and ambitious long-term framework (2050) while keeping in mind 2020 and 2030 as milestones. This is best achieved through a binding energy efficiency target for buildings accompanied by coherent measures to trigger mass-scale renovation of existing buildings. A revised EPBD should include more detailed renovation requirements (including –staged– deep renovation). NZEB definitions should be harmonised and Energy Performance Certificates strengthened (making them “building passports”, including all relevant information), a central, publicly available, EPC registry established in MS and a minimum energy rating for rented buildings set. The EED should extend the renovation rate of 3% to all buildings. Supplier obligations should specifically support renovation investments and have to be continued after 2020.

3. Do you think that further policy measures are needed at EU level to foster energy efficiency in industry?

Yes No No opinion

Please give details:

While industry certainly has a tangible energy savings potential, several studies converge on the fact that it is lower than that of other sectors. Market failures in addressing energy efficiency potentials are lower than in other sectors with many companies implementing rigorous internal energy savings programmes. All companies are subject to regular energy audits under the EED and a significant part of industry is covered by the ETS.

4. Do you think that further policy measures are needed at EU level to foster energy efficiency in transport?

Yes No No opinion

Please give details

A significant part of energy use in the cold food chain stems from cooled environments in transport vessels (lorries). Improving the thermal insulation of these lorries would result in tangible energy savings.

5. Do you think that further policy measures are needed at EU level to foster energy efficiency in electrical equipment?

Yes No No opinion

6. Do you think that further policy measures are needed at EU level to foster energy efficiency in generation and distribution?

Yes No No opinion

7. Do you think that further financial mechanisms and instruments are needed at EU level to mobilise energy efficiency investments?

Yes No No opinion

Please give details:

As to buildings, public and private investment flowing into energy efficiency is insufficient today. Member States will not meet their 2020 and long-term efficiency targets, unless this is scaled up. An ambitious long-term vision based on a stable legal framework and a building efficiency target can create much needed investor certainty.

The best use of Structural and Investment funds 2014-2020 and Horizon 2020 should be ensured so as to increase finance availability and technical capacity. These funds should target energy efficiency investments and use public money to lever private funding. Access to EU funding must be conditional on full implementation of EU legislation within the climate and energy area. Technical EU-level assistance programmes like ELENA should be made available also to private sector building projects, e.g. housing associations.

State Aid Rules should not hamper the use of public funds to support public and private (commercial) energy efficiency projects.

8. Do you think that further measures are needed to build the capacity of actors in the energy efficiency sector?

Yes No No opinion

Please give details:

As regards buildings, energy efficiency actors will build up capacity if the regulatory environment offers an ambitious and stable long-term vision. In particular, a highly fragmented sector such as the building industry requires a binding long-term target (-80% energy demand of the building stock by 2050) with intermediate goals to measure progress. Stop-and-go effects in support schemes must be avoided and market surveillance strengthened.

9. What are the most promising technology solutions that can help deliver energy savings in the 2020 and 2030 time horizon? How can their development and uptake be supported at EU level?

Buildings offer the highest cost efficient saving potential and should be prioritised. Although new high-performance products / systems are in development, today's technologies can already achieve zero energy demand for new build and renovation projects. This is achieved through a well-designed combination of different technologies. No ranking is impossible. It is however important to respect the Trias Energetica according to which the building's energy demand should be minimised as a first step (building fabric first, then controls etc.), followed by the use of renewable energy sources and, if required, topped up by the efficient use of fossil energy sources.

Improved design and prefabrication as well as up-stream project team partnering will be major enablers.

The development and uptake of new technologies can best be supported by putting in place an ambitious long-term regulatory framework, mainly through a binding building efficiency target and measures to stimulate deep renovation.

10. Further comments:

The discount rates assumed for energy efficiency measures in existing modelling must be reduced in order to be more realistic and prevent exaggeration of the costs of these measures. Benefits, including co-benefits (job creation, fostering economic activity in crisis-vulnerable sectors such as construction, improved living conditions (health), benefits for public budgets, etc), from energy savings must be taken into account.

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