

# Public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework

INFORMATION ABOUT THE RESPONDENTS	
Are you responding to this questionnaire on behalf of/as: -single choice reply-( <b>compulsory</b> )	Organisation
Please enter your name or the name of your company/organisation: -open reply-( <b>compulsory</b> )	EuroACE
Please indicate your principal country or countries of residence or activity: -single choice reply-( <b>compulsory</b> )	Other
Please specify which other country. -open reply-( <b>compulsory</b> )	28 EU Member States
How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-( <b>compulsory</b> )	Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. Energy efficiency targets and measures	
1. Do you think the right approach in addressing the shortfall is:  -multiple choices reply-( <b>compulsory</b> )	a) To define energy efficiency target(s) - b) Reinforced implementation of existing legislation, including active policy on infringements - c) Proposing new legislation
1.a.1. How should these target(s) be expressed? -single choice reply-( <b>compulsory</b> )	As absolute energy savings
1.a.2. At what level should they apply? -multiple choices reply-( <b>compulsory</b> )	EU - National - Sectoral
1.a.3. Should they be: -single choice reply-( <b>compulsory</b> )	Legally binding
Further comments on targets -open reply-( <b>optional</b> )	
<p>Unlocking established energy savings potential, especially in buildings, is a prerequisite for the EU to reach its competitiveness, security of supply and climate change goals. It is buildings that offer the highest cost-effective energy savings and GHG reduction potential as well as substantial multiple benefits. Therefore there should be a sectoral target for buildings, expressed as absolute savings, supported by clear milestones and policy measures that are set at EU level and mirrored at national level. The sectoral target should be part of an overall, binding EU energy savings target of 40% based on the available savings potential of contributing sectors (bottom-up approach), expressed as an amount of saved energy resulting from the implementation of efficiency measures, compared to a baseline. This approach should be reflected in the setting of targets and priority measures for 2030 with a view to achieving longer-term, 2050 goals.</p>	
Please specify your response b) -open reply-( <b>optional</b> )	
<p>In spite of well-known measurable economic and social benefits, Member States (MS) demonstrate a lack of focus in their approach to ensuring a complete and fully monitored enforcement of existing EU energy efficiency legislation. At the same time MS should implement EU legislation and use financial instruments (including EU funds) in a way that ensures mutual reinforcement and maximised impact. For</p>	

example, energy efficiency obligation schemes should be designed to support energy renovation measures that trigger higher savings. Furthermore, the lack of implementation of EU buildings-related legislation (for example nZEB) is slowing our journey down the learning curve (e.g. transfer of knowledge from new buildings to the renovation sector), thus keeping costs artificially high and delaying the realisation of the multiple benefits that will accrue from an improved and higher performing building stock with a better and healthier indoor climate.

Please specify your response c)

-open reply-(optional)

As over 90% of the buildings built today will still be standing in 2050, a robust and ambitious policy for driving forward the deep renovation of the existing building stock to ensure energy efficient, comfortable and healthy buildings must be introduced. Ensuring that a holistic vision underpins the EPBD review, which should start at the earliest opportunity, will address this policy gap. Legislation focusing on demand drivers and on up-scaling current best practices is a must and the public sector as demand driver must increase. Legislation that mandates limiting the waste of energy in the public sector in general as well as in sectors supported by public money (social buildings, publicly owned companies, etc.) must be enhanced. Better use of EU funding (Structural and Cohesion funds, EE funds and ETS auctioning revenues) must be prioritised and leveraged with private financing to support a policy for driving and up scaling the deep renovation of the existing 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?

-single choice reply-(compulsory)

Yes

Please give details. -open reply-(optional)

EU legislation needs to trigger & up-scale high quality buildings renovation. EPBD review should: Ensure EE is considered in all renovations Strengthen convergence in nZEB technical definition,ensuring priority for energy demand reduction first Optimise EE and indoor climate Strengthen Energy Performance Certificates(EPCs) to become investment grade certificates Ensure EPCs evolve towards a “building passport” specifying,measuring and controlling EE and other measures throughout a building’s lifetime Mandatory,publicly available databases in MS Improve monitoring,reporting,enforcement of the above EED needs to be enforced post 2020,and should: Extend 3% energy renovation rate to first cover all public buildings (publicly-owned/rented/leased/funded),then to all other segments Ensure energy performance contracting achieves extensive renovations and that public subsidies only support renovations to class A/B Extend EE obligations post 2020,targeting holistic renovation and higher savings

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

-single choice reply-(optional)

No opinion

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

-single choice reply-(optional)

No opinion

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

-single choice reply-(optional)

Yes

Please give details. -open reply-(optional)

EU legislation should take account of the energy efficiency of electrical equipment at whole building level, including installations and systems, to optimise overall energy performance.

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

No opinion

-single choice reply-(optional)	
7. Do you think that further financial mechanisms and instruments are needed at EU level to mobilise energy efficiency investments? -single choice reply-(optional)	Yes
Please give details. -open reply-(optional)	
<p>A framework that enables MS to boost financing of EE in buildings is crucial. The EU should require MS to better structure financing to ensure up-scaling and ambition so that:</p> <ul style="list-style-type: none"> <li>• More people use available existing instruments</li> <li>• Financing supports ambitious levels of renovation and triggers private financing</li> <li>• Financing targets quality, accredited work (eg professional training)</li> <li>• Improved public accounting rules facilitate local investments</li> <li>• Greater availability of guarantee funds underwrite first losses and reduce interest rates</li> <li>• Red tape is reduced for entities seeking loans</li> <li>• EU funds maximise leverage effect, in line with EU sustainable growth</li> <li>• Improved State Aid Rules and use of ETS revenues allow large scale renovation programmes</li> </ul> <p>Access to EU funding must be conditional on implementation of relevant EU legislation. Technical EU-level assistance programmes (eg ELENA) should be available also to private sector actors like housing associations.</p>	
8. Do you think that further measures are needed to build the capacity of actors in the energy efficiency sector? -single choice reply-(optional)	Yes
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? -open reply-(optional)	
<p>The materials, equipment and technology needed to significantly reduce energy demand in buildings are mostly with us today but are not implemented due to non-technological barriers and market failures. An ambitious policy and legal framework with a clear binding target is needed in order to provide a stable regulatory environment. This will lead to market certainty, triggering investment, unlocking the untapped EE potential and ensure that the EU energy efficiency industry maintains its competitive, world-leading position. Underpinning this sector with research funding in order to develop innovative business models and mainstream solutions is an important component. Innovation is needed to:</p> <ul style="list-style-type: none"> <li>• increase customised industrialisation of building components for renovation projects</li> <li>• increase up-stream project team partnering</li> </ul> <p>Examples exist where innovative approaches have been implemented and renovation works have reached the highest energy performance.</p>	
10. Further comments -open reply-(optional)	
<p>The continued practice of using very high discount rates of 17% assumed for energy efficiency measures in buildings (ref Commission's own impact assessments) makes related investment looks disproportionately high. This does not promote a realistic assessment of savings and benefits linked to energy retrofits and makes energy efficient measures seem unworthy of public support. It also nurtures unnecessary hesitation around the willingness to tap the EE potential in key sectors of our economy, otherwise described as the "first fuel" of the economy. The rates used in modelling and assessment work must be reduced to more reasonable single-digit levels in order to better reflect the real results that can be obtained through the implementation of energy efficiency policies and measures. In addition, the modelling must look beyond pure payback issues based only on savings, as purchasing patterns also depend on additional aspects, such as thermal, visual and acoustic comfort and air quality.</p>	
Please give details. -open reply-(optional)	
<p>A buildings target will incentivise actors to invest in training building professionals, which will be crucial to maximising energy savings in buildings. Mandatory harmonized training programmes should aim to increase understanding about building types/ age, about renovation techniques (staged renovation) and about risks of lock-in, through the promotion of buildings as 'integrated systems'. Better awareness about the benefits of adopting an 'integrated design process' early in the project cycle will lead to reduced costs, better anticipated building use patterns, and optimised synergies in energy saving opportunities. A reliable training certification system will boost trust, leading to a better uptake of existing efficiency measures, especially if a link between certified professionals and access to subsidies is created. Training should be extended to full renovation chain (including facility managers, authorities managing EU Funds) and should be mainstreamed into academic curricula.</p>	