

# Public Consultation on the Evaluation and Revision of the Action Plan for Energy Efficiency [COM(2006) 545]

| Profile of the respondent   |  |
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| Your profile  | Organisation   |
| Region  | European Union   |
| Which European Union country?   | EU as a whole (for organisations only)   |
| Would you like your reply to be published online?                                     | Yes  |
| Organisation name   | Architects' Council of Europe (ACE)  |
| Organization type   | Industry and private sector, incl. their associations, excl. SMEs  |
| What type of activities are addressed by your organization (multiple choice question) | Energy Efficiency services in the residential sector<br>Energy Efficiency services in the tertiary and industry sectors<br>Construction<br>Other |
| Which other sector?   | Architecture - policies and regulation   |
| Briefly describe the nature of your involvement in energy efficiency                  |  |

## 1. General questions

1.1. The Action Plan for Energy Efficiency of 2006 identified 6 key areas and proposed 10 priority actions (out of a total of 85 actions and measures). Which of the actions and measures of the 2006 EEAP should be continued / redefined / discontinued, and why? (Max. 4000 characters)

The ACE considers that the six key areas included in the Action Plan for Energy Efficiency 2006 remain valid and should all be included in any new or revised Action Plan. One clear omission is urban design and development. The ACE firmly believes that coherent, holistic urban development planning and projects can have a significant impact on energy efficiency within communities and local areas. In relation to the key priority actions the ACE would like to see greater emphasis in the revised Action Plan on the potential for energy efficient buildings to contribute to the overall target of the EU in its battle to tackle the effects of climate change. In particular, support for research and demonstration of approaches and techniques for the upgrading of existing buildings is seen by the ACE as crucial because a very high proportion of existing buildings will remain in everyday use in 2050. A second area where the ACE believes further emphasis and concrete action is required is in addressing the need to change the behaviour of all people by raising their awareness that their individual actions have a significant impact on overall energy efficiency. In this regard extensive re-training of professionals engaged in the building sector will also be required so that highly energy efficient designs for all buildings and renovation projects will become the norm in a very short timeframe. The ACE remains available to assist the Commission in further developing this theme. A final point that the ACE believes is of crucial importance is the development of coherent incentives for energy efficiency improvements of buildings that do not have perverse or un-intended negative effects on the environment or overall energy consumption.

1.2. Which new challenges have emerged since 2006 and should be addressed in the new Action Plan for Energy Efficiency? (Max. 4000 characters)

The ACE considers that the main new challenges that have emerged since 2006 and that should be addressed in the new Action Plan for Energy Efficiency are: - The need to retrain at all levels in the building sector in order to motivate all workers from site operatives to key decision makers, such as clients in the public sector, on how their day-to-day work has a direct impact on energy efficiency. - The realisation that the existing housing stock and tertiary buildings stock are the key elements of the most readily accessible means of improving the overall energy

efficiency of the European Economy. This means that more actions in relation to the energy efficiency of existing buildings are needed. - The emergence of the European Construction Technology Platform (ECTP) that has led to the proposed public private partnership on energy efficient buildings gives a substantial and well organised basis on which to built new policies, research and demonstration work in the buildings field. - The awareness that urban design issues can positively contribute to energy efficiency policies by the use of coherent integrated and holistic approaches that ensure high energy efficiency in any new urban quarters and in the regeneration of existing deprived or run- down areas. Energy security has become a major political and societal priority and the upcoming Action Plan must show the way to a real independence from energy resources that must be imported to the EU. This means that significant consideration for the inclusion of energy production from renewable sources must be included. One target in this field should be a high level of integration of energy producing technology in the design and construction of buildings.

## 2. Specific questions

2.1. The existing Energy Performance of Buildings Directive (2002/91/EC) and its recast, as well as other relevant legal acts, go a long way for introducing ambitious but realizable energy performance requirements for buildings and increase consumers' awareness. However, much more can be done.

Yes

How do you assess the need for moving towards a requirement that all new buildings have low or zero energy consumption and carbon emissions after certain date? (Max. 4000 characters)

From a technical and architectural point of view the ACE believes that moving towards a requirement that all new buildings have low or net zero energy consumption by a set date is an essential element in the necessary actions that the EU has to take in order to tackle climate change and to achieve the energy efficiency targets that it has set for itself. The ACE firmly believes that the technological means of achieving this in a short timeframe exists but that there are behavioural and political obstacles that stand in the way and it is the task of the European Commission to use the revised Energy Efficiency Action Plan to address these obstacles and barriers head-on.

How do you assess the need for introducing an EU level measures concerning training of architects, builders and installers? (Max. 4000 characters)

The ACE believes that there is a high need for introducing, at EU level, measures that will incite relevant Institutions and Organisations to ensure the training of all those in the supply chain within construction. This supply chain starts with those who Commission buildings such as Public Authorities and large Companies, to the professionals within the project design team including architects, engineers and other designers and on to the contractors and builders who are responsible for the actual construction and installation procedures on building sites. The ACE strongly believes that the operatives on construction sites who actually install energy efficiency materials, products and components must be fully aware of the need for those items to be installed to a high level of workmanship and with a high level of care. Bringing assistance to relevant institutions and associations that can quickly fill the training and education gaps is one tool that could significantly assist in improving the energy efficiency of buildings in the medium term.

What other measures at EU level need to be undertaken? (Max. 4000 characters)

Other measures at EU level that the ACE believes could be considered is the introduction for energy efficiency standards for buildings that comply with one, important condition: Any standards that are introduced should be performance based standards and should not be prescriptive standards. By adopting a performance-based approach the EU would be encouraging innovation and creativity, whereas the introduction of descriptive standards would stifle creativity and act as barriers to innovative approaches. It would be helpful if the EU could ensure that Member States are also precluded from devising proscriptive standards at national level.

2.2. Sustainable transport and energy consumption of cars is currently addressed in the Greening transport package (COM(2008)433), the Regulation on Emission performance standards for new passenger cars (COM(2007)0856), the proposed Directive on labelling of tyres (COM(2008)0779), the proposal on greening car taxation (COM(2005)261) and the 'Green Cars' initiative. The Commission is also working on a proposal on light commercial vehicles and a revision

No opinion

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| of CO2/cars labelling. Do you consider that additional measures at EU level need to be undertaken?   |            |
| 2.3. The Eco-Design (2005/32/EC) and Energy Labelling (92/75/EEC) framework Directives are significant steps as regard to product policy. A number of implementing measures have been already or are soon to be adopted and the ongoing amendments of the two Directives provide for their more ambitious and wider application. Do you consider that additional measures can be taken forward in order to increase the impact of these instruments?   | No opinion |
| 2.4. Lack of access to appropriate financing is an important bottleneck for making a real step forward in our ambitions on energy saving. Innovative financing instruments are now being developed by institutions such as EIB, EBRD, national promotional banks and private banks in particular in association with the Covenant of Majors initiative. Demonstration projects of the application of energy efficient technologies in a competitive manner, e.g. 'smart cities', could also be considered. Do you think other financing measures at EU level are needed? | No opinion |
| 2.5. Well targeted fiscal incentives could be a driver for energy efficiency investments and innovation. The EU has already taken measures to make it easy for Member States to allow for more advantageous VAT rates for some labour-intensive services, such as renovation and repairing of private dwellings. Do you consider that additional measures at EU level need to be undertaken to shape consumer choices?   | Yes        |

In your view what these measures should be? (Max. 4000 characters)

The ACE agrees that well targeted fiscal incentives could be a driver for energy efficiency investment and innovation but they must be carefully considered in a holistic framework so as not to produce perverse or unintended effects. In addition to fiscal incentives the ACE believes that there is a fundamental need to further raise awareness in the minds of general public of the need to consider investments in energy and efficiency as investment in a stable and desirable future. In addition to raising awareness the dissemination of best practice examples and demonstration projects could be used as vectors for encouraging socially responsible behaviour whereby persons would be encouraged by best practice examples to decide to invest in energy efficiency measures themselves. It seems to the ACE that an EU impetus to Member States would be a desirable action whilst at the same time the EU should be undertaking such awareness raising within all Institutions and accelerating change of its own building stock in order to lead by example.

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| 2.6. Education and training on energy efficiency are vital ingredient of a successful energy efficiency policy. These were already mentioned above regarding buildings but the challenge is much broader. Do you consider that measures/actions at EU level to catalyze training at school and university level should be undertaken?                                     | No opinion |
| 2.7. Awareness of final consumers on energy savings possibilities and their benefits is still low. This in particular concerns domestic consumers and SMEs. Some actions to target different groups are already undertaken at national and EU level. For example, the Sustainable Energy Europe Campaign is focusing on grouping social stakeholders and market actors to | Yes        |

undertake joint action. Do you think that further communication action at EU level is needed?

Which would be the content of such a communication strategy as regards each of the target groups concerned? (Max. 4000 characters)

As stated in the answer 2.5. above the ACE believes that significantly raising the awareness of final consumers on the benefits of undertaking energy efficiency measures for their buildings should be a cornerstone of any Action Plan. A robust communication campaign led by the EU and disseminated in all Member States that clearly describes that a package of approaches for each climate zone of the EU would be beneficial, not only raising awareness of energy efficiency but also publicising the benefits of the European Union whereby the message of working together to mitigate the most serious impacts of climate change could be transmitted by the European Union thus creating in the mind of citizens a positive image of the EU.

2.8. Furthermore, small and medium size companies (SMEs) are the backbone of EU's economy as they make up more than 99% of all firms and employ 67% of the EU's workforce but may need more support for implementing energy saving measures. Do you consider that specific measures to target SMEs are necessary?

Yes

In your view what should these measures be? (Max. 4000 characters)

The ACE agrees that, as a significant proportion of all firms and companies that can affect energy efficiency on the ground are small and medium enterprises (even micro- enterprises) there is a need to consider specific measures to target these small companies. Of most importance is to devise supporting mechanisms that ensure these small companies have the capacity to send their staff for additional training and awareness raising without loss of profitability. In other words support should be available to offset the cost of training so that the cost element does not become a barrier to the immediate, rapid and comprehensive re-training of the work force in the construction industry.

2.9. Public sector should lead by providing best practice examples. Positive progresses have been made under the voluntary Green public procurement policy and the proposals for mandatory procurement of energy efficient products in the framework of the recast of the Energy Labelling Directive. The leading role of public authorities has also been emphasized under the recast of Energy Performance of Buildings Directive proposal. Do you consider that further actions at EU level should be undertaken?

Yes

What further actions would you suggest at EU level? (Max. 4000 characters)

The ACE fully agrees that the public sector should lead by providing best practice examples and undertaking best practice approaches to the procurement and construction of its buildings. In this light the ACE would support the idea that Green Public Procurement should become mandatory for Public Authorities. It seems entirely logical that in order to tackle climate change responsible procurement based on whole lifecycle costing and the resourcing of green materials is an appropriate and easy step to take. In undertaking this new approach to public procurement the ACE recommends that the EU revise its Directive on Public Procurement in order to ensure that, at least for the procurement of buildings, the use of the lowest price criteria as a mean to select successful tenders is outlawed. The ACE firmly believes that tenders should only be chosen on the basis of the most economically advantageous tender and that it is understood that the most economically advantageous is also the proposal that has the least impact on the environment and has a high positive impact on climate change aspects. Therefore in order to move forward on energy efficiency in a coherent way the ACE believes it is necessary to completely revise the EU Public Procurement Directive at least as far as procurement of buildings its concerned.

2.10. The role of energy utilities can be substantial but at present they have insufficiently developed a market for energy efficiency services. Ways to create adequate framework conditions for this market to take-up in liberalized electricity and natural gas markets should be sought, possibly in cooperation with the Regulators. Do you consider that actions at

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| EU level should be undertaken?   |            |
| 2.11. Energy efficiency offers significant market opportunities. Do you consider that specific measures at EU level should be adopted to provide incentives for companies to enter these markets, in particularly as regards SMEs?   | No         |
| 2.12. In relation to the above question do you consider that there is a need for the introduction of a EU-wide White Certificate scheme?   | No opinion |
| 2.13. The Directive on energy end-use efficiency and energy services (2006/32/EC) already provides for national indicative energy savings target which differs from the ones for renewables and for the greenhouse gas emissions. Giving the increasing priority for ensuring that investment in energy consumption reduction are made in all Member States do you consider that a move towards binding targets is needed? | Yes        |

How should these binding targets be set up and at what level? (Max. 4000 characters)

The ACE does not believe that it is within its competence to advise the European Commission on how binding targets should be set up in relation to energy consumption reduction. On the contrary it is a task that must be worked out in a holistic and integrated manner taking into account the opinions and views of many stakeholders in a collaborative effort. The first simple step in this approach would be to set binding energy consumption reduction targets for the Member States and it is well known that by initially acting in the building sector the highest percentage increase in energy efficiency can be achieved with the lowest effort. It seems to the ACE that the targets should be set up at Member State level and that they should ensure that if achieved the EU would exceed its own energy reduction target for buildings by at least 50%. This high level of aspiration is needed so that, overall, the EU will achieve its objectives if a number of Member States do not achieve their individual objectives.

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| 2.14. Measurement and verification of energy savings is essential aspect for monitoring the results of any measures introduced at national and EU level. Although some targeted measures are being implemented, do you consider that more systematic and harmonized approach at EU level is needed? | Yes |
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In your view what should these measures be? (Max. 4000 characters)

In the view of the ACE there is a growing need to devise a common methodology for the management and verification of energy savings that allows for a reliable comparison of achievement levels between Member States. In the buildings sector such a common methodology must be able to account for different climatic conditions and different building traditions and cultural approaches so as to give the necessary comparison. Part of the methodology might be a means of sharing best practice examples and experiences in a way that is appropriate to cross border collaboration.

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| 2.15. Energy efficiency should become a vector of international co-operation and a subject of international financing programmes, in particular regarding EU neighbouring countries. Do you agree with statement? | Yes |
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In your view what should these measures be? (Max. 4000 characters)

It seems to the ACE that the EU is, at the present time, the world leader in relation to energy efficient technologies and indeed to environmental technologies as a whole. In its international cooperation and collaboration, particularly with neighbouring countries, it is crucial that the EU maintains this leading position and therefore extensive investment in research, development and demonstration projects is necessary. In relation to international cooperation the ACE is aware that the EU is facing a challenge in relation to energy security and that the adoption of highly ambitious energy efficiency measures in buildings that lead to significant reductions in energy demand is a powerful and obvious tool to increase the energy

security for the EU at the whole.

### 3. Other remarks

#### 3.1. Please add your additional remarks in the section below. (Max. 5000 characters)

Following on the answer 2.15. above, the ACE urges the European Commission to consider in what way energy efficiency measures as a whole can contribute to energy security. It is the view of the ACE that a wholesale move to reliance on renewable energies that are available within the borders of the EU is the most logical and best step for the EU to undertake. It is clear that in bridging from the current reliance on imported sources of energy to a future where we rely fully on the renewable energy sources, energy efficiency measures can be a significant stimulus and vector for the transition period. There is no difficulty, technically speaking, in the design and construction of new buildings. However a huge challenge exists in relation to existing buildings. The ACE therefore believes that the EU should concentrate on supporting measures and actions that stimulate a significant upgrading of the energy efficiency of existing buildings as the priority actions on buildings within the Energy Efficiency Action Plan. The ACE considers that national Energy Efficiency Action Plans (NEEAP) are a potential that has not yet been adequately tapped for their potential to translate European commitments into real action in the Member States. It supports the idea that there should be an agreed format or set of headings under which the Member States must prepare their NEAAPs in order to ensure that they are comparable and to ensure that good ideas can be readily transferred across borders within the EU. A final concern of the ACE is the fact that such a high number of methodologies for measuring energy performance are based on designed performance and not on actual consumption of primary energy. It seems to the ACE that it is only when the actual consumption is known that real savings that have the desired positive impact on climate change can be achieved and so measures or methodologies to move measurement techniques in this direction are needed. The ACE remains to the European Commission and its services in order to assist it in the achievement of highly ambition target in relation to energy efficiency in buildings.

### Meta Informations

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