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REHVA comments on the European strategy for housing construction

EUROPEAN ECONOMIC AND SOCIAL COMMITTEE hearing
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HVAC professional EU umbrella organisation (120,000 members, 24 European Countries)

We **advocate** for a:

- **performance** based "**system**" approach, the **building**, and not for a single **product**,
- **technology-neutral level playing field** of different solutions.

There is no "one-fits all" solution.

Together with our **national Members**, we wish to bring in our **professional experience** and **expertise**, to optimize the quality of policies and legislation at **European** and **national** levels.

REHVA comments:

- focus on **Heating, Cooling, Ventilation and Air Conditioning (HVAC)**,
- underline the **EU added value**.

Boosting supply

Strengthening productivity, capacity, innovation of the construction industry
Cutting red tape (bureaucracy) to accelerate housing supply

➤ Labour and skills shortages

The **EU market** is fragmented. **Education, training, and qualifications** are developed **nationally**.
Example: 32 different **mandatory** calculation methods to assess buildings according to the EPBD.

- Creates **unnecessary administrative burden**, particularly for SMEs,
- Hamper **cross border services, rollout of large-scale education, training, qualification**.

REHVA recommends

- to **incentivize collaborations** between academia, HVAC industry and HVAC professionals to define **new educational programs** addressing the **key challenges**,
- to **develop and use Common EU methods, tools** (e.g. delegated acts, CEN standards), the **Commission should give a mandate to CEN** to develop the needed standards.
- to support a **common, but not unique, transposition** of European **Framework Directives (EPBD)**

Boosting supply

Combining affordability, sustainability and quality in housing

➤ Reduce living costs for Europeans while maintaining high standards

Main tendencies of heating costs:

- French average household spend **up to 10 % of available income on energy**,
- Without subsidies, **heating costs may increase by 8% to 30%** (compared to gas boilers),
- **Investment cost may represent over 50 % of heating costs** (e.g. heat pump),
- Impact of the **CO2 pricing (ETS2)** increases heating cost **by 5% to 16%**,
- Already, “**small**” variations of costs (ETS2) **may push vulnerable households into energy poverty**,
- **Higher initial investment may be compensated by lower energy costs** (whole energy chain).

REHVA recommends:

- significantly enhance **quality awareness**, the importance of **monitored system performance**,
- **performance, CO2 emissions** should be **considered** if lowering taxes, levies (electrification) ,
- **facilitate access to funding** to enable building owners to **pass the initial investment hurdle**,
- **Smooth over the whole lifecycle**, the payback of fundings.

Mobilizing investment

Mobilizing additional public and private investment

Enabling faster and simpler public support for social and affordable housing

➤ Increase public and private investment for affordable and sustainable housing

Many subsidy schemes are descriptive and not system performance based.

Example: Heat pumps are subsidized on their electrical power (lower COP, increased peak loads).

Public funding is not optimized, may have negative side effects (higher prices, lower efficiency)

REHVA recommends :

- **HVAC professionals** should be **subsidized** to provide **trustworthy** information,
- **Performance** of the HVAC installation should be **monitored** after new installation or renovation,
- **Public funds should be carefully managed (system-level performance, monitoring results),**
- **European funding** should be linked to **European rules** (not to national rules).

➤ TECHNICAL

System efficiency and real performance monitoring: key for affordable housing

- **Avoid** oversizing (reduce CAPEX, improve the system performance OPEX)
- **Increase** reliability and quality of measure (monitoring of results)
- **Prioritize** low-cost with high impact measures (e.g. control systems, commissioning)

➤ ORGANIZATIONAL

Common EU methods and tools: key for increased labour capacities and skills

- **Avoid** the fragmentation of the EU market by **national methods and qualification** schemes
- **Increase** cross border recognition of education, training and qualification
- **Prioritize** the development and use of European Standards (third mandate on EPBD standards)

➤ FINANCIAL

Link European funding to European Rules: key for optimized spending of EU money

- **Increase** subsidy scheme based on monitored system level performance
- **Prioritize** European rules as awards criteria for European funding