

REHVA position paper on the European Commission 2030 climate and energy policy

Brussels, 04 February 2014

The Commission's new proposal for 2030 EU climate and energy policy framework sets a target to reduce greenhouse gas (GHG) emissions by 40% below the 1990 level but has abandoned binding targets for energy efficiency and renewables which have guided the R&D work in the building sector for more than 10 years.

Abandoning the energy efficiency target could stop the progress and destroy the leadership in the industry.

REHVA is deeply concerned about the lack of binding targets for energy efficiency and strongly believes that only with three balanced, ambitious targets for GHG, renewables and energy efficiency it is possible to ensure a successful overall climate and energy framework for Europe for 2030 and beyond.

Experience shows that only binding targets can lead the way towards continuous development in energy efficiency, especially in the building sector which represents nearly a half of the energy end-use. The building sector has always needed strong regulatory boost before any major progress has happened. Voluntary efforts by a few forerunners have resulted in success stories which lead the way, but the vast majority has just followed the minimum requirements set by the building codes. Systematic improvement of energy performance of buildings can be done without drawbacks only through national binding requirements, together with voluntary efforts which are not alone sufficient.

REHVA can agree that the GHG target 40% is important as such, and will to some extent contribute towards a greater share of renewables, but it may stop a progress in energy efficiency and create unstable situation for industry. Without binding targets, Member States may expect that progress will happen through the GHG target by itself or through the existing regulations and measures, and through voluntary efforts. Only binding national long term targets will ensure an active boost in the industry and end users towards better efficiency and encourage innovations, too.


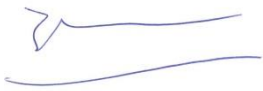

GHG targets alone will put the main focus to energy production oriented policies instead of systematic improvements throughout the whole energy chain, including end-use, distribution and production. Holistic and balanced energy policies are evidently needed to maintain the achieved progress and to keep the leadership role. Thus energy efficiency targets are equally or even more important as the GHG target, as they have a direct influence in the consumers and the industry.

REHVA also believes that three binding targets policy is not only the key to achieving any of those targets, but to reach a sustainable way to strengthen Europe's position as a global leader in energy efficiency, especially in the building sector, and to overcome the still existing weaknesses in this way. By now, several successful innovations have entered the market, with the quality has increased through success stories by forerunners in European industry, for example in eco-design and energy labelling, resulting in win-win situation to both end-users and manufacturers.

“Only the saved energy is free”. Success stories of energy savings are available, and the best of these have also improved the citizens’ well-being. Energy efficiency improvements have been cost effective and positive impact on the economy (unemployment reduction, export increase, etc.). To put the highest priority in the energy efficiency target could actually be the most effective way, to lead to an increase in renewables, and also a major reduction in GHG.

The EU has through systematic legislative efforts like the EPBD, EED and ErP and binding country specific targets, reached a development which can by the year 2020 result in reaching the 20-20-20 target, or at least close to the targets. In the situation where European industry has experienced benefits from ambitious targets as a tool towards global leadership in energy efficiency, the lack of binding energy efficiency target looks a drastic step backwards. The fact that the 20% target for energy efficiency still looks very difficult to meet should stress the importance of a binding and ambitious target to energy efficiency.

As a conclusion, **energy efficiency improvements are so directly linked to GHG reductions that the discussion of GHG reduction target without a binding energy efficiency target will become speculative.** Therefore it would be **essential to fix ambitious and cost-effective energy efficiency targets together with GHG targets.** Also **binding target for renewables is essential** for a holistic and balanced policy framework.

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|  <hr/> Karel Kabele REHVA President |  <hr/> Jan Aufderheijde REHVA Secretary General |  <hr/> Jorma Railio Chair of the REHVA Technical and Research Committee |
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