

**REHVA's contribution to the
Revision of the Regulation 2018/1999 on the Governance of the Energy Union and Climate
Action**

➤ **Technology-neutral indicators and targets should be defined, not the solutions**

There is no “one fits all solution”; the solution will be worked out by professionals and should not be limited by regulations

The Evolution of the National Energy and Climate Plans (NECPs) into genuine **investment plans that efficiently direct public and private funding towards the energy transition actions is a key issue.**

To bring it into practice, **indicators and targets need to be defined.**

REHVA stands for principles such as:

- “technology neutrality”,
- “there is no one fits all solution, but optimisation.”,
- “define the objectives and not the means (solutions)”.

These principles are **valuable at the building level** but also at the **highest legislative level**. For example, if the NECPs fix as a target “100 % electrification”, this is a "mean" and not a "target".

It does not allow other solutions, for example, thermal solar.

As NECPs evolve into genuine investment plans, planning and reporting frameworks should target both supply-side decarbonisation measures and demand-side solutions that lower final energy needs in buildings. This includes building-level efficiency as well as demand-controlled and energy recovery technologies that prevent avoidable heating and cooling losses, optimise system performance and reinforce affordability and resilience. Making these contributions visible in NECP investment chapters and national reporting will help ensure investment pipelines target measures that deliver verified, real-world energy savings.

➤ **Enhancing quality awareness**

It is important to **significantly enhance quality awareness** in both new construction and renovation projects. Member States could potentially be **encouraged to only use subsidies if the quality of the delivered housing is guaranteed.**

More practically:

- For technical installations, **adjustment, tuning, and monitoring ('commissioning')** is important; this does not involve major investments, but rather craftsmanship know-how and the **integration of this type of quality assurance into the implementation processes** for both new construction and renovation.
- For the use of heat pumps as a replacement for fossil fuel boilers, a good quality of the building envelope (e.g. airtight) and commissioning of the installation are prerequisites

for **achieving the promised energy savings in practice** and thus contributing to **affordable housing**.

- The performance of the HVAC installation should be monitored after a new installation or renovation.

➤ **Decentralisation and a variety of solutions are essential to resilience.**

Decentralised energy transition brings opportunities:

- development of local renewable energies (solar, wind, biomethane),
- flexibility of demand,
- the complementarity between “electrons and molecules”, for example, for storage or peak loads, hybridisation.

A variety of solutions increases resilience. There is no ‘one fits all’ solution.

➤ **Decisions must focus on the 3 dimensions (security, competitiveness, decarbonisation) and should not harm any**

European policies **should not create new systemic fragilities** by focusing on one solution (e.g. electrification). The complementarity of energies is a simple way to address these three important dimensions:

- security,
- competitiveness (affordability),
- decarbonisation.