



UEPC CONTRIBUTION TO THE EUROPEAN COMMISSION'S PUBLIC CONSULTATION ON THE GREEN PAPER – A 2030 FRAMEWORK FOR CLIMATE AND ENERGY POLICIES

I. Presentation of the UEPC and its members

The UEPC, European Union of Developers and House Builders, represents more than 30,000 developing and house building companies, affiliated with its 10 member federations. Directly or indirectly the activities of these developers and house builders represent 10% of gross national product and employment in Europe. Together, they annually build and develop several millions m² of offices and shopping centres as well as more than 1.000,000 new homes.

II. Contributions

(1) Which lessons from the 2020 framework and the present state of the EU energy system are most important when designing policies for 2030?

UEPC thinks that EU level targets should be kept as simple and non-prescriptive as possible. It is important to recognize that the first priority should be reduced energy consumption.

(2) Which targets for 2030 would be most effective in driving the objectives of climate and energy policy? At what level should they apply (EU, Member States, or sectorial), and to what extent should they be legally binding?

UEPC thinks that the most important should be energy performance targets.

It is appropriate to have relevant energy targets for building performance. These should relate to the building fabric energy efficiency and the energy efficient provision of essential services – heating, lighting and hot water. It is, however, necessary to recognise that climatic conditions vary greatly across the EU, so the approach of the EPBD in allowing national flexibility in setting performance targets according to a common methodology is correct. For the same reason, it is not appropriate to specify particular levels for the use of renewable technologies within individual buildings across the EU.

(3) Have there been inconsistencies in the current 2020 targets and if so how can the coherence of potential 2030 targets be better ensured?



UEPC thinks that there have not been overt inconsistencies, but there may be some underlying tensions between energy efficiency, carbon reduction and promotion of renewable energy.

Some renewable energy technologies are not necessarily as efficient as they might be and can have other resource implications. The use of rare earths in new technologies may raise strategic resource security issues for the future.

The targets should be credible or made credible by indicating ways to achieve them – if not economically in a first time at least technically; it doesn't matter that afterwards other ways would be more feasible, developed and implemented

(4) Are targets for sub-sectors such as transport, agriculture, industry appropriate and, if so, which ones? For example, is a renewables target necessary for transport, given the targets for CO2 reductions for passenger cars and light commercial vehicles?

Even if UEPC is not directly affected, it would, however, suggest that within a general focus on energy efficiency and energy performance it would be sensible to look at what policy measures may be helpful to drive improvements in the efficiency of appliances and consumer electronic devices used by most citizens across the EU. People will want and need to continue to use such equipment and the best route for reducing the related energy use will be to focus on relevant product standards.

(7) Are changes necessary to other policy instruments and how they interact with one another, including between the EU and national levels?

UEPC does not think so. It is important that Member States have as much flexibility as possible to implement measures needed to achieve the main EU level targets and commitments in view of the very significant differences in their national contexts.

(10) Which measures could be envisaged to make further energy savings most cost effectively?

UEPC suggest that for the built environment, the key measure is the EPBD complemented by the recent Energy Efficiency Directive. This legislation should be sufficient to achieve necessary energy savings in a cost effective way. The EPBD's objective for nearly zero energy buildings only comes into full effect from about 2020 and in the nature and timescale of development and renovation



processes it will take some years beyond 2020 for the full benefits of the EPBD requirements to be realized.

For buildings the primary requirement is to achieve an optimum level of fabric energy efficiency and energy efficiency for all essential services – heating, lighting and hot water. The existing legislation will achieve such a focus and importantly do so in a way which is not technology specific.

It is vital for cost-effective innovation that any EU measures in this field are not prescriptive and do not seek to pick technology winners. Setting sensible and cost-effectively achievable building energy performance requirements is the right route – enabling developers, suppliers and manufacturers to work out the best solutions. Allowance must also be made for the very considerable variation in climatic conditions across the EU: this means technical solutions that work in one Member State may not be the best approach in other Member States.

It could be most important to dispose of valid but newly defined comfort standards which could gain general acceptance (lighting levels/more limited ranges of individual impact on mean temperatures in offices, etc...)

Taking into account for example better insulation, high performance glass or air tightness leading to really low heating needs, it could be ineffective to invest in expensive on-site renewable energy production so it is the total energetic and general Life Cycle Cost that should be the driver.

(12) Which elements of the framework for climate and energy policies could be strengthened to better promote job creation, growth and competitiveness?

UEPC believes that at high level, the best means generally of promoting job creation, growth and competitiveness is to create a long term policy and regulatory framework that provides certainty and confidence to prospective investors in new energy sources and systems.

There may also be a case for considering EU financial support – potentially through from R&D to investment finance support – to help bring through specific energy supply and distribution solutions where there has been a proper case made for the EU having a comparative economic advantage that could be developed to create additional growth and employment opportunities – including export opportunities to other parts of the world.

(14) What are the specific drivers in observed trends in energy costs and to what extent can the EU influence them?



UEPC considers that the current main drivers are fossil fuel demand and availability and the consequent price impact.

Completing the internal EU energy market and ensuring effective implementation of its rules is necessary to help exert downward pressure on prices, but this will not in itself solve the long term upward pressure on fossil fuel prices. Policies to contain and reduce overall energy demand are therefore necessary.

The EU must also encourage and support a diversity of energy supply options consistent with its climate change and energy policies.

(16) How to increase regulatory certainty for business while building in flexibility to adapt to changing circumstances (e.g. progress in international climate negotiations and changes in energy markets)?

UEPC thinks that commitment to long-term policy and regulatory goals and frameworks is the essential requirement.

The investment necessary in new technologies, infrastructure and systems is very substantial and will not be forthcoming if investors do not have confidence in the long-term strategy and supporting rules.

The EU's pro-activity in setting out pragmatic propositions for international negotiations in this field is also critical.

(20) How should the new framework ensure an equitable distribution of effort among Member States? What concrete steps can be taken to reflect their different abilities to implement climate and energy measures?

UEPC believes that the appropriate use of the Structural and Cohesion Funds should be considered. Sharing of experience and best practice on technical solutions should be promoted and supported. Requests for such advice should be industry-led from the Member States who wish to have it.