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**The VELUX Group response to the Green Paper on “A 2030 framework for climate and energy policies” (Joint Transparency Register, ID number 423142010527-25)**

The VELUX Group warmly welcomes the Green Paper on “A 2030 framework for climate and energy policies”. We support setting a long-term, stable climate and energy policy framework in order to build investor confidence and stimulate green transformation, job creation and growth throughout Europe towards 2030.

The future climate and energy framework should include three equally binding targets for increased energy efficiency, reduction of greenhouse gas emissions and higher share of renewable energy. The targets should be framed within the EU Low Carbon Roadmap and the EU Energy Roadmap in order to ensure that the EU delivers on energy consumption reductions, meets its climate ambition and helps create a more sustainable energy mix towards 2050.

A binding *energy efficiency* target is necessary, as higher efficiency in all sectors can be a key to strengthening Europe’s competitiveness and to reaching the ambitious energy and climate targets towards 2020 and 2050. Buildings account for 40% of the energy consumption in Europe and thus constitute the end-use sector with the highest saving potential. Furthermore energy-efficiency is the most cost-effective way to reduce CO<sub>2</sub> emissions. We can achieve a major bulk of Europe’s 2020 carbon emission target by halving the energy use in existing buildings already in 2020 by implementing solutions that are both available and scalable.

Strengthening the energy efficiency of buildings could also make an important contribution to the reduction of the €423 billion energy trade deficit facing Europe at the moment. According to a recent study, gross annual investments of €41-78 billion in building renovation in Europe would bring annual returns of €104-175 billion to society with €52-75 billion coming from lower energy consumption and reduced energy bills<sup>1</sup>.

Therefore, the VELUX Group believes there is a strong case for ambitious programmes for energy-efficient renovation of the EU building stock to be a key element in the future climate and energy framework. At the same time, energy-efficient renovations leading to im-

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<sup>1</sup> “Multiple Benefits of Investing in Energy Efficient Renovations - Impact on Public Finances”, Copenhagen Economics, October 2012

proved indoor climate have a positive effect on the health, productivity and learning abilities of the people living and working in the buildings. These improvements have an extensive positive effect not only on a human factor scale but also on society as a whole.

The future climate and energy policy should be based on a holistic approach to energy efficiency of buildings. Through our Model Home examples<sup>2</sup> based on the Active House Principles<sup>3</sup>, we have demonstrated that it is possible to build and renovate buildings that give more than they take and still provide a healthy indoor climate to the benefit, well-being and productivity of the people living and working in the buildings. Buildings that contribute to the quest for improvements in well-being and health and at the same time reduce the environmental impact by cutting CO<sub>2</sub> emissions can be built and renovated by using materials, building components and technologies readily available today.

The future climate and energy framework should furthermore be based on a strong EU Emissions Trading System (ETS) that provides incentives for heavy polluters to cut their CO<sub>2</sub> emissions and thereby enhances green transformation of the European economy. We are therefore strong proponents of the ETS back-loading proposal and see it as a shortterm measure to strengthening the system. However, we also see a need for a more structural reform to restore the credibility of the ETS in a longterm perspective.

Finally, we urge the European Commission and the ministers to work together for early agreement on an EU 2030 climate and energy framework, based on three binding targets and a strong EU ETS system. That way the EU can deliver a stable framework and unlock the investments needed to accelerate green transformation and thereby stimulate increased demand, growth and job creation.

Yours sincerely,



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#### **About the VELUX Group**

*The VELUX Group creates better living environments with daylight and fresh air through the roof. The VELUX product programme contains a wide range of roof windows and skylights, along with solutions for flat roofs. The Group also supplies many types of decoration and sun screening, roller shutters, installation products, products for remote control and thermal solar collectors for installation in roofs. The VELUX Group, which has manufacturing companies in 11 countries and sales companies in almost 40 countries, represents one of the strongest brands in the global building materials sector and its products are sold in most parts of the world.*

*The VELUX Group has about 10,000 employees and is owned by VKR Holding A/S, a limited company wholly owned by foundations and family. The VELUX Group head office is in Denmark. For more details, visit [www.velux.com](http://www.velux.com)*

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<sup>2</sup> [http://www.velux.com/Sustainable\\_living/Model\\_home\\_2020](http://www.velux.com/Sustainable_living/Model_home_2020)

<sup>3</sup> <http://www.activehouse.info/>