



European Commission  
Directorate-General for Energy  
Directorate C- Renewables, Research and Innovation, Energy Efficiency  
C3. Energy Efficiency

Oslo 18.05.2012

Dear Sir/Madam,

The Federation of Construction Industry in Norway would hereby like to answer the European Commission's consultation on "Financial Support for Energy Efficiency in Buildings".

The Federation of Norwegian Construction Industries (BNL) is the largest employers' federation within the building and construction industry in Norway. We represent 13 different industrial branches with over 4000 member companies. Our membership covers major parts of the total value creation chain such as builders, contractors, manufacturers of building materials and entrepreneurs within the field of building, construction and technical installations.

## **5.2 Consultation questions**

With reference to question 1 (a):

The barriers identified in the Consultation document are the most important ones. In Norway, the most important barrier is the lack of an energy efficiency target. The Government has not set up a goal/target on how much energy Norway should save each year. Based on the result of several reports, it is possible to save 8TWh in existing buildings in Norway during a period of 10 years, for instance as stated in the report 'Arnstadrapporten'<sup>1</sup>. However, we need a target from the Government to reach a national goal for energy efficiency.

With reference to question 1 (b):

Absence of knowledge and awareness about energy efficiency is important to address. Information to the consumers about energy efficiency, possible energy efficiency investments and financial support, is very important to address as the process is often too

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<sup>1</sup>

[http://www.regjeringen.no/upload/KRD/Vedlegg/BOBY/rapporter/energieffektivisering\\_av\\_bygg\\_rapport\\_2010.pdf](http://www.regjeringen.no/upload/KRD/Vedlegg/BOBY/rapporter/energieffektivisering_av_bygg_rapport_2010.pdf)

complicated for the consumers. The importance of giving information is often forgotten, or less emphasised than other factors.

Another challenge is the question whether the responsibility to invest in energy efficiency in a building lies with the owner of the building or the tenant.

With reference to question 1 (c):

It is crucial that it must be easier to initiate the process of energy efficiency investments, especially in households. One of the results of the survey 'Energy advisor'<sup>2</sup> is that about 90 % of those who received advice regarding energy efficiency investments are very content with the help they received.

Based on the results of the survey, we believe that firstly, it is important that the consumer will be offered some support by an advisor to develop an "Energy Plan" of their own building. The Energy Plan will state what should be done and in what order the energy efficient investments should take place. This is an actual plan, and not guidance. Secondly, the advisor should be independent and the advice that is given should be free of charge for households. Lastly, the advisor should help the consumer with the next step in the energy efficiency investment process. There should be a list available with all the legal craftsman enterprises and civil engineering enterprises. The advisor should help the consumer with ordering from the list and give them information on how to get financial support for the investment.

With reference to question 2 (a):

In Norway we are in lack of an effective financial tool for energy efficiency in buildings. Existing tools are not applicable for the volume-marked. The existing tools are meant to address innovative buildings and rehab projects. As a result, there exist no tools for normal households regarding energy efficiency. The financial support that is available, include only a small number of projects. These building projects are often large and very expensive, and they do not address the real big potentials of energy efficiency in existing buildings.

With reference to question 2 (b):

Public financial tools, whether from the National Budget or from marked mechanisms such as White Certificates, are crucial to obtain energy efficiency in the volume-marked.

Enova SF is a public enterprise owned by the Royal Norwegian Ministry of Petroleum and Energy. Enova's goal is to make it easier for public and private enterprises to choose simple, energy-efficient and environmentally correct solutions. However, the system today is very complicated and bureaucratic, and Enova are mainly supporting technological projects and innovative building project. In other words, there is a need of a simple and not bureaucratic arrangement/instrument for existing buildings.

Another recommendation is that we need an independent advisor that can help the consumers to develop and create the Energy Plan. This is especially important for the households.

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<sup>2</sup> <http://www.bnl.no/article.php?articleID=1763&categoryID=332>

There should be a demand that a large amount of the supported energy effective investments should have a long lifetime, with other words it should have a time span at over 25-30 years.

With reference to question 3 (a):

It is more important to raise the competency of the craftsmen and craftswomen to secure that it will last for a long time and that the construction will be of good quality, than to move on with further regulation.

We look forward to the result, and we are happy to answer any questions that you might have.

Yours faithfully,

Caroline Khoury  
Project Leader  
Energy and environment  
The Federation of Construction Industries

BNL Contact:  
Ms Caroline Khoury  
Project Leader  
Mailto: [caroline.khoury@bnl.no](mailto:caroline.khoury@bnl.no)