

## **ITB (ID 83287446455-82) contribution to the Public consultation on Financial Support for Energy Efficiency in Buildings:**

### **1) Addressing market failures**

- a) Are the barriers identified in this document the most important ones? If not, which barriers are missing and why are they important?
- b) Which market failures would be most urgent to address? At what level (i.e. EU, national/regional/local) would these failures be best addressed?
- c) How could these failures be best addressed? For example; how could behavioural change needed for quicker uptake of energy efficiency measures by society be triggered at the national level? How could the development of an energy services market for households be further stimulated? What could be done to increase awareness raising and promotion of energy efficiency in buildings? How could the business community (e.g. building sector, ESCOs, local banks, etc.) be better supported in delivering energy efficiency in buildings? How could the split incentive problem be best tackled?

ITB: In our understanding the most important barriers are connected with the lack of complete information, provided in a reliable format, on what is a real environmental, social or economic consequence of the technical solutions that are to be energy efficient. Cost and benefits of different technologies may be expressed in a form of indicators, taking as much as possible from the European standardisation resources. All decisions on the potential support or investment should be based on the performance based analysis of the whole life-cycle impacts, not restricted only to the use phase. This is also concerning promotion and information campaigns, today using language that is not technically transparent and connected more with marketing than with the engineering.

### **2) Improving access to financing**

- a) Are the current EU-level financial tools for energy efficiency in buildings effective? How could the uptake of EU-level funding for energy efficiency (including cohesion policy funding) be improved? As a complement to tailor-made national or regional financial instruments (e.g. set up with a contribution from cohesion policy funds), what could be the future role of centrally-managed financial instruments at EU level in this context?

ITB: No comment.

- b) How could more private financing (both from institutional investors as well as building owners) for energy efficiency projects be mobilised? What would be the role of public funding (both at EU and national level) in this context? Is access to (project development) technical assistance an issue and how could it be provided most efficiently at the national, regional and local level? How could both national and EU financing schemes be improved to best cover all segments of the market (residential, commercial, public buildings, etc.)?

ITB: Technical assistance is useful, if based on the scientific knowledge. Training courses for technical experts shall be supported from the EU level.

- c) Is there a need for guarantee systems related to building efficiency investments? If so, what guarantee systems for efficiency investment would be necessary and how should they be designed? Is there a need for other enabling mechanisms (e.g. risk-sharing, investment vehicles)?

ITB: No comment.

- d) How could the capacity, knowledge and risk perception regarding energy efficiency investments be improved, both at financial institutions as well as with private investors and administrations at all levels?

ITB: Dissemination of knowledge shall be supported by a common European guidance, worked out with the strong involvement of the Commission, Member States, CEN and research bodies.

- e) Are there examples of good practice at national or regional level (with data on costs and benefits) that could be applied more widely?

ITB: See Second NEEAP for Poland at [http://ec.europa.eu/energy/efficiency/end-use\\_en.htm](http://ec.europa.eu/energy/efficiency/end-use_en.htm)

### 3) Strengthening the regulatory framework

- a) Is there any need for further EU-level regulation to stimulate energy efficiency investments in buildings beyond the Commission proposal for a new Energy Efficiency Directive? If so, what should these measures entail?

ITB: Energy efficiency in the construction sector is supported at the EU level by very different measures regarding buildings and/or construction products. We have a situation, when some of the product groups are or will be covered by Ecodesign requirements (plus obligatory CE marking), for some it is possible to obtain EU-Ecolabel mark, many manufacturers are declaring product performances in the field of energy economy according to the CPD (CPR in future) and there are requirements on energy efficiency in EU GPP Toolkits (to be adopted by the Member States). For buildings, EPBD, EED or RES directives are or will be applicable (and a voluntary EU-Ecolabel will be used for office buildings).

We think that such a situation may be difficult to understand for the market players and it needs more holistic, transparent and coordinated approach. Instead of a new, additional directive, clear European sustainable construction strategy shall be provided, taking into account other important aspects as Indoor Air Quality, accessibility, emissions and so on, with re-thinking of support measures that have to be applied.



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- b) What could be specific measures to be taken at national level to implement and complement most effectively the EU-level regulatory framework for energy efficiency?
- c) What are the specific needs for policy guidance and awareness raising among different stakeholder groups?

ITB: No comment.