

# EVIA Contribution to the public consultation on Financial Support for Energy Efficiency in Buildings

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The European Ventilation International Association EVIA was established in July 2010 in order to represent the ventilation industry both in Brussels with the EU institutions and relevant stakeholders and in the national capitals with our partners.

Our membership is composed of 36 member companies and two national associations across Europe realising an annual turnover of over 3 Billion Euros and employing more than 30,000 people in Europe.

As is the case for many other sectors, the ventilation industry is impacted by a large range of EU Regulations and Directives.

EVIA's answers to the questionnaire:

## *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?*

**Yes.**

*(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?*

**EVIA believes that a concerted action at all levels would be the best practice. The role of Europe should include the following aspects:**

- **Stimulation of the market**
- **Information and exchange of information**
- **Highlighting and reduction of barriers**
- **Harmonization of products and procedures (fully technology open)**
- **Developing and promoting of best practice solutions**
- **Coordinating the research**
- **Ensure a long term support implementation**
- **Training**

*(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?*

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## **EVIA Contribution to the public consultation on Financial Support for Energy Efficiency in Buildings**

**EVIA stresses the importance of a long term support for all measures taken on EU/nat./reg./local level.**

### *(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?*

**EVIA believes that European Financial Programs should establish a framework in which the supported measures guide to a comparable target in energy or CO<sub>2</sub> - reduction. The focus on one single indicator (primary energy) weighted with climate parameters would be helpful. This means, that it makes little sense for Europe to identify technologies for funding that have a national/regional importance.**

*(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.)?*

**Residential segment needs clear information strategy combined with well trained designers (project developer, architects and engineers). This means EVIA stresses the importance of financing "Information and Training" programs.**

**Commercial segment need a predictable and reliable regulatory framework primarily based on direct tax funding programs.**

**Public segment needs a mobilization of Public Private Partnership models.**

### *(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?*

**There is no need for further regulations. The legal framework of enforcement should be clearer and easier to implement and should provide stricter guidance with clear processes for Member States.**

**EVIA calls on the Commission to develop a common enforcement scheme across the EU which would supersede national legislation.**

**Market surveillance and mutual recognition of testing, performance data of products and mandatory cooperation between Member States should be the basis of funding in Europe.**

**EVIA calls for technology-neutral incentives based on EPBD and Ecodesign performance data.**

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