

Reference: EU energy efficiency directive (EED) – evaluation and review by the European Commission

PU Europe, representing the European polyurethane insulation industry welcomes the opportunity to provide input to the European Commission's Inception Impact Assessment on the evaluation and the review of the Energy Efficiency Directive.

The PU industry is committed to a climate neutral and resource efficient Europe by mid-century, and believes that critical legislations such as the EED must be made more effective and contribute more to the success of the European Green Deal. The context described in the background document of this roadmap calls a better implementation as well as an ambitious review of the EED. This review shall fully account for the energy savings potential in the buildings, from commercial and industrial premises to households. According the European Commission own analysis, the pace at which the energy consumption related to heating and cooling is being reduced is not in line with our climate targets for 2050, and even less so when we look at the 2030 milestone.

Therefore a revised EED shall come in strong support to the renovation waves that to date would mainly be triggered in the context of the implementation of the EPBD (decarbonization of buildings at national level via the establishment of long-term strategies for mobilizing investment and facilitating the renovation of their national building stock). Even if in a number of countries, measures targeting the building envelope have been linked to the implementation of the EED, but this must be generalized and the ambitious elevated.

In order to achieve the above, we believe that a bold building stock energy efficiency target should be set in the EED. In addition, decreasing the building envelope consumption, applying the Energy First principle, can be realized via two articles of the EED:

- Energy Savings Obligation (article 7): far more savings could be activated if measures and policies are linked to the renovation of the building stocks, and also through the establishment at national level of innovative schemes to all energy consumers, via energy services companies for instance, and;
- Exemplary role of public bodies' buildings (article 5): this article shall be amended to capture far more public buildings since today's scope is restricted to a few types of buildings.

The above would automatically lead to increasing the 32.5% energy efficiency target for the EU by 2030. If based on the cost-effective energy savings potentials, it could be set at 40% for final energy (see the Fraunhofer modelling <https://www.isi.fraunhofer.de/en/competence-center/energiepolitik-energiemaerkte/projekte/energy-saving-scenarios-2050.html>).

The backing of such above points would provide more certainty for investors and encourage long-term investments as the ones made in buildings.

Furthermore, we take the opportunity of this consultation to share our belief that the climate and energy framework for 2030, needed to achieve our climate neutrality goal by

2050, should strongly rely on its energy efficiency pillar rather than possibly heading towards an EU-ETS for all sectors approach.

At a time of COVID19 pandemic and looming economic crisis, activating more renovation works and new built fulfilling the NZEB standard will make Europe more resilient and fair.

About PU Europe:

PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. The 110 manufacturing sites and more than 20,000 direct jobs in the PU rigid foam sector contribute to tackling the carbon footprint of the buildings stock responsible for around 36% of the CO2 emissions of the European Union (more information about us via www.pueurope.eu and lobbying transparency register ID number 27993486325-38).