

EEB contribution to “Energy efficiency in buildings – consultation on ‘renovation wave’ initiative”

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The EEB believes that the decarbonisation and the de-pollution through renovation of buildings, besides being two formidable opportunities to improve Europe’s economy, are among the most promising policy instruments to achieve the European Green Deal targets.

As the Commission aims for decarbonisation to achieve climate neutrality, it should take full account of **existing and upcoming circular economy measures to reduce embedded emissions**, whose relevance is ever increasing, first and foremost by promoting the energy and material efficiency principles. Promoting low-to zero carbon building products will create a driver for the decarbonisation of energy intense sectors such as steel and cement and foster the interlinkages with the primary sector for the supply of sustainable organic building materials. Green public procurement rules should aim at full decarbonisation and de-pollution of public buildings, starting from schools and hospitals.

While total decarbonisation and de-pollution of (new and existing) buildings is a prerequisite for reaching **climate neutrality** and **air quality objectives**, the immediate priority should be the decarbonisation and de-pollution of heating and cooling by means of renewable energy supply (excluding biomass). The existing technologies that couple PV, solar thermal and geothermal decentralised energy production with heat pumps can allow for progressive phase out of fossil fuels, both in urban and rural areas.

Decarbonisation of heating is easy if compared to other carbon-intensive sectors such as aviation or steel, chemical and cement production, where current technology options for full decarbonisation are more limited. It is of the utmost importance that **fossil fuels play no role in the Renovation Wave (RW)** and that the concept of “**technology neutrality**” **shall not apply** as these would undermine the very objective of prioritising climate and environmental targets.

Building on several recent studies¹², we believe that the **RW should not promote the role of hydrogen for domestic use** either: being hydrogen a very expensive commodity it **should only be used in sectors where no other alternatives** for decarbonisation are available (i.e. industrial sector). Particularly, all efforts should be made to prevent the use of heating and cooling technologies based on the **mix of hydrogen and fossil**

¹ https://www.iee.fraunhofer.de/de/presse-infothek/Presse-Medien/Pressemitteilungen/2020/Wasserstoff_Fokus_Gebaeudewaerme.html
² <https://www.theccc.org.uk/publication/hydrogen-in-a-low-carbon-economy/>

gas, that would inevitably lock us in existing gas infrastructure and prevent end users from considering alternatives to the gas grid.

More than 45% of particulate matter in the EU is produced by domestic heating in households, which also contributes to other air pollutant emissions, such as NO_x and PAH. The RW must therefore have, among its primary objectives, the reduction of air pollution as well. For this reason, it **should allow only for the use of products, both new and recycled, which do not contain hazardous substances.**

While we do support non-emitting solutions, when it will not be possible to abandon wood stoves only appliances holding the [Blue Angel label](#) should be supported via the funds made available.

The contribution of the RW actions towards **air quality and pollution reduction objectives must be identified** within the Communication, the action plan, and the upcoming legislative and non-legislative instruments **as a conditionality criterion.**

The roadmap mentions the link between this initiative and the NECPs: the **National Air Pollution Control Programmes** should also be mentioned in the roadmap given their key role in improving air quality and the need to ensure coherence between the two tools.

To improve energy efficiency, we ask the Renovation Wave promotes first and foremost **deep renovation of buildings** and high performing technologies (only at the **top two classes** of appliances should be allowed in implementing measures).

Finally, we would like to stress that **overcoming the upfront cost should be prioritised in local actions** and grants should be favored as accessing to loans is not an option for many citizens.

