

Public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework

INFORMATION ABOUT THE RESPONDENTS	
Are you responding to this questionnaire on behalf of/as: -single choice reply-(compulsory)	Organisation
Please enter your name or the name of your company/organisation: -open reply-(compulsory)	European Historic Houses Association
Please indicate your principal country or countries of residence or activity: -single choice reply-(compulsory)	Belgium
How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(compulsory)	Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. Energy efficiency targets and measures	
1. Do you think the right approach in addressing the shortfall is: -multiple choices reply-(compulsory)	b) Reinforced implementation of existing legislation, including active policy on infringements
Please specify your response b) -open reply-(optional)	
<p>We consider the energy efficiency regulations already in place as sufficient. We acknowledged that existing directives are not yet applied or applied partially with a lot of difficulties at the national, regional and local level. EU energy efficiency regulation is now sufficiently mature to merit a detailed and comprehensive analysis of what has actually been achieved – not just whether national governments have properly enacted the Directives' provisions, but whether the provisions themselves, even when properly transposed, have had significant energy saving outcomes and whether these have been cost effective. Unsuccessful regulation should be either corrected or rolled back. For instance, historic houses owners are confronted with energy performance certificates with sub-optimal rating methodologies and inadequate recommendations for the cost-optimal or cost-effective improvement of the energy performance of their building.</p>	
B. Energy efficiency sectors	
2. Do you think that further policy measures are needed at EU level to foster energy efficiency in buildings? -single choice reply-(compulsory)	No
Please give details. -open reply-(optional)	
<p>Futher policy measures will with no doubt lead to stringents new targets for energy savings that will force private buildings to deeply renovate up their buildings to a certain standards. As EU funding cannot cover the cost and as member states have not budgeted for subsidising this and cannot be forced to, an extension renovation requirement to the private building stock would inevitably have to be paid for wholly or partially by building owners themselves. To impose a target that in order to be met necessarily requires massive unfunded above-trend private sector renovation is to impose an obligation on private citizens and small businesses to spend. To keep the authentic value of historic buildings (we are targeted mainly non-listed) you need to have a sound and careful management. The owners</p>	

have to find cost-effective solutions as the works for renovation are very expensive, especially in historic buildings where you need to hire craftsmen with specific skills.

3. Do you think that further policy measures are needed at EU level to foster energy efficiency in industry?

-single choice reply-(optional)

No opinion

4. Do you think that further policy measures are needed at EU level to foster energy efficiency in transport?

-single choice reply-(optional)

No opinion

5. Do you think that further policy measures are needed at EU level to foster energy efficiency in electrical equipment?

-single choice reply-(optional)

No opinion

6. Do you think that further policy measures are needed at EU level to foster energy efficiency in generation and distribution?

-single choice reply-(optional)

No opinion

7. Do you think that further financial mechanisms and instruments are needed at EU level to mobilise energy efficiency investments?

-single choice reply-(optional)

Yes

Please give details. -open reply-(optional)

We welcome the fact that supporting energy efficiency and renewable energy use in the housing sector is defined as an investment priority of the European Regional Development Fund as well as the Commission efforts to encourage Member States and managing authorities to set up "off the shelf" financial instruments such as renovation loan to make use of Structural Funds opportunities. However, we would like to see in reality that Member States make use of this opportunity to finance renovation of private historic houses (a majority are non listed) that have also a big role to play in the energy saving sector.

8. Do you think that further measures are needed to build the capacity of actors in the energy efficiency sector?

-single choice reply-(optional)

No opinion

9. What are the most promising technology solutions that can help deliver energy savings in the 2020 and 2030 time horizon? How can their development and uptake be supported at EU level?

-open reply-(optional)

There is great need for historic buildings to access to those technologies at an affordable price. One should consider also that there are not one technology ready-to-apply for private historic houses but several as all those houses have specificities (features, esthetics, materials) that need to be taken into account.

10. Further comments -open reply-(optional)

It is our view that absolute targets for energy savings in buildings should not be part of the EU regulatory panoply and that further EU energy efficiency regulation for buildings should be subject to careful preparation including rigorous analysis of the impacts of existing and planned regulation. To