

October 2005

**Consultation on the The European Commission's Green Paper on Energy Efficiency
- "Doing More With Less"**

**Response from EuroACE (European Alliance of Companies for Energy Efficiency in
Buildings)**

Introduction

EuroACE was formed in 1998 by twenty of Europe's leading companies involved with the manufacture, distribution and installation of a variety of energy saving goods and services. The EuroACE member companies together employ 438,000 people and have a turnover of €70 billion. The mission of EuroACE is to work together with the European institutions to help Europe move towards a more sustainable pattern of energy use in buildings, and therefore to reduce emissions of carbon dioxide.

Buildings currently account for between 40% and 45% of all energy used in Europe. Cutting energy use in half throughout the existing building stock would lead to an annual decrease in carbon dioxide emissions of 460 million tonnes (EU-25). This represents significantly more than the current Kyoto targets, and is possible to achieve using simple and existing techniques. Reducing this energy use would save Europe over €8 billion per year by 2010. Implementation would create over 3 million job-years of employment.

Energy efficiency measures in buildings are the most cost effective of the available technologies and can result in cost savings per tonne of carbon dioxide saved, and increased competitiveness for the European economy.

EuroACE therefore warmly welcomes and fully supports the publication of the European Commission's Green Paper on Energy Efficiency, "Doing More With Less", and sincerely hopes that it will stimulate real debate and result in new policy measures. Specifically, EuroACE welcomes the acknowledgement contained within the Green Paper that we could enjoy today's standard of living whilst using 20% less fuel. As importantly, we welcome the admission that around half of these savings could be achieved by means of the full application of existing measures, notably Community Directives that are already in force or tabled.

Achieving this would improve competitiveness. It would also cut the need to import so much fuel and would be the most cost-effective way to achieve our Kyoto targets. We are therefore pleased to provide our response to the specific questions relating to energy efficiency in buildings.

Detailed Answers to the Consultation Questions

1. *How could the Community (and the Commission in particular) better stimulate European investment in energy efficiency technologies? How could funds spent supporting research in this area be better targeted? (Section 1.1)*

EuroACE agrees with the EC's proposed approach to concentrate on a limited number of key priorities and welcomes the inclusion of renewables in buildings, smart energy networks and energy efficiency within the main programme. In the case of renewables this should include small scale or "mass market" solutions that focus on the household and SME sectors. However, the first priority must always be to seek to avoid any unnecessary usage of energy.

In the case of energy efficiency, we believe that there should be a strong focus on providing low carbon building solutions which improve comfort, including efficient ventilation and shading systems. Research is also required to mitigate increasing emissions from consumer electronics.

The Commission has a key role in ensuring the dissemination of best practice and technology transfer between Member States. We believe there is also an increased need to make environmentally friendly products and services more commercial.

The important new Directive, the Energy Performance of Buildings Directive, has enormous potential, so long as it is purposefully implemented. It is already clear that, whilst some regions and some governments are determined to maximise the opportunities this Directive offers, other have declared their intention to deliver only the most perfunctory, minimalist compliance. It is vital that the Commission ensures that best practice in delivering this directive is replicated throughout the Union.

2. *The emission trading mechanism is a key tool in developing a market-based response to meeting the goals of Kyoto and climate change. Could this policy be better harnessed to promote energy efficiency? If so, how? (Section 1.1)*

EuroACE supports the use of market-based mechanisms, which should allow the adoption of the most cost-effective emission reduction solutions. In the case of the EU Emissions Trading Scheme (EUETS), we believe that greater consistency in the development of the National Allocation Plans (NAPs) by Member States (MS) is required. As a minimum, Phase II targets must be consistent with delivering Kyoto objectives. A priority of the Commission must be to ensure that rigorous monitoring and reporting is carried out to ensure compliance, either through the surrender of required allowances, or through the enforcement of penalties.

3. *In the context of the Lisbon strategy aiming to revitalise the European economy, what link should be made between economic competitiveness and a greater emphasis on energy efficiency? In this context, would it be useful to require each Member State to set annual energy efficiency plans, and subsequently to benchmark the plans at community level to ensure a continued spread of best practice? Could such an approach be used internationally? If so, how? (Section 1.1.3)*

Given the widespread benefits of energy efficiency we believe that Member States should be mandated to set timetabled energy efficiency improvement plans, and report against them, as required by the proposed Directive on Energy Services (COM 2003(739)), currently under discussion in the Council and European Parliament. The targets should be sector-based. However we believe that the Commission is best placed to lead subsequent benchmarking and facilitation of best practice.

It is imperative that this includes leading non-EU countries. For instance, in the case of product standards, the EU lags behind some other countries and should raise its standard accordingly. At all times the EU should be seeking to apply best practice

standards from around the world for energy end-use products. We believe that the Eco Design of Energy Using Products Directive will be helpful in driving forward improved standards for specific priority products, but only if robustly progressed in a timely manner.

4. *Fiscal policy is an important way to encourage changes in behaviour and the use of new products that use less energy. Should such measures play a greater role in European energy efficiency policy? If so, which sort of measures would be best suited to achieve this goal? How could they be implemented in a manner that does not result in an overall increase in the tax burden? How to really make the polluter pay? (Section 1.1.4)*

Taxing environmental pollution is right in principle. 'The polluter pays' is fairer as well as economically efficient. Many fiscal incentives can only be introduced by national governments. Below, apart from the first three European-wide proposals, the main initiatives EuroACE would like to see implemented in all member states include:

- Reform of the EU 6th VAT Directive to allow a reduced rate of VAT to 5% on DIY energy saving materials, bought by a householder to install him/herself.
- All refurbishment work undertaken by contractors installing energy efficient materials and products should be subject only to minimum VAT rates.
- Support programmes for the most environmentally friendly products under favourable State Aid laws.
- A surcharge on inefficient products such as tungsten light-bulbs and subsidies for compact fluorescent bulbs.
- Capital allowances and enhanced capital allowances to allow companies' investments in energy-saving equipment to be written off against tax in a single year.
- A "buildings business tax allowance" - i.e. a tax allowance against profits/surplus for landlords on the cost of energy saving materials.
- A stamp duty rebate for building purchasers who make energy efficiency improvements to their building within, say, six months to a year.
- A local tax reduction for property owners installing all legitimate energy-saving measures.
- A personal tax allowance - i.e. to allow expenditure on energy-saving materials to be set against tax.
- A tax allowance for companies training installers of energy-saving equipment.

5. *Would it be possible to develop state aid rules that are more favourable to the environment, in particular by encouraging eco-innovation and productivity improvements? What form could these rules take? (Section 1.1.5)*

We see no reason why State Aid rules should not be amended to recognise the considerable benefits of the most environmentally friendly products and believe that it is right and proper to do so. The revised Guidelines due in 2007 must reflect this accordingly.

6. *Public authorities are often looked to for an example. Should legislation place specific obligations on public authorities, for example to apply in public buildings the measures that have been recommended at Community or national level? Could or should public authorities take account of energy efficiency in public procurement? Would this help build viable markets for certain products and new technologies? How could this be implemented in practice in a way that would promote the development of new technologies and provide incentives to industry to research*

new energy efficient products and processes? How could this be done in a manner that would save money for public authorities? As regards vehicles, please see question 20. (Section 1.1.6)

Yes, legislation should place specific obligations on public authorities. A high-level approach can be developed at the Community level, e.g. through the Energy Performance of Buildings Directive, but specific detailed legislation can only be developed at the Member State level, due to the different make-up at the local and regional level within Member States.

Clear public sector targets would allow the public sector to lead by example and to “invest to save”. All national, regional and local procurement, including new buildings, should not only take environmental issues into consideration but should result in the purchase of the most efficient products. This should include the installation of renewables and CHP where practical, assurance of full compliance with relevant Member State building standards and the purchase of top-rated energy efficient appliances.

It is also important that all new public buildings are built to high standards of sustainability. They should be designed to be energy efficient in both summer and winter – incorporating optimal insulation, shading and indoor climate control (with a focus on sufficient daylight and natural ventilation). They should also use renewable energy systems for heating and cooling and the most efficient control systems to manage and optimise energy performance.

It is important that these issues are not just set out in procurement targets, but that they are taken seriously throughout the procurement process, i.e. are not optional extras in calls for tenders and post-tender negotiations.

The draft European Directive on Energy Services proposes binding energy-saving targets. We believe that in order to ensure delivery a binding obligation must be included in the final text. We would prefer to see these set at the levels proposed by the European Parliament. Member States should be encouraged to demonstrate real commitment by voluntarily adopting the target prior to EU legislation. The European Commission and Parliament should do likewise, for their own activities.

Local and regional authorities also have a key role in the delivery of sustainable energy policy as energy users, local regulators and leaders in their local communities. It is vital that both regional bodies and local authorities show real leadership on environmental issues. This is best addressed through the development and implementation of specific sustainable strategies that tackle efficient energy use in housing and public and sector buildings. In essence, regional bodies and local authorities should become flagships for sustainability, including regeneration initiatives. Local planning consents should demonstrate a commitment to improving building standards and to encourage developers to go beyond building regulations.

National, regional and local government also have an important role in delivering staff awareness training. This approach would help develop supply chains and commercialise new environmentally friendly products whilst increasing consumer awareness and market confidence. Investment in energy efficient products would provide longer-term financial savings. For example, as well as reduced energy consumption, energy efficiency can help improve well-being when targeted at the fuel poor, thereby reducing social costs.

An obvious obstacle to the promotion of more energy efficient technologies by public authorities is the costs associated with such technologies. However, contracting systems exist that can guarantee the achievement of important energy saving targets while at the same time minimising – or even eliminating – budgetary implications. One such system is called Energy Saving Performance Contracting (ESPC).

ESPC provides a financing mechanism for upgrading and retrofitting energy equipment and services in public facilities without using budgeted funds and without requiring any capital investment by public authorities. Under ESPCs, Energy Service Companies (ESCOs) are responsible for providing the financing and facilities upgrades necessary to achieve energy savings (new lighting, boilers, chillers, controls, etc.). The ESCO guarantees the energy savings, is paid annually out of the savings, and is paid only if the savings are achieved. The public authority faces no upfront investment costs, reduces energy consumption, and all energy cost savings revert back to the authority once the contract expires (i.e. the ESCO has been paid).

The advantage of such a system is clear: reduced public sector energy use with no budgetary impact. The Commission might wish to consider legislation that could promote this type of contracting.

7. *Energy efficiency funds have in the past been used effectively. How can the experience be repeated and improved? Which measures can be adopted usefully at:*
- *International level*
 - *EU level*
 - *National level*
 - *Regional and local level? (Section 1.1.7. See also question 22)*

EuroACE believes that energy efficiency funds have a role to play at all levels. However, we do not believe harmonisation at the EU level would be helpful given the wide variations between Member States' primary fuel sources, climatic and demographic conditions etc. A flexible approach will be far more effective than a "one size fits all" approach.

EuroACE does, however, see an active role for the Structural and Regional Funds and for the European Investment Bank in particular in helping to improve the building stock in new Member States. Improving energy efficiency and conservation in buildings has a key role to play in completing the internal market – not least the internal market for energy services. For this reason there is justification for extending the Structural Funds to cover the buildings sector. This is particularly relevant in the new Member States and the Accession States, where the need for investment in the building stock is most pressing.

EuroACE intends to undertake further detailed research on funding and financing mechanisms – and we will be publishing our findings in due course.

8. *Energy efficiency in buildings is an area where important savings can be made. Which practical measures could be taken at EU, national, regional or local level to ensure that the existing Community Buildings Directive is a success in practice? Should the Community go further than the existing Directive, for example extending it to smaller premises? If so, how could the appropriate balance be achieved between the need to generate energy efficiency gains and the objective of limiting new administrative burdens to the minimum possible? (Section 1.2.1)*

[We assume that the "existing Community Buildings Directive" referred to above is the Energy Performance of Buildings Directive (EPBD).]

Between 40% and 45% of all Europe's fuel is consumed in buildings. EuroACE has commissioned several reports that examine opportunities for energy saving in buildings, the most recent of which is entitled "Towards Energy Efficiency in Buildings"¹. All reports are available at www.euroace.org. This report found that while the buildings sector is receiving important attention in the overall development of energy efficiency policies, there is such significant potential for cost-effective energy efficiency improvements as to warrant the buildings sector receiving an even higher policy priority. The report also highlighted the fact that important networks of experts (both inside and outside government) have evolved in Europe over the past decade. These networks should be tapped into in order to promote knowledge sharing and to help implement the EPBD.

With regard to the Directive, EuroACE feels that the Commission will need to take a proactive approach to ensure that Member States have the necessary capacity – human and financial – to meet their targets on schedule. The Commission should not desist from prosecuting Member States who fail to implement the Directive in any way.

Furthermore, we believe that the Commission should activate Article 11 of the EPBD immediately, thereby ensuring that the provisions of Article 6 are extended to buildings smaller than 1000m². We note with approval that several Member States have announced their intention to extend Article 6 to cover all buildings.

We also believe that the Energy Performance of Buildings Directive could be strengthened with respect to community buildings e.g. making the requirements of Article 5 mandatory in relation to alternative systems. It is also important to ensure that a broad and official definition of "public buildings" exists, to ensure that Article 7(3) is implemented, covering all buildings visited by the public – as para 16 of the Recitation of the Directive makes clear was always intended.

9. *Giving incentives to improve the energy efficiency of rented accommodation is a difficult task because the owner of the building does not normally pay the energy bill and thus has no economic interest in investing in energy efficiency improvements such as insulation or double-glazing. How could this challenge be best addressed? (Section 1.2.1)*

There is a general acknowledgment that, in the private rented sector, there exist few incentives for either landlord or tenant to improve energy efficiency. EuroACE believes that the private rented sector is best addressed through regulation and effective enforcement. As an example, the Landlord's Energy Saving Allowance (LESA) Scheme (recently introduced in the UK) is a good start. The scheme currently provides up-front relief on capital expenditure for installations in rented accommodation of loft, cavity wall and solid wall insulation (including first-time installations). The maximum amount payable to landlords is only 2,250 euro per building, and requires expansion particularly for multiple occupancy buildings.

EuroACE believes there is considerable scope for extending this allowance to cover products other than insulation, which offer technical improvements and lead to better energy use, and for increasing the amount payable per property. We see no reason why such a scheme could not be implemented across all Member States.

10. *How can the impact of legislation on the performance of energy-consuming products for household use be reinforced? What are the best ways to encourage the production and*

¹ Towards Energy Efficiency in Buildings, (2004), Janssen, R.

consumption of these products? Could, for instance, present rules on labelling be improved? How could the EU kick-start research into and the subsequent production of the next generation of energy efficient products? What other measures could be taken at

- *International level*
- *EU level*
- *National level*
- *Regional and local level?(Section 1.2.2)*

A key finding of Eurobarometer research shows that people expect Governments to regulate against products that damage the environment. The worst energy wasting boilers and fridges have already been banned without consumer complaint – no-one minds, everyone benefits.

Energy wasting products damage our pockets as well as our climate. Responsible businesses want a clear and long-term framework for planning investment. In the case of buildings, the EU and national governments need to set this long-term framework.

The key priority for the EU is to implement new minimum energy standards to outlaw energy wasting appliances and to ensure that energy losses from electronic equipment left on 'stand by' are reduced to the lowest levels possible. Care should be taken, however, to ensure transparency when it comes to setting such standards. The Commission must also ensure that standards are integrated into the overall energy efficiency action plan and target.

It is important to continuously improve standards and to allow sufficient product differentiation based on energy efficiency. We see this as a key EU activity. Benchmarking against international best practice is crucial to ensure this approach is as effective as possible. In order to ensure consistency and consumer clarity, it is important to implement information and awareness schemes at the national level. Regional and local variations are undesirable.

The creation of regional and local advice and information centres by Member States is vital to ensure effective dissemination. We believe that these should take a one-stop shop approach providing energy efficiency, small scale distributed generation and transport advisory services to householders. Such services could also be extended to SMEs. We believe that the EU should be encouraging and offering incentives to promote the creation of such networks accordingly, while ensuring that the role of ESCOs is given due consideration.

11. *A major challenge is to ensure that the vehicle industry produces ever more energy efficient vehicles. How can this best be done? What measures should be taken to continue to improve energy efficiency in vehicles and at which level? To what extent should such measures be voluntary in nature and to what extent mandatory? (Section 1.2.3)*

No comment

12. *Public information campaigns on energy efficiency have shown success in certain Member States. What more could and should be done in this area at:*
- *International level,*
 - *EU level,*
 - *National level, or*
 - *Regional and local level? (Section 1.2.4)*

Currently there is a higher degree of public concern and debate around climate change that needs to be converted into a far greater appetite for action in the everyday lives of EU citizens. About half of CO₂ emissions come from our buildings. The real climate change challenge and the biggest potential reductions in emissions are from our buildings. These changes must be driven by both the EU and national governments. Without the awareness, support and action of millions of EU citizens, climate change goals will not be delivered. In our view a 'low carbon economy' can only be built by a 'low carbon society'.

EuroACE believes that EU should be providing greater support to organisations that deliver awareness change at a local level. The required sea-change in understanding and behaviour on energy efficiency and a low carbon society must be rooted in local initiatives to change our behaviour in the home. EU citizens' day-to-day use of energy is significantly influenced by locally-based organisations. Retailers, installers and dealers should advise us to use the greenest products; local authorities have a key role to play in planning and local leadership; and neighbours and community-based organisations are the key influencers of behaviour. We therefore believe that it is paramount for the focus of information activities to be at the local level.

However, it is vital that the local level approach should be supported by a wider campaign at the national level to demonstrate government commitment and deliver key high-level messages which can then be translated into real action at the local level through more focused activities.

In addition to supporting action at the local level, we believe the role at the Community level is one of facilitating best practice across Member States. In particular, we believe that the educational system has a key role to play. Furthermore, there is growing evidence that – in order to attract media attention – well-known personalities in each country will need to become “ambassadors” for energy efficiency: these should be drawn from those who have already established credentials in other fields valued by the media. These include sporting, entertainment and the arts. We would advocate that further work is required to underpin this activity.

One important point to bear in mind, however, is that although initiatives like awareness-raising campaigns are laudable and should be promoted, they are unlikely to achieve important energy savings by themselves. Moreover, their impacts are difficult to measure and quantify. That is why EuroACE believes that such initiatives should be considered only if additional to more concrete regulatory and policy measures, like mandatory targets for energy reduction.

13. *What can be done to improve the efficiency of electricity transmission and distribution? How to implement such initiatives in practice? What can be done to improve the efficiency of fuel use in electricity production? How to further promote distributed generation and co-generation? (Sections 2.1-2.3)*

Regulatory incentives, placed on network operators, are required to reduce network losses to best practice levels. Increased levels of distributed generation will also reduce overall losses and should be encouraged accordingly. Strong enforcement of network operators' obligations to connect distributed generation is required. Network operators should be incentivised to make it as simple, easy and cheap as possible for distributed generation to be connected, particularly at the household level.

14. *Encouraging electricity and gas providers to offer an energy service (i.e. agreeing to heat a house to an agreed temperature and to provide lighting services) rather than simply providing energy is a good way to promote energy efficiency. Under such arrangements the energy provider has an economic interest that the property is energy efficient and that necessary investments are made. Otherwise, electricity and gas companies have an economic interest that such investments are not made, because they sell more energy. How could such practices be promoted? Is a voluntary code or agreement necessary or adequate?*

We believe that it is important to provide incentives to energy supply companies to offer energy services to all their customers. However, this can only be done in the context of the regulatory framework within which such companies operate. The onus is therefore on regulators to establish an appropriate market framework that would stimulate the delivery and uptake of such services. In this context it is also important to establish a consumer pull for such services through effective awareness and information campaigns. It is important to recognise that currently the majority of customers do not value such services and that alternative approaches are required.

One such approach which the draft Energy Services directive should encourage is to place an obligation on each supplier to deliver a specified amount of carbon reduction or energy saving improvement. This approach has delivered real savings in the UK under its current form the "Energy Efficient Commitment (EEC)". However, we believe that there is considerable scope to improve this methodology to deliver even greater savings. UK experience demonstrates that a mandatory approach is required.

15. *In a number of Member States, white (energy efficiency) certificates have been or are being introduced. Should these be introduced at Community level? Is this necessary given the carbon trading mechanism? If they should be introduced, how could this be done with the least possible bureaucracy? How could they be linked with carbon trading mechanism? (Section 2.4)*

In principle EuroACE supports the idea of white certificate trading and welcomes the introduction of the concept of placing a value on delivered energy efficiency. Such an approach clearly has the potential to deliver major carbon savings if well designed and implemented in a rigorous manner.

We believe that it is important for all sectors, even down to individual householders, to make an equitable contribution to reducing climate change emissions. Therefore, further mechanisms to reduce carbon emissions in those sectors outside of the EU ETS are clearly required. Establishing an EU-wide white certificate trading scheme will prove far more difficult than the EU ETS, given the wide coverage that would be required and the considerable number of potential market actors. There would also be a considerable risk of leakage as it would be difficult to agree standardised assessment methodologies for each individual project type applicable across Member States.

EuroACE strongly supports the development of the draft Directive on Energy Services that could require Member States to place energy saving or carbon reduction targets on energy suppliers. However, in the case of white certificates trading, particularly given its nascent state, we would advocate that the Commission should be facilitating the sharing of best practice in this activity across Member States rather than seeking to introduce an EU-wide scheme. This would then allow the creation of the most efficient approach at a later date that would maximise future carbon savings.

Given that the EUETS is still in its first year of operation, with NAPs generally very inconsistent, and that the concept of white certificate trading is still being developed, at this stage we would caution against bringing the two approaches together.

16. *Encouraging industry to take advantage of new technologies and equipment that generate cost-effective energy efficiencies represents one of the major challenges in this area. In addition to the carbon trading mechanism, what more could and should be done? How effective have been the steps taken so far through voluntary commitments, non-binding measures adopted by industry, or information campaigns? (Section 3)*

EuroACE believes that industry is best placed to determine which technologies offer the greatest energy and carbon saving potential and should be offered incentives to do so. Such incentives can include Research and Development funding, fiscal incentives for low carbon products and regulatory requirements. There is currently a major gap at the pre-commercialisation stage where support is required to help mainstream products. This includes the development of supply chains, awareness and information raising including installer training and product accreditation to provide consumer confidence. This is particularly noticeable in the household sector which is obviously outside of the EUETS.

17. *A new balance between modes of transport – a major theme of the strategy set out in the White Paper that the Commission adopted in 2001 on a European transport policy for 2010 – is still a top priority. What more could be done to increase the market share of rail, maritime and inland waterway transport? (Section 4.2)*

No comment.

18. *In order to improve energy efficiency it is necessary to complete certain infrastructure projects from the trans-European transport network. How should the investments needed for infrastructure projects be developed, using what sources of financing? (Section 4.2)*

No comment.

19. *Among the measures that could be adopted in the transport sector, which have the greatest potential? Should priority be given to technological innovations (tyres, engines...), particularly through standards defined jointly with the industry, or to regulatory measures such as a limit on fuel consumption of cars? (Section 4.3-4.5)*

No comment.

20. *Should public authorities (state, administrations, regional and local authorities) be obliged in their public procurement to buy a percentage of energy efficient vehicles for their fleets? If so, how could this be organised in a manner that is technology neutral (i.e. it does not result in distorting the market towards one particular technology)? (Section 4.3)*

No comment.

21. *Infrastructure charging, notably paying to use roads, has started to be introduced in Europe. A first proposal was made in 2003 to strengthen the charging of professional road transport. Local congestion charges have now been introduced in some cities. What should be the next steps in infrastructure charging? How far should “external costs” such as pollution, congestion and accidents be directly charged to those causing them in this manner? (Section 4.4)*

No comment.

22. *In certain Member States, local or regional energy efficiency project financing schemes, managed by energy efficiency companies, have proven very successful. Should this be extended? If so, how? (Section 5.1)*

The development of such schemes (known as ESCOs) should be encouraged, by facilitating the sharing of best practice to allow replication of successful projects. However, specific schemes are best left to be developed at the local and regional level. EU funding for dissemination and replication of best practice within Member States and across the Community would be helpful. This could be a key role for the Intelligent Energy Agency, whose formation we have strongly supported.

23. *Should energy efficiency issues be more integrated in the Union's relationships with third countries, especially its neighbours? If so, how? How can energy efficiency become a key part of the integration of regional markets? Is it necessary to encourage the international financial institutions to pay more attention to demand management issues in their technical and financial assistance to third countries? If so, what could be the most effective mechanisms or investments? (Section 6)*

Yes, it is important to bring into the mainstream energy efficiency issues with the Union's relationships with third countries. The nature of the relationship will be dependent on the specific level of development of each third country or country block. The issue of the use of structural funds is obviously pertinent in this context.

24. *How could advances in energy efficiency technology and processes in Europe be put to effective use in developing countries? (Section 6.3)*

In our opinion, the EU should be taking action to facilitate technology transfer and support the development of supply chains that would allow the take-up of energy efficient and low carbon technologies.

25. *Should the Union negotiate tariff or non-tariff advantages within the WTO for energy efficient products and encourage other members of WTO to do the same? (Section 6).*

Yes. This would be helpful in encouraging the uptake of energy efficient products.

Conclusion

In summary, Building Energy Efficiency Improvement Measures:

- are immediately available
- rely on proven technology
- offer a wide spectrum of technologies
- are suitable for existing and new buildings and especially high-rise homes
- are suitable for buildings of all sizes and functions
- have a strong linkage to sustainable development
- create employment, with consequent reductions in benefit payments
- are highly appropriate to an enlarged EU
- offer a massive contribution to the EU's commitment on greenhouse gas reduction
- improve energy security by reducing the need for imported energy.