EUROPEAN ENVIRONMENTAL CITIZENS ORGANISATION FOR STANDARDISATION

ECOS

ORGANISATION EUROPÉENNE ENVIRONNEMENTALE CITOYENNE POUR LA NORMALISATION

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The Renovation Wave – Energy Efficiency and Beyond

ECOS response to European Commission consultation on the roadmap for the 'Renovation Wave' Initiative

ECOS welcomes the Commission's initiative to accelerate improvements to the sustainability of Europe's existing building stock by targeting energy efficiency and associated emissions through the *Renovation Wave*. In achieving the aim to double the renovation rate of existing building stock[1], **the *Renovation Wave* must prioritise net emissions reductions and eliminate energy poverty in Europe to support the aims of the European Green Deal and the Circular Economy Action Plan.**

Beyond energy efficiency, ECOS believes the *Renovation Wave* has the potential to drive more circular and resource efficient practices in the sector, as actions under this initiative should also be in line with the Strategy for a Sustainable Built Environment and its circularity objectives. To do so, **it is essential to apply circular principles at building and product level when considering options for renovation**. Construction products to be used for renovation **should be made from low-carbon, sustainable and non-toxic materials, and should be easy to repair and reuse in future.** Heating and cooling of buildings under this initiative must also align with decarbonisation and depollution goals, using clean technologies and energy is crucial in doing so. The *Renovation Wave* therefore presents the opportunity to promote sustainability from a holistic perspective throughout the entire value chain. ECOS would therefore like to highlight the following priorities in the next stages of developing this legislative initiative.

Circularity, Resource Efficiency and Healthy Buildings

To be in line with the objectives of the Circular Economy Action Plan, **the *Renovation Wave* should not prompt the increased generation of construction waste or drive emissions from the continued use of high-impact resources**. The *Renovation Wave* should not only make buildings more energy-efficient, it should also be implemented in a resource efficient and circular-economy compatible way to enable more product and material reuse**. EU and Member State initiatives should prioritise the use of secondary construction products and widely introduce recycled content requirements for all products used in the built environment.**

Under a *Renovation Wave* that supports circularity and a non-toxic environment, it must be ensured that buildings and their components are free from risks to health posed by leaching and emissions of substances from renovation materials and products, including any toxic, hazardous chemicals or other volatile organic compounds that reduce indoor air quality, and present health risks to occupants. This includes unnecessary use of toxic flame retardants in construction products such as insulation materials, where design-based fire-safety alternatives for buildings are available.

Targeted Renovation

It is essential that **criteria for the implementation of the *Renovation Wave* account for an absolute reduction in overall emissions associated with buildings and construction products throughout the entire lifecycle, including both embodied and operational emissions**. Such an approach can support the use of the most carbon efficient solutions for improving energy efficiency in existing buildings, including passive design-based renovation.

[1] Europe's moment: Repair and Prepare for the Next Generation

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Moreover, **the *Renovation Wave* should prioritise addressing worst-performing buildings and eliminating energy poverty**, by establishing minimum targets for the energy performance of buildings, and annual improvement targets at national level to continue progress made under the national plans for nearly zero-energy buildings required by the EPBD.

Achieving these targets over the course of the initiative could be supported by financial incentives using the proposed fund, such as subsidies or tax incentives, supporting regional authorities and market actors in making progress against ambitious criteria from EU to local level.

To truly deliver sustainable decarbonisation of the built environment**, the *Renovation Wave* must be implemented based on accurate and reliable data, assessment and communication of the sustainability of buildings, construction products and constituent materials using harmonised approaches, before and after renovation using 3rd party verification.** Such approaches can be found in existing and forthcoming standards for measurement of the Environmental Performance of Buildings (e.g. ISO 52000); the calculation methods for sustainability assessment of buildings (EN 15978), and Core Rules for Environmental Product Declarations (EPDs) - EN 15804.

However, given the divergent uses of these standards in practice, we recommend the EU provides clear guidance on their application under the *Renovation Wave* for coherent implementation across all Member States, and to more accurately evaluate progress made under this initiative.

Heating and Cooling

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* and that the concept of “technology neutrality” shall not apply as these would undermine the very objective of prioritising climate and environmental targets. This includes not promoting the use of hydrogen for domestic purposes.

The *Renovation Wave* offers great potential to stimulate the EU economy while improving the energy efficiency of buildings; but the substantial policy action and financial stimulus for this initiative as part of the Recovery Plan for Europe must maximise benefits for citizens and the environment by targeting a circular, resource efficient and just transition to an energy efficient EU in line with the European Green Deal and Circular Economy action plan.