



An ambitious Directive for a quicker move to low energy in Europe's buildings

Statement by the European Autoclaved Aerated Concrete Association (EAACA) on the European Commission's Proposal for an Energy Efficiency Directive

October 2011

The EAACA:

- Welcomes the emphasis on the **refurbishment** of public buildings;
- Calls for extending the scope of Article 4 to the **replacement** of certain buildings;
- Underlines that AAC is a **material of choice** for energy upgrades and new buildings;
- Urges EU institutions to introduce binding measures for the upgrade or replacement of **privately-owned buildings**; and
- Advocates for a more ambitious approach to the **public procurement** of buildings.

The EAACA welcomes the presentation of a proposal for a Directive on Energy Efficiency¹, which is an important milestone in the implementation of the March 2011 Energy Efficiency Plan and the European Union's political target to achieve 20% energy savings by 2020. The European manufacturers of autoclaved aerated concrete (AAC) strongly support the **EU commitments to climate change mitigation**, whereby energy efficiency gains in buildings represent a large potential. Therefore we welcome the emphasis put on the **refurbishment of public buildings**, with an obligation for Member States to renovate 3% of the total floor area owned by their public bodies every year.

To contribute to this objective, it is important to stress that **construction products**, along with heating, air-conditioning systems, household appliances and insulation materials, can have a determining impact on our energy consumption. Used for more than 50 years in constructions, AAC offers ideal structural solutions for low-energy buildings, thanks to high insulation properties and thermal mass. AAC is therefore a material of choice to meet these new challenges.

While we fully support the measures proposed in Article 4 of the proposal, we believe that **the level of ambition** should be higher if the EU intends to deliver on its energy saving commitments.

Firstly, the EAACA would like to stress that the mandatory obligation to renovate public buildings should allow Member States to opt for demolition and **replacement** in the case of non-heritage buildings, as an alternative to a cost-ineffective renovation.

Secondly, the EAACA acknowledges the exemplary role of public buildings but insists on the high potential for energy savings, should these measures be extended to **privately-owned buildings**. We duly recognise the existence of legal and behavioural obstacles, as well as the impossibility for national authorities to impose renovation works or replacement of a building on a private owner.

¹ Proposal for a Directive of the European Parliament and of the Council on energy efficiency and repealing Directives 2004/8/EC and 2006/32/EC, COM(2011) 370, 22 June 2011.

However, we are of the opinion that a **binding obligation** on Member States to ensure renovation or replacement of a fixed percentage of their whole building stock every year would encourage them to use adequate incentives and policies to this endeavour.

Finally, the European AAC industry supports measures restricting the **public procurement** of buildings to those in compliance with the minimum energy performance requirements as defined by the Energy Performance of Buildings Directive². Here again, we believe that **more ambitious standards** may be desirable in the case of public procurement in order for public buildings to play a truly exemplary role.

The EAACA would like to invite the European Parliament and the Council, in close cooperation with the European Commission, to take our remarks into account and adopt a regulatory act up to the challenges ahead. Our industry will be happy to provide expertise on this area and contribute to the success of a more energy efficient Europe.

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² Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (recast), O.J. L 153/13, 18 June 2010.