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European Commission DG ENER Unit B3

ECIA Feedback on the Inception Impact Assessment on the revision of the Energy Performance of Buildings Directive 2010/31/EU

Energy performance matters both for citizens and the environment. With research suggesting Europeans spending over 90% of their time indoors, health and well-being of European citizens highly depend on how well buildings are designed, renovated and constructed. More so, buildings should remain a focal point within the European Green Deal, as they are the single largest energy consumer, responsible for approximately 40% of energy consumption and 36% of the greenhouse gas emissions in the EU. Without tackling the issues of healthy and green buildings in parallel, it will be impossible to achieve the 2050 climate neutrality target.

The European Cellulose Insulation Association (ECIA) welcomes the Inception Impact Assessment on the revision of the Energy Performance of Buildings Directive 2010/31/EU as part of the “Fit for 55” package included in the Commission Work Programme 2021.

The cellulose fibre insulation industry believes that energy efficiency renovation of the built environment as set in the objectives of the Renovation Wave Strategy holds vast potential for reducing green house gas emissions and turning the built environment into a carbon storage by using carbon storing and climate friendly, recycled materials such as cellulose insulation and bio-based materials.

Therefore, ECIA strongly favors Option 3 to amend the EPBD to translate the actions proposed in the Renovation Wave and the increased ambition towards building decarbonisation into legislation. In this respect, ECIA calls on the European Commission to consider the following points when elaborating its proposals for the revision of the Energy Performance of Buildings Directive:

- Promote the use of bio-based materials such as cellulose insulation since they can play a crucial role underlining their double benefit of carbon storage in EU building stock and energy-intensive material substitution;
- Guarantee the availability of public funding and financing for the renovation of the built environment through a stringent application of rules when approving financial means under the Multiannual Financial Framework and the NextGenerationEU instrument;
- Provide financial support through subsidies or tax credits to facilitate the purchase and use of recycled materials as well as reused and sustainable products in the EU;
- Develop a comprehensive methodology where carbon storage benefits can be accounted for thus allowing consumers to choose materials that offer carbon storage;
- Set-up mandatory minimum energy performance criteria for construction and renovation.

Since its inaugural meeting in September 2013, the European Cellulose Insulation Association (ECIA) has united the voice of the European cellulose insulation manufacturing industry and represented its interests on the European level. Its members are the leading cellulose insulation manufacturing companies within Europe, equipped with both a reputable business tradition and expertise.

ECIA is actively cooperating with European and international industry associations, European and national institutions, authorities and regulatory bodies as well as research institutes. ECIA's and its members' ambition is to provide greener, more sustainable and more energy-efficient homes to the European building stock through use of cellulose fibre insulation in new building and renovation projects.

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