



EuroWindowor feedback to the Call for Evidence on Unlocking private investment in energy efficiency – guidance to Member States and market actors

EuroWindowor appreciates the opportunity to give the Commission feedback to the Call for Evidence on the current guidelines for mobilising private energy efficiency investments according to Article 30 Paragraph 10 under the EU Energy Efficiency Directive.

The activation of private investment in energy-efficient measures requires a balanced adjustment of the relevant political instruments, especially in the building sector. Plannable regulatory requirements must be dovetailed with a reliable and long-term framework for grants and financial incentives and backed up with market-based measures like the pricing of CO₂ emissions.

In terms of funding instruments, it is clear that today's measures are far from sufficient to mobilise the urgently needed private sector investment. The renovation rate in Europe is at a permanent low level. A subsidy of e.g. 20% for the windows renovation costs or a tax incentive of the same amount is still far too low, as experience in the German market show. We expect support of at least 30 to 40 per cent is needed to motivate the majority of private owners to carry out more energy-efficient renovation. An income-related gradation would appear to make sense - however, a threshold value above which no or only a lower level of support is granted would have to be correspondingly high due to the high renovation investment. Such a limit cannot be set in the housing sector. Here, however, it is necessary to ensure that the state-subsidised part of the renovation costs cannot be passed on to the rent. We also recommend the use of attractive tax depreciation.

Experience with the recent low continuity of subsidy programmes in Germany also shows that reliability and predictability are essential, especially in the long-term construction sector.

From our point of view, the necessary measures are:

- Special tax write-offs for energy-efficient renovation for all groups of owners
- Low-interest government renovation loans
- Attractive subsidies for energy-efficient renovation
- High subsidies for energy consultations and customised renovation roadmaps
- Simple, user-friendly processing of the subsidy in a one-stop shop
- Accompanying communication and information campaign on the energy and health benefits of energy-efficient buildings

About EuroWindowor AISBL – EuroWindowor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 18 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.

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