

Public Consultation: State Aid – EEAG
Deadline: 7th January 2021

Question 11: sector of activity (NACE code) of member organisations

C32: other manufacturing

Question 23: in your opinion, should aid be allowed for the following areas?

EuroACE ticked the box *'yes and more than before – higher aid intensities or new aid forms'* for the line *'energy efficiency in buildings'*.

Question 26: in your opinion, should aid covering operating costs (in particular energy costs and raw material costs) on top of investment costs be generally allowed for the following areas?

EuroACE ticked the box *'yes'* for the line *'energy efficiency in buildings'* and *'other'* (in order to be able to add details). If you selected *'other'*, please specify (591/1,000 characters maximum): EuroACE calls on the state aid rules to be updated so as to widen the scope of eligible costs for aid going to energy efficiency in buildings, especially renovation. This means that eligible costs should be understood as the total costs of the renovation, not only the additional or separate investments linked to additional efficiency standards. Second, regarding the issue of potential undue competition distortion, we would like the Commission to not consider condominiums managing multi-apartment buildings, where most apartments are owned by natural persons, as internal market actors.

Question 144: open feedback (992/1,000 characters)

State aid rules should support and accelerate the construction of energy efficient buildings but mostly the financing of ambitious energy renovation projects. The EEAG update as of 2022 should serve both the implementation of the Green Deal and 55% climate target by 2030, as well as the rollout of effective recovery plans. To that end, we want to make two additional suggestions: the revised EEAG should (1) include in its Recitals and as one of the *'objectives of common interest'* a reference to the Energy Efficiency First principle as defined by the Governance Regulation Art 2§18, and (2) ensure that state aid in the field of energy renovation of buildings, targets the worst performing buildings of each segment of the stock, where most households in energy poverty live, and where capacities to use private capital (own funds or loans) to pay for the renovation, are limited. In that context, we attach our feedback to the Taxonomy Delegated Act as separate PDF to this contribution.

For further information

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About EuroACE - Energy Efficient Buildings

EuroACE represents Europe's leading companies involved with the manufacture, distribution and installation of energy saving goods and services for buildings. EuroACE members employ more than 220,000 people in these activities in Europe and have over 1,100 production facilities and office locations. The mission of EuroACE is to work together with the EU institutions to help Europe move towards a more efficient use of energy in buildings, thereby contributing to Europe's commitments on climate change, energy security and economic growth.

EuroACE Members (2021)

