

Response to Consultation

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Eurima response to the consultation on the European Climate Law

The European Insulation Manufacturers Association (Eurima) welcomes the Commission's intention to propose a Climate Law to put the 2050 climate neutrality objective into legislation. Eurima is strongly committed to, and supports, the transition to a climate-neutral economy by 2050 at the latest. The Climate Law needs to help accelerate the transition, by providing certainty as to the trajectories to be taken at EU and national level, and by enabling all sectors to play their part, building on citizens' engagement.

Action in the building sector is urgently needed to make this transition a success. No other sector in the EU uses more energy or emits more carbon dioxide. And no other sector offers such a huge opportunity to make a positive difference to people's lives.

Eurima has identified **4 priorities** to be addressed by the Climate Law.

Firstly, the Climate Law should clearly put the Energy Efficiency First (EE1) principle at its core and ensure its application across all infrastructure, policy and investment decisions. EE1 requires considering the value of investing in energy efficiency in all decisions about energy system development. Applying this principle will increase Europe's ability to create a less costly, jobs-rich and climate-neutral economy. It also means that any new modelling exercise should build on this principle.

As such, the Climate Law should ensure that energy efficiency plays its enabling role to decarbonize the economy at large in the most cost-efficient manner, and buildings in particular. The Climate Law's identified pathway to climate-neutrality by 2050 should therefore set out intermediary targets including for energy efficiency and specify that a share of energy savings will come from the building sector.

Secondly, to realise a climate-neutral Europe by 2050 all sectors will need to play their part. The Climate Law should include a long-term vision for the buildings sector, by re-affirming the objective of a highly energy-efficient and decarbonized building stock by 2050 and by embracing the transition to net-zero whole life carbon buildings.

The Climate Law should also establish a reporting and review process to make sure that Europe and Member States are on track to meeting the climate-neutrality objective (Ecologic (2020); Climate laws in Europe). An ambition trigger mechanism should enable the Commission to put forward new EU legislation, to accelerate the phase-out of the worst energy performing buildings through increasingly higher energy performance standards. This will help to eradicate energy poverty and to bring social, economic and environmental benefits to the society at large. Further inaction in the building sector otherwise risks the EU missing its climate objectives by up to 400 million tonnes of CO₂ (Climact (2018)); The key role of energy renovation in the net-zero GHG emission challenge).

Thirdly, the energy efficiency potential in industry should be unlocked. There is still significant energy efficiency potential of industrial insulation representing around 37 Mt annual cost-effective CO₂ savings, or around 4% of industry's total annual CO₂ emissions (EiiF, 2020). The Climate Law should pave the way for clear EU level requirements for industrial energy efficiency.

Finally, the Climate Law must be accompanied with targeted support to further develop innovative technologies to lower industrial emissions. Mission-oriented R&D programmes for low-carbon technologies in energy-intensive industries like mineral wool are a must. This means providing sufficient support for designing and building demonstration plants at scale, as well as for their roll-out across the market. The Innovation Fund should support industry low-CO₂ innovation, while green public procurement and contracts-for-difference can help ensure market uptake.

Eurima looks forward to work with the European Commission and other policymakers & stakeholders on the development and implementation of the Climate Law.