

REPOWEREU ENERGY SAVINGS PLAN: TIME TO SWITCH TO ACTION

**POLICY BRIEFING** 

MAY 2022

# WHY SAVING ENERGY IN BUILDINGS MUST BE A PRIORITY IN THE REPOWEREU ACTION PLAN

With the invasion of Ukraine by Russia and the outbreak of war at the end of February 2022, the situation in the EU has dramatically changed from many perspectives. Many countries in Europe import significant amounts of fossil fuels from Russia, supporting its economy. For example, in 2021, 43.5% of EU imports of natural gas came from Russia<sup>1</sup>. Political commitments to put sanctions on Russia and to reduce energy imports imply that securing enough energy supplies for next winter and beyond has become an urgent priority for many Member States and for the EU as a whole.

At the same time, energy prices are high for both electricity and gas, and forecasts indicate they will remain so until at least spring 2023.<sup>2</sup> This will exacerbate an already tense financial situation for many households in Europe, with an increased number being pushed into energy poverty. Besides these urgent concerns, addressing the climate

emergency must remain a priority. The latest report of the Intergovernmental Panel on Climate Change (IPCC), published just four days after the start of the war in Ukraine, reiterates the need to limit global temperature rise to 1.5°C to avoid catastrophic social, environmental and economic impacts.<sup>3</sup> Decisions should be taken quickly, and actions implemented

<sup>&</sup>lt;sup>1</sup> https://ec.europa.eu/info/news/focus-reducing-eus-dependence-imported-fossil-fuels-2022-apr-20\_en

<sup>&</sup>lt;sup>2</sup> Forecast from the European Commission Directorate General ECFIN: https://ec.europa.eu/info/sites/default/files/economy-finance/ecfin\_forecast\_ winter\_2022\_box-1-2\_en.pdf

<sup>&</sup>lt;sup>3</sup> IPCC, 2022: Summary for Policymakers [H.-O. Pörtner, D.C. Roberts, E.S. Poloczanska, K. Mintenbeck, M. Tignor, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem (eds.)]. In: Climate Change 2022: Impacts, Adaptation, and Vulnerability. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change [H.-O. Pörtner, D.C. Roberts, M. Tignor, E.S. Poloczanska, K. Mintenbeck, A. Alegría, M. Craig, S. Langsdorf, S. Löschke, V. Möller, A. Okem, B. Rama (eds.)]. Cambridge University Press.

without delay – as, in the words of the UN Secretary-General, "delay means death."<sup>4</sup> The EU energy and climate ambitions are currently at risk. Within the new context, some voices are calling to put a brake on the proposals of the "Fit for 55" package to deliver an increased EU climate target by 2030. In response to the emergencies in the energy sector, on 8 March the European Commission published its REPowerEU Communication for joint European action for more affordable, secure and sustainable energy.<sup>5</sup> It aims to outline a path for the EU to decrease its reliance on Russian fossil fuels by focusing on securing access to energy, whether from renewable sources or fossil fuels from suppliers other than Russia.



This focus on supply, however, misses the fact that the best way to decrease the EU's energy dependency is to reduce energy consumption, especially in buildings.

### **40%** out EU's total energy consumption

Buildings are responsible for **40%** of the EU's total energy consumption



Heating, cooling, and domestic hot water represent around **80%** of the energy consumed in buildings, with fossil-fuels contributing more than **34** of this.<sup>6</sup>

80% fossil-fuels



- <sup>4</sup> Remarks from the UN Secretary General to Press Conference at the Launch of IPCC report, 28 February 2022, https://www.ipcc.ch/site/assets/uploads/2022/02/ UN\_SG\_statement\_WGII\_Pressconference-.pdf
- <sup>5</sup> COM(2022)108 final, https://eur-lex.europa.eu/resource.html?uri=cellar:71767319-9f0a-11ec-83e1-01aa75ed71a1.0001.02/DOC\_1&format=PDF
- <sup>6</sup> https://ec.europa.eu/energy/sites/ener/files/eu\_renovation\_wave\_strategy.pdf

Energy savings in buildings are no-regret independence measures and an insurance against future energy price fluctuations. In line with the Energy Efficiency First principle, reduced energy demand is also a necessary pre-condition to any wider successful decarbonisation as it allows a faster growth of the renewable energy share in the energy mix. As a follow up document to the earlier REPowerEU Communication, the Commission is expected to issue the REPowerEU Action Plan, which would include a specific energy savings action plan. The EU has a historic choice to make: to put us on a pathway compatible with the 1.5°C climate scenario and secure true energy independence, or simply cushion the crisis today with quick fixes that will condemn us to a future where we have no choice anymore and where climate change is a daily emergency.

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Now is the time to make the right choice and to switch. Not to switch from one fossil fuel supplier to another, or simply to switch off the heating in our homes, but to switch our practice and our energy security paradigm. To switch from wishful thinking to rapid action.

The EU needs to durably reduce its energy demand and prioritise an acceleration of building renovation and decarbonisation measures. If not now, when?

The time for incremental change is over. But what exactly must we do, and how do we do it? Based on existing BPIE analysis<sup>7</sup> as well as a review of publications on the topic, this paper lists a number of measures that can deliver energy savings in the next 18 months while putting the EU on a path compatible with its climate targets. The paper also suggests delivery approaches to operationalise the implementation of the measures.



<sup>7</sup> https://www.bpie.eu/publication/solidarity-and-resilience-an-action-plan-to-save-energy-now/

# POLICIES AND MEASURES TO SAVE ENERGY NOW WHILE ACCELERATING PROGRESS TOWARDS EU CLIMATE AMBITION

This section outlines a list of policies and measures, clustered in different topics, that should be integrated in the EU energy savings plan. These policies and measures should deliver (substantial) energy savings, ideally within an 18-month timeframe, while paving the way for future energy savings to ensure coherence with longer-term climate ambition. They should be seen as stepping stones to reach the EU 2030 climate targets ever more quickly. In this context, the cumulative effect of each measure and the lifetime of energy savings must be considered. Some measures can bring some savings in the short term, but their impact will quickly fade, while others might need more time to implement but their effect will be bigger and will last longer, cumulatively resulting in more savings. Finally, issues such as cost and delivery time are considered, whenever possible.



## CLUSTER 1 BEHAVIOURAL MEASURES AND 'QUICK FIXES'

### Inspect heating and air-conditioning systems, and upgrade controls

Ensuring that all systems function at best efficiency (typically 60°C for boilers) can reduce up to 10% of the energy demand for heating. This is a relatively quick and easy action to undertake, which can be done by every household, simply looking at the boiler's manual or online tutorials, and can be promoted by national and regional authorities as well as media. Simple do-it-yourself actions to prevent heat losses such as draught-proofing windows and doors, doing a hydronic balancing/purge of the radiators or switching to LED lighting can further save energy.

### Lower the temperature on thermostats by at least 1 degree (winter), and operate air-conditioning systems at higher temperature (summer)

This is another quick fix that every individual or building manager can undertake. Not only is it cost-free, but it will save money. The average room temperature in the EU is 22°C. Changing this by one or two degrees will have little impact on comfort, especially if the temperature can be set at different levels in different rooms depending on their purpose. While this can be incentivised for private building owners and tenants, it should be made mandatory for public buildings such as government buildings. The City of Amsterdam, for example, has decided to turn down temperatures in public buildings from 21°C to 18°C, which is expected to reduce gas consumption by 15%. Replicating this across the EU could save 10 billion cubic metres of gas,<sup>8</sup> in comparison to the 155 billion cubic metres of Russian gas imports (in 2021).<sup>9</sup> Similar actions related to reducing the use of lighting in commercial or office buildings should also be undertaken – such as banning the use of lighting at night in buildings where it is not needed.<sup>10</sup>

<sup>&</sup>lt;sup>8</sup> https://www.amsterdam.nl/nieuws/nieuwsoverzicht/verwarming-omlaag

<sup>&</sup>lt;sup>9</sup> https://ec.europa.eu/info/news/focus-reducing-eus-dependence-imported-fossil-fuels-2022-apr-20\_en

<sup>&</sup>lt;sup>10</sup> http://www.stefanscheuer.eu/wp-content/uploads/2022/04/Thesenpapier\_Suffizienz\_eng.pdf



### CLUSTER 2 FAST ROLLOUT OF RENOVATION PROGRAMMES

### Support the rollout of energy management systems

Rolling out energy management systems in large non-residential and public buildings, especially those supplied by fossil fuels, will enable better control of energy flows. This will save energy in the short term, while facilitating the switch to renewables as soon as possible. This requirement could also apply to large real estate portfolio owners.

### Insulate attics and roofs, especially in single-family homes and the worst-performing buildings

Insulation can constitute the core of vast national and regional renovation programmes. These could be launched quickly over the coming months, building on existing initiatives. These include recovery and resilience plans and national strategies, including those operating under energy efficiency obligation schemes. The benefits are big: adding 20 cm of insulation in attics and roofs can save up to 14% of residential heating energy (254 TWh/year, equivalent to around 25 bcm/year) in the EU, which would reduce gas consumption by 12% and heating oil consumption by 17%.<sup>11</sup>

### Roll out and scale up industrial/serial renovation programmes

Industrial renovation programmes should target multi-family homes with low energy performance, such as large apartment blocks. Many of these were built in the 1960s and 70s according to similar architectural design, making it easier to implement serial renovation projects and bringing potentially high energy savings. A fast rollout of such programmes, based on the use of off-site prefabricated elements, would further decrease costs and trigger new business models. Some Member States, such as the Netherlands (with its EnergieSprong approach) and France (through its recovery and resilience plan), are already experimenting with this type of renovation, which could be rapidly scaled up. In the German state of Baden-Württemberg, the regional government was giving out grants to support serial renovations of residential buildings constructed before 2002. National and regional governments should be required to create or add some funding to these kind of programmes.<sup>12</sup> More generally, Member States should be required to quickly update their regulatory framework to ease and speed up permitting and tendering procedures, as well as to support companies active in the sector, for example through tax breaks.

### CLUSTER 3 FAST SWITCH TO RENEWABLE HEATING OPTIONS

### Stop installing new fossil fuel boilers

Member States should forbid the installation of new fossil fuel boilers in both (1) new buildings being constructed as of 1 September 2022, bringing forward (from 2030) the zero-emission building standard proposed for new buildings by the European Commission in the Energy Performance of Buildings Directive recast proposal;<sup>13</sup> and (2) existing buildings, when a heating system breaks down or is being scrapped (as part of a bigger renovation project or as a standalone action). This natural trigger point in the life of the building should only lead to replacements by heating systems based on renewables (solar PV, solar thermal, heat pump, biomass meeting sustainability criteria). Switching from fossil to renewable heating and cooling systems would bring energy savings and contribute to the decarbonisation of the energy supply. For example, replacing gas boilers with renewable heat could save up to 312 TWh (140 TWh through heat pumps, 125 TWh

<sup>&</sup>lt;sup>11</sup> https://www.bpie.eu/wp-content/uploads/2022/03/Strategy-paper\_Solidarity-and-resilience\_An-action-plan-to-save-energy-now-1.pdf

<sup>&</sup>lt;sup>12</sup> European Commission, Directorate-General for Energy, Steuwer, S., Volt, J., Dorizas, V., et al., Annexes to the study 'Lessons learned to inform integrated approaches for the renovation and modernisation of the built environment', Publications Office, 2021, https://data.europa.eu/doi/10.2833/177071

<sup>&</sup>lt;sup>13</sup> https://www.bpie.eu/wp-content/uploads/2022/03/Strategy-paper\_Solidarity-and-resilience\_An-action-plan-to-save-energy-now-1.pdf

through district heating and 47 TWh through biomass).<sup>14</sup> Member States should be required to financially support households switching from fossil fuel to renewable heating systems.

#### Accelerate and financially support the replacement of fossil fuel systems with renewables

Member States should provide incentives, such as tax breaks or subsidies, to accelerate the replacement of fossil fuel systems with renewables, particularly in existing buildings with boilers more than 12 years old. These older fossil heating systems could be mapped at the same time as the quick inspection and control outlined in the previous section. The EU should also require Member States to stop any subsidies for the installation of fossil fuel systems overall and redirect those subsidies to the installation of renewable heating systems. However, special attention should be given to avoid favouring an 'element by element' approach to renovation, rather than comprehensive works that address both the building envelope and the heating systems. Any subsidy to replace fossil fuel heating systems with a renewable option should be accompanied with advice on how to embed this coherently in a wider renovation roadmap, such as a building renovation passport.

#### Mandate the installation of solar PV and solar thermal on large buildings

Member States should require large public and commercial buildings to install solar PV on flat roofs. This would quickly reduce dependence on fossil fuels and decarbonise energy consumption for these segments of the building stock. Substantial savings can be achieved on energy bills since renewable electricity is currently cheaper than gas, for example.



<sup>14</sup> https://static.agora-energiewende.de/fileadmin/Projekte/2021/2021\_07\_EU\_GEXIT/253\_Regaining-Europes-Energy-Sovereignty\_WEB.pdf

# HOW TO DELIVER LONG-LASTING ENERGY SAVINGS QUICKLY: RECOMMENDATIONS FOR FAST IMPLEMENTATION

Besides outlining a toolbox of measures that can be put in place by the EU but also by national and regional public authorities to save energy in buildings, this paper suggests some actionable delivery streams which form the essential framework needed for a faster, cheaper, and easier implementation of those measures. Like for the previous section, the delivery streams are clustered into different themes.



### CLUSTER 1 SHOWING LEADERSHIP WITH AN INNOVATIVE ORGANISATIONAL MACHINERY

#### Create a task force for building renovation in the European Commission

The task force, under the political leadership of the President, Ursula Von der Leyen, should combine administrative and political forces. The administrative side could be modelled on the experience of the RECOVER Task Force in the Secretariat General, set up in 2020 to oversee the drafting and monitoring of the national recovery and resilience plans, and drawing on the knowledge and expertise of administrators from different backgrounds and different directorate generals. It should also closely cooperate with the European Investment Bank. The political side of the task force could be modelled on the Global Commission for Urgent Action on Energy Efficiency, created in 2019,<sup>15</sup> and include representatives from the European Parliament as well as political leaders from the national, regional and city level. These actors, who should stem not only from energy and climate but also from finance and budget departments,<sup>16</sup> would help transmit the mobilisation down to every level. Overall, the role of this task force for building renovation will be to steer action, oversee implementation and provide technical support for national and regional actions.<sup>17</sup>

### Set up a 'Renovation Compact'<sup>18</sup> uniting business and social representatives of the construction value chain

Private actors also need to take responsibility for the accelerated delivery of building renovations. They should come together under the leadership of the EU or national level, cooperating on actions such as training workers and installers, or better coordinating supply chains in view of increased project pipelines.

<sup>&</sup>lt;sup>15</sup> https://www.iea.org/programmes/global-commission-for-urgent-action-on-energy-efficiency

<sup>&</sup>lt;sup>16</sup> https://static.agora-energiewende.de/fileadmin/Projekte/2021/2021\_07\_EU\_GEXIT/253\_Regaining-Europes-Energy-Sovereignty\_WEB.pdf

<sup>&</sup>lt;sup>17</sup> https://www.renovate-europe.eu/wp-content/uploads/2022/04/Renovate-Europe\_Recommendations\_REPowerEU\_Action\_Plan.pdf

<sup>&</sup>lt;sup>18</sup> https://www.renovate-europe.eu/wp-content/uploads/2022/04/Renovate-Europe\_Recommendations\_REPowerEU\_Action\_Plan.pdf



### CLUSTER 2 TELLING THE STORY, PROMOTING THE NEW VISION

### Run an all-media communication campaign

The same tools and channels that were used in public health campaigns to stop the spread of the Covid-19 pandemic<sup>19</sup> could be applied to campaigns at all levels (EU, national, local) to raise awareness amongst the public about the crucial importance and opportunity of saving energy, especially through building renovation.<sup>20</sup> To mention just one idea, the volume of energy that is still imported from Russia, and what it costs, could be displayed every day in national and local media.<sup>21</sup> Communications should emphasise that saving energy is not, beyond short-term emergency measures, about switching off the heating. It should encourage moving from 'quick fix' behavioural actions, such as reducing room temperatures by 1°C or taking shorter showers, to longer lasting sufficiency policies that will bring benefits in the long-term. This is important for reducing the risk of rebound effects.

### Promote all new and existing renovation and decarbonisation programmes

The public needs to be made aware of newly launched or revamped programmes, which should prioritise deep renovation and include scaled up renovation advice, notably through building renovation passports where they already exist. That would lead to more comprehensive renovations and thus faster and deeper energy savings.<sup>22</sup>

### Enhance the mapping of the building stock, especially at regional and local levels

Better mapping would enable public authorities to more quickly and effectively identify where the worstperforming buildings are located in their area, enabling more targeted actions. This data could be gathered easily if Member States required utilities to make heating energy consumption data available to public authorities, including regional energy agencies. Another way to gather data easily and quickly would be to use digital tools such as drones or remote thermal imaging of building elements such as roofs or facades to identify leaks.

# CLUSTER 3 MAKING FINANCING EASILY AVAILABLE

#### **Reallocate EU and national funding**

Some funding already available under the Recovery and Resilience Facility could be reallocated by renegotiating national recovery plans, boosting and front-loading their building renovation component – the new European Commission task force on building renovation could guide this. If remaining funding available is in the form of loans and guarantees, it should be considered whether to transform it into grants. Funds could also be reallocated to building renovation within other programmes of the multiannual financial framework, such as the European Regional and Development Fund and the Cohesion Fund, as well as with revenues from the Emissions Trading System or lending from the European Investment Bank. Some existing national programmes, such as Ma Prime Rénov' in France, should secure additional funding and be redirected towards comprehensive deep(er) renovations of buildings while only financing heating based on renewables.

<sup>22</sup> https://www.bpie.eu/wp-content/uploads/2022/03/Strategy-paper\_Solidarity-and-resilience\_An-action-plan-to-save-energy-now-1.pdf

<sup>&</sup>lt;sup>19</sup> https://www.bpie.eu/wp-content/uploads/2022/03/Strategy-paper\_Solidarity-and-resilience\_An-action-plan-to-save-energy-now-1.pdf

<sup>&</sup>lt;sup>20</sup> https://www.renovate-europe.eu/wp-content/uploads/2022/04/Renovate-Europe\_Recommendations\_REPowerEU\_Action\_Plan.pdf

<sup>&</sup>lt;sup>21</sup> See here an example of a counter for how much is spent to import Russian fossil fuels since 24th February 2022: https://beyond-coal.eu/russian-fossil-fuel-tracker/

#### Reduce VAT on renovation products and works

Some Member States have already reduced VAT on energy and should follow this up by similar reductions on products and services that save energy. This would help to further improve the attractiveness of renovation measures. Financing schemes based on tax deductions, such as the Ecobonus or the Superbonus in Italy, should also be promoted, with the caveat that only renewable heating options are financed and that renovations undertaken are deep. The Ecobonus is a subsidy scheme for energy savings works which allows for a tax deduction of 50-65% on single buildings or even 75% on condominium where renovation works are performed. The Superbonus is a subsidy which raises to 110% the rate of deduction of expenses incurred for specific energy efficiency interventions.<sup>23</sup>

### Mobilise private sector financial solutions

Financial institutions such as banks, but also utilities, need to do more to support customers with energy renovations by offering financial solutions such as zero interest loans or on-bill financing. The RenOnBill project provides useful material on how on-bill schemes can be set up, with or without the involvement of financial institutions, to deliver building renovation in the residential segment.<sup>24</sup> This is particularly important as funding from public sources will not be sufficient to cover all renovations, and should be targeted where it is needed most, such as for low-income households experiencing energy poverty.

## CLUSTER 4 PREPARING THE SUPPLY CHAIN TO DELIVER

#### Boost upskilling activities to have a workforce ready to renovate and install quickly

A major upskilling campaign should be organised, in collaboration with social actors (like trade unions, chambers of commerce, tradespeople's representatives), educational institutions and industries. At the highest political level, this could be based on existing structures such as the Tripartite Social Summits.<sup>25</sup> This upskilling campaign could be financed by reallocations from the Recovery and Resilience Facility as well as from EU programmes such as the European Social Fund or the Just Transition Fund. It should be directed at training construction workers, but also installers and professionals involved in designing (architects) or carrying out renovation works.

#### Create a special initiative for energy saving coaches

Energy saving coaches or advisers can act as a bridge between public authorities and financial institutions on one side, and homeowners and tenants on the other. These advisers could be professionals already working in one-stop-shops, for example, but also volunteers, such as students from architectural or engineering universities. The advisers could also be people currently unemployed and who are willing to be re-skilled as part of a 'back-to-work' training programme. Another avenue would be to train social workers who are familiar with giving advice to citizens, or to upskill citizens active in energy communities who have a good knowledge of their neighbourhoods. There are already examples of this, such as in the Cooperatie Hoom (Netherlands), or the Energy Communities Tipperary Cooperative (Ireland, with the support of national and regional energy agencies).<sup>26</sup> All of these profiles already have an interest in the topic, have some technical background and knowledge, and could be easily and quickly trained to advise citizens on how to save energy. As well as outlining do-it-yourself measures,<sup>27</sup> they could undertake more in-depth home energy audits and even deliver building renovation passports, with supervision and guidance from professional experts.

<sup>&</sup>lt;sup>23</sup> European Commission, Directorate-General for Energy, Steuwer, S., Volt, J., Dorizas, V., et al., Annexes to the study 'Lessons learned to inform integrated approaches for the renovation and modernisation of the built environment', Publications Office, 2021, https://data.europa.eu/doi/10.2833/177071

<sup>&</sup>lt;sup>24</sup> https://www.renonbill.eu/

<sup>&</sup>lt;sup>25</sup> https://ec.europa.eu/commission/presscorner/detail/en/ip\_21\_5384

<sup>&</sup>lt;sup>26</sup> https://www.rescoop.eu/news-and-events/events/energy-communities-empowering-our-future-rescoop-eu-conference-2022

<sup>&</sup>lt;sup>27</sup> https://static.agora-energiewende.de/fileadmin/Projekte/2021/2021\_07\_EU\_GEXIT/253\_Regaining-Europes-Energy-Sovereignty\_WEB.pdf

### Set up a special funding line called the Industrial Renovation Alliance, managed by the European Investment Bank, to boost investments in these types of renovations and scale them up quickly

This alliance would gather companies with expertise and experience in industrial/serial renovation projects to share best practices and spread know-how. It could look at the example of the Renovation Accelerator (Netherlands), a national programme to incentivise large-scale energy renovations by large housing corporations. The accelerator aggregates the demand for renovation of similar housing types, and then facilitates a match with the supply chain. This should improve the cost-effectiveness of renovations through standardisation, economies of scale and optimisation of supply chains.<sup>28</sup> With higher energy prices, the cost-effective potential of innovative business models should be increasingly attractive to investors.<sup>29</sup>

#### Roll out one-stop-shops throughout Europe

Existing models can be quickly replicated, so that they are ready and available once the short- to mid-term actions have been undertaken. The European Commission, for example, could produce a standardised guidebook on how to set up one-stop-shops, based on existing models throughout Europe, and disseminate it to both Member States and regional and local authorities. This guidebook could also include standardised templates for contracts or other types of documents needed in the running of a one-stop-shop. The project Turnkey Retrofit has some recommendations on how to further roll out and replicate such renovation advice centres, considering the diversity of situations in Member States and renovation markets.<sup>30</sup>

# CONCLUSION

The crisis which affects Europe has revealed weaknesses and has profoundly disrupted debates and decisions in the energy sector. With hindsight, the cost of previous missed opportunities to improve the energy performance of the EU building stock is all too apparent. In France, for example, if objectives decided in 2008 to reduce energy demand in the building sector had been acted upon and met, no imports of Russian natural gas would be needed today.<sup>31</sup> The EU must decide now what the future brings. This paper provides the reasons why, in this endeavour, energy savings must be prioritised, especially in the buildings sector. It also lists actionable and concrete ideas for measures and policies that should be put in place and implemented in the next two to three years. Its suggestions and recommendations show how to concretely organise ourselves to deliver those measures. Because we need to get our act together. There is neither time nor energy to waste.



The EU's addiction to fossil fuels must stop. This starts by recognising the errors of the past and committing to change.

<sup>&</sup>lt;sup>28</sup> European Commission, Directorate-General for Energy, Steuwer, S., Volt, J., Dorizas, V., et al., Annexes to the study 'Lessons learned to inform integrated approaches for the renovation and modernisation of the built environment', Publications Office, 2021, https://data.europa.eu/doi/10.2833/177071

 <sup>&</sup>lt;sup>29</sup> http://www.stefanscheuer.eu/wp-content/uploads/2022/04/20220419-FraunhoferISI\_Scheuer\_Briefing-higher-prices-higher-energy-savings\_final.pdf
<sup>30</sup> https://www.bpie.eu/wp-content/uploads/2021/11/06536-Turnkey-Retrofit-report\_RenovationWave.pdf

<sup>&</sup>lt;sup>31</sup> https://www.iddri.org/en/publications-and-events/blog-post/energy-renovation-essential-tool-long-term-protection-against

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