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UIPI COMMENTS ON  
THE REVISION OF THE ENERGY AND  
ENVIRONMENTAL STATE AID GUIDELINES  
(EEAG)



As key stakeholders in the housing and real estate sectors, we fully acknowledge the importance of the decarbonisation of the building stock. Property owners, be they owner-occupier households or individual/professional landlords, have a crucial role to play to contribute towards achieving the 2050 climate goals, and thus we, as an association, are committed to improve the sustainability of our built environment on the EU level.

In line with the views expressed in the Green Deal Communication and the Renovation Wave Strategy, we are convinced that better performing buildings can ensure healthier and safer environments for all citizens. However, renovation does not come without a cost, and this inevitably entails a critical challenge for European citizens and real estate companies, even more so considering the disruption brought by the recent pandemic. We therefore welcome the Revision of the *Energy and Environmental State Aid guidelines* (EEAG), an empowering tool to make the Renovation Wave a reality across the European Union, and we would like to share with the European Commission our suggestions as follows.

❖ The revised EEAG needs to reflect the ambitious policy developments

The past years have seen the rise in the energy and environmental legislation, in particular through the Clean Energy Package. This has recently been followed by the European Green Deal and the Renovation Wave Strategy, and will be further continued by the upcoming revisions of the EED, RED and EPBD, all under the objective to achieve climate neutrality. In order to be able to reach this ambitious goal, the revised EEAG needs to enable the provisions set on the table and allow stakeholders to fulfil the obligations from the mentioned Directives. As more stringent measures are announced, we strongly encourage the European Commission to update the EEAG on sectoral measures in relation to the upcoming obligations.

❖ Member States need to be enabled to fund what is regulated

We support the intention of the European Commission to at least double the renovation rate and increase the depth of renovation, as announced in the Renovation Wave Strategy. Nevertheless, the issue of overall affordability to renovate is particularly concerning in the context of households' financial aptitude to keep up with the climate objective, as in a certain number of EU Member States the average annual households' net income is less than €10.000.

We thus highly recommend the European Commission to include a widening of the scope and types of possible support measures which should include green bonuses. Within this context, the revised EEAG should ensure that subsidies are in line with the new green legislation in order to sustain the effort of the renovation of the building stock.

❖ The State aid intensities for energy efficiency in building projects need to be increased

Current state aid intensities for energy efficiency projects in the built environment are significantly low, which sets pressure on the affordability of the green transition. In line with the objective to reach the climate neutrality, we therefore encourage increasing the state aid for energy efficiency projects in buildings.



## ABOUT UIPI



### International Union of Property Owners (UIPI)

*European Commission's Transparency Register No. 57946843667-42*

The International Union of Property Owners (UIPI), the largest pan-European non-profit association of both homeowners and private landlords. UIPI comprises 31 organisations from 28 countries which, jointly, represent more than 6 million private property in Europe.

The interests of the sector we represent correspond to the concerns and needs of a substantial part of the European population. As shown by Eurostat, almost the 70% of EU citizens are owner-occupiers, whereas almost another 20% of the population is housed in the private rented sector.

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