

EVIA submission - Targeted review of the GBER (State aid): revised rules for State aid promoting the green and digital transition

EVIA, the European Ventilation Industry Association, welcomes the opportunity to comment on the review of the General Block Exemption Regulation. Our commentary refers to Section 4.2 'Aid for the improvement of the energy and environmental performance of buildings' of the [Draft revised Climate, Energy and Environment State Aid Guidelines](#), which we understand would largely be translated into the GBER, specifically Article 38, paragraph 3a and 3b. Concrete suggestions for improvement are provided further below.

EVIA requests for waste heat/cold recovery, as well as Indoor Air Quality (IAQ)/Indoor Environmental Quality (IEQ), to be better integrated in the CEEAG and GBER, based on the following considerations:

- Energy efficiency renovations primarily target the insulation of the building envelope with a view to limiting thermal losses and thus improving the energy performance of the building. In new or refurbished buildings which are well insulated, approximately 50% of the energy demand, and even a higher rate in non-residential buildings, can stem from thermal losses due to air renewal through both window airing and non-state of the art or non-properly operating ventilation system losses, depending on the use of the building¹. This energy waste can be dramatically reduced thanks to the implementation of a modern and well-functioning dedicated ventilation system. Thus, the use of proper mechanical ventilation brings the benefit of a reduced building heating or cooling demand. Typically, 1 kWh electricity results in a saving of 4 to 10 kWh thermal energy (depending on climate and use). **The recovery of heat and cold from indoor air in buildings should therefore be promoted as it can significantly reduce the energy consumption necessary for heating and cooling of buildings in the first place, and consequently significantly facilitate and accelerate the decarbonization of the sector.**
- Improving insulation levels and in consequence air tightness of the building envelope heavily reduces the air infiltration and energy losses of a building. In such a context, **controlled air renewal via mechanical ventilation becomes a necessity to avoid negatively impacting health outcomes.** As non-residential buildings typically need higher ventilation rates caused by higher occupation density, this aspect is even more acute. The Commission has rightly acknowledged the interrelation between indoor air quality and energy efficiency in the recently published Recommendation and guidelines on energy efficiency first. As is stated in the guidelines, indoor air quality, linked to the concentration of major indoor air pollutants (carbon dioxide, relative humidity, VOC pollutants such as formaldehyde and benzene, radon, carbon monoxide, ultrafine particulates) strongly depends on the level of air renewal. Improvement of buildings' energy efficiency through better insulation can have a very detrimental impact on indoor air quality if the air within the building is not sufficiently renewed. **Therefore, ensuring the proper implementation of well-functioning mechanical ventilation systems in new and renovated buildings, is essential to help guarantee an adequate IEQ/IAQ for people living, working, or undertaking recreational activities more than ever in highly insulated and air-tight environments.**

EVIA would be delighted to further support the review of the GBER/CEEAG by providing further documentation and substantiation of the above considerations if requested.

Suggestions for improvements to Section 4.2 of the draft revised Climate, Energy and Environment State Aid Guidelines 'Aid for the improvement of the energy and environmental performance of buildings'

Suggested changes are highlighted in red.

4.2.1 Rationale for the aid

114. Measures aimed at improving the energy and environmental performance of buildings target negative externalities by creating individual incentives to attain targets for energy savings and for the reduction of greenhouse gas and air pollutant emissions **as well as indoor concentrations**. In addition to the general market failures identified in Chapter 3, specific market failures may arise in the field of energy and environmental performance in buildings. For instance, when renovation works in buildings are considered, the benefits of energy, environmental, **and indoor environmental quality** performance measures do not typically accrue only with the building owner, who generally bears the renovation costs, but also with the tenant. The Commission therefore considers that State aid may be needed to promote investments aimed at improving the energy, ~~and~~ environmental **and indoor environmental quality** performance of buildings.

4.2.2 Scope and supported activities

115. Aid may be granted for the improvement of the energy efficiency of buildings.

116. This aid may be combined with aid for any or all of the following measures:

(a) the installation of integrated on-site renewable energy installations generating electricity, heat or cold;

(a1) the installation of integrated on-site waste heat or cold recovery installations or systems;

(b) the installation of equipment for the storage of the energy generated by on-site renewable energy installations;

(c) the construction and installation of recharging infrastructure for use by the building users, and related infrastructure, such as ducting, where the car park is located either inside the building or it is physically adjacent to the building;

(d) the installation of equipment for the on-site digitalisation of the building, in particular to increase its smart readiness. Eligible investments may include interventions limited to passive in-house wiring or structured cabling for data networks and, if necessary, the ancillary part of the passive network on the private property outside the building. Wiring or cabling for data networks outside the private property is excluded;

(e) other investments that improve the energy, environmental **or indoor environmental quality** performance of the building, including investments in green roofs, ~~and~~ equipment for the recovery of rain water **and systems ensuring a sufficient but controlled renewal of the indoor air**.

About EVIA

The European Ventilation Industry Association (EVIA)'s mission is to represent the views and interests of the ventilation industry and serve as a platform between all the relevant European stakeholders involved in the ventilation sector, such as decision-makers at the EU level as well as our partners in EU Member States. Our membership is composed of more than 40 member companies and 6 national associations across Europe, realising an annual turnover of over 7 billion euros and employing more than 45,000 people in Europe.

EVIA aims to promote highly energy efficient ventilation applications across Europe, with high consideration for health and comfort aspects. Fresh and good indoor air quality is a critical element of comfort and contributes to keeping people healthy in buildings.