

(CAB-VON DER LEYEN)

From: [REDACTED] (CAB-VON DER LEYEN)
Sent: jeudi 4 mars 2021 09:12
To: [REDACTED] @eurima.org'
Subject: RE: EU Taxonomy must contribute to building the Green Deal on solid foundations

Dear [REDACTED],
[REDACTED] would like to thank you very much for your e-mail, of which I herewith acknowledge receipt. Thank you also for sending us the op-ed by the Eurima-Board published on EURACTIV on how the EU Taxonomy must contribute to building the Green Deal on solid foundations. We have also shared your e-mail with our colleagues in the Cabinet of Commissioner McGuinness, in charge of taxonomy. With very kind regards,

[REDACTED]



European Commission
Cabinet of President Ursula von der Leyen
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We would like to highlight that for reasons of public transparency, Commissioners and their Cabinets only meet organisations or self-employed individuals that are registered in the EU's Transparency Register (see here: <http://ec.europa.eu/transparencyregister>). I would invite you to register if you have not yet done so, and send us your registration number if you wish to request a meeting.

DISCLAIMER

"The views expressed are purely those of the writer and may not in any circumstances be regarded as stating an official position of the European Commission."

From: [REDACTED] - EURIMA <[REDACTED]@eurima.org>
Sent: Wednesday, March 3, 2021 12:50 PM
To: [REDACTED] (CAB-VON DER LEYEN) <[REDACTED]@ec.europa.eu>
Subject: EU Taxonomy must contribute to building the Green Deal on solid foundations

Dear [REDACTED]

Following up to our earlier exchange on this important subject and the ongoing review process within the EU Commission, I would like to reiterate our strong concerns about the way the manufacturing of (mineral wool) insulation is classified in the draft EU Taxonomy Delegated Act for climate change mitigation and adaptation. In this context, please find attached, an op-ed by the Eurima-Board published on EURACTIV last week on how the EU Taxonomy must contribute to building the Green Deal on solid foundations. For your convenience, please find it available [here](#) and attached.

Hoping that the abovementioned issue is indeed considered in the ongoing process by the European Commission, we remain available to further discuss with you our suggestions and support the Commission in its further effort to design and review the EU Taxonomy.

Your sincerely,



European Insulation Manufacturers Association

On behalf of the EURIMA Board members



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EU Taxonomy must contribute to building the Green Deal on solid foundations

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Stakeholder Opinion



Decarbonising the building sector will make or break Europe's Green Deal. Thankfully, renovations are enjoying some much-deserved limelight. But there is one very important detail which could slow down our hard-won progress, warns the European Insulation Manufacturers Association (EURIMA).

If the EU is to hit its 55% emissions cut goal for 2030, the building sector will have to scrub its emissions by 60%. That means better-built buildings and lots of renovations, as quickly as possible. The current rate of overhauls is well behind the required pace.

We also need such renovations so that people living in leaky homes can escape energy poverty, kids in schools enjoy healthier conditions and patients in hospitals recover faster. And we know that every €1 million invested in building renovation creates around 18 jobs.

Renovations are not cheap but thankfully, the EU is starting to put in place initiatives, rules and, most importantly, sources of funding that mean the ambitious Renovation Wave stands a chance of being a great success.

One of those initiatives is the EU taxonomy for sustainable activities, a comprehensive set of rules that is designed to guide investments into green projects and provide the Green Deal with the financial boost required to slash emissions and stick to the Paris Agreement.

The European Commission is now putting the final touches to the taxonomy, building the delegated acts that will provide all the criteria needed, ahead of probably publishing it this spring.

But the current draft shows that insulation materials, one of the key solutions in the Renovation Wave's arsenal, have been re-categorized. Instead of being included under "energy efficiency equipment", they are now listed in the far less specific "other low-carbon tech" category.

This may seem unimportant when you consider the Commission has to contend with more high-profile issues. But it is important, as it risks misrepresenting renovation's potential and confusing markets.

A technical expert group initially recommended that insulation be filed under the energy efficiency equipment category – which is where you would expect it – but that advice, as well as feedback provided by industry during the public consultation, has not been so far incorporated.

It would be more than odd not to include insulation under the energy efficiency heading, when insulation is actually the sine qua non technology that will enable other equipment in the efficiency category to deliver the required energy performance.

The bottom line is that EU Taxonomy should provide clear and logical guidance to investor community. But the current text of the delegated act risks sending contradictory signals to investors by ignoring the role of insulation as energy-efficiency technology. Keep in mind that insulation can save up to 200 times the amount of CO₂ produced during its entire production chain!

Thankfully, this is an easy fix.

There is just about enough time for the Commission to get it right, before the financial community is misled and starts underestimating the added value of one of our most effective climate technologies.

Solid foundations are starting to take shape. The EU Renovation Wave sets a clear direction to decarbonize our building stock, the 'energy efficiency first' principle is finally taking hold in policymaking, governments are upping investments in renovations and, quite simply, we have the technology to achieve what we need to do.

Meeting our climate goals will need all of our resources and instruments aligned and in step. Given all the benefits for jobs, air quality, energy poverty and emission cuts, the taxonomy dossier has to support the Renovation Wave – and with some minor adjustments, it will.

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