

## **Stellungnahme vom 15.04.2020: feedback on: 2030 Climate Target Plan**

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12265-2030-Climate-Target-Plan>

We do not consider an increased EU-Climate target for 2030 affordable, if it leads to higher German targets than 55% in 2030. It is seriously necessary to focus on the affordability of housing (gross rent, includes net rent, running costs and energy costs), not only on energy poverty or the energy affordability! There is a high need for grants for energetical modernization in rented apartments. However, if these grants are given under state aid notification, they will be to no avail for German housing companies and the energetical modernization of rented apartments will remain blocked.

With regard to an increased climate target for 2050 we would like to point out that the German 55% target 2030 in connection with a 95% target 2050 already means an almost insurmountable challenge for the German building sector. The 55% target gives the opportunity to achieve a 95% target in 2050. If the EU increases its 2030 target, Germany would also have to increase its 2030 target as part of the burden-sharing process. We do not consider that affordable.

Corresponding to the study Integrated Energy Transition by the German Energy Agency, the current goals in Germany require non-economic additional costs for buildings in the net amount (without taxes) of EUR 518 billion (open to technology) to EUR 932 billion (electrification, i.e. heat pumps plus high renovation rate) by 2050.

Additional costs are additional investments plus additional maintenance and repair minus energy cost savings. Please see [https://www.dena.de/fileadmin/dena/Dokumente/Pdf/9261\\_dena-Leitstudie\\_Integrierte\\_Energiewende\\_lang.pdf](https://www.dena.de/fileadmin/dena/Dokumente/Pdf/9261_dena-Leitstudie_Integrierte_Energiewende_lang.pdf).

For this non-economic costs funding is necessary, especially for affordable housing, for rented apartments and households with medium and small incomes. The EU should allow sufficient funding without requiring state aid notification. In the case of Germany, the BGB (German civil code) stipulates that subsidies and other funding for energetical modernization must be passed on to the tenants in their totality, which means that the company itself does not benefit from them.

District solutions that reduce greenhouse gas emission will be crucial for reaching climate neutrality in 2050. The generation of local electricity in buildings, neighbourhoods and districts is extremely complicated when it comes to energy law, taxes, measuring technology and funding. This must be simplified significantly, preferably as an additional service to tenants.

Self-consumption by energy communities described in the Renewable Energy Directive cannot be applied to apartment buildings with tenants. This is because tenants rarely invest in renewable energy systems, since they only live in the building for a limited amount of time. Specific regulations for prosumer solutions that property owners transpose to the benefit of the tenants are necessary. A solution for financing the electricity system (i.e. grid) costs must be found as well.

Anlage: GdW\_Statement\_Renovation Wave.pfd