

Kellen Europe Stakeholders' Mapping to VIPA International on the energy efficiency of buildings debate at EU level

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1. Introduction

As a recently created association with a clear stake on the energy efficiency of buildings' debate in Brussels, it is vital for VIPA International to be familiar with the different actors involved in the process.

This map provides an overview of the different European Union institutions, associations, interest groups and technical organizations that take part in the EU decision-making process and have a keen interest on the buildings' energy efficiency topic. Since raising awareness to VIPs is one of the key priorities of the association, we added to the analysis some comments on which stakeholders could be more useful to partner with on this regard.

The rationale of this map is hence twofold:

- Identify the actors involved in the energy efficiency of buildings debate in Brussels. For this purpose we have grouped the different actors in two categories: decision-makers and influencers;
- Analyse the value of engaging with each group of actors according to what they could bring to VIPA International either in terms of advocacy activities as well as in terms of public relations and awareness raising activities.

2. Overview of each stakeholders' category

Decision-makers: the main actors both in Brussels as well as at national level that prepare legislation, vote on it and then implement it:

- European Commission
- Standardisation Bodies
- European Parliament
- Member States

Influencers: all the other organisations that influence the first group of stakeholders. Note that these are listed starting with the most general ones down to the most specific:

- **Horizontal associations**
 - Plastics Europe (plastics)
 - Construction Products Europe (construction)
 - FIEC (construction)
 - EuroAce (energy efficiency of buildings)
 - E2BA (energy efficiency of buildings)
- **Technical advisory type of organisations**
 - ECF (climate foundation)
 - ECEEE (energy efficient economy)
 - BPIE (buildings performance)
 - Construction21 (green buildings practitioners)
 - BuildUp (energy efficiency buildings)
- **Hybrid groupings on energy efficiency**
 - EU-ASE (alliance to save energy)
 - Coalition for Energy Savings

- Active House
- Renovate Europe
- **Insulation-related associations**
 - EURIMA (mineral wool)
 - EAE (external insulation systems)
 - EUMEPS (expanded polystyrene)
 - EXIBA (extruded polystyrene)
- **Associations representing materials/substances used in VIPs**
 - PPA-Europe (panels and profiles)
 - PU Europe (polyurethane: PUR/PIR)
 - AluEurope (aluminium)
 - GlassFiberEurope (glass fibre)
 - Eurosil (silica)
- **Users of VIPs**
 - EFCA (engineering consultancies)
 - UEPC (developers and house builders)
 - EUBuilders (builders)
 - ACE (architects)
 - ECCE (civil engineers)
 - FESI (insulation contractors)

3. Explanatory Notes

This part provides more background information on the two categories of stakeholders. The objective is to justify their inclusion in the mapping and to analyse the advantages for VIPA International to engage with them.

3.1 Decision-Makers

The Commission drafts and proposes legislation which is then adopted by the European Parliament and the Council. Legislation approved at EU level often establishes general objectives and targets. Member States have then to translate these general objectives into concrete policies at national level.

Should VIPA International identify one key piece of legislation impacting the industry which is about to be drafted or is being drafted already, the European Commission will be key in the process. Once the text passes the draft mode, the European Parliament and the Council become the main actors in the process. On the other hand if VIPA International identifies as priority a piece of legislation that has already been adopted at EU level, then the attention should be entirely focused on the Member States and the specific body in charge of translating the EU directives into concrete national policy.

Another significant group of actors worth highlighting on the decision-makers side are the European Standardisation Organisations (CEN, CENELEC and ETSI). Upon a mandate of the European Commission, the relevant standardisation body develops a set of common specifications and/or procedures to support the development of a specific market or policy. The CEN is already working on a number of standards relevant for

the Vacuum Insulation Panel industry. Once adopted, CEN standards will be used by other standardisation bodies in other parts of the world. This means that CEN standards will impact not only companies operating in Europe but all over the world.

3.1.1 European Commission

2014-2019 European Commission led by Jean-Claude Juncker is organized in a cluster structure. Teams of Commissioners work on specific issues under the leadership of one of the Vice-Presidents. Maroš Šefčovič (Slovakia) is the Vice-President for the Energy Union and Jyrki Katainen (Finland) is the Vice President for Jobs, Growth, Investment and Competitiveness which are the two clusters with relevance for VIPA.

Looking concretely at the European Commission's General Directorates (DG), energy efficiency of buildings is the responsibility of the Unit C.3 Energy Efficiency belonging to the Directorate General for Energy (DG Energy). Lead by the British Paul Hodson, Unit C.3 will most likely be on the lead for the review of the Energy Efficiency Directive (EED)¹ and Energy Performance of Building Directive (EPBD)². Unit C.3 is part of Directorate C Renewables, Research and Innovation, Energy Efficiency, directed by the Irish Marie Donnelly.

DG Environment, DG Clima and DG Enterprise have several units that could actively contribute to the review of EED and EPBD during the interservice consultation. DG Environment is also leading the initiatives related to sustainable buildings. Relevant European Commission units working on topics related to the energy efficiency of buildings are displayed in the table below:

Table 1: European Commission units working on areas relevant for VIPA International

Directorate General (DG)	Unit	Head of Unit
Clima	A3 Monitoring, Reporting, Verification	Alexandre Paquot
Clima	C1 Low Carbon Technologies	Piotr Tulej
ENV	A1 Eco-Innovation & Circular Economy	Hugo-Maria Schally
ENV	F1 Resource Efficiency & Economic Analysis	Carina Vopel
ENER	C.3 Energy Efficiency	Paul Hodson
ENTR	B.1 Sustainable Industrial Policy & Construction	Marzena Rogalska
ENTR	C.3 Prevention of Technical Barriers	Giuseppe Casella
ENTR	F.3 Raw Materials, Metals, Minerals and Forest-based Industries	Maria de las Flores Diaz Pulido

Value for VIPA: The European Commission is the institution drafting new legislation and reviewing existing pieces of legislation. It is fundamental for any trade association to establish a very good relationship with the key EC officials in charge of the most important dossiers (like the EED and EPBD) even if there is no

¹ Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on energy efficiency <http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1399375464230&uri=CELEX:32012L0027>.

² Directive 2002/91/EC of the European Parliament and of the Council of 16 December 2002 on the Energy Performance of Buildings <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32002L0091>.

important legislative activity going on. VIPA International needs to ensure it is considered by the European Commission's officials as the privileged partner for providing information on Vacuum Insulation Panels-related topics.

In addition to the Commission's staff members, VIPA International should pay attention to the expert groups created by the European Commission on specific pieces of legislation. This is the case of the Concerted Action for the Energy Performance of Buildings (CA EPBD)³ and Concerted Action for the Energy Efficiency Directive (CA EED)⁴. These are mixed groups of stakeholders (mainly the national authorities in charge of implementing the directives, but also other actors including trade associations, as well EC officials) that discuss the implementation of these directives. Their conclusions will serve as basis for the revision process of these directives.

3.1.2 Standardization Bodies

The most relevant standards for VIPs are developed by CEN (European Committee for Standardization), which is organized in Technical Committees (TCs). CEN/TC 88 - Thermal Insulating Materials and Products develops the standards for VIPs. A full list of harmonized standards for the construction sector is available on the Commission's website⁵.

The horizontal coordination of the work under M/480⁶ (methodology calculating the integrated energy performance of buildings and estimating the environmental impact) has been allocated to CEN/TC 371 - Project Committee - Energy Performance of Building project group. Five CEN technical committees have been created under this committee to develop the required standards of the EPBD:

- CEN/TC 89 - Thermal performance of buildings and building components
- CEN/TC 156 - Ventilation for buildings
- CEN/TC 169 - Light and lighting
- CEN/TC 228 - Heating systems in buildings
- CEN/TC 247 - Building automation, controls and building management

Value for VIPA: VIPA members already take part in the CEN Technical Committee working on VIPs standards. Standardization was identified as a key topic for VIPA. CEN Standards will be replicated in other parts of the world so participating actively in the process is even more important to global associations such as VIPA International.

3.1.3 European Parliament

The European Parliament and the European Council are the two institutions with voting power in the European Union. The European Parliament's role and influence in the decision making process has increased over the

³ See website of CA-EPBD: <http://www.epbd-ca.eu>.

⁴ See website of CA-EED: <http://www.esd-ca.eu>.

⁵ List of harmonized standards for construction: http://ec.europa.eu/enterprise/policies/european-standards/harmonised-standards/construction-products/index_en.htm.

⁶ Mandate M480 to CEN, CENELEC and ETSI, 14 December 2010, http://ec.europa.eu/energy/efficiency/buildings/doc/2010_mandate_480_en.pdf

years. The European Parliament is nowadays a very influential institution and it can ask the Commission to investigate or initiate a policy. The Parliament can bring attention to a topic through its resolutions, committee hearings and the questions asked by the Members of the European Parliament (MEPs) to the European Commission.

The previous European Parliament (2009-2014) demonstrated its support to ambitious energy efficiency policies when it adopted a resolution⁷ early 2014 calling for a binding target of 40% cut in CO₂ emissions, 30% renewable energy use and 40% energy efficiency by 2030. It remains to be seen how the new Parliament (2014-2019) will position itself on this topic⁸. The election of more right-wing, Eurosceptic and populist MEPs compared to the past term could mean that environmentally friendly policies are less likely to be adopted, but that is not necessarily true.

The most relevant European Parliament Committees working on energy efficiency-related topics are the Committee on Industry, Research and Energy (ITRE)⁹ and the Committee on the Environment, Public Health & Food Safety (ENVI)¹⁰. Both committees are chaired by EPP MEPs, the Italian Giovanni La Via for ENVI and the Polish Jerzy Buzek for ITRE.

Still related to the European Parliament, it is also important to mention the Urban Intergroup¹¹ which gathered 70 MEPs during the previous parliamentary term. The Urban Intergroup monitors the work of EP's committees on urban related issues, including topics broad topics such as housing, environment but also energy efficiency. Currently, this intergroup is not yet active. We will monitor the activities of this Intergroup since the MEPs taking part on it will most likely be the most supportive MEPs in terms of energy efficiency of buildings related policies.

Value for VIPA: The European Parliament is an important actor to influence when a new draft text is up for approval. Establishing a good relationship with the key MEPs interested in the energy efficiency of buildings debate and more concretely in insulation matters can be extremely useful for VIPA International.

3.1.4 Member States

Broadly speaking, the influence of national governments is important at two stages of the legislative process: voting in Brussels via the Council; and implementing the adopted act at national level. The voting procedure for general energy efficiency targets (Europe2020 and Framework 2030) requires unanimity. Other legislative proposals only require qualified majority in the Council, but groups of Member States opposing particular proposals can act as a blocking minority.

For the purpose of this map which is to focus on energy efficiency of buildings, we highlight the work done at national level to translate European legislation (directives) into national policy. Both the EPBD and EED included

⁷ European Parliament resolution of 5 February 2014 on a 2030 framework for climate and energy policies (2013/2135(INI), <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P7-TA-2014-0094>.

⁸ For more details about the new composition of the European Parliament following the election of May 2014, please see a set of graphics and data here: <http://www.europarl.europa.eu/elections2014-results/en/election-results-2014.html>.

⁹ Full list of ITRE Committee members is available here: <http://www.europarl.europa.eu/committees/en/itre/members.html#menuzone>.

¹⁰ Full list of ITRE Committee members is available here: <http://www.europarl.europa.eu/committees/en/envi/members.html#menuzone>.

¹¹ European Parliament Urban Intergroup website: <http://urban-intergroup.eu>.

a set of targets and objectives which are then implemented in the different Member States by the competent authority. In most cases the implementation is overseen by the Ministries of environment, energy and economic development. The field work is done by agencies and bodies working on the buildings codes and other acts setting out how the objectives included in the directives are to be concretely applied in practice.

The implementation of the both directives has not been so successful though. 24 Member States missed the EPBD transposition deadline (9 July 2012). The difficult economic situation in Europe makes it challenging for Member States to enforce the renovation of the building stock. However, we noticed that the energy security threat posed by the Ukraine crisis has highlighted that energy efficiency could contribute significantly to reduce EU's energy dependence. This debate is still on-going and might result in a better implementation of energy efficiency policies in the near future.

Having a closer look at the individual positions of the different Member States, we notice two main divergent paths: on one side Germany (with the support of among others of Denmark and France), pushing for binding and ambitious energy efficiency targets; while on the other hand U.K., Poland and other Eastern European Countries, were more prone to general objectives to be implemented by the national governments as they wish.

The same division is reflected in the level of ambition of the energy efficiency roadmaps presented by Member States to the European Commission. Denmark, Germany and France are among the most ambitious countries, while Eastern European countries are a bit more conservative with regards to energy efficiency.

Value for VIPA: It is key to understand how EU directives are being translated into concrete building codes or other specification documents for both new buildings as well as renovations. With this information we can analyse which country is more favourable to the use of Vacuum Insulation Panels and identify countries where action might be required.

In addition, Member States are also crucial during the voting process of EU legislation in Brussels. Similar to European Commission and European Parliament, trade associations need to create good relationships with the officials in charge of the main dossiers. VIPA International needs to be recognized as the authoritative voice of the Vacuum Insulation Panel industry. The VIP industry also needs to be recognized as a high performing technology that contributes to better and more energy efficient buildings in Europe.

3.3 Influencers

This second group of stakeholders includes actors that advocate their positions influencing the first group of stakeholders (decision-makers) and the direction of the debate/legislation. The only exception is the technical advisory type of organizations. These organizations provide technical and market data on the status of implementation of a given legislation or raise awareness to a topic not yet covered by legislation.

3.3.1 Horizontal associations

PlasticsEurope; Construction Products Europe; FIEC (European Construction Industry Federation); EuroAce (Alliance of Companies for Energy Efficiency of Buildings); E2BA (Energy Efficient Buildings Association); Associations that have a general scope and represent broad sectors (construction products, building products, plastics, etc), but are very influential in Brussels. These associations constitute a valuable source of contacts and information. In terms of advocacy efforts, their positions will be general and quite horizontal given the different

type of membership. Nevertheless, if any urgency pops up in terms of legislation it is important to align advocacy efforts with them.

Value for VIPA: associations like Plastics Europe or Construction Products Europe are quite broad in terms of membership and position on concrete topics. They are strong advocates for further energy efficiency targets and very influential in Brussels. Membership to associations like Construction Products Europe; EuroAce or E2BA would contribute to the creation of a network of contacts in Brussels and it would allow the access to a lot of relevant information. This group of stakeholders should not be considered priority but it is still relevant to understand their position, even if these are normally very broad.

3.3.2 Technical advisory type of organizations

ECF (European Climate Foundation); ECEEE (European Council for an Energy Efficient Economy); BPIE (Building Performance Institute Europe); BuildUp (portal on energy efficiency on buildings); Construction21 (portal for green building practitioners).

The organizations included in this category have different profiles, ranging from institutes and foundations to online platforms. They publish technical and market data about energy in general (ECF), but also very concrete data on energy efficiency of buildings (BPIE). They are regarded as impartial and independent advisors on energy and building related topics. It is important to keep a close eye to their publications, understand their view on VIPs and possibly partner on any activity considered important. The online platforms (BuildUp and Construction21) work as repositories of best practices for all professionals involved in the building sector. It is also important to monitor EU-funded projects related to renovation and training of work force like for instance TrainRebuild.

Value for VIPA: Important to understand how VIPs are perceived as insulation products by these actors. Possible co-operation in research activities could be considered. Joining networks such as BuildUp and Construction21 (free membership) is a way of raising awareness to VIPs and increasing the literature about VIPs on these online platforms.

3.3.3 Hybrid groupings on energy efficiency

EU-ASE (European Alliance to Save Energy); Coalition for Energy Savings; ActiveHouse; Renovate Europe
These organizations have hybrid memberships, including companies, foundations, NGOs and Members of the European Parliament. They are quite vocal in Brussels and produce deliverables (studies, articles and press releases) on energy efficiency in general. Their positions are quite general because of their hybrid membership structure. Taking part in such organizations could also be interesting to understand the perception of VIPs, especially among NGOs.

One particular campaign worth highlighting is the Renovate Europe campaign. Lead by EuroAce (see horizontal associations) this communication campaign is focused on renovation of buildings. It releases numerous studies and organizes events (Renovate Europe Day) in Brussels. This campaign is very visible in the Brussels arena and has a very good list of partners.

Value for VIPA: alliance/membership could be considered mainly to increase visibility to the association and to VIPs and to build a network of contacts (easier access to MEPs and NGOs for instance).

3.3.4 Insulation-related associations

EAE (external thermal insulation systems); EUMEPS (expanded polystyrene), EURIMA (mineral wool); EXIBA (extruded polystyrene)

Although these associations represent competing products to VIPs, they are likely to partner with VIPA on horizontal matters (promotion of insulation, building renovation). It is important to recognize which of these associations could support VIPs (very unlikely though) and understand which arguments they could possibly use against VIPs.

Value for VIPA: Important to keep a close look at their activities and positions and see how VIPs are considered. Membership to the horizontal insulation associations could be considered to ensure VIPs are taken into account and are part of the process.

3.2.5 Associations representing materials/substances used in VIPs

AluEurope (aluminium); GlassFiberEurope (glass fibers); PU Europe (polyurethane: PUR/PIR); PPA-Europe (panels & profiles); Eurosil (silica)

In case of a specific regulation affecting one of the materials/substances used in the manufacturing of VIPs, it would be relevant to get in touch with these associations and to support their work where deemed necessary. These associations are also strong advocates for further energy efficiency targets for the building sector so it would be good to align with them on any general campaigns calling for more insulation.

Value: Key associations to establish alliances with in case of regulatory threats related to a specific material/substance used in the manufacturing of VIPs. Another possibility of coalition could be a general campaign raising awareness to the advantages of insulation or to renovation at EU level.

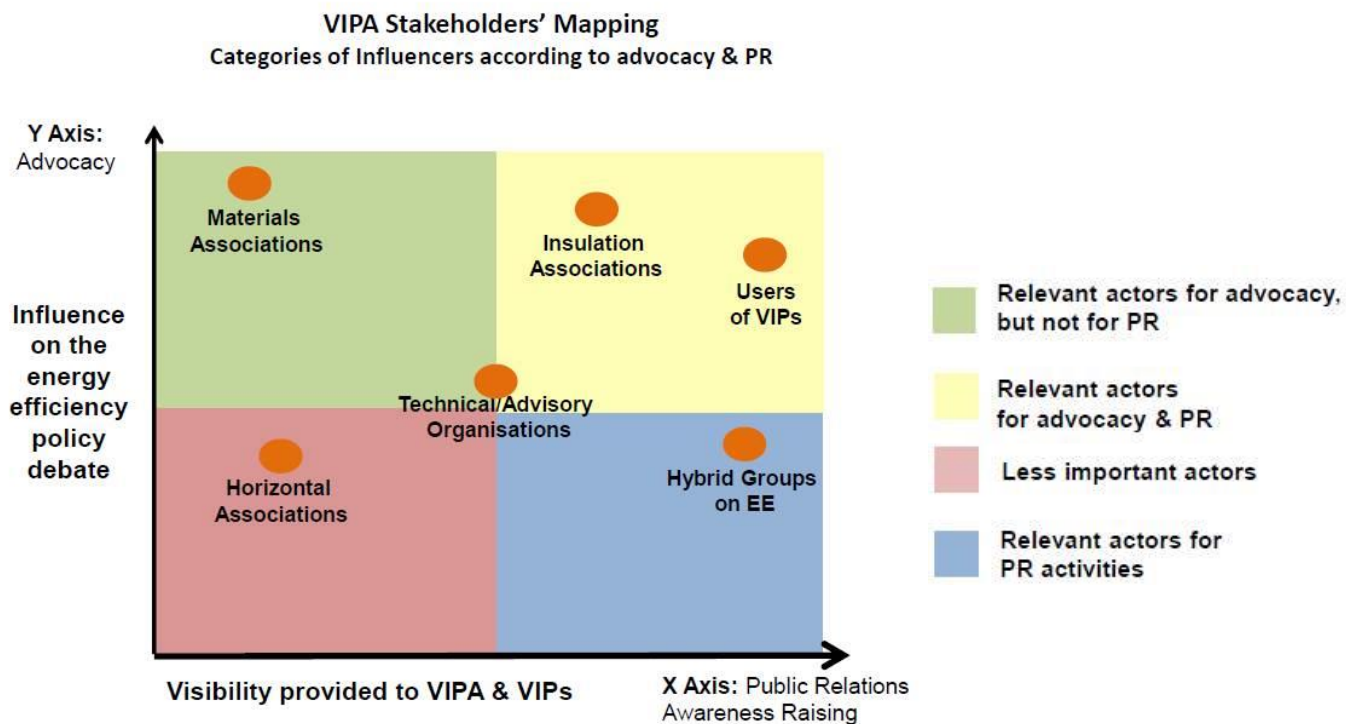
3.3.6 Users of VIPs

EFCA (European Federation of Engineering Consultancy Associations); UEPC (European Union of Developers & House Builders); EUBuilders (European Builders Confederation); FESI (European Federation of Association of Insulation Contractors); ECCE (European Council of Civil Engineers); ACE (Architects' Council of Europe)

Associations and professional societies grouping professionals that take the decision to use and install VIPs. Partnerships with these associations would be a crucial way of passing a message to this audience. Unfortunately, most of these associations dislike the idea of partnering with associations representing products. They fear any influence on the choices they make as professionals. These associations also advocate for more ambitious renovation targets so they would also be good partners for a coalition on this regard.

Value for VIPA: These associations are a vital vehicle to reach out to all those that take the decision of using VIPs so VIPA International should consider them for education and awareness raising activities.

4. Stakeholders' mapping visuals

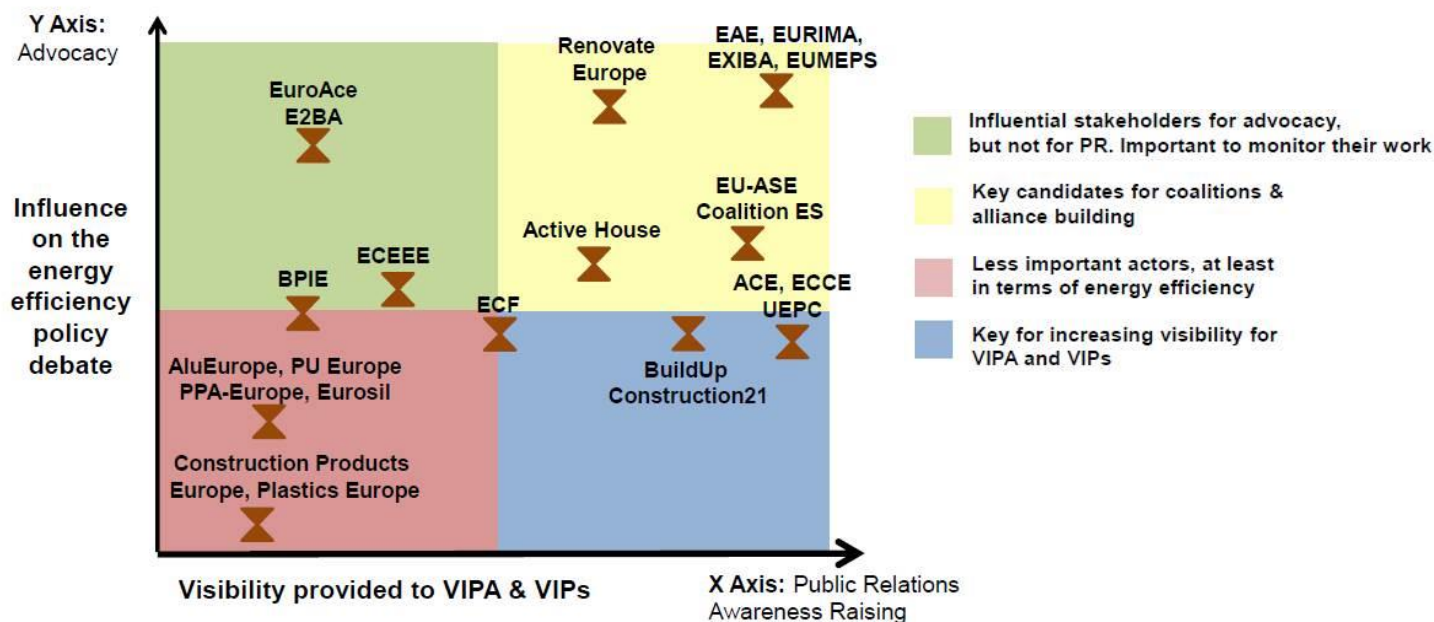


On the visual above, we have placed each group of influencers according to their role and level of influence in terms of advocacy activities (y axis). On the x axis we organized the categories of influencers in terms of the visibility they could offer to both VIPA and VIPs.

For instance, we can conclude that associations representing materials/substances used in VIPs are very influential in terms of advocacy, but they would not be the best vehicle to increase awareness to VIPs and VIPA. On the other hand, hybrid groupings are placed very high on the x axis because they constitute a great platform to get in touch with different type of actors (MEPs, NGOs, other trade associations, etc) and hence increase the visibility of both VIPA and VIPs. In terms of the y axis their position is relatively low, since their positions are often very general so they would not be the best partners for specific advocacy efforts related to insulation for instance.

The yellow and the blue quadrants of the graphic include the most relevant categories of stakeholders for concrete and effective advocacy and public relations activities related to the energy efficiency of buildings. The green and pink quadrants include the categories of stakeholders which are less important in this specific debate. Nevertheless these stakeholders should be monitored and kept informed about VIPA and VIPs.

VIPA Stakeholders' Mapping
Influential actors in terms of advocacy & PR



With the second visual above we highlight some individual actors within each one of the categories of influencers. The same reasoning was used: y-axis related to advocacy and x-axis related to public relations.

Associations like Construction Products Europe and PlasticEurope have limited influence in the energy efficiency debate and are not the best platform to raise awareness to VIPs. Hence they are placed very low in the pink quadrant. Notwithstanding in case any legislative threat arises in a policy issue covered by these associations, then it would be relevant to partner with them.

Actors included in the yellow quadrant rank high in both axes which means they are important stakeholders to take into account in the energy efficiency of buildings debate at EU level, both in terms of public affairs as well as in terms of public relations.

This mapping document provides the leadership of VIPA International with a general overview of the main stakeholders in Brussels involved in the energy efficiency of buildings debate. Should VIPA International decide to undertake any advocacy or public relations initiative related to the debate on the energy efficiency of buildings, these stakeholders should be taken into account.