

## **Statement / Feedback**

on the European Commission's proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND THE EUROPEAN COUNCIL on the amendment of Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC with regard to the promotion of energy from renewable sources and on the repeal of Directive (EU) 2015/652 Renewable Energy Directive (RED II)

In its statement on the Renovation Wave initiated by the European Commission, ICOMOS Germany, together with other organizations and associations, has already pointed out that European cultural heritage must not be completely disregarded in the efforts for effective climate protection. Even if the climate protection initiative of the European Commission is undoubtedly important and justified, according to the plans announced to date it threatens European cultural heritage considerably.

The presented draft for a revision of the EU Energy Efficiency Directive (EED) seems to confirm the fears that the importance and relevance of cultural heritage and monument protection is being negated and that our European cultural heritage is being completely subordinated to the envisaged ambitious goals or the binding minimum requirements for the protection of the climate.

The simultaneously presented draft of the Renewable Energy Directive (RED II) also confirms these fears rather than allaying them. The newly added Article 15a(1) requires that, in order to promote the production and use of renewable energy in the buildings sector for 2030, Member States shall set an indicative target for the share of renewable energy in final energy consumption in their buildings sector, consistent with the indicative target of achieving a share of renewable energy of at least 49% of final energy consumption of the buildings sector in the Union by 2030.

Article 15a(2) requires that, in order to achieve the indicative share of renewable energy referred to in paragraph 1, Member States should provide minimum mandatory levels of renewable energy use in buildings within their building codes and building regulations and, where applicable, in their subsidy schemes or otherwise with equivalent effect.

Finally, Article 15a(3) requires Member States to ensure that public buildings at national, regional and local levels set an example in terms of the share of renewable energy used. Member States may, among others, allow that obligation to be fulfilled by providing for the roofs of public or mixed private-public buildings to be used by third parties for installations that produce energy from renewable sources.

### **Requirement:**

The increased use of renewable energies in existing buildings and the proposed leading role of the public buildings in the demanding process of energy efficiency improvement is undoubtedly important and the introduction of the new Article 15a is a suitable regulation for this purpose.

However, in order not to endanger our European architectural heritage through this new regulation, from ICOMOS' point of view, it must be clearly stated in the recitals that neither the indicative targets of the EU nor obligatory measures for their implementation at EU or national level may affect European cultural heritage. A clear commitment to cultural heritage must be included with the indication that cultural heritage will not be subjected to mandatory measures for the use of energy from renewable sources if this leads to irretrievable loss of substance or impairments in appearance. Funding incentives must not lead to simpler approaches being given preference over alternative and more heritage-friendly measures due to greater funding (e.g. for standard solar panels).

Nor must the consideration of cultural heritage be left solely to the member states when transposing it into national law, as this would render the consideration non-binding and the protection would not

be guaranteed. In view of the EU's constantly repeated commitments to the common European cultural heritage, the EU must take responsibility by means of its directive competence.

Finally, ICOMOS refers to the **European Cultural Heritage Green Paper**, prepared by Europa Nostra in close collaboration with ICOMOS and the Climate Heritage Network, with the participation of other members of the European Heritage Alliance. It is supported by the European Investment Bank Institute and the European Union's Creative Europe program, and was recently launched by the European Commission with the aim of making Europe the first carbon-free continent by 2050.

The paper correlates the contribution of cultural heritage to all key areas of the European Green Deal, including Clean Energy, Circular Economy, the Renovation Wave, Smart Mobility, Farm to Fork, Green Finance and a Just Transition, Research and Innovation, Education and Training, as well as Green Deal Diplomacy. It proposes a series of concrete recommendations for both policymakers and cultural heritage stakeholders. Potential conflicts - real or perceived - between cultural heritage protection and European Green Deal policies are identified, as well as win-win strategies to overcome these conflicts.