



Position paper – FRANCE

*(WP2 EXPERIENCE AND VIABILITY OF NZE REFURBISHMENT PROJECTS –
D2.7, position paper)*

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THE EU INITIATIVE NEARLY ZERO ENERGY HOTELS (neZEH)

neZEH's scope is to accelerate the rate of refurbishment of existing hotels into Nearly Zero Energy Buildings (nZEB), providing technical advice to hoteliers for nZEB renovations, demonstrating the sustainability of such projects, challenging further large scale renovations through capacity building activities, showcasing best practices and promoting the front runners. The project covers seven (7) EU countries: Greece, Spain, Italy, Sweden, Romania, Croatia, France and has a wide EU level impact.

The expected results are:

- An integrated set of decision support tools to assist hoteliers in identifying appropriate solutions and designing feasible and sustainable nZEB projects;
- A dynamic communication channel between the building sector and the hotels industry, which will enable the exchanging between demand and supply side and the endorsement of the nZEB concept;
- Demonstration pilot projects in 7 countries to act as "living" examples; aiming to increase the rate of nZE renovation projects in the participating countries
- Practical training, informational materials and capacity building activities to support nationally the implementation and uptake of nZEB projects;
- Integrated communication campaigns to increase awareness for the nZEB benefits, to promote front runners and to foster replication; challenging much more SMEs to invest in refurbishment projects in order to achieve nZE levels.

In the long term, the project will assist the European hospitality sector to reduce operational costs, to improve their image and products and thus to enhance their competitiveness; contributing in parallel to the EU efforts for the reduction of GHGs.

neZEH started at May 2013 and will end at April 2016 and is co-financed by the Intelligent Energy - Europe (IEE) programme.

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Network of European Regions for a Sustainable and Competitive Tourism (NECSTouR)	EU
Federation of European Heating, Ventilation and Air-conditioning Associations (REHVA)	EU
Agency of Braşov for Energy Management and Environment Protection (ABMEE)	Romania
Creara Consultores S.L. (CREARA)	Spain
ENERGIES 2050 (ENERGIES 2050)	France
Energy Institute Hrvoje Požar (EIHP)	Croatia
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1. INTRODUCTION

The main objective of neZEH project is to stimulate and accelerate the rate of refurbishment of existing SME (small and medium enterprises) hotels into Nearly Zero Energy Buildings. This national position paper identifies the needs of all involved stakeholders, from owners and policy makers to financial institutions. This document is based on discussions that took place from the start of the project with various stakeholders (hotel owners and managers, supporting institutions, policy makers, financial institutions, professionals of the building sector and engineers).

These discussions took place on various occasions, either official or informal, such as:

- **Conferences :**

- “Innovative City”, Business meeting organized by the Chamber of commerce and Industry of the Alpes-Maritimes department (06) as a side-event of the conference – Nice - June 2013
- AGECOTEL Hotel Fair – Nice - February 2014
- Forum on Sustainable Buildings – Marseille – February 2014
- Regional Consultation on Tourism – Gréoux-les-Bains – February 2014
- neZEH Launch event – Sanary - April 2014
- CODA Strategies conference “Which energy efficiency services for the transition?” – Paris – July 2014
- Conference and round-table on neZEH project during a regional event on Sustainable Development – Forcalquier – September 2014
- neZEH international Conference in Nice as part of a week event on sustainable buildings and cities, labelled COP21 – June 2015
- Citizen Climate Conference organized by ENERGIES 2050 in Marseille with the support of PACA region – November 2015
- COP21 side events and Conferences on neZEH, sustainable buildings and tourism – December 2015
- Launch of the task force “Action for sustainable tourism” with key representatives of the national tourism Industry in Paris – March 2016

- **Meetings with institutional stakeholders such as :**

- Regional Tourism Committee of Côte d’Azur (February 5th, 2014)
- Council of the Alpes-Maritimes Department, with the Presence of the Chamber of Commerce and Industry of Nice Côte d’Azur (February 11th, 2014)
- Council of the Alpes de Haute-Provence Department, with the Presence of the Chamber of Commerce and Industry of Alpes de Haute Provence (March 6th, 2014)
- City of Nice (April 4th, 2015)

- **Phone calls and bilateral meetings with :**

- Hotels
- Hotel associations
- Tourism committees and agencies
- Tourism internet portals (such as “Voyageons autrement” and “GGPLWS”)
- Technicians of local institutions (Council of the Var Department, Council of the Bouches-du-Rhône Department, Council of the Haute-Alpes Department, Regional Council of Provence-Alpes-Côte d’Azur - PACA)
- Regional and local Chambers of Commerce and Industry (Marseille-PACA, Var,

Alpes de Haute-Provence, Alpes-Maritimes, etc.)

The following position paper is also based on an extended literature relevant to the national hotel industry and to the identification of potential improvements in existing supporting mechanisms. Without being comprehensive, we can quote:

- National Plan for Increasing the number of nearly zero-energy buildings (nZEB) in France, 2013 - available at : http://ec.europa.eu/energy/efficiency/buildings/implementation_en.htm
- La rénovation thermique des bâtiments en France : enjeux et stratégie, ENERTECH, 2012, available at http://www.enertech.fr/pdf/48/enjeux-de-la-renovation-thermique-des-batiments-en-france_v0.pdf
- The Travel & Tourism Competitiveness Report 2013, World Economic Forum, 2013, available at : <http://reports.weforum.org/travel-and-tourism-competitiveness-report-2013/>
- Le tourisme, « Filière d'avenir », NOGUE Report, National Tourism Council, 2013, available at : http://travail-emploi.gouv.fr/IMG/pdf/Rapport_NOGUE_-_Le_Tourisme_filiere_d_avenir.pdf
- Les Français et « le tourisme responsable », Harris Interactive pour Voyages-sncf.com, 2012, available at : http://www.harrisinteractive.fr/news/2012/cp_hifr_vsncf_26102012.pdf
- Plan d'action de la France en matière d'efficacité énergétique, French Ministry of Ecology, Sustainable Development and Energy, 2014, available at http://www.developpement-durable.gouv.fr/IMG/pdf/110619_PNAEE.pdf
- Bilan énergétique de la France en 2014, 2015, French Ministry of Ecology, Sustainable Development and Energy

Also, this document is based on EU level position paper available at NEZEH web page provided by project partners Federation of European Heating, Ventilation and Air-conditioning Associations (REHVA) and World Tourism Organization (UNWTO).

2. RATIONALE

2.1 France is the first touristic destination in the world. France welcomed 83.8 million international tourists in 2014, placing the country first above the US and Spain. The tourism sector represented 7.4% of national GDP the same year and provided jobs to over 1.2 million people. In terms of revenues coming from International travellers, France ranked third behind Spain and the US at €43.2 billion¹. The hotel sector represents around 36 000 companies² with an important representation of small sized companies (in the hotel sector, the average number of employees is

¹ Key facts on Tourism, 2015 edition, Direction Générale des Entreprises, available at <http://www.entreprises.gouv.fr/etudes-et-statistiques/chiffres-cles-tourisme>

² NOGUE Report, *Le tourisme, « Filière d'avenir »*, National Tourism Council, 2013, available at : http://travail-emploi.gouv.fr/IMG/pdf/Rapport_NOGUE_-_Le_Tourisme_filiere_d_avenir.pdf

4.2 by company and 40% of the companies in the hospitality sector are family owned³). The hospitality sector represented in 2014 7% of the national building stock, at 62.3 millions m².⁴

2.2 Buildings represent over 40% of the energy consume in the EU and France, so the building sector is a key priority to energy efficiency related policies. Two key directives target buildings energy efficiency at European level: the Energy Performance of Buildings (EPBD) and the Energy Efficiency Directives (EED). In France, the implementation of EPBD provisions was made first through the adoption of specific building codes and thermal regulations in 2005 (RT2005), again developed afterwards through the Grenelles of the environment and RT2012. Specific targets include a 38% cut in buildings' energy consumption and 50% cut in greenhouse gases emissions by 2020. The long term goal is to scale up the number of nZEB throughout the country.

2.3 The neZEH initiative provides SME hotels the opportunity to achieve NZEB performance levels, by defining what should be a nearly zero energy hotel (neZEH), as well as offering tailored technical assistance for deep energy renovation of buildings and showcasing best-practice examples. This approach can lead to up to 50% energy consumption reduction and to 70% savings in operational costs. Because of the specificity of the accommodation sector – associated with buildings, but which total use of energy relates as well to a range of hosting and non-hosting functions - the neZEH initiative is addressing this gap by considering and proposing policies related to the specificities of accommodation sector at EU level, within national NZEB policies.

2.4 The neZEH policy paper aims at addressing the tourism - energy - buildings nexus for EU and national Policy makers. It provides some insights of the state of play of the SME-size accommodation industries in relation to the building energy efficiency requirements stated in the EPBD and the EED. It identifies existing and missing supporting measures for the improvement of hotels energy performance. Ultimately, it provides EU level policy makers identified challenges and gaps, and suggests a set of possible policies and measures.

3. EXISTING NATIONAL POLICIES ON NZEB AND ENERGY REFURBISHMENT OF HOTELS

In France, the implementation of EPBD provisions was made first through the adoption of specific building codes and thermal regulations in 2005 (RT2005), again developed afterwards through the Grenelles of the environment and RT2012. The label BBC (Bâtiment Basse Consommation – Low Consumption Buildings) was adopted and was reinforced through RT2005, the Grenelles and building codes RT2012. The introduction of BBC label enabled the follow up and scaling up of actions and best practices of nZEB. It usually involves for new buildings a primary energy consumption below 20% (i.e. a reduction of 80%) of the standards set in regulation; and 60% (reduction of 40%) compared to benchmarks (also set in regulation) in the cases of renovation.

³ Ibid.

⁴ Merit Order de la filière éco-électrique, 2014 (data CEREN) and CEREN, publication données 2014

In terms of tertiary buildings, 302 projects applied for a certification. A third of these applications were made in the sole year 2015, showing a recent acceleration in intake. It should be noted that renovation projects mainly involve offices (80% of projects, 85% of the surface) and the private sector (85% of projects). As much as 22% of projects concerned buildings built before 1948. As per end of 2015, 1 million m² were refurbished and were granted the certification.

3.1. INCENTIVES FOR ENERGY REFURBISHMENT

3.1.1. INCENTIVES FOR ENERGY REFURBISHMENT

This is one key measure to support the French government's energy management policy. This measure applies specifically to energy suppliers who are obligated by law to generate energy savings through end users. In parallel, this is a possibility for end users to finance, retroactively, energy saving operations. Are considered as end users anyone who buys energy: individuals, local authorities, companies, etc.

The government defines an energy saving objective which must be reached in a period of three years and which is distributed among the energy suppliers according to their share of the market. At the end of the three-year period, the energy suppliers must justify the energy savings they have generated thanks to a corresponding amount of Energy Saving Certificates (CEE). The CEE certificates have been established specifically for this innovative mechanism.

The government has established a list of "standard operations" which are frequently implemented for saving energy (isolation, solar water heater...) and which are eligible to generate CEE certificates. When an energy supplier encourages an end user to implement one of these operations, the end user can in return "sell" the energy savings he has made to the energy supplier by providing bills and other justifications of investments. The energy supplier will then use these justifications to receive CEE certificates and will pay compensation to the end users (funds, reduced bill, vouchers...).

Source:

<http://www.developpement-durable.gouv.fr/Principes-du-dispositif.html>

3.1.2. PARTICIPATIVE LOAN FOR HOTEL RENOVATION (PPRH)

This programme, proposed by BPI France (Public Bank of Investment), aims to support hotel operators in renovating their hotel. The final objective is for them to benefit from the new ranking norms in the hotel sector, set by Atout France⁵.

The particularity of this loan called "participative loan" is that the funds attributed are assimilated to the hotel's own funds and not to the debt funds. It is a way for companies to consolidate their financial structure and can help them in accessing other loans for example. With the participative loan, hotel operators can thus implement renovation operations while preserving their treasury.

⁵ Atout France is the national touristic development agency in charge of promoting the touristic industry. Among other missions, Atout France is in charge of attributing the ranking of hotels, based on norms and requirements for the quality of equipment and services

The expenses that are covered by this loan programme are:

- Renovation or extension operations
- Operations to meet the security and accessibility norms
- Equipment, furniture, material, as well as measures related to a sustainable development process
- Expenses related to clients' services (training, commercial documentation, website, etc.) as well as expenses linked to the eventual closing of the hotel during the renovation operations (in the limit of 25% of the overall operations).

The amount of the loan can be between 30 000 and 600 000 €

Source:

http://www.bpifrance.fr/votre_projet/se_developper/aides_et_financements/financements_bancaires/pre_t_participatif_pour_la_renovation_hoteliere

3.1.3.ECO-ENERGY LOAN TO IMPROVE ENERGY EFFICIENCY (PEE)

The eco-energy loan is managed by BPI France (Public Investment Bank) and is supported by the Ministry of sustainable development, environment and energy. The eco-energy loan supports micro-companies, very small companies and small or medium companies to implement programs for improving their energy efficiency. This loan is dedicated for investments in lighting, heating and air-conditioning, electric motorization and refrigeration systems.

Source:

<http://www.pee.bpifrance.fr/>

3.1.4.DECISION-MAKING AIDS (WITH FINANCIAL SUPPORT)

The National Agency for the Environment and Management of Energy (ADEME) supports, financially and technically, owners and managers who want to run assessments on how to improve their buildings' energy performance.

These aids cover a maximum of 50% to 70% of total financial investment according to the size of the company. They cover the following studies and advising tools:

- **Pre-diagnosis** (*Prédiagnostic*)
The pre-diagnosis aims to analyze the existing situation, identify issues and suggest solutions for improvement;
- **Diagnosis** (*Diagnostic*)
The diagnosis provides a comprehensive and detailed assessment of the existing situation and compares several solutions for improvement;
- **Project study** (*Etude de projet*)
The project study deepens a specific solution in order to acknowledge its feasibility.

Source:

<http://www.ademe.fr/entreprises-monde-agricole/financer-projet/financements-proposees-lademe>

3.2. OTHERS EXISTING MEASURES FOR ENERGY EFFICIENCY AND RENOVATION IN THE HOTEL SECTOR AT LOCAL LEVEL

In France, there are currently three levels of local authorities which can propose aids to implement energy efficiency measures:

- Regional councils (27)
- Department councils (101)
- Intercommunalities (groupements of Municipalities)
- Municipalities (36 781)

No specific legislation regarding supporting measures by local authorities exist, it is a voluntary support. As an illustration, a hotel situated in a rural area of the Intercommunality Métropole Nice Côte d'Azur can use various mechanisms:

- From the Intercommunality Métropole Nice Côte d'Azur : grant for an energy audit (information collected from an interviewed hotel, there is no information on their website regarding this support mechanism)
- From the Department council of Alpes-Maritimes : technical support and grant for the refurbishment of hotels situated in rural areas (mechanism currently being revised <https://www.cg06.fr/aides-touristiques/aides-aux-structures-touristiques-en-zone-rurale-2731.html>)
- From the Regional Council of Provence-Alpes-Côte d'Azur (co-financed by the Region and by the National Agency for the Environment and Management of Energy – ADEME): decision-making aids (pre-diagnosis, diagnosis and project study) as well as grants for investments.

4. COMMON FEATURES OF SMES HOTELS IN EUROPE

Tourism is the third-largest industry sector of the European Union. Eurostat highlights that the number of nights spent in tourist accommodation in the EU continued to grow in 2014, by 1.6 %, reaching 2.7 billion, hotels being the most popular type of accommodation with 64% of the nights.

The tourism sector is composed of several industries and by 1.8 million businesses, 99.5% of which being SMEs and 91% being micro enterprises⁶, especially family business. The sector is very fragmented and not well federated. Hotels and similar accommodation numbered more than 200,000 establishments in the EU-28, according to Eurostat data⁷.

Because the sector is mainly made of M-SMEs and fragmented, accessing information for better understanding and/or responding to energy or building directives is rather complex. The size of companies, the industry business model (own and operated – or operated only), the technical

⁶ HOTREC, Green Paper on the safety of tourism accommodation services-HOTREC contribution, November 2014

⁷ Eurostat, <http://ec.europa.eu/eurostat/web/tourism/data/database>

support and financial implications add to the difficulties for accommodation industry SMEs to engage.

The neZEH initiative, through its approach with pilot countries/hotels, aiming at better informing SMEs, summarizes the challenges that the accommodation industry faces in relation with energy performance measures. neZEH provides an integrated approach to pilot SMEs for responding to the existing challenges.

- **SME Hotels highest priority is to reduce their operations costs** and boost their competitiveness. However in the majority of the neZEH countries, reducing energy related operational costs requires a heavy investment for energy efficiency refurbishments.
- **SME Hotels lack technical knowledge about and awareness of buildings energy efficiency issues**; they do not have skilled technical personnel in charge of the technical building maintenance or dealing with energy management issues.
- **The majority of SMEs cannot prepare their own refurbishment plans**, are lost when it comes to look for incentives related to energy measures, and do not have access to private loans in the current economic environment.
- **SME hotels do not have the capacity to leverage available support policies** and do not know how to use available existing support schemes for investing in efficiency. Furthermore, they lack of information on how to plan and implement energy efficiency investments.
- **SME Hotels have difficulties in understanding the full economic benefit** of investing in energy retrofit in cooperation with private energy consultancy companies
- **The SME hotels business model can be burden** in engaging towards neZEH levels. Many EU properties do not own the building in which they operate.
- **Resource efficiency/sustainability certification schemes** are the most common approach SME Hotels can relate to, for understanding neZEH level requirements.

The implementation of energy performance measures by the accommodation industry presents opportunities to boost their competitiveness, but is not always well understood or the capacity to engage is limited. Such measures require the attention and support from the related policy makers at the local level.

5. SPECIAL CHARACTERISTICS AND NEEDS OF THE NATIONAL HOSPITALITY SECTOR AND THE HOTEL BUILDINGS

In France, amongst the 143 800 touristic establishments, 82 400 were self-catering accommodations, 31 700 bed and breakfast, and 18 100 tourist hotels.

5.1. COMPETITIVENESS, INNOVATION AND QUALITY: THREE IMPERATIVES OF THE HOTEL SECTOR

Not unlike the international level, competitiveness is a major issue for the hotel sector in France. But recent improvements have been made in this domain and France, which remains the first touristic destination in the world, has moved from 7th place in terms of travel and tourism competitiveness in 2013⁸ to the second place (behind Spain) only 2 years later⁹.

The hotel sector is still confronted with the need for permanent innovation, especially with the growing use of new technologies such as the internet. In 2012, 66% of French tourists used websites to book a trip (hotel, transport, etc.¹⁰). In this context, going through booking organizations have become almost compulsory for hotels. The reservation fee that these organizations charge is important and this can be a major issue for independent and small or medium sized hotels.

Moreover, there is a growing demand for certified quality in the Hotel sector in France, illustrated with a numerous number of labels and quality certificates (Ecolabel européen, Green Globe, Hotel au Naturel, Chouette Nature, Earth Check, La Clef Verte, Qualité Tourisme, Tourisme et Handicap, etc.). According to a study on Responsible tourism, 87% of the French population trusted quality labels in 2012¹¹.

5.2. IMPLICATIONS FOR IMPLEMENTING ENERGY EFFICIENCY MEASURES IN THE HOTEL SECTOR IN FRANCE

According to the situation -previously presented- of the hotel sector in France, there are several implications to the implementation of energy efficiency measures, both positive and negative:

⁸ World Economic Forum, *The Travel & Tourism Competitiveness Report 2013*, 2013, available at : <http://reports.weforum.org/travel-and-tourism-competitiveness-report-2013/>

⁹ World Economic Forum, *The Travel & Tourism Competitiveness Report 2015*, 2015, available at : <http://ep00.epimg.net/descargables/2015/05/06/f2c1e517ce56a6453171d3a9d1b1da05.pdf>

¹⁰ NOGUE Report, *Le tourisme, « Filière d'avenir »*, National Tourism Council, 2013, available at : http://travail-emploi.gouv.fr/IMG/pdf/Rapport_NOGUE_-_Le_Tourisme_filiere_d_avenir.pdf

¹¹ Harris Interactive pour Voyages-sncf.com, *Les Français et « le tourisme responsable »*, 2012, available at : http://www.harrisinteractive.fr/news/2012/cp_hifr_vsncf_26102012.pdf

Positive implications	Negative implications
<ul style="list-style-type: none"> - Energy efficiency can contribute to the hotel's competitiveness by reducing operating costs - Energy efficiency is a sign of quality (and notably environmental quality) aimed in many quality labels and certificates, and which receives growing interest from potential clients 	<ul style="list-style-type: none"> - Small and medium sized as well as independent hotels are facing important financial issues (Internet booking organization fees, renovation and other costly measures to adapt to fire security and accessibility regulations...) which leaves less financial capacity for investing in energy efficiency measures - Small and medium sized as well as independent hotels have none or only very few employees, meaning no employee can be specifically dedicated to handling environmental or energy issues, which generally require technical or special qualifications

6. POLICY RECOMMENDATIONS FOR REGIONAL AND NATIONAL POLICY MAKERS

Assessing the advantages of retrofitting hotels is the necessary first step towards any definition of successful policies in this field. From the interviewed hoteliers and stakeholders, the main pros of becoming a nearly Zero/high performing hotel emerged clearly:

- Reduction of the hotel's operational costs, thanks to the consistent energy demand decrease;
- Improved image of the hotel and improved market positioning, meeting the new interest of tourist for sustainability;
- Increase comfort as an added value for hotels' guests.

In order to take advantage of the listed benefits, hoteliers need to be supported by local and national policies to start the refurbishment process, overcoming all the limits previously stated.

ISSUE 1: Member States policy makers do not differentiate the specificities of the accommodation sectors while preparing their National NZEB policies.

National NZEB definitions do not sufficiently recognize the specificities of the accommodation industry, and especially the integration of energy services linked to swimming pools, spas, etc. They should address the particular building features, uses and operating models, since hotels cannot be considered as typical non-residential buildings; their business models usually include a number of energy intensive operations associated with their customers' comfort and expectations, closely linked with their competitiveness and viability. In order to develop viable scenarios for hotels, a "modular" benchmarking could be considered to include the non-hosting functions. Furthermore, different targets should be set for new and renovated buildings.

RECOMMENDATION 1: Policy makers should better define guidance for NZEB for refurbished buildings – SME Hotels.

ISSUE 2: Policy support mechanisms exist but are not always well-known from hoteliers and lack of integration and coordination

The list of national and regional support mechanisms for energy efficiency applicable to the hotel sector shows a significant number of mechanisms as well as numerous stakeholders in charge (Public Bank of Investment, National Agency for Environment and Energy Management, Local authorities, etc).

Even though this diversity can be an asset, it can also contribute to a lack of visibility and therefore make it difficult for hoteliers to engage on energy efficiency. This issue is even more important considering the lack of spare time hoteliers have, particularly for the independent and small-medium sized hotels who are the most relevant targets for these support mechanisms.

Moreover, there is a general lack of coherence between the different mechanisms available, in particular regarding aids and support proposed by local authorities. Indeed, on a same territory, there can be up to four levels of local authorities, which can each potentially propose a financial, a technical or a communication support. Once again, this can be a real asset and improve financial capacity of hoteliers to invest in energy efficiency measures, but this can also lead to negative situations.

Another issue raised by the multiplicity of support mechanisms and stakeholders is that they all have their own criteria and administrative procedures. As a result, if a hotelier wishes to mobilize all available mechanisms, he will have to fill in many administrative forms. Moreover, there is the possibility that even though his project meets the requirements of one stakeholder, it might not meet those of the others.

RECOMMENDATION 2.1: Create a “One-stop shop” regrouping all information regarding policies and available support mechanisms for energy efficiency in the Hotel sector.

A similar service already exists in the housing sector (“*Espace Info Energie*”). It is a national service which is made available at the local level.

RECOMMENDATION 2.2: To coordinate available mechanisms between the national level and the different levels of local authorities.

This coordination could notably be implemented through **pluri-annual programmes** in which each stakeholder/institution would engage to provide financial and/or technical support on a defined period of time, therefore addressing the issue of constancy

RECOMMENDATION 2.3: To have a unique administrative procedure (administrative form, procedure and criteria) for the different support mechanisms.

ISSUE 3: Policy support mechanisms exist but are not always adapted to the hospitality sector

Some of the support mechanisms available are dedicated to specific investments (such as roof insulation or double-glazing). This raises the question of implementing deep-refurbishment programmes or only specific measures one at a time on an extended period. Even though this last solution may seem relevant, especially to overcome potential financial barriers, it appears to be more costly on the long term (due to the multiple intervention of various companies) and requires inevitable technical considerations. It should also be underlined that in an overall

refurbishment process, the most cost-effective measures can pay for the others, which are as important to reach neZEH status.

Some measures can also require other mechanisms to be implemented as well (insulating the building can lead to the installation of a new ventilation system to avoid condensation; improving thermal performances can require to readjust the whole heating system; etc.).

RECOMMENDATION 3.1: organize a national consultation process in order to discuss, in detail, with all relevant stakeholders how these mechanisms can be adapted to the hotel sector.

RECOMMENDATION 3.2: Propose new mechanisms adapted to the hotel sector such as support for an overall hotel's refurbishment or/and technical support to hoteliers.

ISSUE 4: *Engaging in a deep-renovation process is risky for hoteliers.*

Engaging in deep renovation process to become neZEH does not only represent an important investment for an hotelier. It also represents a risk that can be divided into three parts:

- The risk link to the energy audit's assessment and recommendations. The hotelier has no guarantees that the recommendations and the evaluations made during the audit are conformed to the reality of its situation. He has to trust the auditor.
- The risk linked to the refurbishment process: the work has to be done by specialized experts to bring the expected benefits.
- The risk linked to behavior changes: the hotelier has not a full control of its final energy consumption, since it depends also on final users (guests), behaviors and the way staff is working. The risk of rebound effect is also real and can undermine any expected savings.

RECOMMENDATION 4.1: Create a warranty fund and adapt funding mechanisms such as Energy Performance Contracts to the reality of SME Hotel owners.

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