



SAKSBEHANDLER
Tove Elise Ihler

VÅR DATO
17.10.2024

postmottak@ra.no
www.riksantikvaren.no

VÅR REF.
24/03293-2

DERES REF.

DERES DATO

Nærings- og fiskeridepartementet
Postboks 8090 Dep
0032 OSLO

Att:

Net-zero Industry Act (NZIA) - Ny EU-forordning om produksjon av nullutslippsteknologi - Høring

Riksantikvaren takker for tilsendt høring, og sender innspill på engelsk for å forenkle prosessen dersom departementet ønsker å benytte innspillene våre videre inn mot EU. Utvikling av spesialiserte teknologier og kompetanse innen energieffektivisering av historiske bygninger kan skape nye næringsmuligheter og arbeidsplasser. Energioppgraderinger i historiske bygninger krever spesialtilpassede løsninger som ivaretar bygningenes tekniske, arkitektoniske og kulturelle verdi. Dette gir et marked for innovative produkter og tjenester. Historiske bygninger finnes i alle verdensdeler, og det gir et stort mulig marked for energieffektive løsninger tilpasset ulike klimaforhold og byggestiler. Erfaringer fra vellykkede energioppgraderinger av historiske bygninger kan deles på tvers av landegrensene, og fremme internasjonal kompetanseutvikling og samarbeid. Energieffektivisering av eksisterende bygninger bidrar til å redusere klimagassutslipp samtidig som man bevarer viktig kulturarv.

While this regulation primarily focuses on scaling up manufacturing capacity for net-zero technologies, it does not specifically address cultural heritage buildings or their energy upgrades. However, there are some aspects of the regulation that could potentially be relevant or adapted to support energy efficiency improvements in historic buildings, being as it is an important asset for EU markets and heritage, and a potential scope in markets worldwide:

1. The regulation covers a broad range of net-zero technologies, including energy efficiency technologies (Article 4(1)(m)). This could potentially include technologies specifically designed for historic buildings. There is a need for adopted and tailor-made solutions, for example solar panels and other solutions to fit historic tiles. Markets all over the world would potentially be at the recipient end for these kinds of tailor-made products.
2. The concept of Net-zero Acceleration Valleys (Article 17) could potentially be adapted to include areas focused on developing and testing innovative solutions for energy efficiency in historic buildings.
3. The regulation emphasizes skills development and training through the European Net-Zero Industry Academies (Article 103). This could potentially include specialized training for working with historic buildings and heritage buildings form an interesting

platform for training. Many valuable historic buildings throughout Europe already went through energy upgrade and can share experience, science and best practice.

4. The regulation encourages innovation through regulatory sandboxes (Article 33), which could potentially be used to test new approaches for energy upgrades in historic buildings, again as an interesting case.

To specifically address the needs of historic buildings within this framework, we would like to suggest:

1. Creating a dedicated entity or program within the Net-Zero Europe Platform (Articles 38-39) focused on energy efficiency solutions for historic buildings.
2. Developing a specific category of net-zero strategic projects (Articles 13-16) for innovative technologies designed for historic building energy upgrades.
3. Establishing a specialized Net-zero Acceleration Valley (Article 17) dedicated to developing and testing energy efficiency solutions for historic buildings.
4. Including historic building energy upgrades as a focus area for skills development in the European Net-Zero Industry Academies (Article 103).
5. Creating a specific regulatory sandbox (Article 33) for testing innovative approaches to energy efficiency in historic buildings.

This would recognize historic buildings as both an economic and cultural asset, acknowledge the embodied carbon in existing structures, and promote the development of specialized technologies and skills needed for their sustainable preservation and adaptation.

Hilsen

Anne Judith Munthe Kaas
Avdelingsdirektør

Tove Elise Ihler

Brevet er elektronisk godkjent uten underskrift

Vedlegg:

Kopi til: