



ICOMOSin SUOMEN OSASTO r.y.
ICOMOS Finska nationalkommittén r.f.
The ICOMOS Finnish National Committee
INTERNATIONAL COUNCIL ON MONUMENTS AND SITES
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES

Mikkeli, 10.6.2009

To the attention of the Finnish representatives of the European Parliament

Dear Sir/Madam,

ICOMOS Finnish National Committee hereby sends you the comments that the European ICOMOS committees have agreed upon concerning the amendments of the Directive 2002/91/EC of the European Parliament and of the Council of 16 December 2002 on the energy performance of buildings and that will be discussed soon in the European Parliament.

The ICOMOS Europe Group, which met in Vienna from 4th-6th June 2009, welcomes in principle this initiative on energy performance of buildings and the measures proposed therein. We acknowledge the importance of sustainability in relation to the built heritage and that special attention has been given to it.

Following the principle of subsidiarity, regulations concerning cultural heritage are the responsibility of member states. However, legislation in other areas in which the EU has a say increasingly affects the preservation of our monuments and cultural landscapes. Of course, while European legislation does not set out to harm such heritage, it can often be damaging when the consequences have not been fully thought through.

The directive in its current form does not address the special needs of the built heritage and will run the risk of jeopardising its authenticity, integrity and viability. A substantial part of the European economy is based on the qualities our common heritage provides and these shared values account for a high quality of life in Europe. We are seriously concerned that this new directive will have a negative effect and there is considerable potential for damaging interventions which would undermine the value of this important economic resource.

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The built heritage is by its nature energy efficient, especially vernacular heritage. Through our history man has by necessity used energy saving materials and construction which are inherently sustainable. Inappropriate intervention in such balanced systems can cause irreversible damage and lead to loss. We need to look at ways of harnessing the proven technologies of the past while developing suitably appropriate modern technologies and using them in a sensitive way.

The lack of adequate exclusion clauses in the directive will threaten the built heritage. The term 'built heritage' not only applies to officially protected or listed monuments and sites but also embraces a wider concept relating to historical, aesthetical and social values. Therefore we suggest it is necessary to extend the categories for specifying requirements with respect to Amendment 50, Article 4, paragraph 2.

In the process of planning EU legislation there should be a multidisciplinary assessment of possible risks and counterproductive side effects on the built heritage. Exclusion clauses or alternatives favouring preservation and protection of this heritage could be formulated and included at the early stage of legal drafts.

It is the responsibility of the European Parliament to do everything to preserve and secure our common heritage for the generations to come and ICOMOS supports this aim. It should be done in an appropriate way and the ICOMOS Europe Group is most willing to offer its expertise to help realise this.

On behalf of the Finnish ICOMOS national committee

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