

Feedback on the evaluation/review roadmap of the Energy Efficiency Directive

The Coalition for Energy Savings thanks the Commission for the opportunity to react to the roadmap on the Energy Efficiency Directive (EED).

The Coalition has been advocating for a strong energy efficiency legislative framework for over a decade. Our diversity in membership is a key asset in that effort.

The Coalition welcomes the **strong energy efficiency narrative** in the roadmap, as well as its proposal to revise the current EED. Applying the Energy Efficiency First principle, the core focus of the energy policy in the EU, needs a robust legislative and regulatory framework and enforceable targets.

The EED has secured the continuation of policies and the introduction of new instruments at national level. However, it did not lead to the investments required to tap the savings potentials across sectors. In many countries, the energy savings delivered fall short of the minimum required and are often insufficient to achieve the national indicative targets. Enforcement has not been effective, and some rules not stringent and ambitious enough. Either way, the review has to lead to a comprehensive revision of the EED, a strengthening of the legal requirements and effective enforcement.

Already for the EED I and the EED II and now for the upcoming revision, the European Parliament has asked to make the national energy efficiency targets binding. It is arguably the most effective way to secure the delivery of the given objectives. Nevertheless, the co-legislators agreed on indicative targets (Article 3) with binding measures (Article 7). This has not worked sufficiently.

The EED revision has to raise the level of ambition of the current policy framework. The existing target for energy efficiency of 32.5% by 2030 needs to be increased higher than the proposed 36 % in the Commission's 2030 Impact Assessment to **at least 40% to tap the cost-effective energy efficiency potential**. Above all, to ensure delivery, **the EU-level target**, as well as national contributions, **should be made binding**. A stronger and binding target is a key enabler to ensure the success of other Commission's initiatives (Renovation Wave, Energy System Integration, Industrial Strategy, Circular Economy Action Plan).

All the provisions related to measures detailed in the roadmap are important and need to be updated. In particular, **Article 5** does not currently deliver. It needs to become a leading requirement to create a renovation wave for the public sector and deliver on its exemplary role, such as with renovation of schools or hospitals. To strengthen its impact, Article 5 needs to be broadened by including all public buildings, while avoiding regulatory loopholes.

Last but not least, the EED revision needs to consider adjustments to the legal architecture set by **Article 7**. Solutions have to be provided to mitigate the current issues of eligibility and additionality of Article 7 measures, as new EU policies will be introduced to meet the revised GHG emission objectives (carbon pricing, vehicle

standards...). The interaction of those provisions with the Article 7 energy savings obligation needs to be assessed. It should lead to an increase of the energy savings obligation and a simplification of its implementation to guarantee its enforcement, together with a reinforced monitoring system.

Such ambition for the revision of the EED is in line with the European Green Deal. Reducing the overall energy consumption is the bedrock for achieving climate targets. Achieving carbon neutrality will be too slow and expensive without a significant reduction of energy demand. Energy savings are fast, fair and attractive. On the ground, increasing energy efficiency means delivering stable, quality local jobs, a healthier environment, increased energy security while spending less on energy bills and imports. In short, strengthening the EED is a way to ensure a deep economic transformation that is supporting a circular, resilient and equitable post-COVID recovery.