

## **Feedback on the roadmap for the amendment of the Effort Sharing Regulation**

The Coalition for Energy Savings would like to thank the Commission for the opportunity to provide feedback to the roadmap on amending the Effort Sharing Regulation (ESR).

The ESR and energy efficiency policies are strongly interconnected.

National energy efficiency policy measures put in place to implement the Energy Efficiency Directive (EED) are often the main instruments of Member States to meet their ESR targets. In particular, the EED's energy savings obligations under Article 7 require actions at the energy end use level, usually targeting the main ESR sectors, buildings and transport.

With its more robust enforcement mechanism, the ESR has played so far an important role in some Member States as a driver for energy efficiency actions, while at the same time incentivising other Member States to create a surplus of allocations by undertaking serious energy efficiency actions as well.

The revision of the ESR is an opportunity to further strengthen those synergies. The EU has to ensure that Member States put in place policies to overcome the non-price related market barriers to energy efficiency investments and to help vulnerable and hard to reach energy users. Only then, can the energy transition be fast, fair and attractive to people and businesses

However, a phasing out of the ESR or reducing its scope linked to a possible extension of the EU-ETS would be unacceptable. In addition, the interaction of an extension of the EU ETS with existing policies should be carefully assessed.