

Consultation on the Review and the Revision of Directive 2012/27/EU on Energy Efficiency

Fields marked with * are mandatory.

Introduction

This consultation aims to collect views and suggestions from stakeholders and citizens on the review and the revision of Directive 2012/27/EU on energy efficiency (Energy Efficiency Directive or EED), as partially amended in 2018 (Directive (EU) 2018/2002), foreseen by June 2021[1].

Energy Efficiency dimension of the Energy Union and the EED

Since the beginning, Energy Efficiency targets and policies have been one of the cornerstones of the EU Energy and Climate policy. Energy efficiency is one of the five dimensions of the Energy Union and will continue playing a key role in delivering the 2030 energy and climate framework supported by the governance process under the Governance Regulation[2]. In addition, Energy Efficiency First[3] has become a guiding principle of EU energy policy. To facilitate the operationalization of the principle, the Commission will issue a guidance.

The EED was adopted in 2012 to promote energy efficiency across the EU, to tap the existing energy saving potential with concrete measures, to remove barriers and overcome market failures that impede efficiency in energy supply and use in different sectors in order to achieve the EU headline energy efficiency targets for 2020.

The EED is part of the broader EU energy efficiency policy framework, which brings together other key instruments, such as the Energy Performance of Buildings Directive[4], as amended by Directive (2018/844 /EU) (EPBD), the Energy Labelling Regulation[5] and the Ecodesign Directive[6].

The EED is part of the overall decarbonisation policy framework and is interlinked with other energy and climate policy areas, notably, the Renewable Energy Directive (RED)[7], the EU Emissions Trading System (ETS) Directive[8] and the Effort Sharing Regulation[9] (non-ETS sectors), and security of supply and internal energy market. The EU level energy and climate targets are linked together in the Governance Regulation, which requires Member States to prepare their integrated National Energy and Climate Plans (NECPs) for 2030. In these NECPs Member States set out their national contributions to the EU level targets and policy objectives, and the intended policies and measures to implement them.

The EED was subject to a first, limited revision in 2018[10] as part of the Clean Energy for All Europeans package[11]. This revision sets the EU headline energy efficiency target for 2030 of at least 32.5% and

amended certain provisions[12], including adding a new requirement for a general review of the Directive and a possible, upwards revision of the target[13]. The transposition deadline for the amending Directive (2018/2002) was, in general on 25 June 2020, and, for Articles 9 to 11, on 25 October 2020.

The European Green Deal and the increased energy efficiency target for 2030

The Commission announced in the European Green Deal[14] that it would present an impact-assessed plan to increase the EU's greenhouse gas emission reductions target for 2030 to at least 50% towards 55% in a responsible way. The Commission also committed to “review and propose to revise”, where necessary, the relevant energy legislation by June 2021”, including the EED.

In the impact assessment[15] accompanying the Communication on the Climate Target Plan[16] adopted on 17 September 2020, the Commission examined the effects on the economy, society and environment of reducing emissions by 50% to at least 55% by 2030 (compared to 1990 levels). The assessment also considered the mix of available policy instruments and how each sector of the economy could contribute to these increased targets.

To this end and based on this impact assessment, the Communication on the Climate Target Plan puts forward an emissions reduction target of at least net 55% by 2030 as a balanced, realistic, and prudent pathway to climate neutrality by 2050. It also highlights that, to achieve this level of greenhouse gas emission reductions, there is a need to significantly step up energy efficiency efforts (to 36-37% for final and 39-41% for primary energy consumption) by 2030 from the current headline target of at least 32.5%.

The assessment of Member States' national contributions to the current headline target[17] shows insufficient level of ambition in terms of energy efficiency. The gap is equal to 2.8 percentage points for primary energy consumption and at 3.1 percentage points for final energy consumption.

Trends in energy efficiency

In terms of energy consumption, transport is the sector with the highest energy consumption accounting for 34% of final energy consumption in 2018. It is followed by industry and the residential sectors with both representing 25%, and the services' sector representing 13% of final energy consumption. The remaining sectors including, agriculture, fishing and forestry represent 3% of final energy consumption. Following a gradual decrease between 2007 and 2014, energy consumption has started to increase in recent years, and is now slightly above the linear trajectory for the 2020 targets. This is mainly due to weather variations, notably colder winters in 2015 and 2016, but also increased economic activity, low oil prices and increase in transport. Energy intensity in industry has continued to improve by as much as 22% between 2005 and 2017 and energy savings have indeed helped offset parts of the impact of these increases.

The latest assessment of progress for 2018 shows a decline of 0.6% in primary energy consumption compared to 2017[18], but this pace of reduction is insufficient to meet the EU target in 2020.

To address the growing energy consumption since 2014, the Commission set up a dedicated Task Force in the summer 2018 to mobilise Member States' efforts to reach the EU energy efficiency targets for 2020[19].

Partial and preliminary data for 2020 indicate that the impact on energy consumption of the COVID-19 crisis is significant and, as a result, the 2020 energy efficiency targets may well be met. However, these reductions are not caused by structural changes. Moreover, it was clear before the crisis that the level of

energy efficiency efforts by Member States would not alone be sufficient to reach the 2020 targets. The subsequent recovery from the COVID-19 crisis is expected to lead to a return of energy consumption close to the pre-crisis levels.

Taking the above-mentioned elements into consideration and given the collective ambition gap of the national contributions proposed in the NECPs, the policies in place would have to be significantly increased in order to reach even the current 2030 targets

Review and the revision of the EED

The process will cover two elements:

1. The evaluation of those elements of the EED that were not revised in 2018.
2. The Impact assessment for a revision of the EED in view of meeting the increased 2030 GHG emissions reduction ambition.

Against this background, the Commission shall undertake a two-step process. As a first step, the evaluation will assess the existing framework of the EED since its entry into force in 2012[20], except for those elements already revised in 2018. It will assess whether the provisions are efficient, effective, and coherent with the broader EU legislative framework. It shall assess whether the EED is fit to overcome remaining regulatory and non-regulatory barriers, and market failures, whether there are some shortcomings, gaps and weaknesses for the existing measures or whether additional measures would be needed to deliver on their expected results.

The findings of the evaluation will then offer the basis for what needs to be streamlined, strengthened, added or changed in the EED in order (a) to address the remaining ambition gap to the 2030 EU energy efficiency targets and (b) to deliver the increased EU greenhouse emissions reduction target of at least 55% by 2030. The impact of these policy choices will be thoroughly analysed and the impact assessment will look at the impacts of the entire EED, irrespective of the articles that were revised in 2018.

The questions of this consultation are formulated to respect the requirements of the Better Regulation rules [21] and to support this two-step process of evaluation and impact assessment.

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish

- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

NN

* Surname

NN

* Email (this won't be published)

secretariat@energycoalition.eu

* Organisation name

255 character(s) maximum

The Coalition for Energy Savings

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|--|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Senegal |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Eswatini | <input type="radio"/> Mali | <input type="radio"/> Seychelles |
| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Armenia | <input type="radio"/> Falkland Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Singapore |

- Aruba
- Australia
- Austria
- Azerbaijan

- Bahamas
- Bahrain

- Bangladesh

- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan

- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei

- Faroe Islands
- Fiji
- Finland
- France

- French Guiana
- French Polynesia
- French Southern and Antarctic Lands

- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland

- Grenada
- Guadeloupe

- Guam

- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau

- Guyana
- Haiti

- Martinique
- Mauritania
- Mauritius
- Mayotte

- Mexico
- Micronesia

- Moldova

- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar /Burma
- Namibia
- Nauru

- Nepal

- Netherlands
- New Caledonia
- New Zealand
- Nicaragua

- Niger
- Nigeria

- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa

- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland

- Syria

- Taiwan
- Tajikistan
- Tanzania
- Thailand

- The Gambia
- Timor-Leste

- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam

- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Saint Kitts and Nevis
- Saint Lucia
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* What is the scope of your organisation or institution?

- International
- European Union
- National
- Local
- Other (please specify)

* Does your organisation or institution primarily deal with energy, climate and/or environmental issues?

- Yes
- No

* In which sector / activity? (more choices are possible)

- Energy
- Climate
- Environment

* Does your organisation or institution primarily deal with OTHER issues than energy, climate and/or environmental issues?

- Yes
 No

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

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Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

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Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

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Part I – Questions of general nature

1. Assessing the implementation and the effectiveness of the Energy Efficiency Directive

Although the progress towards the achievement of the 2020 targets is still to be assessed, it is important to assess the effectiveness of the existing EED framework and to see how and to what extent the original

objectives were achieved in the context of the proposed higher climate ambition of at least 55% net emissions reduction by 2030.

1.1 To what extent do you agree with the following statement?

“The original objectives of the EED - to increase energy efficiency across the EU and to remove barriers and market failures in energy supply and energy use - are still relevant”?

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	No opinion
* Please select your answer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your answer:

While the EED has led to significant energy efficiency improvements across the EU, there is still a need to accelerate actions to reduce energy consumption across all sectors of the economy, also considering that progress in energy efficiency has been slowing down over the past few years.

Furthermore, in many countries, energy efficiency measures put in place are often insufficient to achieve the national indicative targets.

In this sense, the original objectives of the EED are still relevant, but they must be reviewed and strengthened to remove barriers and put in place measures which are able to achieve the full efficiency potential and mobilise investments in that direction. In a time of rapid innovation in the energy system, the EED can be responsive to emerging changes and can promote energy efficiency as a cross-cutting solution.

1.2 To what extent has the EED attained its objectives – to increase energy efficiency across the EU and to remove barriers and market failures in energy supply and energy use ?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Please select your answer	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer:

The EED was put in place in 2012 to close the gap towards the 2020 target, but data before the COVID crisis showed that the target will be missed. The gap towards the EU's energy efficiency target for 2020 stood at 4.6% for primary energy consumption and 3.5% for final energy consumption in 2018, according to the latest progress report of the European Commission.

The EED was reviewed in 2018 to include a 2030 perspective, but it is clear from the NECPs that Member States still lack ambition towards the 2030 target. According to the final NECPs assessment, the collective contribution of Member States leaves a gap to the 2030 energy efficiency target, based on the final NECPs assessment of 2.8% for primary energy and 3.1% for final energy.

As the EU energy efficiency target is set to be revised upward linked to the new 55% GHG emission reduction target for 2030, efforts to increase energy efficiency across the EU, pushed mainly by the EED, will need to be significantly strengthened.

In addition, the energy savings obligations under Article 7 lack precise monitoring, reporting and verifications rules, which reduce the quality of the savings delivered and therefore the achievement of the EED objectives.

*** 1.2.A Which factors helped the most to achieve the objectives of the EED? (multiple options are possible)**

- Binding nature of the measures of the EED (e.g. Article 5 on exemplary role for public buildings and Article 7 on energy savings obligation, etc.)
- Significant flexibility left to Member States how to achieve various obligations under the EED
- Existence of targets at the EU level
- Requirement to set national targets
- Requirement for planning policies and measures at national level
- Wide scope of the EED covering both the energy supply and demand and targeting different market actors (e.g. energy suppliers and distributors, transmission grid operators, national regulators, enterprises and consumers)
- Strong monitoring and reporting framework at EU level
- Other (please specify)

1.3 To what extent could the below mentioned positive effects and outcomes (achieved to date) be associated with the EED since its entry into force in 2012? (use a rating scale of 1 to 5, where 1 = to a very little extent and 5 = to a very large extent)

	1	2	3	4	5	No opinion
* My country is more committed to energy efficiency	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* There is greater awareness about energy efficiency and its role in achieving the overall climate objectives (i.e. Paris Agreement)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* More developed market of energy services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Innovative technologies and techniques are more often used	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Greater availability of funding for energy efficiency investments	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy efficiency policies triggered more jobs and growth	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy efficiency led to an increased security of supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy efficiency led to lower energy bills	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy efficiency reduced energy poverty	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy efficiency increased resource efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

1.4 To what extent could the below mentioned negative effects be associated with the EED?

(use a rating scale of 1 to 5, where 1 = to a very little extent and 5 = to a very large extent)

	1	2	3	4	5	No opinion
* Obligations under the EED led to higher administrative burden besides costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Obligations under the EED led to disproportionately higher costs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Enterprises have lost substantial revenues	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Obligations under the EED led to flawed investment decisions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Obligations under the EED further complicated existing rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Guidance on implementation of the EED from national authorities to enterprises and consumers was unclear	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Obligations under the EED put strain on already limited national administrative resources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Obligations under the EED led to too diverging implementation across Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The benefits of the EED were unequally distributed among the population.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain what administrative burden you perceive:

*** 1.5 Which measures stemming from the EED have been the most successful in your country in terms of energy savings and other benefits?** (multiple options possible)

- Energy efficiency obligation schemes introduced to achieve annual energy savings among final customers
- Obligation for public authorities to renovate buildings owned and used by the central government
- Obligation for public authorities to purchase only products, services and buildings with high energy-efficiency performance
- Obligation for large enterprises to carry out regular energy audits to learn about their energy consumption profile and identify energy saving opportunities
- Support provided to small and medium-sized enterprises to carry out energy audits to learn about their energy consumption profile and identify energy saving opportunities
- Measures introduced on awareness raising of energy efficiency and promoting change of consumer behaviour
- Deployment of individual meters and obligation to provide consumers with better and more frequent information about their energy consumption
- Introduction of subsidies, support schemes and fiscal incentives for energy efficiency
- Increased efficiency in energy production/conversion, transmission and distribution
- Introduced measures to address regulatory barriers or split incentives in national legal frameworks or administrative practices
- None of the above
- Other (please specify)

1.6 To what extent has the EED stimulated energy efficiency efforts in the following sectors?

(1 = to a very little extent and 5 = to a very large extent)

	1	2	3	4	5	No opinion
* Buildings	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Heating and cooling	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Industry	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Information and communication technologies (ICT)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Transport	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Agriculture	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Services (i.e. commercial and public)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

1.7 To what extent do the following factors represent barriers impeding the energy efficiency improvements across different sectors?

(use a rating scale of 1 to 5, where 1 = to a little extent and 5 = to a very large extent)

	1	2	3	4	5	No opinion
* Lack of clear information among consumers about available energy efficiency measures and support schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Split incentives (different interests of owners and tenants or investors and users)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Administrative burden associated with energy efficiency investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Regulatory barriers preventing energy efficiency investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Lack of awareness among investors of profitability of investments in energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* High transaction costs to finance the energy efficiency measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Limited access to capital for households and small and medium-sized enterprises to invest in energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Lack of available skills to make energy efficiency improvements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Low profitability and return on investment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Complexity or hassle associated with making energy efficiency investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Lack of fiscal measures and incentives including carbon pricing and energy taxation to provide incentives for energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer (optional):

1.8 To what extent were the costs associated with the implementation of the EED proportionate to the achieved energy savings and other benefits?

(please rate 1 to 5, where 1 - disproportionate, 5 - proportionate)

	1	2	3	4	5	No opinion
* Please select your answer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain, provide further data and information on the costs and benefits associated with the implementation of the EED and specific EED articles.

When assessing the costs of the implementation of the EED, it is paramount to consider all benefits resulting from energy efficiency improvements. In addition to reducing energy consumption and the associated greenhouse gas emissions, energy savings are a key factor for a fast, fair, and attractive energy transition. Energy savings bring multiple benefits, such as lower energy bills, better air quality, increased competitiveness and more local jobs.

However, we note that the multiple benefits of energy efficiency are rarely factored in and properly quantified or monetised; this often creates the inaccurate perception that overall costs outweigh benefits, when, especially from a societal perspective, it is the contrary.

*** 1.9 Are there any parts / specific provisions of the EED that are obsolete or have proven inappropriate?**

- Yes
- No
- No opinion

Please explain your answer:

When objectives set in the current EED provisions are not achieved, there is a clear indication that the provision itself, or at very least its enforcement, must be improved.

First, the indicative nature of the EU energy efficiency target has proven inappropriate to steer an adequate level of actions that deliver energy savings. The current gap towards the 2020 objective shows that a binding target is needed to provide accountability for all actors, including Member States, and to give a clear longer-term perspective and certainty to stakeholders and investors. By comparison, the 2020 GHG and renewable energy targets are both binding and are likely to be met. In addition, the current energy efficiency target for 2030 is now obsolete given the new GHG emission reduction goal and should therefore be significantly increased to at least achieve the 40% cost effective potential and maximise the environmental social and economic benefits of the energy transition. The potential can be increased if societal trends, like digitalisation, emerging economic and social models, industrial, transformation and increasing quality of life expectations, are taken into account and when the energy efficiency first principle is applied.

Second, the 2020 progress report of the European Commission indicates that the objective of renovating 3% of the floor area of buildings owned and occupied by central governments (Article 5) will also likely be missed. In total, only 9 countries have fulfilled their total targets for the period 2014-2019, using either the default or the alternative approach.

Third, according to the Commission, the cumulative savings achieved under Article 7 for the period 2014-2018 amounts to only 58% of the total cumulative savings required by 2020. It is therefore important to monitor whether the current provision will deliver as it should at the end of the obligation period and take corrective actions for the next period. Concretely, according to a study from the Regulatory Assistance Project, the annual reductions in energy consumption will need to be four times greater over the 2018-2030 period, compared to what they have been under the 2005-2018 period, to deliver a higher energy efficiency target. As a result, the ambition level of energy savings obligation should be aligned with more ambitious energy efficiency and climate goals.

Finally, the current 10% discount rate used to calculate the energy system costs in the Commission's modelling for the EED Impact Assessment is obsolete. Indeed, capital costs have fallen significantly in recent years as shown by the issuing of bonds with negative yields in the context of the recovery package. Moreover, a standard number should not be used in all scenarios: scenarios based on well-designed and additional policies should be linked to a lower discount rate as clear regulation provides a stable framework for investors and lower investment risks. If the Impact Assessment uses the same rate for all scenarios, it assumes that new proposed policies have no real world impact.

*** 1.10 In your view, does the EED have positive synergies with the Effort Sharing Regulation and the Emission Trading System? If yes, what are those?**

- Yes
- No
- No opinion

Please explain your answer:

There are significant interactions between the ESR and energy efficiency policies as they target to a large extent the same sectors. In this context, national climate targets are complementary to the dedicated energy efficiency policy framework, further directing national action to sectors such as buildings and transport. At the same time, national energy efficiency policy measures put in place to implement the Energy Efficiency Directive (EED) are often also the main instruments for 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 key ESR sectors, such as buildings and transport. Regarding the ETS, currently most of the energy efficiency potential lies outside the sectors covered by the EU ETS, so the interactions under the current framework are more limited. To reinforce synergies with the EED, Member States could reinvest revenues from the ETS allowances in energy efficiency programmes.

*** 1.11 In your view, does the EED have positive synergies with the Renewable Energy Directive? If yes, what are those?**

- Yes
- No
- No opinion

Please explain your answer:

Energy efficiency and renewable energy policies are both necessary to achieve the objectives of the European Green Deal. Reduction of energy consumption through energy efficiency improvements is an enabler for renewable energy penetration. Overall, those synergies need to be strengthened to accelerate the decarbonisation of Europe's energy system.

*** 1.12 In your view, does the EED have positive synergies with the Energy Performance of Buildings Directive? If yes, what are those?**

- Yes
- No
- No opinion

Please explain your answer:

The EED is the framework directive for energy efficiency policies, setting the overall ambition and direction at the EU and national levels for energy efficiency measures in all sectors, including the building sector. First of all, a good implementation of the EPBD is necessary to achieve savings in the building sector and, therefore, a prerequisite to meet the overall EU energy efficiency target.

Furthermore, there are clear synergies between several articles of the EED, such as Article 5, 6, and 7, and the EPBD. Articles 5 and 6 specifically deal with public buildings and the exemplary role of public authorities and are an integral part of the supportive legal framework for energy efficiency measures in buildings. These two provisions (Articles 5/6) should now be updated in view of the objective set out in the EPBD to achieve a "highly energy efficient and decarbonised building stock by 2050". Concerning Article 7, a good proportion of energy savings measures undertaken to fulfill its requirements take place in the buildings sector, particularly the renovation of existing buildings. In that sense, Article 7 is a key instrument to deliver savings in the buildings sector, in accordance with requirements set out in the EPBD.

*** 1.13 To what extent has the EED contributed to an optimisation of the overall energy system (higher system efficiency)?**

1000 character(s) maximum

The current EED has primarily focused on end-user/demand side measures and supply-side efficiency, but it has promoted overall system efficiency to a very limited extent and the full potential of energy efficiency in buildings and industry has not yet been captured. In line with the energy efficiency first principle, the revision of the EED offers an opportunity to strengthen the requirements for energy market actors to improve the consideration of demand resources in the energy market from the planning phase to market operation, including recognizing the value of energy efficiency and more efficient conversion, transmission and distribution of energy as well as demand response in grid operations.

*** 1.14 What are the main lessons learned from the implementation of the EED?**

1000 character(s) maximum

The main lesson learned is that an indicative target is not effective to ensure delivery compared to a binding one, as shown by the mandatory nature of the renewable and the GHG reduction targets, which are both being met.

Another lesson is that the lack of clear reporting and monitoring requirements weakens the implementation and enforcement of the EED's provisions. This is also evident from the Commission progress reports covering the provisions of the EED that have the strongest reporting requirements, such as Article 7 and Article 5.

Improve monitoring and reporting is also supported by the findings of the JRC's recent NECPs energy efficiency assessment which finds that it is impossible to assess most of the national contributions towards the EU target, as the national measures do not always include a quantification of the expected energy savings. In this context, monitoring and verifications of energy savings need improvements to safeguard the delivery of the 2030 target.

*** 1.15 What is missing in the EED?**

1000 character(s) maximum

-An increase of the existing energy efficiency target of 32.5% by 2030 to at least 40% to tap the cost-effective energy efficiency potential and to maximise the environmental social and economic benefits of the energy transition.

-A binding EU energy efficiency target supported by binding national contributions, based on the assessment of national potentials;

-A holistic perspective of the renovation of public buildings under Article 5, with the extension of the provisions to all public buildings, prioritising schools, hospitals and social housing, and the deletion of the alternative approach.

-An Article 7 which is aligned with an increased 2030 target; this includes a clarification of the savings achieved to mitigate the current issues of eligibility and additionality. Together with a reinforced monitoring system, a clarified Article 7 will lead to an increase of the energy savings delivered and a simplification of its implementation to guarantee its enforcement.

2. Assessing possible options for revising the Energy Efficiency Directive (EED) in view of contributing to the 55% climate target for 2030 and addressing the ambition gap in the final NECPs

The impact assessment supporting the 2030 Climate Target Plan concluded that a contribution at the level of 36-37% for final energy consumption and 39-41% for primary energy consumption by 2030 would be required.

Therefore, the Commission has launched the EED revision process. The revision would reflect on the need to increase energy efficiency efforts to match the level of ambition of a higher 2030 climate target and would also aim to strengthen those parts of the EED, which could address the remaining ambition gap for energy efficiency in the NECPs, to ensure the achievement of the current level of the EU energy efficiency target for 2030. In addition, the revision will be vital to contribute to the implementation of the other European Green Deal Initiatives[22]. This is particularly relevant especially in the context of actions identified in the Commission's Recovery Plan[23], which need to be reflected in the national Recovery and Resilience Plans.

The EED revision also offers the important opportunity to address any shortfall in its effectiveness and efficiency. A notable case relates, for instance, to the need for a more consistent application of the Energy Efficiency First principle. Another important area is the need to address any outstanding regulatory and non-regulatory barriers for additional energy savings and emissions reduction throughout all economic sectors.

In this context, the revision of the EED will also have to consider whether the EED sufficiently addresses emerging opportunities and needs for energy efficiency improvements in sectors like ICT sector, as well as agriculture and water.

In addition to the results of the evaluation of the Directive, the impact assessment of the 2030 Climate Target Plan and the Commission assessment of the final NECPs will feed into formulation of policy options to identify which elements of the EED – and to what extent – need to be amended, and what needs to be added to achieve the objectives outlined above.

*** 2.1 Do you agree that energy efficiency should play a key role in delivering a higher climate ambition (of at least 55% net) for 2030 and in view of achieving the EU's carbon neutrality by 2050?**

- Agree
- Neutral
- Disagree
- No opinion

Please explain your answer:

Reducing the overall energy consumption is the bedrock for achieving Europe's climate targets. Achieving carbon neutrality without a significant reduction of energy demand will be too slow and too expensive. The Impact Assessment accompanying the 2030 Climate Target Plan clearly recognizes that achieving a GHG reduction target of at least 55% would require a significant increase of the current 2030 energy efficiency target and of its supporting measures. In doing so, the energy efficiency target should be increased to at least 40% to tap the cost-effective energy efficiency potential and to maximise the environmental social and economic benefits of the energy transition. Such an increase would also have positive economic effects contributing to the sustainable recovery of Europe following the COVID crisis.

The contribution of energy efficiency to decarbonisation is also evident at the national level; the latest JRC analysis of the NECPs highlights that nearly half of the reported energy efficiency measures (685 measures or 49% of total) were associated with the decarbonisation dimension.

*** 2.2 Given the suggested increase in energy efficiency efforts by 2030, which instruments of general nature should be considered to achieve the higher energy efficiency ambition? (multiple options possible)**

- Making the “Energy Efficiency First” principle* a compulsory test in relevant legislative, investment and planning decisions
- Strengthening the EED requirements
- Setting a higher energy efficiency target at EU level for 2030
- Setting energy efficiency targets in specific sectors of the economy
- Stronger focus on implementation and on enforcement of the existing legislation at national and EU level
- Stronger focus on life-cycle efficiency and circularity.
- The EU should provide additional technical support to Member States
- Stronger focus on fiscal measures and incentives including through carbon pricing.
- Stronger focus on awareness raising of energy efficiency and behavioural change
- Other (please specify)

* Energy Efficiency First (in line with Article 2(18) of the Regulation (EU) 2018/1999), means taking utmost account in energy planning, and in policy and investment decisions, of alternative cost-efficient energy efficiency measures to make energy demand and energy supply more efficient, in particular by means of cost-effective end-use energy savings, demand response initiatives and more efficient conversion, transmission and distribution of energy, whilst still achieving the objectives of those decisions.

* If you selected 'other', please specify here:

Skills are crucial for developing and realising high quality energy renovation projects. The availability of a well-trained workforce needs to be guaranteed. In that sense, measures to ensure the reskill and upskill of workers for energy efficiency improvements are essential to achieve a higher energy efficiency ambition.

In addition, the Ecodesign and Energy labelling provisions could help achieving the untapped energy savings potential, which could be provided for example by strengthening market surveillance (including better coordination between Members States) and ensuring that requirements are up to date and rolled out in a timely manner.

*** 2.3 Do you agree that the EED should be strengthened by introducing new measures and stricter requirements in the context of a higher energy efficiency ambition for 2030?**

- Yes
- No
- No opinion

Please explain your answer:

The Coalition for Energy Savings fully supports the strengthening of the EED, which is coherent with a reduction of GHG emissions by at least 55% in 2030.

To that end, the 2030 EU energy efficiency target of 32.5% needs to be increased well beyond the 36% resulting from the Commission's 2030 Impact Assessment to at least 40% to tap the cost-effective energy efficiency potential.

Additionally, to ensure its delivery, the EU target should become binding, as well as the national contributions.

Finally, a higher energy efficiency target goes hand in hand with stronger measures that underpin its achievement.

*** 2.4 Could the EED be simplified while preserving its objectives and if so, how?**

1000 character(s) maximum

The EED could be simplified and reinforced by avoiding provisions that allow for potential loopholes. In this sense, the alternative approach under Article 5 should be deleted to simplify its enforcement.

Member States would also benefit from more detailed rules on measurement, verification and evaluation (MV&E) of energy savings. Annex V of the EED includes valuable principles to organize this exercise. Reinforcing MV&E in the context of Art 7 of the EED would simplify the EED while preserving its objective.

Finally, setting the EU energy efficiency target as well as national contributions as binding provisions would greatly simplify and incentivise Member States to comply with the legislation and contribute to an increased 2030 energy efficiency target.

*

2.5 With the suggested increase in ambition for energy efficiency for 2030, what should the nature of the EU targets be?

- Indicative
- Binding
- Not specified
- Other (please specify)

*** 2.6 With the suggested increase in ambition for energy efficiency for 2030, what should the nature of the national targets be?**

- Indicative national targets (to contribute to EU energy efficiency target for 2030)
- Binding national targets
- Not specified
- Other (please specify)

If you selected 'other', please specify here:

The revision of the EED should introduce binding national contributions to the EU energy efficiency target.

*** 2.7 In which sectors would additional energy efficiency efforts be most needed to achieve a higher energy efficiency ambition for 2030? (multiple options possible)**

- Buildings
- Heating and cooling
- Industry
- Information and communication technologies (ICT)
- Transport
- Agriculture
- Services (i.e. commercial and public)
- Other (please specify)

Please explain your answer:

Firstly, buildings used by households and the service sector are responsible for 42% of the EU's energy demand, mainly for heating, hot water and cooling. By 2050, all buildings must be highly energy efficient and decarbonised and the Renovation Wave states that emissions in buildings must be cut by 60% compared to 2015 levels in 2030. This implies that the vast majority of existing buildings must undergo deep or staged-deep energy renovation (improving both the envelope and technical building systems therein by replacing old and inefficient heating and cooling appliances and improving their energy management. In order to

achieve this goal, energy renovation rates have to be accelerated to reach 3% per year, whilst simultaneously increasing the depth of each renovation.

Second, transport accounts for 31% of the EU's energy demand, and it continues to increase every year. The potential for stepping up energy savings in transport is significant (up to five times the current levels) if, in addition to the policy measures at EU level such as the CO2 emissions standards for vehicles, best practices across countries and municipalities would be mainstreamed. Realising the energy savings potentials in transport will play an important role to achieve the EU's energy efficiency target. It requires applying the Energy Efficiency First principle across transport policies. This means taking account of energy efficiency considerations over the whole value chain of fuel and power supplies.

Finally, the growing energy demand of the ICT sector is an increasing concern for several Member States. Potential measures to reduce demand of data centres are available.

They include higher operating temperatures, efficient cooling technologies and the re-use of rejected heat. Nevertheless, their deployment is hampered by a lack of common standards at the EU level.

2.8 Should the following measures be considered to achieve a higher ambition?

(use a rating scale of 1 to 6, where 1 = strongly disagree and 6 = strongly agree)

	1	2	3	4	5	6	No opinion
* Strengthening the renovation obligations for public buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Strengthening energy efficiency requirements for public procurement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring that local authorities (above a certain size) develop an energy efficiency action plan with measurable impact indicators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring that large enterprises implement certain energy efficiency improvements identified in energy audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring that small and medium-sized enterprises are offered free energy audits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Extending the requirement on frequent consumption information from electricity and thermal energy to also cover gas and roll-out remotely readable gas meters	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Establishing sector specific goals or measures addressing sectors for which the energy efficiency potential is higher (e.g. services, data centres, energy-intensive industries)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Strengthening the requirements for efficiency in energy transformation, transmission and distribution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*							

Strengthening the requirements for using energy performance contracting in renovation of public buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Introducing or extending fiscal measures and incentives, including carbon pricing and energy taxation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* If you selected 'other', please explain here:

In addition, the energy savings obligations under Article 7 of the Energy Efficiency Directive should be strengthened to contribute to an increased 2030 EU energy efficiency target and to better support building renovation and encourage deep renovation.

Minimum Energy Performance Standards (MEPS) to upgrade the worst performing buildings, including public buildings, with a view to achieve a highly energy efficient building stock by 2050 are also useful measures to achieve higher energy efficiency ambition, in line with the Renovation Wave.

Please explain your answer:

There is a vast potential for different types of measures in many sectors. Introducing new measures and strengthening existing measures is needed to support the achievement of a higher energy efficiency target for 2030.

2.9 Should the following measures in the heating and cooling policy area be considered in order to achieve more effectively the decarbonisation objectives?

(use a rating scale of 1 to 6, where 1 = strongly disagree and 6 = strongly agree)

	1	2	3	4	5	6	No opinion
* Member States should introduce specific energy efficiency targets for the heating and cooling sector to ensure that energy consumption in this sector is sufficiently taken into account	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Fossil fuels in heating systems (in buildings and district heating) should be gradually phased out with a faster phasing out of the most polluting ones	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Fossil fuel heating system should be banned for new buildings whenever technical feasible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should unbundle the management of the generation and distribution heat network	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Allow public support for heating systems only to non-fossil fuel technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The recovery of waste heat from heating and cooling (air-conditioning) systems in individual buildings should be promoted	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Specific requirements for utilization of waste heat and waste cold should be set for industry and services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring district heating and cooling operators to prepare long-term plans to improve their energy efficiency in terms of primary energy intensity energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should facilitate local and district approaches to policy and infrastructure planning and development in heating and cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer:

2.10 Can the following principles ensure overall consistency of energy efficiency and renewable energy as key policies for decarbonisation?

(use a rating scale of 1 to 6, where 1 = strongly disagree and 6 = strongly agree)

	1	2	3	4	5	6	No opinion
* Having distinct energy efficiency and renewable targets is the best avenue to decarbonisation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Member States' progress towards decarbonisation targets should be the primary indicator to assess the renewables and energy efficiency policies and measures.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States need to progress on both energy efficiency and renewables to reach their decarbonisation targets.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Non-binding nature of national renewable and energy efficiency targets allows Member States to choose cost-efficient decarbonisation paths.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Energy efficiency policies and measures should be prioritised where fossil-based energy solutions are currently used.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 2.11 How could synergies between the EED and the Renewables Energy Directive be strengthened in the future?

1000 character(s) maximum

Higher and binding GHG emissions, renewable energy and energy efficiency targets are part of a mutual reinforcing framework which is the bedrock to reach the transition to climate neutrality. In particular, energy efficiency and renewable energy are both crucial to decarbonise the energy system. Reduced energy consumption facilitates a higher renewable share in the energy mix. As a result, synergies between the two, based on an integrated approach coherent with the Energy Efficiency First principle, should be further exploited as this will lead, for example, to increased energy system efficiency, in combination with demand side flexibility efforts.

* 2.12 How could synergies between the EED and the Energy Performance of Buildings Directive be strengthened in the future?

1000 character(s) maximum

The EED and EPBD are complementary to spur action in the building sector: the EPBD sets requirements on the depth of renovation, while the EED puts in place measures to increase the rate of renovations. The (almost) parallel revisions in 2021 of the EED and EPBD are an opportunity to reinforce connections, to minimize overlaps, and to improve how the two directives build on each other. For example, Article 5 on public buildings should include a reference to the EPBD Article 2A, which requires Member States to achieve a highly energy efficient and decarbonised building stock by 2050.

The ambition of Article 5 should be reinforced to align with the one in the EPBD and ensure it serves as a stepping stone for the future implementation of the Renovation Wave. Coordination and complementarity should also be ensured between the Long-Term Renovation Strategies in the EPBD and the outcomes of the comprehensive assessment to be conducted under Article 14 EED (Annex VIII).

* 2.13 How could synergies between the EED and the Emission Trading System (ETS) be strengthened in the future, especially in the context of a possible extension of the ETS?

1000 character(s) maximum

Carbon pricing is a useful instrument to complement energy efficiency support schemes and regulatory actions; it can further incentivise investments in energy efficiency improvements. However, pricing signals alone cannot overcome barriers hindering energy efficiency, mainly because most of the barriers to energy efficiency are non-economic and because of the low price elasticity of energy demand. Therefore, while carbon pricing is important to stimulate climate action, a strong energy efficiency policy framework which includes targets, support schemes and regulatory measures, such as the energy savings obligation (Article 7) and minimum energy performance requirements (MEPS) for buildings, remains the key for creating demand for energy efficiency investments and for developing the energy services market. The revenues from carbon pricing, should be earmarked to help in particular lower income as well as disadvantaged rural households with the climate neutral transition.

* 2.14 How could synergies between the EED and the Effort Sharing Regulation be strengthened in the future?

1000 character(s) maximum

The ESR and energy efficiency policies are strongly interlinked. National climate targets complement and support the dedicated energy efficiency framework, further directing national action to sectors such as buildings and transport. At the same time, national energy efficiency measures contribute to reducing GHG emissions and thus help Member States achieve their ESR targets. A large energy savings potential remains across Europe, allowing for increased national ESR targets. The upcoming legislative revision should

strengthen the ESR combined with a strong energy efficiency policy framework. For example, Article 7, which leads to the implementation of energy efficiency measures among final consumers in key ESR sectors such as buildings and transport, should be strengthened. In that sense, improving Member States' measurement, verification and evaluation of reported energy savings would support achieving national targets under the ESR and reinforce its synergies with the EED.

*** 2.15 How could EU citizens - and especially young people - be more engaged and contribute to achieving a higher ambition of energy efficiency?**

1000 character(s) maximum

To involve EU citizens, and especially young people, in energy efficiency improvements, awareness of the multiple benefits of energy savings need to be increased. By highlighting how energy efficiency helps to achieve both the decarbonisation of our economy and support a circular, resilient and equitable post-COVID recovery, EU citizens can be motivated to participate in those endeavors.

*** 2.16 The “Energy Efficiency First” principle is established in energy legislation to contribute to a higher energy efficiency ambition. Which measures in your view could be implemented to ensure the principle is consistently applied? (multiple options possible)**

- Providing more information to users on energy efficiency and energy consumption of products and infrastructures, considering their life-cycle.
- Requiring that the “energy efficiency first” principle is applied to all relevant EU energy policies related to the whole energy value chain
- Requiring that the “energy efficiency first” principle is applied to all relevant national energy policies related to the whole energy value chain
- Developing guidelines on implementation in relevant policy, planning and investment decisions
- Developing mechanisms to monitor implementation of the principle at national level
- Others (please specify)
- None

Please elaborate on your answer:

1000 character(s) maximum

The energy efficiency principle should be systematically and consistently applied in EU law, in line with its definition provided by the Governance Regulation. To that end, the Coalition welcomes the Commission's intention to produce guidelines to help its implementation. In addition, it is important to monitor and enforce its implementation both at EU and national level.

*

2.17 Is there a need to develop a common methodology on the application of the “Energy Efficiency First” principle in energy networks investment programmes and operation practices?

- Yes, and it should be developed by the European Commission, ENTSO(-e,-g), national energy regulator, TSO, other
- Yes, and it should be accompanied by an appropriate monitoring mechanism
- No, there are already specific documents and methodology developed on this
- No, this would intrude into the independence of the National Regulatory Authorities
- No, the energy networks in the EU are too diverse to be covered by a common methodology (principle of subsidiarity)
- No, while the case can be made for a common methodology, it would be too cumbersome to implement in practice
- Other (please specify)

* If you selected 'other', please specify here:

When developing and implementing a common methodology on the application of the Energy Efficiency First principle in the form of guidelines, stakeholders should be involved in each step of the process.

This is the end of Part I.

If you wish to contribute on technical aspects of different articles, please continue with part II.

Do you want to continue with part II on the technical aspects of different articles?

- Yes
- No

If you decide to end the survey here, we thank you very much for your valuable contribution.

Part II – Technical questions on specific Articles of the Energy Efficiency Directive

The EED lays down a set of measures aimed to step up Member States’ efforts to use energy more efficiently at all stages of the energy chain – from the transformation of energy and its distribution to its final consumption - and those are as follows:

- **Articles 1 & 3 (energy efficiency targets)** sets the EU headline energy efficiency targets for 2020 (of 20%) and for 2030 (of at least 32.5%) and Member States have to set their national indicative targets and indicative contributions in view of achieving those headline targets for 2020 and 2030 respectively. Member States shall report annually on the progress towards their national indicative energy efficiency targets and submit National Energy Efficiency Action Plans ('NEEAPs) every three years, starting from 2014. For the headline EU 2030 target, Member States shall fulfil the planning and reporting obligations under the Governance regulation (set their national contributions towards the EU 2030 target and define the national measures to fulfil those contributions in the National energy and Climate Plans to be submitted to the Commission by end 2019).
- **Article 5 (exemplary role of public bodies' buildings)** requires that Member States renovate 3% (or implement alternative measures resulting in equivalent savings) of their central government buildings of over 500 m² which do not meet the cost-optimal energy efficient standards. This threshold dropped to 250 m² as of 9 July 2015.
- **Under Article 6 (purchasing by public bodies)** central governments have the obligation to purchase energy efficient products, buildings and vehicles, and Member States should encourage public bodies of local and regional government do so as well. This Article was evaluated in 2016[24], however the findings were not conclusive given that the implementation had just started and it was too early to assess the impact[25].
- **Article 7 (energy saving obligations)** sets an obligation on Member States to achieve new energy savings each year (of 1.5% of the annual energy sales for the period 2014-2020 and of 0.8% (0,24% for Malta and Cyprus) of the final energy consumption for the period 2021-2030) by putting in place an energy efficiency obligations scheme or other policy measures. Article 7 is responsible for about half of the energy savings the EED is expected to deliver. As mentioned above, this Article was amended as part of the focused EED review in 2016 (amending Directive EU/2018/2002). Under
- **Article 8 (energy audits and energy management systems)** Member States must ensure that large companies have their first energy audit by 5 December 2015 and then every four years. The review of the implementation of the definition of small and medium size enterprises for the purposes of Article 8(4) is carried out in a separate process (in line with the amended Article 24(12)).
- **Articles 9 to 11 (metering and billing)** provide requirements for metering and billing of energy use. As mentioned above, those Articles were already amended as part of the focussed EED review in 2016 (amending Directive EU/2018/2002) by adding new, more precise and specific provisions applicable for thermal energy (heating and cooling)[26]. Electricity related provisions were transferred to the recast Electricity Directive (EU) 2019 /944. For an overview and a detailed discussion of the changes made please refer to Commission Recommendation (EU) 2019/1660 of 25 September 2019 on the implementation of the new metering and billing provisions of the Energy Efficiency Directive 2012/27/EU[27].

- **Article 14 (promotion of efficiency in heating and cooling)** requires that Member States promote efficiency in district heating and cooling systems and carry out comprehensive territory-wide assessments of the potential for efficient heating and cooling by 31 December 2015 which should be resubmitted again by 31 December 2020 (on basis of the updated methodology and the amended Annex VIII and part of Annex IX)[28]. It also requires individual cost-benefit analysis to be carried out in the context of the planning and permitting of certain types of installation (thermal electricity generation, industrial installations, district heating and cooling network), in order to assess the potential benefits of high-efficient cogeneration installation or utilising waste heat from nearby industrial installations(Art. 14(5) and 14(7)).
- **Article 15 (energy transformation, transmission and distribution)** requires that Member States ensure that energy efficiency is taken into account in energy transformation, transmission and distribution and contains specific provisions to this end. Certain of these (parts of Art. 15(5) and Art. 15(8)) were removed as part of the focussed revision in 2018 and replaced with consolidation provisions in the new Electricity Market legislation.
- **Article 16 (on qualifications and accreditation schemes for providers of energy services and energy audits)** had a later transposition deadline than the rest of the Directive (31 December 2014) and it is also closely linked to the implementation of Articles 17 and 18.
- **Under Article 17 (information and training)** Member States shall ensure that information on available energy efficiency mechanisms and financial and legal frameworks is widely disseminated to all relevant market actors. The effectiveness of the implementation of this Article was assessed in 2017[29]. The findings of the assessment showed that while most of the Member States have put in place information and awareness raising measures, it is hard to assess their impact on the uptake of energy efficiency improvements and investments due to lack of robust monitoring results and ex-post evaluations.
- Member States are required to promote the energy services market under **Article 18 (energy services)** with a particular focus put on supporting the public sector including through the use of energy performance contracting. A number of reports to assess progress of energy service markets in the EU including the uptake of the energy performance contracting have been carried out by the JRC in the framework of an administrative arrangement with DG ENER.
- **Article 19 (other measures to promote energy efficiency)** requires the Member States to take action to remove regulatory and non-regulatory barriers to energy efficiency and to report on this to the Commission as part of their first National Energy Efficiency Action Plan (NEEAP). Progress made by Member States in relation to Article 19(1) was assessed on basis of the notified NEEAPs 2014 and 2017 and a report was published in 2019[30].
- **Article 20 (Energy Efficiency National Fund, financing and technical support)** provides that the Member States shall facilitate the establishment of financing facilities

and that they may set up an Energy Efficiency National Fund. This Article was amended in the focussed EED review by adding additional requirements for the Member States and the Commission (providing guidance on how to unlock private investments).

- **Article 21 on the conversion factors** set out in Annex IV was amended for the purposes of reviewing the default coefficient - primary energy factor for electricity generation (in footnote 3) and which should be again reviewed by 25 December 2022 (as required by amending Directive EU/2018/2002). Article 24 (review and monitoring of implementation) contains reporting obligations for the Commission (while the reporting obligations for the Member States have been transferred to the Governance Regulation, (EU)2018/1999). This Article thus has been partially amended to ensure the coherence with the Governance framework and the amendments of Articles 3 and 7, and it is thus specifically targeted in this consultation.

About you - What is your field of expertise?

- Energy policy
- Energy efficiency
- Energy audit and management
- Energy performance of buildings
- Heating and cooling
- Other (please specify)

If you selected 'other', please specify here:

Article 1 and 3 - Energy efficiency targets

3.1 How do you assess the level of ambition of the existing EU energy efficiency targets?

(too high - adequate level - too low)

	Too high	Adequate level	Too low	No opinion
For 2020 targets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
For 2030 targets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3.2 Could you please give your opinion on the current aspects of the Union's energy efficiency targets for 2020?

(Appropriate – Not appropriate – Difficult to say/ No opinion)

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	Appropriate	Not appropriate	Difficult to say	No opinion
The nature of the target is not specified (whether it is binding or indicative)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indicators used for defining the target: primary or final energy consumption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Same level of ambition for both primary and final energy consumption	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Definition of the baseline (2007 Reference Scenario projections for 2020)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Clarity of the target	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer here (optional):

As already mentioned in previous answers, the indicative EU energy efficiency target, accompanied by non binding national targets, has not delivered because of its weak legal nature.

Even so, we believe that the target, expressed both in primary and final energy, corresponding to a specific level of ambition is clear and transparent. Although the PRIMES 2007 baseline is outdated, changing the reference on which the EU energy efficiency target is built would create uncertainties and complex comparisons, which would not benefit achieving the required energy savings.

We also note that a clear quantification of non-energy benefits associated with the overall target, both for the EU and for Member States, would have helped to encourage compliance.

3.3 Could you please give your opinion on the following aspects of the national energy efficiency targets for 2020?

(Appropriate – Not appropriate – Difficult to say/ No opinion)

	Appropriate	Not appropriate	Difficult to say	No opinion
Approaches for setting national targets are not prescribed - Member States can choose the methodology and indicators for setting their target (s) (primary/ final energy consumption, savings or intensity)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Indicative nature of national targets (no sanctions for non-compliance)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
No reference values/formula at EU level for assessing the level of national ambition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
No need to set intermediate milestones/ trajectory to targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility to revise the national targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer here (optional):

The indicative nature of national targets in combination with the lack of reference values/formulas to benchmark them and the little transparency of some Member States in setting their national contributions make the enforcement very difficult and does not make Member States accountable. This has jeopardized the achievement of the overall EU 2020 energy efficiency target.

Therefore, as it stands, the indicative nature of national targets is not appropriate. The revision of the EED should put in place national binding contributions based on an assessment of national potentials.

3.4 Has the EED provided the right monitoring and enforcement mechanisms to achieve national energy efficiency targets?

- Yes
- No
- No opinion

Please explain your answer:

The current monitoring and enforcement mechanisms have been too weak to achieve the national energy efficiency targets, as shown by the gap to the EU 2020 target and by the insufficient pledges to the EU 2030 target.

Those mechanisms need to be strengthened. To do so, the Commission should develop effective incentives and enforcement schemes. In the case of Article 7, Member States' measurement, verification and evaluation of reported savings should be improved to address issues related to the reliability of energy savings estimates.

In addition, the EED did not lead to enough stakeholder engagement in the monitoring process, which can be an essential element to monitor the implementation of the pledges made in the NECPs and thus ensure that energy efficiency policies do deliver.

Article 5 – Exemplary role of central government buildings

3.5 Has the EED made central government buildings in your country more energy efficient?

- Yes
- No
- No opinion

Please explain your answer:

Although we are mostly working at EU level, which means we cannot express country-specific opinions on the implementation of Article 5, we know that, according to the latest data provided by the European Commission, only 9 Member States have fulfilled their Article 5 target for the period 2014-2019 using either the default or the alternative approach.

Moreover, 16 Member States have chosen to apply alternative measures instead of renovating 3% of the total floor area of central government buildings. Alternatives such as selling buildings or rolling out information campaigns cannot, by design, deliver more energy efficient buildings. Finally, Article 5 has very limited effectiveness because the provision only applies to a small proportion of the stock and requirements on the depth of renovation do not go beyond EPBD requirements.

3.6 What are the main factors limiting central government in effective and efficient renovation of its buildings (multiple options possible)?

- Insufficient enforcement of the regulatory framework in my country
- Insufficient national budget earmarked for renovation
- Requirement to renovate can be achieved by alternative measures that are not clearly defined and are hard to monitor
- Requirement to renovate does not apply to rented buildings and central government authorities often rent their buildings
- Other (please specify)

If you selected 'other', please explain here:

Article 5 only focuses on increasing the rate (3% per year) but does not encourage an increase of the depth of renovations, as it requires to only meet the minimum energy performance requirements set in accordance with cost-optimality.

Moreover, the article does not establish any objective in terms of real energy performance or reduction of energy consumption. This makes Article 5 not in line with the EPBD ambition for 2050, which is to achieve a 'highly energy efficient and decarbonised building stock'.

Regarding the alternative approach, it cannot, by design, deliver the same amount of energy savings, let alone the associated benefits, of energy renovation of buildings. It can deliver some savings, but these tend to be less significant and time-limited. Therefore, the alternative approach should be deleted from Article 5 – which would also make the monitoring and enforcement more straightforward. We also note, as a limitation, the lack of technical support, besides financing, targeted at helping public authorities fulfilling requirements of Article 5.

3.7 How do you assess the current 3% annual goal on renovation of central government's buildings in line with Article 5?

- The 3% goal is too low and does not go beyond the standard rate of renovation
- The 3% goal is at an adequate level to promote renovation of central government's buildings
- The 3% goal is too high
- Other (please specify)

If you selected 'other', please explain here:

An at least 3% renovation rate per year seems adequate but what is equally important is the depth of renovation (see our reply to Q3.6 and Q3.8). The scope of Article 5 should also be widened to include buildings serving the public's interest such as schools, hospitals and social housing and public buildings beyond central government ones, such as those of regional and local authorities. Moreover, Article 5 should also look at the operational phase by ensuring a proper energy management of these public buildings, to make sure that energy performance is improved and kept over time through the effective operation of energy installations.

3.8 Given that additional energy efficiency efforts are needed, how could Article 5 be made more effective? (multiple options possible)

- The obligation to renovate public buildings should be extended to regional and local authorities
- The obligation should be extended to include buildings simply occupied by the central government
- The obligation should be extended to include buildings simply occupied by the central, regional and local public authorities
- The obligation should target specific type of public buildings, such as schools and hospitals
- The required floor area to be renovated each year should be higher than 3% of all public buildings
- The obligation shall require deep renovations in order to reach higher than minimal energy standards
- Minimum energy performance requirements for owned and rented public buildings should be introduced
- Minimum levels of renewable energy use should be introduced
- Public authorities should be required to adopt an energy management system and track buildings performance
- Wider approaches to achieving sustainable built environment (such as circular economy considerations) should be better considered for public buildings renovations
- Other (please specify)

If you selected 'other', please explain here:

The wider benefits (beyond energy savings, such as improved Indoor Air Quality and comfort) of renovating public buildings, especially schools, elderly homes, or hospitals, should be factored in when planning for Article 5 implementation, as it would encourage public authorities to be more ambitious. Moreover, a stronger link with the EPBD Article 2A on long-term renovation strategies should be introduced, and some best practices from some renovation strategies should be further shared. For example, according to the long-term renovation strategy of the Walloon Region (Belgium), public buildings have to reach an EPC label A by 2030 and schools by 2035.

Public buildings should have an exemplary role since they are often frequently visited by the public. This exemplary role means that they should achieve a high level of energy performance well before 2050, make the results publicly available, and explore advanced solutions before rolling them out to other segments of the building stock. Public buildings could be, for example, the one segment exploring / applying earlier a framework for Minimum Energy Performance Standards. Finally, the better implementation of Article 5 should be ensured via a 'delivery mechanism', including stronger monitoring and reporting requirements (to collect better data on energy savings delivered – which should also be made easier if alternative measures are deleted), and the provision of Technical Assistance and Project Development Assistance, especially to regional and local authorities.

Moreover, the use of energy management solutions can guarantee actual, measurable and verifiable energy savings over time, such as with Energy Performance Contracts (EnPCs). EnPCs can also be a driver to promote deep renovations, especially when combined with grants. Their usage should therefore be further and better promoted by Article 5, in addition to the renovation requirement.

Article 6 – Purchasing by public bodies

3.9 Has the requirement for central governments to purchase only products, services and buildings with high energy-efficiency performance helped to develop a market for energy efficiency products and services in your country?

- Yes
- No
- No opinion

Please explain your answer:

The Coalition for Energy Savings works on EU level policies; this means we cannot express a country-specific opinion on the implementation of Article 6.

However, we consider Article 6 as an important first step in raising awareness and moving public authorities towards purchasing more products, services, and buildings with high energy efficiency performance.

3.10 Given that additional energy efficiency efforts are needed, how could Article 6 be made more effective? (multiple options possible)

- The energy efficiency requirement in public procurement should be extended to all levels of public administration (including to regional and local authorities)
- Requirements on reporting on energy used during the whole lifetime of procured goods and buildings should be gradually introduced
-

A mandatory calculation of total cost of ownership shall be introduced for public procurement. The references to limiting conditions (e.g. cost-effectiveness, economic feasibility, technical suitability) should be removed.

Other (please specify)

If you selected 'other', please explain here:

The Coalition calls for Article 6 obligations to be extended to regional and local authorities. Member States should also be encouraged to invest in training for public buyers and their legal advisors to improve their skills in designing tenders with high efficient criteria while remaining compliant with competition and public procurement rules.

In addition, it should be considered how state aid rules could improve investments in energy efficiency.

Article 7 – Energy Savings Obligation

3.11 Taking into consideration the required higher energy efficiency efforts for 2030, how do you assess the current level of ambition of Article 7(1) on energy savings obligation?

(too high - adequate level - too low)

	Too high	Adequate	Too low	No opinion
Please select your answer	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

3.12 What elements of Article 7 should be addressed to ensure the higher level of energy efficiency for 2030 (ranking the measures by using the scale 1-6, 1 – not important and 6 – very important; or No opinion)

	1	2	3	4	5	6	No opinion
Increase the ambition level of energy savings obligation for 2021-2030	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strengthen the additionality criteria for existing tax measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Make the EEOS a mandatory instrument in all Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Require Member States to set a certain level of energy savings to be achieved in building renovations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Require Member States to set a certain level of energy savings to be achieved in transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen the monitoring and verification rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Require Member States to target specific sectors with policy measures under Article 7	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set mandatory requirements to implement a specific share of policy measures to alleviate energy poverty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If you selected 'other', please explain here:

Regarding the point to require Member States to target specific sectors with policy measures and set a certain level of energy savings for building renovations and transport, we note that, overall, more actions are needed under Article 7, especially dedicated to building renovations as they deliver long-lasting savings.

In that sense, as the impact of Article 7 depends on its synchronisation with the policy framework and investment opportunities available in Member States, the article should be better aligned with other energy efficiency policies to drive forward higher energy performance in buildings.

Article 8 – Energy audits and energy management systems

3.13 Current rules oblige enterprises that are not small or medium-sized to carry out every four years an energy audit to learn about their energy consumption profile and identify energy saving opportunities. Should these rules be changed?

- Yes
- No
- No opinion

Please explain your answer:

To deliver energy savings, it is not just important to carry out energy audits, but also to ensure that the resulting recommendations are followed up by concrete energy efficiency actions. To promote the follow-up on energy audits, incentives could be linked to the implementation of the recommendations. Moreover, energy management solutions encompassing concrete energy efficiency actions, should be considered as fully fulfilling the audit obligation and be more widely deployed.

3.13.A Would the following option address the shortcomings you have observed

(select one answer for every option)?

Obligation to carry out energy audits should:	I fully agree	I agree	Neutral	I disagree	I fully disagree	No opinion
depend on energy consumption and not size or ownership	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

depend only on size of the enterprise but not on who owns it	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
depend both on energy consumption and on size	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
be made more frequently than every four years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
be accompanied by an obligation for enterprises to implement certain measures identified in energy audits	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
be accompanied by a requirement to disclose non-sensitive information from energy audits	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
include recommendations for utilising renewable energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Include recommendations on resource efficiency	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Articles 9-11 - Metering for gas

3.14 To what extent has the EED contributed to final customers being informed of actual gas consumption and costs properly and frequently enough to understand what drives their consumption and make informed choices about possible energy saving measures?

- Contributed to a large extent
- Contributed to some extent
- Did not contribute
- I do not know

Please explain your answer:

Article 14 - promotion of efficiency in heating and cooling and related Annexes and definitions

3.15 Have the requirements under Article 14 increased energy efficiency in the heating and cooling sector in your country?

- Yes
-

No

No opinion

Please explain your answer:

The Coalition for Energy Savings is not a national stakeholder; therefore, we do not have first-hand national experience to share on this point.

Overall, Article 14 offered a number of opportunities to embed efficiency more systematically in decision-making regarding the design of heating and cooling systems and the transformation, transmissions and distribution of energy. We note that an integrated approach in relation to energy demand and supply, building on the energy efficiency first principle, should be reinforced for the design of national and local policies.

3.16 What was the impact in your country of the requirement to carry out a cost-benefit analysis under Article 14(5) in the following areas

(please rank: Very high – High – moderate – Low – Very low)

	Very high	High	Moderate	Low	Very low	No opinion
It increased energy efficiency of energy supply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
It increased energy efficiency of heating and cooling networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
High-efficiency cogeneration was more often deployed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Efficient district heating and cooling was more often deployed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increased reuse of waste heat from industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
It increased reuse of waste heat from services (including ICT)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

3.17 Given that additional energy efficiency efforts are needed, how could Article 14 and related Annexes and definitions (Article 2) be made more effective? To what extent do you agree that the following measures should be implemented

(use a rating scale of 1 to 6, where 1 = strongly disagree and 6 = strongly agree)

	1	2	3	4	5	6	No opinion
Minimum requirements for efficient district heating and cooling should be strengthened;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Minimum requirements for efficient district heating and cooling should be established separately for networks and generation units;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Minimum requirements for high-efficiency cogeneration should be strengthened;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Minimum requirements for high-efficiency cogeneration using fossil fuels should be stricter;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The Comprehensive assessments in line with Article 14(1) should explicitly cover renewable energy potentials in heating and cooling;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The requirement to address the potential identified in the Comprehensive assessments through policies and measures should be strengthened;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The requirements for a cost-benefit analysis in line with Article 14(5) should be based on primary energy savings;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Member States should better ensure that costs and benefits of more efficient heating and cooling supply are taken into account in infrastructure and investment planning and permitting;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Planning and permitting of infrastructure generating waste heat or cold should take into consideration geographical proximity of a potential demand (heat sink) for this energy;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Member States should introduce specific energy efficiency indicators for district heating and cooling to ensure that operators improve energy efficiency of their generation and reduce network losses;	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please specify).	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3.18 Which of the following measures would be important to increase energy efficiency of data centres? (select one answer for each option)

Rules should ensure that:	Very important	Important to some extent	Not important	No opinion
large data centres are encouraged to be located where their waste heat can be used	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
the potential for waste heat reuse is assessed when new data centres apply for planning permissions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
existing provisions to exploit industrial waste heat potential are strengthened	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer (optional):

The growing energy demand of the ICT sector is an increasing concern for several Member States. Potential measures to reduce the demand for data centers are available. They include higher operating temperatures, efficient cooling technologies, and the re-use of rejected heat. Nevertheless, their deployment is hampered by a lack of common standards at the EU level.

Article 15 – Energy transformation, transmission and distribution

3.19 Do electricity and gas networks (transmission and distribution) operate in the most energy efficient way in your country?

- Yes
- No
- I don't know

Please explain your answer:

The Coalition for Energy Savings is not a national stakeholder; therefore, we do not have first-hand national experience to share on this point.

We note however that according to the Commission's assessment of the effectiveness of the EED, Article 15 impacts to date have been modest.

3.20 Which are the main factors limiting energy efficiency improvements of the networks in your country? (multiple options possible)

- The regulatory authorities discouraged investments by not accepting the investment in the Regulatory Asset Base;
- Financing for investments is not easily available;
- The tariff structure is not conducive to the minimization of energy losses in the grids;
- The capital expenditure would result in an unacceptable increase of network tariffs for the final consumers;
- The efforts needed to upgrade the physical infrastructure of the grid would disturb households;
- The authorisation of permits is too long;
- The environmental impact of upgrading the infrastructure would be larger than that of the energy wasted in the grids;
- Other (please specify)

Article 16 – Availability of qualification, accreditation and certification schemes

3.21 Are you aware of the certification schemes, accreditation schemes and equivalent qualification schemes for providers of energy services, energy audits, energy managers and installers available in your country?

- Yes
- No
- No opinion

Please explain your answer:

The Coalition for Energy Savings is not a national stakeholder; therefore, we do not have first-hand national experience to share on this point.

3.22 How you would assess the effectiveness of the existing certification and /or accreditation schemes in your country?

	Effective	Effective to some extent	Not effective	I do not know/ no opinion
Please select your answer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer:

The Coalition for Energy Savings is not a national stakeholder; therefore, we do not have first-hand national experience to share on this point.

3.23 In your view, has the EED (Article 16) contributed to setting up the certification and/or accreditation schemes and/or equivalent qualification schemes, including training programmes?

- Yes
- No
- No opinion

Please explain your answer:

Skills are crucial for developing and realising high quality energy renovation projects. The availability of a well-trained workforce needs to be guaranteed.

The current assessment of the EED shows that a majority of Member States have established certification and/or accreditation schemes and/or equivalent qualification schemes covering energy services, energy audits, energy managers and installers, to which Article 16 contributed (as some of the schemes pre-existed in some Member States).

However, the effectiveness of the schemes varies across Member States and the level of technical competence varies across the category of specialists.

In this sense, the revision of Article 16 needs to focus on simplifying and making existing certification and labelling schemes clearer while ensuring that the quality and technical competence of operators are checked and duly assessed.

Article 18 – Energy services

3.24 Have the requirements under Article 18 contributed to the development of energy services market in your country?

- Yes
- No
- No opinion

Please explain your answer:

Article 18 has led to the development of the energy services market, however, the article provisions should be better implemented and enforced. A BPIE report from August 2020 on Energy Services and the Renovation Wave shows that the countries that went beyond minimum requirements under Article 18 have a more developed energy services market in place.

3.24.A Which were the most important factors that contributed to the development of the energy services market in your country?

at most 3 choice(s)

- Information about energy services has been made available to SMEs and consumers;
- Model for energy performance contracts have been developed and deployed in practice (?);
- Certification and accreditation schemes for energy services providers ensures that the needed skills are available;
- Financing and support mechanisms has been made available;
- Regulatory framework has been properly set;
- Other (please specify).

3.25 What possible elements should be considered as part of the EED revision to improve the functioning of energy services and energy performance contracting?

-

Introduction of reporting requirements for Member States on the certified energy services providers, number of energy performance contracts concluded in the public sector etc.;

- Introduction of requirements for independent monitoring and verification of energy performance contracts;
- Strengthening of requirements on independent market intermediaries /facilitators/ one-stop shops to increase trust and facilitate the use of energy services/ energy performance contracting;
- Other option(s). (please specify)

If you selected 'other', please explain here:

Energy management solutions are important tools to maintain and increase energy performance overtime; Energy Performance Contracting (EnPC) can help local authorities to perform and finance public buildings renovations, notably in the framework of the provisions laid out in Article 5.

Article 19 – Other measures to promote energy efficiency

3.26 How do you perceive the existence of regulatory, legal or administrative barriers to energy efficiency in the following areas:

	Very significant	Somewhat significant	Not significant	No opinion
Split incentives between the owner and the tenant (s) of a building	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Split incentives between owners in multi-owner properties	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Investments in energy efficiency by individual public bodies prevented due to national or regional rules on public purchasing annual budgeting or accounting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain your answer:

Article 20 – Energy Efficiency National Fund, financing and technical support

3.27 Has Article 20 facilitated access to finance for energy efficiency projects in your country?

- Yes
- No
- No opinion

Please explain your answer:

The Coalition for Energy Savings is not a national stakeholder; therefore, we do not have first-hand national experience to share on this point. However, we note that setting up a new EU-wide renovation fund would be beneficial for job creation, increasing the energy performance of buildings and supporting the alleviation of energy poverty.

3.28 What was the impact of Article 20 in your country in the following areas?

	Very low	Low	Moderate	High	Very high	No opinion/ difficult to assess
Setting up an Energy Efficiency National Fund or a similar national financial support scheme for energy efficiency in households	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Setting up specific financing facilities for increasing energy efficiency in different sectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Setting up specific technical support schemes for increasing energy efficiency in different sectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Dissemination of best practice in the field of financing energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Using revenues from annual emission allocations under Decision No 406/2009 /EC for the development of innovative financing mechanisms for improving the energy performance of buildings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Article 21 – Conversion factors and Annex IV

3.29 Should Annex IV on “Energy content of selected fuels for end use” be revised? If so, how?

- Yes
- No
- No opinion

Please explain your answer:

3.30 In your view, how could the default Primary Energy Factor (the coefficient referred to in footnote (3) of Annex IV) facilitate decarbonisation?

1000 character(s) maximum

This is the end of the survey. Thank you very much for your valuable contribution.

References

- [1] The Roadmap and Inception Impact Assessment was published on 3 August and was made available for public feedback until 21 September 2020: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12552-EU-energy-efficiency-directive-EED-evaluation-and-review>
- [2] Regulation (EU) 2018/1999
- [3] Definition provided in Article 18(2) of the Regulation, EU(2018)1999 on the Governance of the Energy Union and Climate Action
- [4] Directive 2010/31/EU
- [5] Regulation (EU) 2017/1369
- [6] Directive 2009/125/EC
- [7] Directive (EU) 2018/2001
- [8] Directive 96/61/EC
- [9] Regulation (EU) 2018/842
- [10] Amending Directive (EU) 2018/2002
- [11] <https://ec.europa.eu/energy/en/topics/energy-strategy-and-energy-union/clean-energy-all-europeans>
- [12] Articles 1&3 on headline energy efficiency targets, Art 7 on energy saving obligations, 9-11 on metering and billing, 15(2), 20, 22-24, footnote 3 in Annex IV, Annex V, a new Annex VIIa, Annex IX
- [13] Cf. Article 24(15) and Article 3(6) of the revised EED
- [14] COM(2019) 640 final
- [15] COM (2020) 562 final
- [16] COM(2020) 562 final
- [17] COM/2020/564 final
- [18] COM(2020) 954 final
- [19] A report from the Task Force is available here: https://ec.europa.eu/energy/sites/ener/files/report_of_the_work_of_task_force_mobilising_efforts_to_reach_eu_ee_targets_for_2020.pdf
- [20] Article 24(15) of the EED requires to carry out a general evaluation by 28 February 2024.
- [21] See <https://ec.europa.eu/info/sites/info/files/better-regulation-guidelines-evaluation-fitness-checks.pdf>
- [22] Notably – but not limited to – the Renovation Wave initiative (COM(2020) 632), given that a significant share of energy and resource savings are expected to come from renovation of buildings, the EU Strategy for Energy System Integration (COM(2020) 299 final), the Digital Strategy (COM(2018) 7118 final), the forthcoming Zero Pollution Action Plan and new Circular Economy Action Plan (COM(2020) 98 final). Energy efficiency is relevant especially in the context of actions identified in the Commission's Recovery Plan[1], which need to be reflected in the national Recovery and Resilience Plans.
- [23] COM(2020) 456 final
- [24] SWD(2016) 402 final

[25] See https://ec.europa.eu/energy/sites/ener/files/documents/3_en_autre_document_travail_service_part1_v3.pdf

[26] While removing thermal energy from the original provisions thereby restricting their scope to electricity and gas. Subsequently also electricity has been removed from their scope and instead regulated under the provisions of the recast Electricity Directive (EU) 2019/944: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2019.158.01.0125.01.ENG&toc=OJ:L:2019:158:TOC

[27] See e.g. section 1.1. and 1.3 of the annex: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1574946822907&uri=CELEX:32019H1660>

[28] C(2019) 6625 final

[29] https://ec.europa.eu/energy/sites/ener/files/final_report_of_assessment_of_the_implementation_status_and_effectiveness.pdf

[30] <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC115314>

[/assessment_of_progress_made_by_member_states_in_relation_to_article_19_final.pdf](#)

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