



The Coalition for  
ENERGY SAVINGS



**Coalition for Energy Savings:  
Feedback to EED recast proposal**

November 2021

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The Coalition for Energy Savings is thankful for the opportunity to provide feedback on the Energy Efficiency Directive (EED) recast proposal. We believe that the EED recast is a core element of the Fit for 55 package as energy savings are the prerequisite to reach Europe's 2030 energy and climate targets in an affordable way. The Commission's proposal is a solid basis to strengthen the energy efficiency framework and accelerate the delivery of energy savings in Europe, but more is still possible and achievable.

The increase of the energy efficiency target for 2030 to 36% for final energy consumption and 39% for primary energy consumption remains in the lower end of what is achievable through measures that make economic sense. The Coalition recommends to step-up ambition of the energy efficiency target to at least 40% (PRIMES 2007) and to 17% (PRIMES 2020) which is supported by a recent assessment of the cost-effective energy savings potential in Europe.

We welcome the introduction of a binding EU energy efficiency target for 2030; however, to fully ensure that Member State deliver their share and the EU target is achieved, national binding contributions are necessary. This will provide certainty for all actors, including businesses and investors. We also support the introduction of a formula for Member States to calculate their national contributions to the EU target. We note however that only the use of the formula is binding, not its result, which leaves the possibility for Member States to adjust their contributions to national circumstances. This level of discretion undermines the effectiveness of the formula and the achievement of the 2030 EU target.

The Coalition also supports the introduction of a gap filler mechanism which requires Member States diverging from their trajectory to get back on track within one year of the Commission's assessment. To improve enforceability, binding milestones should be introduced as this will reinforce the role of the trajectories and the gap filler mechanism.

The Energy Savings Obligation remains a core article of the EED. In that sense, we recommend increasing the annual rate to at least 2% to support the achievement of a higher energy efficiency target. In addition, we support that a minimum share of savings is achieved among people affected by energy poverty, vulnerable customers and people living in social housing, while noting that the scope of this ringfencing should be enlarged to low-income households and be properly monitored and implemented.

We also support the extension of the obligation to renovate 3% of floor area per year to all public buildings owned by public bodies. However, to ensure that public bodies also rent the most performing buildings, the public procurement rules should be strengthened by requiring that contracting authorities only make new rental agreements for buildings that are nearly-zero energy buildings (NZEB). Finally, we support the deletion of the alternative approach to renovation and the increase of the requirement's depth to require that all renovations achieve NZEB standards.

To broaden energy efficiency actions of the public sector beyond the renovation of their buildings, we are also pleased to see the introduction of a new target for all public bodies to reduce their total final energy consumption by at least 1.7% per year.

The Coalition warmly welcomes the introduction of a new article providing a legal basis for the Energy Efficiency First principle, which requires that energy efficiency solutions are considered in planning, policy and investment decisions in energy and non-energy sectors. However, the article should be reinforced by deleting the reference to “major” investment decisions, include a stronger obligation to develop cost-benefit methodologies to take into account the wider benefits of energy efficiency, and define clear compliance criteria to assess its implementation.