

Energy Efficiency Roadmap: From Impetus to Action

On 13 June 2025, Commissioner for Energy and Housing Dan Jorgensen presented a new roadmap for energy efficiency, highlighting 10 concrete areas for action and 6 deliverables. These aim at, among others, supporting implementation, increasing financing of energy efficiency, mainstreaming energy efficiency in EU policy, and strengthening cooperation among stakeholders. This briefing presents the Coalition for Energy Savings' feedback and suggestions to ensure this positive impetus translates into actionable measures and tangible results.

1 Area 1: Support and simplify implementation

The successful implementation of the current energy efficiency legal framework is the make-or-break factor in determining whether the EU can safeguard and improve its competitiveness for businesses, improve affordability and fairness for its citizens, and achieve its climate goals. Supporting and simplifying the implementation is therefore crucial: **Member States must be enabled and supported to fully deliver the Energy Efficiency Directive and the Energy Performance of Buildings Directive**, as well as the Ecodesign and Energy Labelling Regulations. Maintaining the stability of this legal framework is also a pre-requisite to ensure businesses and investors plan and carry out the necessary investments. In that context, we recommend to:

- Ensure a robust implementation of the Energy Efficiency Directive and the Energy Performance of Buildings Directive, including by **triggering the gap filler mechanism**, which allows the Commission to take action in case Member States are behind on the trajectories included in their National Energy and Climate Plans (NECPs).
- Highlight in the upcoming State of the Energy Union report that **the gap to the EU 2030 energy efficiency target stemming from the updated NECPs** must be addressed and define a course of action to support Member States in addressing deficiencies.
- Make sure that the announced **Energy Omnibus does not negatively interfere with the implementation of the efficiency legal framework** by jeopardising the regulatory certainty that it has created for businesses and investors.



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- Use the revision of the Governance Regulation as an opportunity to consolidate its successes and address its shortcomings. While certain complex obligations could be reviewed and adjusted, **the core elements of Member States' planning, monitoring and reporting obligations must be maintained and consolidated** to ensure that the Commission and stakeholders retain all necessary tools for effective scrutiny.
 - Send a clear signal that energy efficiency objectives, policies and measures will be continued beyond 2030, by, among others, **establishing a 2040 EU energy efficiency target**. Long-term regulatory predictability and clarity is crucial to ensure continued investment in energy efficiency solutions, enabling the achievement of the 2030 EU energy efficiency target as well as further efficiency improvement in the future.

2 Area 2: Mainstream energy efficiency in EU energy policymaking

The Energy Efficiency First (EE1st) principle outlined in the Energy Efficiency Directive must serve as the basis for mainstreaming efficiency in EU energy policymaking. The EE1st principle allows decision makers to properly value solutions and identify those which are most cost-effective while also delivering broader societal benefits such as reduced infrastructure costs, lower energy bills, and improved resilience. As such, **it must be integrated and promoted into the upcoming Commission's initiatives, such as the Citizens Energy Package, Heating and Cooling Strategy, European Affordable Housing Plan, Grids Package and Electrification Strategy**. We recommend to:

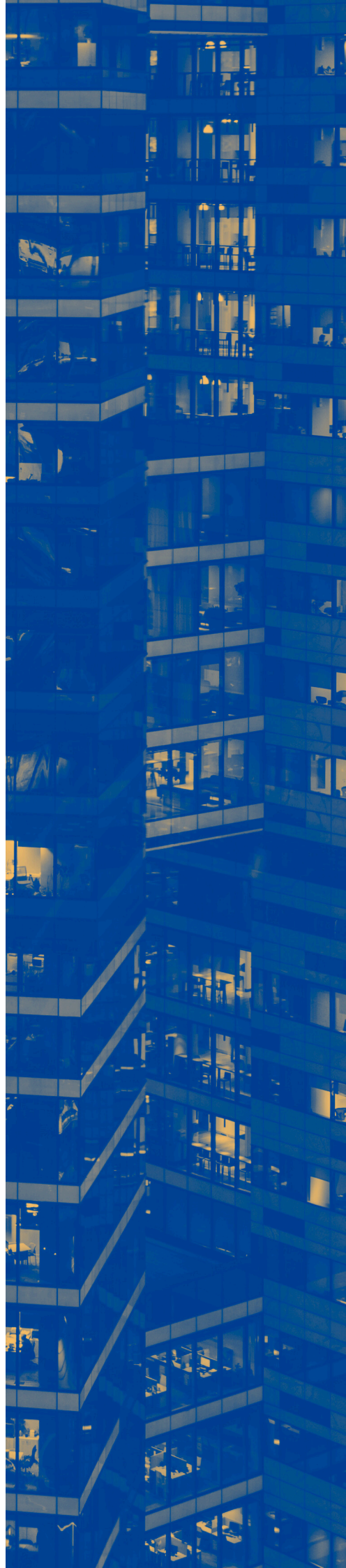
- **Streamline the EE1st principle in the upcoming Electrification Action Plan.** Reducing energy demand across sectors through **energy efficiency measures allows faster electrification** and ensures that the increased electricity needs are met without wasting valuable clean electricity, congesting grids or creating stranded assets in the future. This can be done, for example, by introducing incentives for TSOs and DSOs to undergo efficiency measures. In that framework, support demand-side flexibility and ensure that energy poor, low-income and vulnerable households can benefit from renewables-based electrification coupled with energy efficiency measures in buildings.
- **Anchor the goal outlined in the roadmap to reduce electricity demand from electrification by 10-20% thanks to industrial energy efficiency actions** in the upcoming Electrification Action Plan. Such an objective should be calculated as a cut compared to the most recent EU Scenario of electricity growth and be expanded to also cover energy efficiency actions in sectors other than industry. Additionally, by prioritising energy efficiency in all end-use sectors, particularly buildings and transport, clean electricity can be saved and redirected to the industrial sector, thus optimising grid capacity and helping industry to decarbonise.
- Recognise the **critical role of building energy performance in reducing housing costs and addressing energy poverty** and ensure this is a core metric in affordability and housing adequacy assessments in the European Affordable Housing Plan.

- **Incentivise local and citizen ownership of energy assets, enhancing communities' agency and control in their energy consumption, production, and energy distribution**, such as citizen-led renovations and community-led heating and cooling, and unlock funding schemes, such as early-support mechanisms and revolving funds for the development of energy efficiency activities in the Citizens Energy Package.
- Ensure that the **Heating and Cooling Strategy** supports municipalities and regional and local authorities to prepare **local heating and cooling plans under EED Art. 25 that are fully compliant with the EE1st principle**.
- Promote the uptake of efficient heating and cooling by fostering new business models that remove upfront cost, reduce taxation gaps between gas and electricity and **deliver the long-due revision of the Ecodesign and Energy Labelling regulations for heating and cooling products** as soon as possible.

Area 3: Strengthen sector-specific policies and product standards

Standards are the most effective tool to ensure a level playing field while boosting the competitiveness of businesses. Simultaneously, they promote regulatory simplification and predictability, reducing the burden on businesses who operate across the EU while also ensuring that their competitors abide by the same rules. We recommend to:

- **Ensure the full and timely implementation of the Ecodesign for Sustainable Products Regulation**, including robust and coordinated market surveillance by, for example, strengthening the European Product Registry for Energy Labelling database as a central tool for compliance, transparency, and market surveillance by consolidating all mandatory product information within the database.
- **Establish energy efficiency requirements for data centres**, potentially with progressive minimum energy performance standards, in the upcoming Data Centre Energy Efficiency Package, as data centres' energy consumption has increased and will continue to do so.
- **Accelerate the completion of the single market for energy efficiency products and technologies**, including by harmonisation of requirements and standards across the EU, as common standards simplify compliance for businesses and ensure a level-playing field.
- **Maintain and improve the current European standardisation framework** to ensure high stakeholders' involvement.



Area 4: Facilitate financing and investment

Investment in buildings' energy efficiency alone in Europe has nearly doubled over the last decade, reaching more than 65 billion euros.¹ This momentum must be maintained by ensuring that public money, including EU funds, is strategically allocated to spur private investment in energy efficiency. This should support the implementation of the existing energy efficiency legislative framework, reinforcing a positive signal for future investment. In addition, we recommend to:

- **Extend the Recovery and Resilience Facility deadline beyond August 2026 to 2028**, ensuring any gap between its end and the start of the new Multiannual Financial Framework (MFF) is closed.
- Ensure that the **post-NextGenerationEU (NGEU) period does not result in a financial cliff edge after 2027**. Under the current 2028–34 MFF proposal, both the overall level of available EU funds and the funds available for the green transition will be substantially reduced compared to the current period. To guarantee, at minimum, the same level of funds, the 2028–34 MFF must either be larger than the current proposal, or a joint borrowing NGEU 2.0 mechanism needs to be enacted.
- Ensure that funding for energy efficiency products, technologies and services is encompassed under the proposed National and Regional Partnership Plans and the European Competitiveness Fund, for example **by earmarking a portion of the budget for efficiency actions**.
- **Direct revenues from the Social Climate Fund and EU ETS 2 to the most vulnerable and energy poor**, properly earmarking them for measures that cut building energy demand and decarbonise heating and cooling.
- **Stimulate private investments through EU funds and blended finance**, setting up loan guarantee funds in each Member State, and engaging banks and private lenders on mortgage portfolio standards and loan performance requirements that reward efficient buildings.
- Ensure the implementation of the recently announced **European Investment Bank guarantee scheme for energy efficiency solutions** targeted at small and medium sized enterprises and assess the energy and cost savings resulting from the scheme.
- Use the **cohesion policy mid-term review to scale-up funding for energy efficiency** in Member States' and regions' Operational Programmes, as investment in energy efficiency aligns with the emerging challenges of competitiveness, security, affordable housing, and the energy transition.
- Accelerate and prioritise the rollout of the proposed **energy efficiency tripartite contracts**.
- Recognise and **support local and regional investment facilitators, such as energy agencies**, which aggregate and secure public and private investment flows towards energy efficiency.
- Promote innovative simplified, **turn-key business models that integrate public support schemes into zero-upfront cost investments**, i.e. activating the ESCO network, utilities and financial stakeholders to multiply the benefits of public support schemes, particularly for vulnerable households.



Area 5: Enhance collaboration and cooperation

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To ensure that all stakeholders are heard and that energy efficiency benefits everyone, **it is important to reinforce shared ownership and a common objective to deliver on energy efficiency between the actors of the energy efficiency ecosystem.** This must include civil society organisations and energy communities, financial institutions, industry representatives and policymakers to ensure investment flow to make energy efficiency solutions available to citizens. We recommend to:

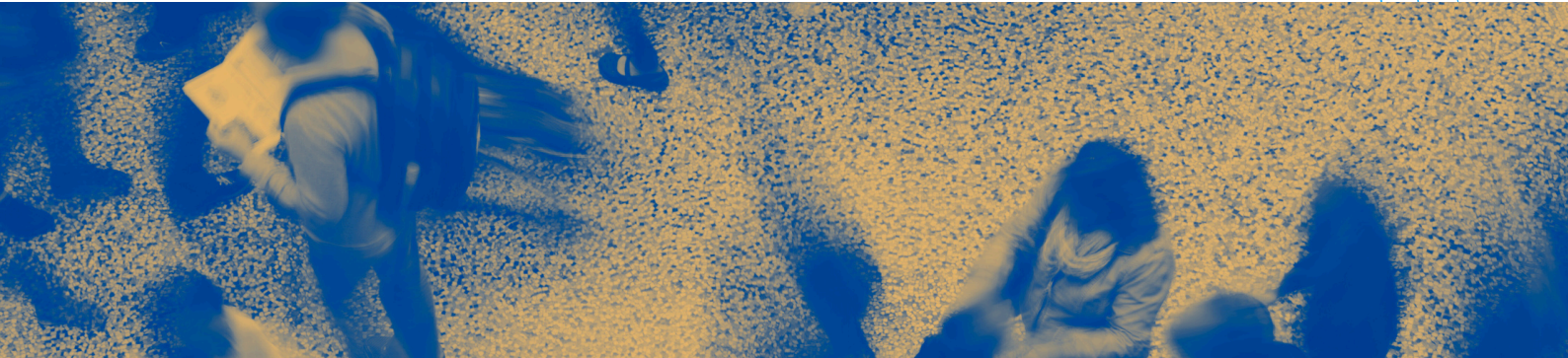
- Reconfirm the intention of making the **High-Level Stakeholders' Dialogue**, as launched and hosted by the European Commission on the 20 May 2025, **a permanent and well-structured forum** that gives visibility to energy efficiency. This is a key tool to deliver on EU competitiveness and decarbonisation while keeping key actors, including civil society actors, active in this ecosystem.
- Ensure that the announced **"Efficiency Action Forum 2030"** **provides a useful platform** for Member States to exchange on how to accelerate action on the ground to meet the 2030 EU energy efficiency target.

Area 6: Create a tradable energy efficiency market

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The Coalition recognises the potential of introducing a tradable energy efficiency market at European level, as this new tool could result in energy savings that are additional to those delivered by the current EU energy efficiency legislation. However, it should be noted that an **EU-wide tradable energy efficiency scheme will likely create a new layer of regulatory complexity and could overlap with national policies to deliver the existing Energy Savings Obligations**, which countries are already implementing successfully since several years. In this context, we recommend:

- Carefully exploring the **political and technical feasibility of such a new tool**, in particular in the framework of the simplification goal.
- Ensuring that if the tradable energy efficiency market is rolled out, **it is a tool to complement and supplement the existing Energy Savings Obligation and other energy efficiency objectives**, rather than replacing them.



7 Area 7: Develop skills for energy efficiency

The risk of insufficient and inadequately trained labour is a barrier to the uptake of energy efficiency solutions. Beyond this, ensuring training, up and re-skilling, and employment opportunities is a key concern for European citizens. **The EU is uniquely positioned to support a just and social transition by contributing to a job market that evolves alongside the green transition.** To support employment opportunities, job attractiveness and job visibility in the energy efficiency sector, we recommend to:

- Guarantee that the Affordable Housing Plan and Citizens Energy Package support **the creation of high-quality, green jobs by focusing on decent, safe working conditions and inclusive employment practices**, skilling programmes, and constant dialogue with trade unions and civil society.
- Leverage the STEM Education Strategic Plan, launched as part of the Union of Skills strategy, to **identify skills needs in energy efficiency related sectors** and to ensure support measures aimed at developing the workforce and its skillsets.
- Invest in re-skilling, up-skilling and training and mentoring programmes in this sector to **ensure availability of skills for the implementation of EU energy efficiency objectives**, supporting an energy efficiency Pact for Skills and Large-Scale Partnership, particularly in the context of Article 28 of the EED (dedicated to the availability of qualification, accreditation and certification schemes).

Area 8: Boost research and innovation funding and partnerships

The EU is a global leader in energy efficiency innovation, pioneering product and patent development, and delivering quality services. It is imperative for EU industries to maintain and solidify their first-mover advantage. To do so, innovation in energy efficiency should be defined not only as the production of new materials and technologies, but also as innovation in services, business models, installation techniques, and design of integrated systems. We recommend to:

- Support the **emergence of tools conducive to innovation such as energy management solutions** and those boosting digital collection and processing of data on building and industrial processes performance and disseminate this information to encourage their use.
- Ensure the **availability of dedicated funding for innovation in energy efficiency under the Horizon Europe programme** in the next MFF and maintain the LIFE programme as a crucial funding instrument for environmental and climate action.

Area 9: Promote international cooperation

The EU is a global leader and pioneer in energy efficiency thanks to its advanced legal framework that has driven investment in state-of-the-art products made in the EU. **With a pledge to double energy efficiency improvement signed by 133 countries during COP 28, the EU must show a continued commitment to energy efficiency to and beyond 2030.** To do so, we recommend to:

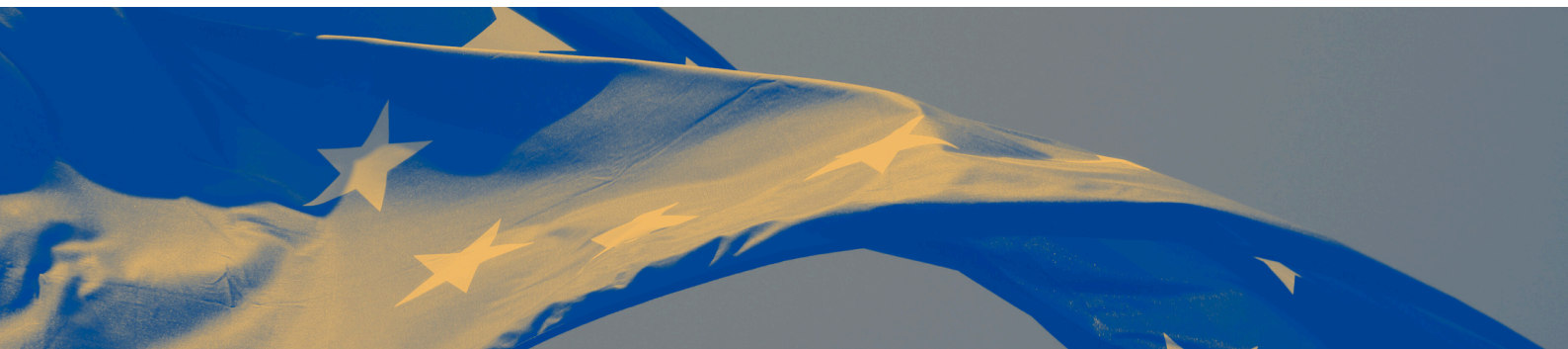
- Make a clear **commitment to continuing energy efficiency progress beyond 2030, namely through a target for 2040 on energy efficiency**, at least in line with the doubling pledge. Such a target would reconfirm that energy efficiency is a priority not only for the coming 5 years, but as a pillar of the EU's climate neutrality and decarbonisation objectives.

Area 10: Increase energy efficiency awareness

It is crucial to improve awareness, and more importantly, access to tailored information, at all levels (EU, national and local) to highlight the benefit of energy efficiency solutions. **Personalised advice as well as frequent feedback on energy consumption are a pre-requisite to ensure sustainable behaviour change and the continued uptake of energy efficiency solutions.** We recommend to:

- Prioritise **implementing the provisions on information and awareness raising in EED Art. 22 and EPBD Art. 18 regarding one-stop shops**. These structures help consumers access tailored advice to reduce energy consumption, understand the financial support they can receive, and connect with qualified professionals. This can be done, for example, through local and regional energy agencies, networks of physical one-stop-shops at municipal level, and ensuring clearer, easier to understand energy efficiency labels on products.
- **Facilitate consumers' access to real-time energy consumption data**, thereby fostering their active engagement and data-driven optimisation of energy flows, **enabling demand-side flexibility**. This can be achieved using energy efficiency technologies and services, for example through the swift roll-out of remotely readable thermal meters as required under EED Art. 16.
- Highlight **the role and the importance of energy efficiency for EU independence towards citizens and businesses**, inter alia with an EU communication campaign that underlines the role of the EU institutions in helping consumers in this direction.

The new impetus for energy efficiency is a welcome renewal of the EU commitment to prioritise energy efficiency. The EU has the tools to ensure that this roadmap yields concrete benefits for all Europeans, both through the implementation of the current energy efficiency legislative framework and setting new, complementary actions in the years to come.





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