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Public consultation on the energy efficiency framework for the decade ahead

Fields marked with * are mandatory.

Introduction

As announced in the 2026 Commission Work Programme, the European Commission plans to keep Europe on track to meet its climate goals and put forward an enabling framework for the decade ahead securing Europe's competitiveness ans sustainability, including the setting-up of the energy efficiency framework and the phase-out of fossil fuels subsidies. This initiative aims to help prepare an enabling and future-proof energy and climate policy framework to support the EU's efforts to achieve its objectives of decarbonisation, affordability, security and competitiveness.

The initiative will contribute to reaching the proposed target of reducing net greenhouse gas emissions by 90% in 2040 compared to 1990, as set out in the provisionally agreed amendment to the European Climate Law. Energy efficiency is expected to play a central role in cost-effectively reaching this target, while strengthening EU competitiveness, improving energy security and ensuring affordability for citizens and businesses. The energy efficiency framework for the decade ahead will be developed in conjunction with other ongoing and planned initiatives across EU climate and energy law, including the review of the Governance Regulation, the post-2030 national climate targets and flexibilities, the renewable energy framework, the EU Emissions Trading System (EU ETS), the social dimension of the Energy Union and other relevant energy policy initiatives and enabling instruments.

The Energy Efficiency Directive sets out a comprehensive framework for promoting energy efficiency across the EU, including binding EU-level objectives, national contributions, sectoral measures, public sector leadership and planning, monitoring and reporting rules. It supports strategic medium- and long-term energy planning through its links to integrated national energy and climate plans (NECPs) set out in the Governance Regulation, and contributes to the achievement of the EU's 2030 energy and climate objectives and long-term goals. It also provides the basis for the Commission to monitor progress at EU and Member State level and to take corrective action if ambition or implementation is insufficient.

Given evolving policy needs and the transition towards the post-2030 period, the Commission will assess how the energy efficiency framework has functioned to date and identify areas where it could be further streamlined, strengthened or adapted for the decade ahead. This assessment will consider the increasing importance of energy efficiency in the design and operation of a decarbonised, cleaner, more electrified and

integrated energy system, the need to support industrial competitiveness and innovation, and the importance of ensuring social fairness and a just transition while ending the EU's fossil fuel import dependency and reducing subsidies for fossil fuels, administrative burden and costs.

Building on this assessment and on the Commission's political priorities for 2024-2029, the Commission will examine options for the future development of the EU energy efficiency framework, with a view to ensuring an effective, flexible and forward-looking framework for the decade ahead.

In this context, the Commission is launching a public consultation to gather views from all interested parties. The consultation is based on a questionnaire consisting of two parts:

- Part 1 collects background information about you.
- Part 2 focuses on key aspects of the energy efficiency framework for the decade ahead, notably:
  - the effectiveness and coherence of the current energy efficiency policy framework;
  - the role of energy efficiency in the new climate and energy framework (political and strategic direction, sector-specific provisions and financing framework and enabling tools);
  - the streamlining of the regulatory framework and the reduction of the administrative burden (enhancing coordination across sectors and policies).

You can save your responses as a draft and finish them later. Apart from some mandatory questions, you can answer questions on the sections which are relevant to you. When answering questions with a free text box for additional comments please be concise. At the end of the questionnaire, you can also upload a document with further comments and views, as appropriate.

About you

* Language of my contribution

- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ◉ English
- ○ Estonian
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- ○ French
- ○ German
- ○ Greek
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* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- 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

* Country of origin

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

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
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- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- 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
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago

- 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
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- Kosovo
- Kuwait
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- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Tunisia
- Türkiye
- 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
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia

- Democratic Republic of the Congo
- Denmark
- Lesotho
- Liberia
- Saint Kitts and Nevis
- Saint Lucia
- Zimbabwe

Role/position (if applicable)

*Organisation name

255 character(s) maximum

The Coalition for Energy Savings

*Are the organisation's main headquarters within the EU?

- (•) Yes
- ( ) No

*Organisation size

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

In which sector(s) do you or your members operate? Please select all that apply.

- [ ] Public sector/government - national level
- [ ] Public sector/government - regional level
- [ ] Public sector/government - local level
- [ ] Research and education
- [ ] Social economy
- [ ] Construction/buildings

Energy sector

- [ ] Transmission system operator (TSO)
- [ ] Distribution system operator (DSO)

- [ ] Regulator
- [ ] Energy supplier, retailer or aggregator
- [ ] Power exchange/market operator
- [ ] Energy trader
- [ ] Energy producer
- [ ] Energy project developer
- [ ] Energy service company (ESCO) and other energy service providers
- [ ] Energy technical, legal or financial advisory
- [ ] Energy storage operators and other market participants providing storage services
- [ ] District heating or cooling provider
- [ ] Data centre or Information and Communication Technology processing company
- [ ] Manufacturer of clean technologies

Financial and insurance sector

- [ ] International financial institutions (IFIs) and National promotional banks and institutions (NPBIs)
- [ ] Credit institutions
- [ ] Investment funds
- [ ] Investment services

Energy-intensive industry

- [ ] Steel
- [ ] Non-ferrous metals
- [ ] Cement
- [ ] Chemicals and chemical-based fertilisers
- [ ] Glass and ceramics
- [ ] Paper
- [ ] Production of hydrogen or gases including low carbon, biomethane, biogases
- [ ] Other

Transport

- [ ] Aviation

- [ ] Maritime
- [ ] Road transport
- [ ] Rail
- [ ] Other

Waste management, including incineration

- [ ] Technology provider or waste management manufacturer
- [ ] Company of mission of public service

Land use/bioeconomy

- [ ] Agriculture value chain
- [ ] Forestry value chain
- [ ] Other

Please provide a short description of your activities in the abovementioned sectors.

500 character(s) maximum

The Coalition for Energy Savings is a European non-for profit association striving to make energy efficiency and energy savings the first consideration of energy policies. The Coalition advocates energy efficiency as the driving force towards a secure, competitive, sustainable and climate neutral European Union. The Coalition unites businesses, local authorities, energy agencies, energy communities and civil society organisations in pursuit of this goal.

Transparency register number

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

72911566925-69

* How many years of experience do you have with the Energy Efficiency Directive?

- ( ) Less than 1 year
- ( ) 1-5 years
- (•) More than 5 years

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.

- **Anonymous**

  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.

- **Public**

  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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Energy efficiency framework for the decade ahead

1. Effectiveness and coherence of the current energy efficiency policy framework

The current energy efficiency policy framework could do more to support a broader set of strategic objectives for the decade ahead. This includes accelerating the transition towards climate neutrality, strengthening EU competitiveness, enhancing energy security and system resilience, supporting strategic autonomy, and addressing challenges along the value chains for clean and net-zero technologies.

Energy efficiency policies should ensure energy efficiency in the design and operation of the future decarbonised energy system to integrate high shares of renewable energy, eliminate energy waste, increase excess and waste heat reuse, and minimise the cost of the transition. Energy efficiency policies could also further contribute to the phasing out of fossil fuels and inefficient fossil fuel subsidies, and to more systematic integration of skills, workforce development and job creation aspects. Energy efficiency also plays a central role in increasing climate resilience and supporting adaptation to climate impacts in a more integrated energy

system.

Finally, there is scope for enhancing coherence and synergies between the energy efficiency framework and other policy areas, including environmental (notably air quality) and climate policies, transport, industry, buildings and urban development, agriculture, macro-economic and industrial policy, and the social dimension of the Energy Union to maximise overall effectiveness and cost-efficiency.

1. To what extent do you agree with the following statement?

"The main objectives of the Energy Efficiency Directive (EED), notably to implement energy efficiency as a priority across all sectors, remove barriers in the energy market and overcome market failures that impede energy efficiency, are still relevant for the post-2030 framework."

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	No opinion
* Please select your answer:	○	○	○	○	◉	○

Please explain your answer.

The EU energy efficiency framework, and in particular the Energy Efficiency Directive (EED), has been successful in removing several market barriers for energy efficiency improvements, as evidenced by the important energy efficiency progress that took place over the past 15 years, during which the EU has decreased its final energy consumption by 12.1% while its economy grew by 25%. Recent estimations also indicate that energy efficiency improvements generated 250 Mtoe of energy savings in 2023 compared to 2000 levels. Without these savings, final energy consumption in the EU would have been 29% higher, and households would have spent on average €540 more on energy in their dwellings in 2023. However, some market barriers are still present and need to be further addressed by EU legislation. For instance, in the building sector, regulatory uncertainty in the form of inconsistent national renovation programmes creates a "stop-and-go" effect, preventing the scale-up of energy efficiency solutions, products and technologies. For certain specific market actors, such as energy communities, there is still a lack of appropriate frameworks to access funding for energy efficiency programmes, limiting their uptake.

In addition, any major change in the existing EU energy efficiency framework risks bringing uncertainty for investors, businesses and citizens, at odds with the continuing need to overcome market failures that limit the deployment of energy efficiency solutions. Indeed, further energy efficiency improvements are still paramount for the post-2030 framework, as they represent a core tool to reach EU energy security, improve businesses' competitiveness, ensure energy affordability, and meet climate targets. We therefore believe that, as the main objectives of the EED are still very much relevant, the existing energy efficiency provisions must be prolonged and strengthened for the 2031-2040 decade.

2. To what extent has the EED achieved its objectives so far?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Please select your answer:	○	○	○	◉	○	○

Please explain your answer.

As the transposition deadline of the Energy Efficiency Directive recast was on 11 October 2025 and the European Commission is still assessing how Member States have incorporated the new provisions into national legislation, it is very early to assess to what extent the EED achieved its objectives. Nonetheless, the 2023 EED already increased existing energy efficiency targets and supportive measures, leading to greater stakeholder certainty to invest in relevant technologies. By setting a binding 2030 EU energy efficiency target with clear contributions for Member States and provisions to adopt more ambitious energy savings measures, the 2023 EED provides ambition, clarity, and predictability to all relevant energy efficiency actors, from businesses to citizens and local authorities.

First evidence, namely from the update of the National Energy and Climate Plans, shows that the 2023 EED is leading to the adoption of more ambitious national energy efficiency policies, that investment in energy efficiency technologies is accelerating, and that there is a general positive momentum to undertake energy efficiency actions. However, to deploy the full potential of the 2023 EED, implementation must be further supported and accelerated: the European Commission must scale up financial and technical support for Member States, including on how to reallocate existing EU funds for energy efficiency measures, as proposed by the AccelerateEU communication and in line with the Affordable Energy Action Plan, the Citizen Energy Package, and the Clean Energy Investment Strategy, so that EU funds can better support effective implementation.

3. Which elements have contributed most to the effectiveness of the EU energy efficiency policy framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being a very low contribution and 5 a very high contribution.)*

	1	2	3	4	5	No opinion
* The "energy efficiency first" principle	○	○	○	◉	○	○
* EU-level targets and/or national contributions	○	○	○	○	◉	○
* National planning and reporting requirements	○	○	○	○	◉	○
* The energy savings obligation	○	○	○	○	◉	○
* The public sector's exemplary role	○	○	○	◉	○	○
* Energy audits and energy management systems	○	○	○	◉	○	○
* Consumer information and metering	○	○	○	◉	○	○
* Energy efficiency in heating and cooling	○	○	○	◉	○	○
* Local heating and cooling plans	○	○	○	◉	○	○

* Financing and technical assistance	○	○	○	◉	○	○
Other	○	○	○	○	◉	○

* If you selected "Other", please specify:

A crucial part of the effectiveness of the EU energy efficiency framework relies on having a dedicated overarching directive on energy efficiency which sets the direction for energy efficiency progress to be further delivered by sectoral legislation, such as the Ecodesign and Energy Labelling Regulations and the Energy Performance of Buildings Directive.

4. Which factors have limited the effectiveness of the current framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being a very low contribution and 5 a very high contribution.)*

	1	2	3	4	5	No opinion
* Insufficient ambition	○	○	◉	○	○	○
* Limited harmonisation and cross-border interoperability across the national energy efficiency frameworks	○	○	○	◉	○	○
* Complexity of provisions and administrative burden	○	◉	○	○	○	○
* Uneven implementation across Member States	○	○	○	○	◉	○
* Insufficient enforcement	○	○	○	○	◉	○
* Limited access to finance	○	○	○	○	◉	○
* Limited business case	○	○	◉	○	○	○
* Skills shortages	○	○	◉	○	○	○
Other	○	○	○	○	○	○

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

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Buildings	○	○	○	◉	○	○
* Heating and cooling	○	○	○	◉	○	○
* Industry	○	○	○	◉	○	○

* Information and communication technologies (ICT)	○	○	◉	○	○	○
* Transport	○	◉	○	○	○	○
* Commercial services	○	○	◉	○	○	○
* Public services	○	○	○	◉	○	○

6. To what extent have energy management systems and energy audits proven to be effective ways of optimising businesses' energy performance and contributing to costs savings?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Please select your answer:	○	○	○	○	◉	○

Please explain your answer.

Energy efficiency audits and energy management systems are crucial tools to make businesses, especially energy-intensive ones, more aware about their energy efficiency potential and to outline the solutions available to reduce their consumption (for instance by the electrification of certain of their processes) and advise on the exact steps to implement them. We therefore think that these are paramount to decrease businesses' energy costs and increase their competitiveness.

This is also recognised and leveraged by recent initiatives, such as the European Investment Bank's scheme for energy efficiency improvements in SMEs. The supporting EIB report "Unlocking energy efficiency investments by small firms and mid-caps" finds that regulatory push and awareness of energy efficiency potential are important factors for companies to act on their energy performance, showing the value of mandatory energy management systems and energy audits. The report also acknowledges that "energy audits are crucial to overcoming information barriers because they pinpoint specific areas for improvement and inform firms' management on the cost and benefit of energy efficiency investment". In that context, the 2023 EED Article 11 includes positive obligations for companies to undergo an energy audit and install an energy management system, depending on their energy consumption, which will fast-track the implementation of energy efficiency solutions.

7. Which national policies and measures implemented to fulfil the energy savings obligation (Articles 8-10 of the EED) have proven to be the most effective under the current framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being not effective at all and 5 very effective.)*

	1	2	3	4	5	No opinion

* Energy efficiency obligation schemes (EEOS)	○	○	○	○	◉	○
* White certificates schemes	○	○	○	◉	○	○
* Energy efficiency financing programmes, including financial instruments and subsidies	○	○	○	○	◉	○
* Information and behavioural campaigns	○	◉	○	○	○	○
* Industrial programmes	○	○	○	◉	○	○
* Public sector interventions	○	○	○	○	◉	○
* Taxation, including carbon taxes	○	○	◉	○	○	○
Other	○	○	○	○	○	○

8. Which factors have influenced the effectiveness of the application of Annex V of the EED for the implementation of the energy savings obligation?

Between 1 and 3 selections

- ☐ Complexity of provisions
- ☑ Different methods for calculating energy savings
- ☑ Uneven implementation across Member States
- ☐ Limited exceptions to the principle of additionality
- ☐ Insufficient guidance
- ☐ The exclusion of savings from measures concerning the direct combustion of fossil fuels
- ☐ Low interest on energy savings monetisation due to high transaction costs linked to complexity
- ☐ Other

9. Which provisions of the EED were the most effective for increasing energy efficiency in heating and cooling?

Between 1 and 3 selections

- ☑ Provisions on local heating and cooling planning
- ☐ Provisions on the development of high-efficiency cogeneration
- ☐ Provisions on energy efficiency in district heating and cooling
- ☐ Provisions on waste heat recovery
- ☑ Provisions on metering and billing information
- ☑ Other

* If you selected "Other", please specify:

Provisions ensuring the comprehensive renovations of buildings, such as public buildings, increasing the efficiency of their heating and cooling systems. In addition, the Energy Savings Obligation is also driving the decarbonisation of heating and cooling, given the new accounting rules restricting the energy savings stemming from direct fossil fuel combustion, which will push for more efficient and decarbonised heating systems, such as heat pumps.

2. Effectiveness and coherence of the current energy efficiency policy framework

a. Political and strategic direction

In the context of the revision of the Governance Regulation, the Commission has asked for evidence in the period between 18 December 2025 and 12 March 2026 on the preferred target architecture for the post-2030 framework, including as far as energy efficiency is concerned. It is asking stakeholders to respond to questions on this topic in the context of that consultation as long as it remains open.

If you have not participated in the consultation on the Governance Regulation by the 12 March 2026 deadline, the following question on the revision of the Governance Regulation is replicated here.

1. The EU currently has a 2030 energy efficiency target with indicative national contributions. How do you think energy efficiency should be expressed and what should the design be to support the necessary uptake of energy efficiency to achieve the EU's 2040 climate objectives? (*Please rank the following options or accept the initial order.*)

Use drag&drop or the up/down buttons to change the order or accept the initial order.

- Option 1: Continue with the current structure of a binding EU energy efficiency target, supported by national contributions determined by formulas.
- Option 2: Keep a similar structure with a binding EU energy efficiency target as in option 1, while allowing for flexibilities that reflect Member States' specificities.
- Option 4: Set a single, overarching electrification target for the EU with embedded minimum thresholds for key parameters (such as renewable energy and energy efficiency).
- Option 1, 2, 3 or 4 complemented by/combined with monitoring KPIs for key energy system components (such as electrification, waste heat reduction or re-use), while ensuring transparency and comparability.
- Option 3: Set a single, overarching clean energy target for the EU with embedded minimum thresholds for key energy parameters, including energy efficiency.
- Another option or a combination of options

If stakeholders have something to add or specify regarding the post-2030 target architecture, would they please do so here:

To ensure the continuation of energy efficiency ambition, and to guarantee predictability and certainty for all actors, a 2040 EU energy efficiency target, shared among Member States with a transparent methodology, is needed. The target must be binding, so as to ensure enforceability and to empower the Commission to act in case of lack of progress.

The target for 2040 should maintain the same metric as the 2030 EU energy efficiency target, i.e., an absolute reduction of energy consumption, with possible adjustments to increase political acceptability. For example, some additional flexibilities could be envisaged, such as adjusting the EED formula's criteria in Annex I to better reflect the current EU priorities and reward those Member States that are taking actions to reduce their dependency on fossil fuel imports and/or that are accelerating their electrification rate.

If you selected "Another option or a combination of options", please specify:

1000 character(s) maximum

* 2. How should energy efficiency progress be benchmarked/monitored after 2030?

- (●) In terms of energy consumption
- ( ) In terms of energy intensity
- ( ) Other
- ( ) No opinion

Please explain your answer.

Setting the 2040 EU energy efficiency target in terms of an absolute reduction of energy consumption would first and foremost ensure the continuation of the current target framework, sending a positive signal in terms of investment certainty and stability, simultaneously supporting the achievement of the 2030 EU energy efficiency target. It would also: 1) improve EU energy security by incentivising an absolute reduction of energy use, particularly from fossil fuel imports, thereby enhancing the EU's energy independence and resilience to possible supply disruptions; 2) result in greenhouse gas emissions reductions essential to achieve the EU 2040 climate target with domestic action that also brings benefits to citizens and businesses; 3) contribute to cutting energy costs, as it reduces the investments needed to build additional energy infrastructure (reduction of total system costs). Finally, an energy consumption target would support the increase of the EU electrification rate and enable its monitoring, as it is often expressed as a percentage of the total EU final energy consumption.

A target in energy intensity, on the other hand, would undermine the continuity and stability of the current energy efficiency framework, deprioritising the achievement of the 2030 EU energy efficiency target, which is based on a different metric: 1) it would have only a limited impact on energy security as it cannot be automatically translated and easily communicated in terms of reduced energy imports for the EU and therefore lacks alignment with the key objective of reducing fossil fuel imports to increase EU strategic autonomy; 2) it would also potentially have a weaker impact on the reduction of greenhouse gas emissions, as the target could be achieved without a decrease in EU energy use overall; 3) it also decouples measurement and progress in the acceleration of the electrification rate from the existing energy efficiency target, as it is usually measured on total energy consumption. Finally, a target in energy intensity is ill-fitted to measure and drive concrete energy efficiency actions in end-use sectors, such as the residential sector, where the correlation between energy use and economic growth is less strong.

3. Which mechanisms would best ensure the achievement of post-2030 energy efficiency objectives?

Between 1 and 3 selections

- [x] Better monitoring and reporting
- [x] Corrective or enforcement mechanisms
- [x] A better financing framework for energy efficiency
- [ ] Better technical assistance
- [ ] Better application of the "energy efficiency first" principle
- [ ] Other

4. Should the future EU energy efficiency policy ensure efficiency of the whole energy system, by focusing equally on energy efficiency potential on both the supply and the demand side?

- ( ) It should
- (•) It should not
- ( ) No opinion

Please explain your answer.

The deployment of renewables and the optimisation of the efficiency of existing energy infrastructure, such as electricity grids, improve the efficiency of the EU system and are therefore important to consider. We therefore fully acknowledge and support the leveraging of the energy efficiency potential of both the supply and the demand side. Such supply-side improvements are already rightly recognised in the list of alternatives to additional infrastructure development in the Commission's guidance note on the Energy Efficiency First (EE1st) principle. However, an increased focus on efficiency of the supply side should not undermine or reduce actions on the demand side, which remain an essential component of the EE1st principle. In addition, the energy efficiency potential from the supply side is already generally considered and acted upon by relevant actors, such as TSOs and DSOs, as it represents a direct economic benefit to lower operation costs and does not require policymakers' approval/decision making.

5. What type of policy measures will be effective at ensuring energy efficiency in the design and operation of the future decarbonised energy system? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being not effective at all and 5 very effective.)*

	1	2	3	4	5	No opinion
* Better application of the "energy efficiency first" principle in national energy system planning	○	○	○	○	◉	○
* Calculating whole-system costs to prioritise energy efficiency options on the supply and demand side	○	○	○	○	◉	○
* Encouraging the use of AI in the design and operation of the energy system	○	◉	○	○	○	○
* Decentralising energy system planning and empowering the local level in efficient system design and system integration	○	○	○	◉	○	○
* KPI or target, for example for waste heat reduction	○	◉	○	○	○	○
A combination of the above measures	○	○	○	○	○	○
Other	○	○	○	◉	○	○

If you selected "A combination of the above measures" or "Other", please specify here:

Digitalisation offers an important opportunity for collecting relevant data of the energy system and having real-time information on its energy consumption and how to better balance supply and demand and integrate different energy sources in the most efficient way. At the building level, for example, improved digitalisation would make the identification of inefficiencies of heating and cooling systems, or the building envelope, easier.

6. Regarding a potential energy savings obligation, which instruments should be favoured to achieve end-use savings nationally and in end-use sectors?

- ○ Energy efficiency obligation schemes (EEOS)
- ○ White certificates schemes
- ○ Energy efficiency auctions
- ◉ National energy efficiency funds and dedicated energy efficiency financing programmes, including financial instruments
- ○ Taxation and fiscal incentives
- ○ Other

b. Sector-specific provisions

* 1. In which sectors or areas would additional energy efficiency efforts be most needed?

Between 1 and 3 selections

- ☑ Buildings
- ☑ Heating and cooling
- ☑ Industry
- ☐ Information and communication technologies (ICT), including data centres
- ☐ Energy system
- ☐ Transport
- ☐ Commercial services
- ☐ The public sector
- ☐ Financing
- ☐ Other

2. Which provisions of the EED on the public sector will be the most relevant for the future and should be continued/strengthened?

Between 1 and 3 selections

- ☐ Energy management systems and energy audits for public bodies
- ☑ Energy consumption reduction targets for the public sector
- ☑ Member States' assistance to regional and local authorities
- ☑ The obligation to renovate 3% of public buildings every year
- ☐ Energy savings in public buildings
- ☐ Obligatory energy efficiency criteria in public procurement

* 3. Should the implementation of energy management systems and energy audits in businesses be continued/strengthened?

- (●) It should
- ( ) It should not
- ( ) No opinion

Please explain your answer.

It is difficult to assess the effectiveness of Article 11 as the deadlines to transpose its key requirements (an obligation for energy-intensive companies to undergo energy audits or to install energy management systems) are only set for October 2026 and October 2027 respectively. However, the former Article 8 of the 2012 EED led to an uptake of energy audits, as evidenced by a study by the Institute for Resource Efficiency and Energy Strategies in Germany, which found that most of the companies that have completed an energy audit wouldn't have done it without the EED. This shows the value of having a dedicated provision to mandate energy audits in relevant companies.

Importantly, as found by a recent EIB report "Unlocking energy efficiency investments by small firms and mid-caps", firms that implement energy efficiency measures outperform those without these measures, and this benefit improves as their energy intensity increases. Energy efficiency also makes businesses "structurally more resilient to future price shocks". In that context, the provisions of Article 11 EED are still highly relevant to raise awareness among energy-intensive companies about their energy efficiency potential and the technologies and solutions available to improve their performance, leading to a decrease in their energy costs and strengthening their competitiveness on the European and global scale. As a result, we would strongly recommend maintaining the provisions on energy management systems and energy audits in the EED, and strengthening the financial and technical support available to companies and energy communities to implement energy efficiency solutions. This is further supported in Annex I of the AccelerateEU communication that lays out examples of good national practices, suggesting Member States to set an "obligation for companies to implement all energy efficiency measures that have a payback period of less than five years".

However, adjustments could be made to the existing provisions, in the case that evidence from the implementation of Article 11 demonstrates a need for streamlining, notably in relation to the accounting of companies' energy consumption when assessing compliance with the thresholds established in Article 11.

4. What should the main criterion for the implementation of energy management systems and energy audits in businesses be?

- ( ) The size of an enterprise (e.g., small or medium-sized enterprises (SMEs), non-SMEs)
- (●) Energy consumption
- ( ) The operational sector (e.g., industry, transport, services)
- ( ) Greenhouse gas emissions
- ( ) Other

5. What should the scope of applicability of energy management systems and energy audits in enterprises be?
(*For the terms, see Article 3 §1 in Title I of the Annex to Commission Recommendation 2003/361/EC*)

- (●) Autonomous enterprises only
- ( ) Autonomous and linked enterprises
- ( ) Autonomous, partner and linked enterprises
- ( ) Other

6. Which provisions of the EED related to heating and cooling will be the most relevant for the future and for phasing out fossil fuels and should be continued /strengthened?

Between 1 and 3 selections

- [x] Local heating and cooling plans linked to national energy and climate plans (NECPs) and national air pollution control programmes (NAPCPs), as well as air quality plans
- [ ] Provisions on efficient district heating and cooling
- [x] Provisions on clean technologies for heating and cooling, including heat pumps, geothermal systems and solar thermal technology
- [ ] Provisions on high-efficiency cogeneration
- [ ] Provisions on waste heat recovery from the power sector, industry, services and data centres
- [x] Provisions on metering and billing information
- [ ] Other (or new) provisions

* 7. Should waste/excess/production heat recovery become mandatory when cost-effective re-use options have been identified through a cost benefit analysis or energy audits?

- (●) It should
- ( ) It should not
- ( ) No opinion

Please explain your answer.

From a system efficiency perspective, the waste heat recovery potential must be tapped whenever cost-efficient to reduce energy consumption.

8. Should heating networks (e.g., district heating) be prioritised in urban areas to unlock efficiency and prevent a lack of capacity in the local electricity grid or the soaring cost of electricity distribution?

- ○ Yes, by requiring a minimum share of heating networks in the total heating and cooling supply
- ◉ Yes, by empowering local authorities to decide on the urban areas to be supplied by heating networks
- ○ Yes, by requesting lower national taxation on heat delivered from heating networks (minimum or zero taxation rates for VAT and excise)
- ○ Yes, through an investment-enabling financing and funding framework for the development of heating networks
- ○ Yes, through an investment-enabling financing and funding framework for clean technologies for heating and cooling, designed to decarbonise buildings and industry
- ○ Other prioritisation measures
- ○ No prioritisation needed

9. How should data centre regulation evolve post-2030? (*Please assign a numerical weight from 1 to 5 to each option below, with 1 being a strong disagreement for the option and 5 a strong agreement.*)

	1	2	3	4	5	No opinion
* No regulation is needed	◉	○	○	○	○	○
* Maintain the current framework of Article 12 of the EED (the public disclosure of data, a reporting scheme, and a rating scheme)	◉	○	○	○	○	○
* Make the current framework of Article 12 and Annex VII to the EED more uniform across the EU	○	○	○	◉	○	○
* Add EU-wide minimum performance standards for data centres to the framework	○	○	○	○	◉	○
* Add sustainability conditions to permitting or state financing	○	○	○	◉	○	○

* Add measures to support the integration of data centres into the energy system	○	○	○	○	◉	○
Other	○	○	○	○	○	○

c. Financing framework and enabling tools

* 1. What type of financing framework do you consider the most relevant for the achievement of the energy efficiency objectives?

- ◉ A prescriptive financing framework, specifically linking financial incentives to binding energy efficiency improvements in line with regulatory requirements
- ○ An enabling financing framework, where public financing helps market actors to leverage the energy efficiency business case, and private and public stakeholders to access finance for their energy efficiency projects
- ○ A monitoring framework focused on performance tracking through reporting and the benchmarking of energy efficiency, with limited public intervention
- ○ None of the above frameworks is considered sufficiently effective at achieving energy efficiency objectives
- ○ No opinion

2. What are the most important financing support and enabling tools to facilitate energy efficiency investments and uptake?

- ☑ Energy efficiency grants and subsidies
- ☑ Energy efficiency preferential loans and bankability support, by means of public financing programmes (such as public guarantee as collateral, a tax discount on the interest rate, etc.)
- ☑ Blended financing combining grants, financial instruments and technical assistance
- ☑ Tradable energy efficiency certificates (White certificates)
- ☑ Advisory services and project development assistance facilities
- ☑ Public-private partnerships such as concessions and other equity co-investment structures
- ☑ Fiscal incentives and penalties through taxation
- ☐ Financing through service agreements/ operational expenditures (energy efficiency as a service and other innovative energy services, leasing, etc.)

- [ ] Financing by means of credit agreements, such as energy efficiency lending products (secured and unsecured)
- [ ] Energy service company-based and third-party financing (off balance sheet)
- [ ] Green securitisation and asset-backed securities to boost lending activities and capital markets
- [ ] Other

3. How relevant do you consider the following improvements to the EU framework for energy efficiency financing and energy services? (*Please assign a numerical weight from 1 to 5 to each option below, with 1 being the least relevant and 5 the most relevant.*)

	1	2	3	4	5	No opinion
* Harmonising and simplifying the energy efficiency financing framework by ensuring the strict alignment of eligibility rules for energy efficiency investments and energy services across the relevant regulatory framework (energy efficiency legislation, financial services regulation, EU Taxonomy, the State aid framework, EU funding programmes, EU budget rules and Do No Significant Harm, and other relevant frameworks)	○	○	○	◉	○	○
* Providing a coherent set of EU-level definitions and standard templates for energy efficiency loans, energy services (companies and providers), energy performance contracting, and other relevant innovative financing and emerging energy service-based models	○	○	○	○	◉	○
* Giving market participants clearer guidance and information, while improving programme design and implementation, notably in terms of responsiveness, relevance and operational efficiency	○	○	○	◉	○	○
* Clarifying EU accounting rules and financial treatment of energy services contracts and service-based financing	○	○	◉	○	○	○
* Establishing a common template for an energy efficiency certificate (EEC) to increase investors' confidence in the monetary value of energy savings and provide a minimum basis for cross-border interoperability	○	○	○	○	◉	○

* Simplifying energy savings monitoring and verification measures to enable cross-border interoperability, reduce transaction costs and favour energy efficiency investments and market scaling	○	◉	○	○	○	○
* Establishing national energy service companies' databases and ensuring their cross-border interoperability and mutual recognition	○	○	◉	○	○	○
* Supporting the establishment of (national) performance guarantees and refinancing opportunities for energy service companies and energy performance contracting	○	○	◉	○	○	○
* Mandating the provision of project development assistance and advisory support to facilitate the uptake of energy efficiency investments	○	○	○	◉	○	○
* Supporting the use of financial instruments and public guarantees as a default way of establishing national support frameworks for energy efficiency	○	○	○	◉	○	○
* Encouraging and supporting closer cooperation with financial institutions and market actors, for example through the Energy Efficiency Financing Coalition, and helping Member States to develop national collaboration platforms, such as national hubs	○	○	○	○	◉	○
* Developing national or local level collaboration among actors in specific sectors, assets or technologies in order for them to reach agreement on shared goals (model partnership agreements, e.g. on waste heat recovery)	○	○	○	◉	○	○

3. Streamlining the energy efficiency policy framework and reducing administrative burden

* 1. Should the energy efficiency framework be streamlined or implementation made more flexible while preserving its objectives for the decade ahead?

- ○ It should
- ◉ It should not
- ○ No opinion

* 2. In your view, which provisions of the EED could be incorporated into other regulations/directives (e.g., public procurement, energy performance of buildings, financing regulations, legislation regulating metering and billing and consumer-related provisions etc.) and in which ways?

The 2023 EED is crucial as an overarching regulatory and investment signal for the acceleration of energy efficiency progress, offering long-term visibility, guidance, and policy coherence across sectors. Its targets and measures have effectively driven momentum and translated to sustained, concrete action on the ground which has yielded considerable energy savings since its adoption. It is therefore first and foremost essential to maintain this signal and clarity, particularly in view of the ongoing energy crisis, to ensure that Europe continues to extract maximum benefits from energy efficiency action.
Transferring or incorporating provisions from the EED into other existing legislation must therefore be carried out selectively, strategically, and with clear communication so as to genuinely address overlap without sacrificing ambition or investment clarity. These changes must be focused on improving delivery, speeding up implementation, reducing market fragmentation and allowing Member States to save time on their administrative efforts to implement the legislation. The decision to do so must also be weighed against the risks that come with reopening legislation, including weakening ambition, clouding the investment signal, and inadvertently increasing and complicating the Commission's work.
Finally, we would like to strongly warn against the risks of removing a dedicated EU directive for energy efficiency linked to the progressive transfer of the EED provisions into other pieces of legislation. This would lead to energy efficiency becoming a secondary priority for Member States and stakeholders, at a time when energy efficiency improvements are crucial to address the current energy security crisis.

* 3. In your view, are there provisions in the EED, for which the administrative costs of implementing exceed the benefits?

At this time, we would like to underline that it is difficult to assess whether the administrative costs of implementing certain provisions of the EED exceeded their benefits, given the short implementation period and the medium to long-term return on investments of energy efficiency solutions. As a result, we would strongly encourage that any option envisaged to reduce administrative costs be well substantiated by evidence from the implementation of policies on the ground, with a dedicated section in the supporting Impact Assessment, and that the broad societal benefits of energy savings solutions are completely factored in this analysis, including through monetisation of those benefits, to effectively compare costs and benefits.

* 4. Are there any parts or provisions in the EED that are obsolete or have proven to be unsuitable for the achievement of its objectives?

N/A

* 5. In the post-2030 framework, are there energy efficiency reporting obligations that could be removed, simplified, streamlined or merged with other reporting obligations in the broader energy policy architecture?

Better alignment of the reporting obligations between the Energy Efficiency Directive and the Governance Regulation, which is also due to be revised, will be positive. For example, the 2023 EED introduces several accountability mechanisms for Member States, namely the “ambition gap mechanism” and the “gap-filling mechanism” in Article 4 (5) and Article 4 (6); these should also be integrated into the Governance Regulation to ensure consistency and be maintained for the post-2030 energy framework. Overall, the reporting obligations of both the EED and Governance Regulation’s provisions should be made fully consistent to ease implementation for national and local authorities, and facilitate enforceability and scrutiny by the European Commission. However, we would strongly warn against simply removing reporting obligations, as it would reduce the Commission’s and stakeholders’ scrutiny over the implementation of EED provisions and measures. Those are necessary to ensure full transparency and to increase stakeholders’ awareness about the measures taken at the national level, while also ensuring that the Commission can assess and act on possible implementation gaps.

Final questions

Do you have any additional comments on points not addressed in the previous questions?

1000 character(s) maximum

It is crucial to maintain a stable and ambitious energy efficiency framework. An overhaul of the EED, either by proposing a new directive that phases out several existing obligations, or by integrating EED provisions into other pieces of legislation, would risk undermining energy efficiency actions not only in the next decade, but also in the next years, at odds with the need to reduce energy demand given the ongoing energy crisis. A signal that the post-2030 framework will contain significantly different provisions from the existing ones risks slowing implementation efforts and diminishing the Commission’s political leverage to ensure the full implementation of the EED. In short, to ensure the progressive acceleration of energy efficiency policies, the future energy efficiency framework should take the 2023 EED as a basis, strengthening its provisions while simplifying implementation through improved enabling conditions, such as additional financial support and further guidance.

Alternatively, you may submit evidence or position papers on topics falling under the scope of this review.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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