

Energy Efficiency Directive (EED) - Summary of EuroACE Reply to Public Consultation 25th February 2016

The EED is a crucially important, complementary element of the EU legislative framework; it is pivotal for the realisation of the ambitions set out in the EU Energy Union initiative and for the achievement of the commitments made under the Paris Agreement. The most important factors that EuroACE believes must be taken into account in the review of the selected articles of the EED (1, 3, 6, 7, 9, 10, 11, 20 and 24) are:

Implementation of the EED

1. Full and conscientious implementation and enforcement of the EED across all Member States must be assured by increased surveillance and through more targeted guidance from the Commission on how to implement the Directive. This guidance must include the preparation of templates for national planning and reporting requirements
2. The new Governance approach that is currently being debated, should allow the Commission to closely monitor national implementation of EU legislation, particularly on energy efficiency, and to intervene, in a timely manner, when national plans are inadequate
3. Implementation measures at Member State level must openly prioritise action in the buildings sector as it is the sector with the highest, proven, cost effective potential for achieving energy efficiency ambitions. It is also the sector that generates the most jobs, especially in SME's

Factors to be considered when revising the EED

4. Revisions to the EED should have a 2050 horizon and the Paris Agreement in mind. They should also consider the vast potential tied up in key sectors, which will never be realised without new policy¹. Such revisions should prioritise action in the buildings sector requiring, for example, early implementation of the strategies on financing renovation required by Article 4
5. These strategies must be more ambitious, must be built on a proper analysis of the existing building stock, must include defined targets and milestones for the level of improvement of the stock and must account for the multiple benefits that will arise
6. The revision of the target for energy efficiency for 2030 should be set at the highest cost-effective potential for our economy – 40%. This is needed to give a strong and reliable signal to investors and companies that are engaged in the energy efficiency sectors
7. Arguments describing the multiple benefits^{2,3,4} of high ambition on energy efficiency (e.g. productivity gains, increased comfort, better physical and mental health, increased productivity etc.) must be better disseminated, quantified, monetised and taken into account in cost benefit analyses, based on life cycle assessments. This is key to building greater support for high ambition on energy efficiency among the Member States

¹ The International Energy Agency (IEA) states that without new policy two-thirds of the economic potential in the buildings sector will go untapped

² See the IEA Report entitled *Capturing the Multiple Benefits of Energy Efficiency* at:

<http://www.iea.org/topics/energyefficiency/energyefficiencyiea/multiplebenefitsofenergyefficiency/>

³ See the Copenhagen Economics report entitled *Multiple Benefits of Investing in Energy Efficiency Renovations at:*

<http://www.renovate-europe.eu/Multiple-Benefits-Study>

⁴ See new report from the Global Buildings Performance Network on *Monetary Benefits of Ambitious Building Energy Policies* at:

http://www.gbpn.org/sites/default/files/Low_C_MBABEP.pdf?utm_source=newsletter&utm_medium=email&utm_campaign=Newsletter%2011%20-%20New%20Report%20Quantifies%20the%20Global%20Return%20on%20Investment%20of%20Ambitious%20Building%20Energy%20Performance%20Policies

Means to improve effectiveness of the EED in the buildings sector

8. Buildings related provisions of the EED (Articles 4, 5, 6, 9, 10, 11, 13, 18, 19, and 20) should be internally consistent and mutually reinforcing and should be conceived so as to work together towards the realisation of a clearly defined nZEB performance level for the whole building stock of the EU by 2050
9. Provisions of the EED that relate to exemplary practices by public bodies should be extended to all public bodies in Member States and not be restricted to central government bodies as at present
10. EEOS under Article 7 must do more to unlock the energy savings potential in the buildings sector and to help implement long-term renovation strategies. The provisions of Article 7 must be maintained and extended beyond 2020. The focus of EEOS must remain on achieving end-use energy savings
11. Exemptions and derogations to the main requirements of the EED must be repealed so that Member States actually achieve the objectives of the Directive. This is especially needed to ensure that Article 5 leads to actual renovations of public buildings

The full response of EuroACE is available on request from info@euroace.org

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