EU-ASE's Response to the post-2030 energy efficiency framework Consultation

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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
- ○ Finnish
- ○ French
- ○ German
- ○ Greek
- ○ Hungarian

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- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* 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

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luigi@bs-europa.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.

- Afghanistan
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- Solomon Islands
- Somalia
- South Africa

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- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
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- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- 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
- Cuba
- Curaçao
- Cyprus
- Czechia
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
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- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- North Macedonia
- 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

European Alliance to Save Energy (EU-ASE)

*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

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.

* 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.

Europe is a resource-scarce continent facing structural challenges that go well beyond the current geopolitical context. Recent crises have exposed these vulnerabilities more visibly, but Europe's dependence on imported energy and raw materials will continue to weigh on economic competitiveness and social resilience even in a more stable geopolitical environment. Against this backdrop, a rational and economically sound approach to the post-2030 framework would be to further strengthen the role of energy efficiency within EU energy policy.

Energy efficiency is Europe's first fuel. This is not a political slogan, but a fact consistently supported by extensive evidence and repeatedly acknowledged at the highest political level, including by the President of the European Commission and the Commissioner for Energy. Improving energy efficiency is one of the most cost-effective and immediately available tools to strengthen Europe's competitiveness, resilience, and energy security. If anything, recent geopolitical developments and rising energy costs strengthen the argument for ambitious demand-side efficiency policy. During the first 44 days of the Middle East crisis alone, the EU incurred an estimated additional €22 billion in fossil fuel import costs.

Applying the Energy Efficiency First principle systematically across sectors — including through robust cost-benefit assessments in planning and investment decisions — should therefore remain a core pillar of the post-2030 framework. This is above all a matter of economic rationality. Europe needs to sustain industrial activity, economic growth, and social prosperity while operating within structural resource constraints. In this context, reducing energy demand through energy efficiency improvements, not through reduced economic activity, and improving system efficiency directly lower operating costs and energy bills for businesses and citizens alike.

At the same time, energy efficiency is indispensable enabler for the transition towards a renewable and increasingly electrified energy system. Efficiency measures reduce overall system costs, facilitate faster integration of renewable energy, by limiting the scale of infrastructure investments required for grids and generation capacity. In practice, this makes the transition both faster and more affordable, particularly for households and businesses most exposed to energy costs.

Despite the strong economic case for energy efficiency, important barriers to deployment remain across sectors. One of the most significant challenges is the insufficient availability of financing and investment support for energy efficiency improvements. Addressing this challenge requires the EU to create a framework that prioritises and optimises the use of public resources to effectively leverage private investment at scale.

The foundation of such an approach is regulatory certainty. Investors require consistent implementation across Member States, a stable, ambitious, and long-term EU-wide policy framework with binding objectives and clear implementation pathways. Predictability and consistency are essential conditions for mobilising capital, scaling markets, and accelerating the deployment of energy efficiency solutions across the European economy.

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.

The current transposition deadline for the revised Energy Efficiency Directive (EED) — 11 October 2025 — is too recent to allow for a comprehensive assessment of how Member States have incorporated the new provisions into national legislation, or whether the Directive has already achieved its objectives. Several Member States have reportedly received letters of formal notice from the European Commission for failing to transpose the Directive on time, further confirming that implementation remains at an early stage. Nonetheless, our industry members report that the revised EED has already had a positive market effect. By increasing existing energy efficiency targets and strengthening the overall policy framework, the Directive has provided greater certainty for investments in manufacturing capacity, skills development, innovation, and research across energy efficiency technologies and solutions.

This certainty is now being undermined by ongoing discussions around simplification and deregulation. Indeed, while well-designed simplification can be beneficial if it preserves the core value and ambition of energy efficiency goals, there is a clear risk that it drifts into deregulation and even if such discussions are formally framed in a post-2030 perspective, they risk weakening the political commitment and policy continuity needed to achieve the EU's 2030 energy efficiency objectives. Launching debates on simplification without a proper impact assessment sends a negative political signal and may provide justification for slowing down the energy efficiency agenda among those Member States or economic operators that remain locked into inefficient and unsustainable fossil fuel-based economic models.

At this stage, the only meaningful assessment possible is based on the National Energy and Climate Plans (NECPs), which indicate that the 2023 EED is already driving the adoption of more ambitious national energy efficiency policies across the EU.

More broadly, the EED and the EU's energy efficiency framework have consistently delivered tangible results over time. Today, the EU imports around 57% of its primary energy. Without the energy efficiency gains achieved since 2000, this dependency would have increased dramatically to approximately 73%, leaving the EU significantly more exposed to global market volatility and supply disruptions (source: Update of the Governance of the Energy Union and Climate Action, DENEFF, 2026).

The benefits are equally evident in the industrial sector. According to the International Energy Agency, the EU

manufacturing sector now generates 50% more added value while using 25% less energy than in 2000 (source: Economic Growth, International Energy Agency, 2025). This demonstrates that energy efficiency is not only a climate and security instrument, but also a key driver of industrial competitiveness and economic resilience.

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:

Some of the above elements identified as contributing only to a limited extent to the objectives of the EED should not be interpreted as poorly designed or ineffective measures. Rather, many of these provisions were introduced only with the revised EED and are therefore still at a very early stage of implementation. Given the fragmented and uneven transposition across Member States, there is currently insufficient data and practical experience to carry out a robust assessment of their effectiveness and actual contribution to the Directive's objectives.

Another important consideration is that the EU energy efficiency framework is broader and more integrated than the EED alone. The EED provides the overarching principle and strategic direction that drive progress on energy efficiency across a wide range of sectoral legislation. Its influence extends well beyond the Directive itself and is reflected in key legislative instruments such as the Ecodesign and Energy Labelling Regulations, the Energy Performance of Buildings Directive (EPBD), and even specific provisions of the Urban Waste Water Treatment Directive.

The EED therefore plays a systemic role within the EU regulatory framework: it establishes the political ambition and policy coherence necessary to mainstream energy efficiency across sectors and technologies. Any assessment of its effectiveness should take into account this broader enabling function, which cannot be measured solely through the direct implementation of individual EED provisions.

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.

Evidence demonstrates that energy audits are an effective tool for identifying structural opportunities for energy, water, and cost savings in industry.

Data from Italy's ENEA, based on approximately 11,000 mandatory energy audits, identified 30,847 energy efficiency measures across 5,688 enterprises, including 2,796 energy-intensive companies. The identified measures represented an estimated investment potential of €4.1 billion, with 73% of the measures showing a payback period of less than five years.
Importantly, these audits translated into concrete action. A total of 7,352 measures were implemented, delivering annual final energy savings of 474 ktep and primary energy savings of 191 ktep. Based on current industrial electricity prices (€100–150/MWh), these savings correspond to approximately €774 million to €1.16 billion in annual cost reductions for industry (Source: Le risultanze dell'obbligo di diagnosi energetiche ai sensi dell'Art. 8 D.Lgs. 102/14, ENEA, 2019).

In some sectors, implementation rates are even higher. For example, the European Industrial Insulation Foundation reported that 75% of more than 3,000 audited companies implemented the measures recommended through their audit programme Tipcheck, underlining the strong contribution of energy audits to improving industrial efficiency and competitiveness (Source: The overlooked industry decarbonization champion: technical insulation, EIIF, 2024).

The importance of energy audits is also recognised by the European Investment Bank. In its report Unlocking Energy Efficiency Investments by Small Firms and Mid-Caps, the EIB notes 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 this context, Article 11 of the revised 2023 EED introduces positive obligations for companies to carry out energy audits and, depending on their level of energy consumption, to implement energy management systems. These provisions are expected to accelerate the uptake of energy efficiency solutions across European industry by improving awareness, investment planning, and implementation capacity.

Energy audits have been extremely effective in identifying opportunities for saving energy, however the recommendations from energy audits frequently go unimplemented, due to investment barriers, split incentives and the absence of follow-up obligations, as well as lack of controls post-audits.
We support making the implementation of cost-effective audit recommendations mandatory – especially those with a short ROI- rather than leaving it to voluntary action, in line with the recommendations from AccelerateEU. This single change would dramatically increase the real-world impact of the existing audit framework.

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
- [x] Other

* If you selected "Other", please specify:

Energy Savings Obligation

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:

The architecture that would provide the greatest predictability post-2030 is one that maintains the current framework, including target for primary and binding target for final energy consumption for 2040, together with a mechanism to share efforts between Member States. While some flexibility is acceptable to address specific national circumstances, a shared responsibility is essential in a world where Europe must act independently to confront mega-powers controlling critical energy and other resources.

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.

Defining the EU's 2040 energy efficiency target on the basis of an absolute reduction in energy consumption would preserve consistency with the existing policy framework and provide long-term predictability for investors and market actors. Maintaining the current approach would reinforce confidence in the EU's energy efficiency agenda and help sustain momentum towards the achievement of the 2030 targets.

An absolute energy consumption target would also deliver several strategic benefits. First, it would strengthen EU energy security by directly encouraging lower overall energy demand and, consequently, reducing dependence on imported fossil fuels. This would improve the Union's resilience to external supply shocks and contribute to greater strategic autonomy. Second, lowering total energy consumption would support the achievement of the EU's 2040 climate objectives by ensuring concrete domestic greenhouse gas emissions reductions, while generating tangible benefits for households and businesses. Third, reducing overall demand would lower the need for additional energy generation, transport and distribution infrastructure, thereby decreasing total system costs and helping contain energy prices.

In addition, an absolute target is well aligned with the EU's electrification objectives. Since electrification rates are commonly measured as a share of total final energy consumption, a consumption-based target would both support and facilitate the monitoring of progress in this area.

By contrast, adopting an energy intensity target would risk weakening the coherence and credibility of the current energy efficiency framework. Because the 2030 targets are expressed in absolute energy consumption terms, moving to a different metric for 2040 could undermine policy continuity and dilute the political focus on delivering existing commitments.
Moreover, an energy intensity target would provide a less effective contribution to energy security objectives. Improvements in energy intensity cannot be easily translated into reductions in absolute energy imports and therefore fail to clearly support the EU's strategic goal of decreasing fossil fuel dependency. Similarly, the impact on greenhouse gas emissions reductions could be weaker, since energy intensity improvements may occur even in scenarios where total energy consumption continues to rise.
As mentioned above a shift to energy intensity would also complicate the monitoring of electrification progress, as electrification indicators are generally linked to total energy consumption rather than economic output metrics. An energy intensity framework uses a different logic and metric, making the tracking of electrification progress less meaningful from an energy transition perspective.
Finally, energy intensity is not an appropriate indicator for driving or assessing concrete energy efficiency action in several end-use sectors, particularly in buildings and residential applications, where energy demand is not strongly correlated with economic growth. In such sectors, absolute energy savings remain the most meaningful and policy-relevant measure of progress.

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

Between 1 and 3 selections

- [ ] Better monitoring and reporting
- [ ] Corrective or enforcement mechanisms
- [x] A better financing framework for energy efficiency
- [x] Better technical assistance
- [x] 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.

Future EU energy efficiency policy should adopt a whole-energy-system approach that considers efficiency improvements across both supply and end-use in a complementary and integrated way. Significant efficiency gains can be achieved not only through reduced consumption on the demand side, but also through optimised energy generation, conversion, and distribution, including reduced losses and better system integration.

This systemic perspective is particularly important when considering the water–energy nexus, as energy generation and use are closely interlinked with water consumption and water systems (for example in cooling processes, wastewater treatment, and desalination). Improving efficiency across the energy system therefore also contributes to reducing water use and enhancing water security, while more efficient water management can in turn lower energy demand.

By recognising the interdependence between system elements, policy can unlock the full spectrum of cost-effective efficiency opportunities across the energy system. This approach enhances overall system performance, reduces total energy costs, lowers emissions more efficiently, and strengthens energy security. It also ensures that improvements in one part of the system are reinforced by, rather than isolated from, efficiencies elsewhere.

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	○	○	○	○	○	○

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

- [x] Buildings
- [ ] Heating and cooling
- [x] Industry
- [x] 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
- [x] Energy consumption reduction targets for the public sector
- [ ] Member States' assistance to regional and local authorities
- [x] The obligation to renovate 3% of public buildings every year
- [ ] Energy savings in public buildings
- [x] 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.

While it is still too early to provide a robust assessment of the effectiveness of Article 11, given that the relevant obligations only become fully applicable in October 2026 and October 2027, there is already a strong case for reinforcing the implementation framework for energy management systems (EMS) and energy audits.

Evidence suggests that firms adopting structured energy efficiency approaches tend to outperform those that do not. As highlighted in a recent European Investment Bank report, “Unlocking energy efficiency investments by small firms and mid-caps”, companies that systematically implement energy efficiency measures benefit from improved operational performance and stronger competitiveness. EMS and energy audits play a key role in this process by helping firms, particularly energy-intensive ones, identify and better understand their energy savings potential. They also provide concrete, technology-specific recommendations that can be translated into investment decisions, ultimately leading to reduced energy costs and enhanced competitiveness both within the EU and globally.

To further strengthen this impact, EU policy could consider requiring the implementation of recommended measures with short payback periods, while ensuring that appropriate financial and technical support is available to companies to facilitate delivery. This would help bridge the gap between identification and implementation, and maximise the real-world impact of audits and EMS in driving cost-effective energy efficiency improvements.
A proper harmonized integration between EMS and BMS, required in buildings by EPBD, could further enhance the opportunity of saving through data to drive energy optimisation.

The EED should also consider lowering application thresholds. The thresholds currently set out under Article 11 of the EED for mandatory energy audits and EMS (companies consuming over 85 TJ must implement an Energy Management System; those under 10 TJ must conduct an energy audit every four years unless an EMS is already in place) warrant downward revision, particularly given the declining cost and growing accessibility of digital energy monitoring technologies. Wider coverage is both operationally feasible and necessary to fully apply the energy efficiency first principle across the economy.

Access to EU funding and incentive schemes should be conditional on compliance with energy audit and EMS requirements equivalent to those under the EED. Aligning eligibility criteria across key financing instruments - including EU Cohesion funds, the Recovery and Resilience Facility, and InvestEU - would create a coherent incentive structure and avoid a two-tier system in which publicly supported projects are held to a lower standard than privately financed ones.

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

- ☑ 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
- ☑ 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
- ☐ 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.

Heat recovery should become mandatory because reusing excess heat is much cheaper than buying or producing energy for heating and it will lower overall energy demand and costs for consumers. Adding to this, excess heat can replace significant amounts of electricity or gas otherwise needed to produce heat. In total, there is about 2,860 TWh/year of waste heat accessible in the EU. This corresponds almost to the EU's total energy demand for heat and hot water in residential and service sector buildings, which is approximately 3,180 TWh per year in the EU27+UK.

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

- [x] Fiscal incentives and penalties through taxation
- [x] Financing through service agreements/ operational expenditures (energy efficiency as a service and other innovative energy services, leasing, etc.)
- [x] Financing by means of credit agreements, such as energy efficiency lending products (secured and unsecured)
- [x] Energy service company-based and third-party financing (off balance sheet)
- [x] 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?

It carries significant risks to reopen the Energy Efficiency Directive (EED) with the objective of redistributing some provisions across other regulations or directives. Such an exercise could inadvertently increase legal and administrative complexity at both EU and national level, potentially slowing down implementation rather than improving coherence.

In particular, fragmenting EED provisions into multiple legislative instruments could weaken the clarity and stability of the EU energy efficiency framework. This comes at a time when a strong and predictable regulatory signal is essential to support investment decisions, especially as Europe continues to respond to the energy crisis and a broader context of geopolitical uncertainty and energy market volatility.

Rather than enhancing effectiveness, premature or partial relocation of provisions could dilute responsibility, create overlaps or gaps in implementation, and reduce policy visibility for economic actors. This risks undermining the investment certainty that the EED has helped to establish in recent years.

For these reasons, maintaining the EED as a central, coherent framework appears preferable, ensuring consistency in ambition, governance, and monitoring, while allowing complementary legislation (such as the Energy Performance of Buildings Directive, the public procurement directive , or financing frameworks) to support and interact with it in a coordinated rather than fragmented way.

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

At this time, it is difficult to assess whether the administrative costs of implementing certain provisions of the EED exceeded their benefits, given the short implementation period, the medium to long-term return on investments of energy efficiency solutions and the complexity of factor the broader societal benefits of energy efficiency in.

* 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?

White certificate schemes (also referred to as energy saving certificates or tradeable energy efficiency obligations) are a powerful instrument for mobilising private investment in energy efficiency. However, recent evidence from France, where the Cour des Comptes found systematic savings overestimation of at least 30% and widespread anomalies in on-site controls, and from Italy, where a €10.4 million fraud involving fictitious white certificates was uncovered in 2025, illustrates that without robust verification and anti-fraud mechanisms, white certificate schemes risk generating accounting gains rather than real energy savings. The post-2030 framework should condition their continued use on robust governance, additionality, and fraud control.

* 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?

We believe that the reporting requirements under the Energy Efficiency Directive (EED) should be better aligned with those under the Governance Regulation, which is itself expected to be revised. In particular, the accountability mechanisms introduced by the 2023 EED, notably the “ambition gap mechanism” and the “gap-filling mechanism” under Articles 4(5) and 4(6), should be integrated into the Governance Regulation in order to ensure greater consistency and coherence across the EU energy and climate framework. These mechanisms should also be preserved in the post-2030 framework, given their importance in supporting the delivery of EU energy efficiency objectives. Following the same approach, also reporting obligation under the EPBD and the NBRP should be aligned with reporting under the Governance Regulation.

At the same time, efforts to streamline monitoring and reporting obligations should build on the opportunities offered by enhanced digitalisation and AI-supported tools for data collection, processing, and exchange. Improved digital data flows can reduce administrative burdens, increase the quality and comparability of reporting, and facilitate more timely monitoring of implementation progress.

Such an approach would make it possible to maintain robust reporting obligations under both the EED and the Governance Regulation, which remain essential for enforcement, transparency, and stakeholder awareness regarding national measures, while also ensuring that the European Commission is able to effectively identify, assess, and address potential implementation gaps.

Final questions

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

1000 character(s) maximum

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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