

# ENERGY EFFICIENCY DIRECTIVE

## Key points for consumers

## Why it matters to consumers

Consumers are willing to improve the comfort of their homes and to save energy, which is good for their wallets and for the planet. However, for consumers to undertake energy efficiency measures, the transposition and implementation of the Energy Efficiency Directive needs to be thorough. Moreover, it needs to be complemented by beneficial national legislative evolutions BEUC advocated for at the European level that would be instrumental for consumers' protection.

This two-pagers summarises BEUC's main stances on the recast of the Energy Efficiency Directive. Many of BEUC's recommendations were taken on board, although some key ones were discarded and should be endorsed at the national level during the transposition period.

The table assesses the articles and content with the following symbols, illustrating whether BEUC:



supports the new article as it is.



supports the article but there is room for improvement



rejects the article as weak and supports national advocacy.

### EED APPROVED CONTENT

### BEUC STANCE ON THE CONTENT



#### A COMMON DEFINITION OF "ENERGY POVERTY" AT THE EUROPEAN LEVEL:

will help defining the issues and design the relevant policies and programmes by the Member States, following an out-of-silos logic that intertwines energy and social matters (*Article 2 Definitions (52) and Articles 22 and 24 for further provisions*).



Supports the definition of energy poverty endorsing "affordable housing" as it addresses not only energy performance but also the unsustainable levels of rents in the private rented sector.



#### LOCAL HEATING AND COOLING PLANS

will help consumers to get the information needed to make their individual investment decisions (*Article 25, bridge with Renewable Energy Directive*).



BEUC suggests incentivising "engagement strategies" within the plans as defined in article 2 to get consumers on board and develop approaches inclusive of vulnerable and energy poor households.



#### MINIMUM SHARE OF ENERGY SAVINGS AMONG ENERGY POOR HOUSEHOLDS:

A share of the energy savings is to benefit lower income households and should integrate the National Energy and Climate Plans and the Energy Efficiency National Funds. (*Articles 8 and 9*).



BEUC supports the inclusion of energy poverty alleviation into the objectives of energy saving and recommends making it mandatory for Energy Efficiency Obligation Schemes (EEOS). However, the allocation of a share of the EEOS objectives towards multi-unit buildings and/or their units, on top of their eligibility.

## EED APPROVED CONTENT

## BEUC STANCE ON THE CONTENT



### CONSUMER RIGHTS & PROTECTIONS FOR HEATING & COOLING

Information on alternative solutions to disconnection should be provided to consumers of district heating at the latest a month before the planned disconnection, at no extra costs (*Article 21, paragraph 9*). Final customers shall be provided with an efficient out-of-court mechanism for the settlement of disputes concerning this Directive (*Article 22 paragraph 8*)



BEUC supports the mandatory information on disconnections and the provision of the contract to the final customers.



BEUC supports the implementation of Alternative Dispute Resolution (ADR) as out-of-court mechanism, including for district heating, a sector still under regulated.

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**ENERGY EFFICIENCY FIRST PRINCIPLE:** is defined, but only applicable to investments higher than €100m (*Article 3*).



BEUC supports the introduction of the Energy Efficiency 1<sup>st</sup> Principle in the Directive, but observes that it is not strong enough to induce a paradigm shift in its application



### INDEPENDENT ADVICE VIA ONE-STOP SHOPS:

One-stop-shops (OSS) are thoroughly defined and will help consumers find guidance and support to undertake retrofit works. OSS will address energy poverty, the worst performing buildings and multi-unit buildings. Local authorities are to be involved where relevant and third-party financing made possible (*Article 22*).



BEUC welcomes that one-stop-shops (OSS) are promoted. However, to be fully beneficial, they should not only provide information to consumers but also offer operational support to people in their retrofit projects. For instance, OSS should facilitate contacts between consumers, accredited installers and their clusters, and banks throughout the retrofit project.



### INNOVATIVE FINANCIAL INSTRUMENTS AND DE-RISKING TOOLS:

Besides subsidies, innovative financial instruments (such as on-bill schemes) can help consumers undertake retrofit projects by enabling them to cover the high up-front costs insulation works often require. (*Articles 24 and 30*).



BEUC welcomes the reference to creative financial instruments. However, to maximise the impact of such instruments, several regulatory barriers need to be addressed and consumer protection strengthened. For instance, in tenancy laws, third-party financing is not allowed, and all up-front costs need to be covered by landlords.



**TECHNICAL ASSISTANCE** will ensure the quality and effectiveness of the residential retrofit policies and programmes and empower local authorities with the necessary skills on complex topics (multi-units, energy poverty alleviation). (*Articles 22, 24 and 30*).



BEUC recommends that the European Commission ensures that the technical assistance provided to Member States and local authorities is inclusive and meets the needs of consumers on low incomes. Regulatory framework reforms need to facilitate multi-unit housing retrofit projects.