

## Response to consultation

# The consumer policy take on the update of the Energy Union and Climate Action Governance Regulation



## Why it matters to consumers

EU energy and climate legislation sets the pace for decarbonising our economy. Some of these laws contain EU targets. The governance law helps Member States deliver these targets and defines reporting obligations. This should result in consumers benefitting from lower bills, a better quality of life, and a future for our planet. Practically this means more renewable energy, less imports of volatile fossil fuels, continuous efforts to use energy more efficiently, the availability of sustainable products that can be recognised via clear labels, a variety of green mobility choices, and a future where healthy and sustainable foods are accessible and affordable.

The European Consumer Organisation (BEUC) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with [our members](#), we inform EU policies to improve people's lives in a sustainable and fair economy and society.

**Published** | 19 March 2026

**Contact** | [energy@beuc.eu](mailto:energy@beuc.eu)

**Reference** | BEUC-X-2026-023

**Document coordinator** | Laurens Rutten

**Credit** | Photo by Enis Aksoy from iStockPhoto

### **BEUC, The European Consumer Organisation**

Bureau Européen des Unions de Consommateurs AISBL | Der Europäische Verbraucherverband

Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • [www.beuc.eu](http://www.beuc.eu)

EC register for interest representatives: identification number 9505781573-45



*Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or EISMEA. Neither the European Union nor the granting authority can be held responsible for them.*

The Governance Regulation on the Energy Union and Climate Action<sup>1</sup> (hereafter, ‘Governance Regulation’) regulates the delivery of EU-wide policy goals at the national level. A revision of this legislation is an opportunity for the EU to assert its commitment to energy security; a more affordable energy system based on renewables, electrified heating and transport; energy-efficient products; and – the, so far, untapped potential of – more sustainable food consumption patterns.

In this document, the European Consumer Organisation (BEUC) calls on the European Commission **not to reinvent the wheel** and use this review<sup>2</sup> to **plan the delivery of new renewable energy and energy efficiency targets after 2030**.

Given the reporting obligations of this Regulation, we also urge the Commission to clarify how it will deliver **new energy policy developments and sectoral laws** in buildings, environment, food, and transport<sup>3</sup>. **Clearer accountability and enforcement systems** should lead to effective delivery of these laws and improve people’s daily lives.

We see this in a context where BEUC supports important EU energy and climate legislation adopted in the last decade. But we also regret the decision to roll back some of this legislation, particularly CO2 emissions standards for cars. Consumers, much like the businesses they depend on, need a direction of travel for a transition that promises to benefit their wallets, health, and our planet. This requires stable regulation that exists beyond the paper, and across EU Member States.

Below we detail why it is crucial that the household consumer perspective is reflected in this update. Consumer policy provides levers that EU, national and local policymakers can use to make the sustainable choice the easy choice. In turn, this will allow the EU to create a better energy system<sup>4</sup>, deliver the Energy Union, reach agreed targets, and tackle distributional impacts.

## 1. Consumer policy levers for the energy and climate transition

If well-managed, households stand to benefit from a transition to an economy based on decarbonised electricity, cooling, heating, and transport. These measures need to be seen together with broader actions – in areas such as product design, food systems, or sustainable finance – that improve people’s quality of life.

---

<sup>1</sup> Regulation (EU) 2018/1999.

<sup>2</sup> Which has to be seen in tandem with other EU laws on, for example, renewable energy and energy efficiency.

<sup>3</sup> Examples of such measures are the actions coming out of the EU’s 2025 Affordable Energy Action Plan, or the envisioned electrification of corporate car fleets.

<sup>4</sup> In 2015, we expressed support for a transparent governance system based on a robust monitoring process to benefit consumers and deliver a sustainable energy system.

For this to happen, it is important that certain measures are taken. These include<sup>5</sup>:

- **Improve energy efficiency and use:** Our input to the EU’s Grids Package and Electrification Action Plan highlights measures such as: a) helping people adopt clean tech, navigate complex energy markets, and finding the best (flexible or otherwise) tariff; b) better insulating homes; c) looking at the specific needs of tenants and co-owners; c) promoting sustainable products via Ecodesign, the energy label, an improved car label; and d) ensuring households are not disproportionately burdened with the cost of modernising Europe’s electricity grid.
- **Accelerate the shift to renewables and electrify the economy:** This includes sectoral measures such as the electrification of corporate car fleets, stringent CO<sub>2</sub> emission reduction standards for cars, and an improved EV charging experience. Europe’s dependence on fossil fuel imports, a huge contributor to energy price spikes, must be reduced.
- **Change the way we heat and cool our homes:** The EU and its Member States should commit to a clear strategy to speed up the installation of heat pumps, to expand renewable-based district heating, and to accelerate housing renovations.
- **Tackle distributional impacts:** Our input to the EU Citizens Energy Package underlines measures to: a) help people who struggle to pay their bills; b) prepare for a phase-out of gas networks; c) promote participatory models such as energy communities and sharing; and d) ensure that consumers in specific situations – be it younger generations, people with particular health needs, the lower middle-income bracket, etc. – are considered and included in supportive measures.

Beyond energy and energy-adjacent (buildings, mobility, product) policies, food systems are also an integral part of climate action. In this context, we urge the EU to:

- **Make healthier and sustainable diets the easy choice for consumers:** Plant-rich diets high in vegetables, fruits, legumes, nuts and whole-grains have a positive impact on health and climate. If Europe wants to achieve its health, sustainability and climate targets, the healthy and sustainable (incl. climate-friendly) food choice must become the most available, affordable, promoted, and desirable option for consumers. In this regard, we echo the March 2026 recommendation by the European Scientific Advisory Board on Climate Change calling for “*an overarching [EU] food policy framework that promotes healthy, climate-friendly diets and reduces food waste across the value chain*”.

---

<sup>5</sup> This is not an exhaustive list. A broader set of energy and energy-adjacent policy recommendations can be found in this paper.

## 2. Mixed assessment of the Governance Regulation's implementation

A 2024 European Commission report considers the Regulation's “*governance mechanism ... to be an agile framework to respond to*” major economic and political developments of recent years. We note the report mentioning that the law has spurred more national policies and measures via the National Energy and Climate Plans.

Based on its consumer policy experience, BEUC often flags that enforcement (of legislation) is the EU's Achilles heel. A reading of reviews suggests this also applies to the national delivery of the existing Governance Regulation.

Given that this law guides the delivery of EU ambition at the national level, BEUC is concerned about many of the highlighted challenges. These include: differences in the scope and quality of National Energy and Climate Plans; uneven political commitment across countries; the lack of “*sufficiently early and inclusive public consultations*”; and a “*compliance mechanism ... largely based on recommendations and other non-binding mechanisms*”. Other shortcomings underlined by stakeholders are also a cause of worry, such as a lack of ambition<sup>6</sup> and timelines for national plans not being met.

These challenges can undermine the EU's ability to meet its collective energy and climate ambitions. A Governance Regulation revision must beef up implementation and enforcement so that energy and climate laws materialise in the real world. For an effective delivery, policymakers should also consider the calls for more coherence between this Regulation and environment, buildings, or transport legislation.

## 3. Consumer policy recommendations for energy and climate governance

In its consultation, the European Commission highlights five policy options. **BEUC prefers a choice that does not reinvent the wheel and keeps the existing structure of EU binding targets for renewable energy and energy efficiency. Clearer accountability and enforcement systems need to be added to this structure so that it delivers in people's daily lives<sup>7</sup>.**

---

<sup>6</sup> “Only seven member states raised their ambition in line or above the formula for renewable energy, while 20 member states submitted insufficient targets for 2030 (Fig. 2). In the domain of energy efficiency, a sufficient level of ambition in both primary energy consumption and final energy consumption is reached by four member states. Another four member states only reach a sufficient level in either primary or final energy consumption.” (Bruch, N., Knodt, M., and Ringel M., 2024, p.5)

<sup>7</sup> This entails a version of Option 5 (based on Option 1) for the post-2030 targets, plus stronger enforcement.

## BEUC RECOMMENDATIONS

**1** **Continue the direction of travel by setting ambitious renewable energy and energy efficiency targets post-2030:** The current legislative text focuses on delivering targets in 2030. Much like businesses, households need to know where the transition is headed. We also urge policymakers to avoid regrettable actions such as diluting the ambition of recently adopted automotive CO<sub>2</sub> legislation.

**2** **Integrate new legislative developments and improve coherence with other policy measures:** Examples are the 2024 electricity market design reform; the Emissions Trading System 2.0 and its Social Climate Fund; any measures that follow the EU's Affordable Energy Action Plan; and buildings, transport, product, and food sector laws.

- This includes new household-relevant concepts that have appeared in recent EU energy legislation, such as energy sharing.
- Where energy or other climate legislation sets sectoral targets, these should be considered in delivering the Governance Regulation.
- Given that the reporting obligations also touch upon for instance agriculture-related measures<sup>8</sup>, the Regulation should specify how pieces of legislation beyond energy fit into its scope.

**3** **Improve the Regulation's enforcement:** Better enforcement of the Regulation can spur the overall delivery of EU energy and climate targets.

**4** **Improve public consultation at the national level:** This should happen ahead of the development of long-term strategies and National Energy and Climate Plans. The former could affect the ambition of the latter.

In addition, we also ask the European Commission **to clarify two things**. Firstly, have 'energy poverty' measures (Articles 3 and 24) been taken up, and will a revision consider the Citizens Energy Package? Secondly, do the public consultation requirements for National Energy and Climate Plans also apply to the development of long-term strategies (Articles 10 and 15) foreseen in 2029?

---

<sup>8</sup> See Annex II, part 2.