

Response to consultation

The consumer policy take on EU energy efficiency legislation in the 2030s

Why it matters to consumers

Improving energy efficiency is essential for consumers to lower their energy bills. Progress has been made, but it remains slow, with too few homes renovated and cleaner heating solutions still out of reach for many consumers. What is needed is clear, tailor-made guidance, adequate financial help, and stronger protection and support, in particular for the most vulnerable households.

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 | 16 April 2026

Contact | energy@beuc.eu

Reference | BEUC-X-2026-033

Document coordinator | Louise Rohmer and Sophia Pena Pereira

Credit | Photo by artursfoto 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

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.

BEUC welcomes the possibility to comment on this [call for evidence](#) for an energy efficiency framework for the decade ahead¹. A prerequisite for achieving EU's decarbonisation goals is that the EU maintains its energy and climate policies agreed in recent decades. Any backtracking would cause confusion among consumers about their – often long-term – decisions and similarly affect businesses that are essential in providing consumer products and services for the transition.

Energy efficiency reduces consumers' energy bills, makes homes healthier and more comfortable, and protects the planet. The Energy Efficiency Directive (EED) has played an important role in this regard - promoting efficiency measures, addressing energy poverty, and protecting consumers in the energy markets. However, progress remains slow, as fragmented and unstable policies, such as the lack of consistent financial support and trustworthy advice, keep energy efficiency measures out of reach for many consumers. Among other factors, this has resulted in a [low renovation rate](#) of about 1% per year for EU's building stock (2016-2020) and a [slow roll-out of renewable heating](#).

Updating this legislation for the next decade is an opportunity for the EU to better integrate energy efficiency into energy markets, raise the level of ambition of energy efficiency targets, and remove practical barriers to energy efficiency improvements. This is how consumers can benefit from long-term energy and cost savings.

Based on the work of our members, national consumer organisations, we suggest various measures and improvements to:

- Ensure energy efficiency improvements are more available, affordable and hassle-free to implement for consumers.
- Enable people to be informed about the most efficient housing, products, and services through clear and trustworthy advice and information.
- Provide tailored financial support to help consumers undertake energy efficiency measures.
- Help consumers in vulnerable situations as well as tenants to benefit from energy efficiency measures through dedicated support.
- Improve consumer rights and protections in the heating and cooling sector.
- Ensure alignment of local heating and cooling plans with gas network development plans and provide support to consumers in replacing their heating system.

Below, BEUC provides consumer-facing elements to energy efficiency in the building and heating and cooling sectors.

¹ Please note the review of the EED must be seen together with updates to EU laws on renewable energy, and the [Energy Union and Climate Action Governance Regulation](#).

Making energy efficiency the obvious choice for consumers

1. Ensure reliable information and advice

Relevant to Articles 3, 21, 22

The revision of the EED should be an opportunity to further strengthen rules and measures for information provision and awareness raising related to housing renovation and the uptake of sustainable heating and cooling solutions.

Consumers face a wide range of behavioural barriers when undergoing renovation works, including limited information, mistrust and the perceived hassle of navigating renovation measures. All of this makes targeted support essential for consumers engagement in the energy transition. While this need is particularly acute for vulnerable consumers, even those with sufficient financial resources to renovate their homes may also perceive the process as too complex, be constrained by practical barriers, or simply not know where to turn or whom to trust.

These challenges have been exacerbated in recent years by the instability of subsidy schemes, which frequently change and lack clarity for households, thereby delaying or discouraging action.

In this context, consumers primarily need stability and clarity. One-stop shops (OSS) are a particularly effective tool in this regard. However, they are currently not defined in either the Energy Performance of Buildings Directive (EPBD) or the EED, but only in a Commission [recommendation](#) (2024/2481). It would therefore be appropriate to introduce an explicit legal definition in the revised EED, in order to ensure a common understanding of their role, guarantee a minimum level of service across Member State, and support their large-scale deployment. Such legal recognition would also help secure the public investment needed for their deployment.

Given the scale of the challenge in supporting consumers through the energy transition, it is essential to develop mandatory physical OSS, targeting vulnerable consumers but remaining open to all consumers. These OSS should be capable of guiding households throughout the entire process. These structures should also act as true facilitators, providing independent advice, with the necessary administrative capacity, skilled staff, and connect consumers with trusted contractors to ensure the quality of renovation works. Finally, it is crucial to ensure stable public funding for the creation and operation of OSS to strengthen consumer trust.

2. Breaking cost barriers for consumers

Relevant to Article 30

Upfront costs are and will remain one of the main barriers to the purchase of sustainable heating appliances and the improvement of buildings' energy efficiency. To address this issue, financial support must effectively reach homeowners and tenants, with a particular focus on lower-income households. Incentives covering up to 100% of the cost of energy efficiency measures should be made available to low-income households.

The Energy Efficiency Directive defines how both public and private capital should be mobilised. Article 30 notably requires Member States to adopt measures aimed at overcoming the major barrier of upfront costs, through the promotion of dedicated financial products such as green mortgages, on-bill financing schemes or loan guarantee instruments.

However, there is a concerning gap between the stated ambition and the practical effectiveness of the proposed tools. While the solutions identified in the directive are relevant, national consumer organisations consistently report that high upfront costs are still the main barrier for households to invest in energy efficiency improvements. Findings from BEUC's ongoing [EU project CLEAR-HP](#) show that financial support schemes for heat pump installations are often insufficient, unpredictable, and fail to provide tailored support for people in vulnerable situations. In addition, complex subsidy and loan application procedures and the need to pay costs upfront before receiving subsidies prevent many consumers from benefiting from available support schemes. [BEUC's checklist on financial instruments](#) provide recommendations on how support schemes can be better design to meet consumer needs. This includes, for instance, that low-income households and vulnerable consumers should have priority access to subsidies, while wealthier consumers should be able to benefit from attractive green loans. For such loans, a creditworthiness assessment is an important protection mechanism against over-indebtedness and should always be applied. Since energy efficiency projects are expected to reduce energy consumption, the reduction in energy costs should also be taken into account in the creditworthiness assessment.

3. Tackling energy poverty

Relevant to Articles 8+9, 24

Energy efficiency of buildings is a big factor in energy poverty besides income and expenditure on energy. The EED (Article 24) requires Member States to prioritise measures for people affected by energy poverty, vulnerable consumers, and low-income households. Improving the identification of these consumers is essential to ensure targeted and effective support. The Commission has recently announced an update on its [recommendations](#) on energy poverty, which should inform and strengthen the energy poverty-related provisions in EED.

Furthermore, Article 8 of the Directive requires Member States to follow an increasingly ambitious energy saving trajectory. This article also introduces a major social step: the obligation for each country to establish and achieve a mandatory share of energy savings specifically targeting households in energy poverty, vulnerable consumers, and tenants in social housing. For BEUC, this “social share” is essential, as it ensures that the energy transition does not benefit only the wealthiest households.

To achieve these objectives, Member States have two main tools: energy efficiency obligation schemes (EEOS) imposed on energy suppliers under Article 9, and alternative policy measures under Article 10 (such as taxes or public funds).

However, the EEOS provision grants flexibility to Member States regarding the means of achieving these social objectives to address energy poverty. BEUC therefore recommends including a systematic and binding inclusion of energy poverty alleviation in EEOS objectives. Without such a requirement, suppliers aim for short-term, ‘low-hanging-fruit’- solutions, targeting wealthier and easier-to-reach households.

4. Protecting consumers in the district heating sector

Relevant to Articles 18, 26

District heating is an effective way to decarbonise people’s homes and many Member States and municipalities plan new networks to replace gas networks in urban areas. To be beneficial for consumers, district heating networks should bring energy efficiency savings, gradually increase the share of renewable energy in existing systems, and use exclusively renewable energy in new ones.

Despite the improvements made in the last revision of the Energy Efficiency Directive regarding billing and contractual rights, there is still a need for stronger consumer

protections to address the specific circumstances of district heating operating under a natural monopoly. This includes greater transparency in price structure, stronger price control, and the right to disconnect from the network without paying excessive fees. To achieve this, National Regulatory Authorities should have equivalent competences for district heating as already in place for the electricity sector that allows for monitoring of price developments and the quality of services. In Austria and Denmark, BEUC members report very high and widely varying prices in the district heating sector. And even in Denmark, where district heating is well established and regulated, prices vary widely from about €729 to €5,923 annually for a standard 130 m² house.

5. Removing barriers for tenants

Relevant to Article 22 (9)

Tenants do not have the rights, the financial means nor incentive to make long-term changes to a property they do not own. The landlord, meanwhile, has little incentive to invest in energy efficiency measures since the energy bills are paid by the tenant. Therefore, landlords should be incentivised to improve the energy efficiency of their properties, while clear rules must ensure that the costs are fairly divided between landlords and tenants.

BEUC is currently investigating best practices in or outside Europe that could inspire EU policies to help tenants and co-owners overcome obstacles and obtain approval for energy-efficient technologies and renovations.

6. Aligning local heating and cooling plans with gas network development plans

Relevant to Article 25

Consumers need clarity and timely information about the future of their heating system to have sufficient time to plan for a replacement. The European Commission should therefore enforce the local heating and cooling plans required under EED and ensure compliance with the gas network development plans as legally required under the Gas Directive.

To ensure that consumers are adequately informed and supported throughout the switch to a new heating system, the European Commission should support the development and implementation of these plans by providing technical and financial assistance to Member States and local authorities. More concretely, the plans must specify when gas

grids are to be decommissioned, and which alternative heating solutions are or will be available. This ensures long-term visibility and can unlock consumer investments in energy efficiency upgrades. BEUC will issue a report on consumer protection during the gas phase-out in the near future.