

Response to consultation

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

Why it matters to consumers

Continuing Europe's shift to renewable energy is indispensable to better protect households against bill shocks caused by fossil fuels. This also protects the planet and improves people's quality of life. Advancing renewable energy includes building wind turbines and installing solar panels. It is also about decarbonising heating and cooling; making the buying and charging process of electric cars hassle-free; and sharing excess solar energy with one's local community.

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.

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Households directly stand to benefit from the EU's transition to renewable energy. This has become glaringly apparent during fossil fuel price shocks in 2022 and 2026. By contrast, renewables are the most cost-effective way to generate electricity and are less susceptible to geopolitical unrest.

The Renewable Energy Directive¹ promotes the adoption of renewables. It does so via: a) a binding EU target; b) providing a framework for their integration in the electricity, transport, cooling, and heating sectors; and c) regulating broader consumer-relevant measures such as information, self-consumption, and installer certification schemes.

Updating this legislation for the 2030s is an opportunity for the EU to assert its commitment to energy affordability, security and a decarbonised economy.

Consumer policy provides levers for EU, national and local policymakers to deliver renewable energy ambition in practice, reach agreed targets, and tackle distributional impacts. From a consumer perspective the most important point to remember is that the sustainable choice must be the easy choice.

As the Renewable Energy Directive is updated for the 2030s, the European Consumer Organisation (BEUC) calls on EU policymakers to:

- **Further boost renewable energy² by setting new targets for after 2030.**
- **Not water down existing legislation or future regulatory ambition:** Consumers, much like businesses, 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 is delivered across EU Member States. BEUC has expressed its disappointment about the decision to backtrack on the decarbonisation of the automotive sector.
- **Electrify the economy:** Europe's dependence on fossil fuel imports, a huge contributor to energy price spikes, must be reduced. Sectoral measures such as the electrification of corporate car fleets, speeding up the decarbonisation of home heating and cooling, and improving the EV charging experience – while providing alternatives to car use – are essential.
- **Enable people to act:** the decarbonisation of our energy system, including through renewables, relies on consumer engagement. This is why BEUC strongly supports³ measures such as: a) helping people adopt clean tech such as heat pumps, navigate complex energy markets via simplified energy bills, and finding the best (flexible or otherwise) tariff; b) looking at the specific needs of tenants and

¹ Directive (EU) 2018/2001.

² Which has to be seen in tandem with other EU laws on, for example, energy efficiency; energy union / climate action governance; and in the electromobility sector.

³ See BEUC's input regarding the EU's Grids Package and Electrification Action Plan.

co-owners; and c) ensuring households are not disproportionately burdened with the cost of modernising Europe’s electricity grid.

- **Check whether existing provisions should be aligned with new legislative developments:** Certain topics in this Directive overlap with legislative changes to electricity market design legislation⁴. This includes the concept of energy sharing and the possibility for consumers to have multiple electricity contracts.
- **Clarify how companies can communicate their green tariff without misleading consumers,** in line with relevant legislation such as the Unfair Commercial Practices Directive and the Directive on empowering consumers for the green transition.
- **Turn legislation from paper into reality, and monitor consumer adoption of innovative renewables schemes:** EU-wide targets and ambitions must be delivered on the ground. This requires enforcement, market monitoring, and cross-sectoral cooperation between energy and other regulators. For instance, in how far have the existing Directive’s provisions regarding installer certification or consumer information become a reality?

Below, **BEUC provides details and evidence on how this can be done**⁵.

Consumer policy levers to boost renewable energy

Take away barriers to the installation of renewables

Relevant to Articles 15a; 18; 20a; and Annex IV.

Consumer organisations’ work shows people continue to face barriers to the adoption of renewables. For example, tenants still struggle to get approval for their energy transition measures due to so-called ‘split incentives’. BEUC is running a project to suggest ways that enable both tenants – as well as co-owners in flat buildings – to get approval for energy transition measures. We expect to publish findings in autumn 2026.

BEUC welcomes the European Commission’s work on innovative forms of solar energy – particularly the proposal to remove barriers to the adoption of plug-in solar panels in the context of the ‘Grids Package’. Meanwhile, BEUC member Which? has been providing information to consumers about these solar panels as the UK government considers

⁴ Directive (EU) 2024/1711.

⁵ Please note this Directive must be seen together with updates to EU laws on energy efficiency, and [energy union / climate action governance](#) (whether and how targets are actually delivered in Member States). The overall consumer policy view on the energy sector can be found in the 2026 BEUC brochure “*How to make energy markets work for consumers and deliver affordable bills*”. The speed and effectiveness of the energy transition depends on the interplay between these laws and the broader actions advocated by BEUC in this paper.

legalising them. Which? cites figures that these panels are expected to save British households £70 to £110 a year.

Reduce high taxes and levies on electricity

Electricity taxes/levies represent on average 25% of households' bills. They also contribute to making electricity more expensive than gas, making otherwise cost-effective solutions such as heat pumps more expensive to run. Households need incentives to electrify their heating and cooling and transport, and use the cheap energy generated when sun or wind is abundant.

We therefore support the European Commission plan to cut these taxes, charges and levies. All non-energy related taxes and levies should be removed from electricity bills.

Promote flexibility ('demand response') in all forms and shapes

Relevant to Articles 3; 15a; 15b; 20a.

In an energy system based on renewables, consumers must be incentivised to shift their energy to moments when prices are low. This 'flexibility' can provide savings and also contribute to alleviate grid congestion. BEUC recognises flexibility might not be the most interesting option for everyone, as it depends on many factors. This includes energy consumption, household composition, the availability of attractive contracts, etc. All consumers benefit from downward pressure on electricity grid costs if some consumers help match electricity supply and demand.

In this context:

- Flexibility offers must cater to people's specific needs, different consumer experiences, or risk appetites. **Suppliers should therefore design their flexibility offers with different consumers in mind.** Best practices include a) informing consumers if an offer is adequate for their specific needs; b) minimising bill shocks – e.g. by price corridors; and c) transparent terms and conditions.
- The EU's 2024 Electricity Market Design Directive (Article 4) opens **the possibility for people to have multiple electricity contracts.** BEUC expects this to be of interest for electric car or heat pump owners. They could choose a flexible tariff for these clean tech solutions while having a less flexible contract for the rest of their consumption. Market monitoring is needed to gauge real-world impacts. The Commission could also investigate the alignment between this Directive and the new electricity market design.

Removing barriers to self-consumption and collective or participatory energy schemes

Relevant to Articles 15a, 18, 21, 22.

Integrating renewables into the energy system requires promoting the use of electricity where it is generated. This includes participatory solutions such as collective self-consumption, energy communities and energy sharing.

As BEUC's Spanish member CECU pointed out after a comprehensive analysis, **collective self-consumption schemes face major regulatory, technical, and social barriers**. CECU provides many suggested improvements including the need to a) develop role of a self-consumption manager; b) create national protocols for all stakeholders involved in the creation of these scheme; and c) set minimum grid access quotas.

Energy sharing was legally introduced by the 2024 EU electricity market reform. It can maximise the value of solar panels and make renewable energy available to people who cannot afford or install solar panels. As the concept is relatively new, and overlaps with other related concepts, regulators should monitor elements such as administrative arrangements, the number of schemes, system size, and whether schemes follow essential consumer rights. We recommend the European Commission reviews the alignment of this Directive with Article 15a of the Electricity Market Design Directive.

Self-consumption by way of home batteries (storage) is another option. However, as flagged by BEUC's Dutch member Consumentenbond, consumers usually do not yet earn back the purchase costs within the lifespan (average of 15 years) of a home battery. Before purchasing a home battery, consumers are therefore advised to take into account many factors – their total consumption, whether they have solar panels or an EV, whether the battery can dynamically adapt to weather and household patterns, etc. In addition, it is crucial that marketing, as well as terms and conditions of purchase are transparent. Consumentenbond already flags consumer complaints about misleading sales practices. Neighbourhood-wide batteries or virtual batteries are other solutions that consumers might consider.

Trustworthy installations of clean tech

Relevant to Articles 18 and Annex IV.

In recent projects, such as a Clear-X or Clear-HP, BEUC and its members identified that consumers face significant difficulties when shifting to renewable energy, heat pumps or undergo building renovation. One of the key challenges is the lack of reliable, impartial advice as well trustworthy installers. Another is the feeling of being overwhelmed by the abundance of information and advertisement.

Another BEUC project (What's it like to live with a heat pump?) collected testimonials from existing heat pump owners in Spain, France and the Netherlands. While people generally appreciated the installation process and the installers' knowledge, BEUC expressed concern about the specific advice installers gave regarding the energy performance of their clients' homes. This is, however, crucial as a certain amount of

insulation contributes to better energy efficiency, which means a better functioning heat pump and lower bills for the consumer.

This is why to advance renewable energy solutions, BEUC advocates for the availability of lists of certified installers at the national level. To simplify the consumer journey in this process, BEUC also called on Member States to establish one-stop shops. In this regard, we urge the European Commission to investigate in how far the provisions of the existing Directive's Article 18 and Annex IV regarding certification of installers – and broader availability of support measures to consumers – are a reality across Member States.

Promoting fossil-free transport solutions

Relevant to Articles 15a, 18, 20a, 25, Annex IV.

Fossil-fuelled mobility is at the centre of attention due to the currently high and volatile prices of oil. This situation highlights the need for consumers relying on individual mobility to have access to affordable and convenient alternatives. In this regard, electric mobility represents the greatest potential for consumers to reduce their mobility costs.

Therefore, the Renewable Energy Directive should further incentivise battery-electric vehicles, notably by favouring them in the target for renewable energy in transport. The Commission should extend the use of provisions favourable to renewable electricity set out in Articles 20a and 25 (crediting system for electric vehicle charging, multiplier effect for renewable electricity).

On the other hand, conventional biofuels and renewable fuels of non-biological origin (RFNBOs) must be strictly kept away from road transport. BEUC repeatedly highlighted the financial risks they pose to consumers.

Electric vehicle drivers also deserve to have access to quality services that further reduce their mobility costs. The swift deployment of smart and bidirectional charging will benefit consumers and the electricity grid. The implementation of current provisions should be further monitored, as too many consumers do not yet have access to smart and bidirectional services. Member States should enable electric vehicles to provide balancing and flexibility services to the grid, while vehicle manufacturers should be incentivised to equip their cars with vehicle-to-grid capabilities.

It must be complemented by further provisions in the Alternative Fuels Infrastructure Regulation (AFIR) to make smart and bidirectional charging widely available. The upcoming review of AFIR should also focus on making prices transparent and payment methods easier.

Finally, while the Renewable Energy Directive and Commission guidelines already address battery-related data sharing, electric vehicle drivers are likely to face constraints in their choices should in-vehicle data, functions and resources be kept unregulated to a larger extent. BEUC calls for a sectoral Regulation ensuring that consumers have access

to products and services (charging, apps, repair and maintenance) in a competitive aftermarket environment.

Guarantees of origin need to deliver additionality

Relevant to Article 19.

While the offer of green electricity has become very prevalent across the EU, companies not always communicate that the offer is based on Guarantees of Origin (GO) and what the use of GOs actually means.

This can be misleading and lead consumers to believe that the electricity produced and injected by the company in the grid (and their electric sockets) is actually green, when that is not the case. GOs mean that the company will buy certificates of energy produced from renewable electricity but it does not mean that the company will be necessarily producing such energy itself and injecting it in the grid.

The RED should clarify how companies can communicate their green tariff without misleading consumers, in line with consumer relevant legislation such as the Unfair Commercial Practices Directive and the Directive on empowering consumers for the green transition. Furthermore, the Commission should also assess whether the use of GOs for green electricity continues to be effective to increase the use of renewables.

Renewable heating and cooling

Relevant to Articles 20, 23, 24.

The decarbonisation of heating and cooling in buildings plays a central role in meeting renewable energy targets. Currently, 70% of heat demand in EU's households is still met by fossil fuels. The EU should speed up and further incentivise the uptake of proven and easily scalable clean heating and cooling technologies, expand renewable-based district heating, and accelerate housing renovations. Policymakers must create frameworks conditions that ensure a competitive and truly single market for heating and cooling technologies and services to help consumers benefit from lower prices, greater choice, and high-quality installations.

This must be complemented by policies that address practical challenges faced by consumers, such as the lack of financing options, or access to independent advice, as well as strong consumer protection to support consumers in moving away from fossil fuel-powered heating.