

The Consumer Voice in Europe

## REVISION OF ENERGY EFFICIENCY LEGISLATION

BEUC preliminary views on the European Commission proposals



**Contact:** Monika Štajnarová – [energy@beuc.eu](mailto:energy@beuc.eu)

**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.twitter.com/beuc](http://www.twitter.com/beuc) • [consumers@beuc.eu](mailto:consumers@beuc.eu) • [www.beuc.eu](http://www.beuc.eu)  
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BEUC, The European Consumer Organisation, welcomes the revision of energy efficiency legislation which extends the Energy Efficiency Directive beyond 2020 and aims to improve the buildings' energy performance. This should make energy efficiency the easy option for consumers through clear information, independent advice and tailored incentives.

The current revision of energy efficiency legislation should help consumers better control their energy bills and improve efficiency of people's homes to keep them warm and healthy and, at the same time, improve security of energy supply and push climate actions.

## **1. How to ensure energy efficiency policies deliver benefits to all consumers?**

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### **1.1. Set an ambitious energy efficiency target for 2030**

An ambitious 2030 energy efficiency target and policy framework that delivers savings to consumers must be an EU priority. It will lift millions of people out of energy poverty and make homes of all Europeans more comfortable.

In the recent European Commission's proposal amending Directive 2012/27/EU on energy efficiency, a 2030 binding energy efficiency target of 30% for the EU is proposed. However, having in mind the multiple benefits of energy efficiency to health, employment, energy poverty as well as its role in decreasing energy import dependency, BEUC believes the EU energy efficiency target for 2030 should be more ambitious. For instance, the study by the Coalition for energy savings, BEUC is a member of, shows that energy bill savings resulting from energy efficiency targets of up to 40% could exceed the costs of upfront investment.<sup>1</sup>

### **1.2. Continue energy savings schemes without loopholes**

BEUC supports the European Commission's proposal to extend energy savings obligation beyond 2020. However, we are concerned about continuing loopholes such as exemptions for transport in the calculation of energy saving obligations. Transport sector has an important energy savings potential and should not be excluded. This could benefit consumers in form of reduced fuel bills and main-streaming and cost reduction of clean transport solutions (along with potential local effects such as reduction of local air pollution).

### **1.3. Prioritise energy efficiency measures in energy poor households**

BEUC welcomes the European Commission's proposal to strengthen the social dimension of energy efficiency and prioritise under the energy efficiency obligation scheme measures in households affected by energy poverty. However, co-legislators should ensure the same applies for alternative policy measures Member States may put in place to fulfil their obligations to achieve the savings (set in Article 7.1).

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<sup>1</sup> Study by the Coalition for energy savings: Critical review of the European Commission assessment for the Clean Energy For All Europeans package. Towards a cost benefit analysis. <http://energycoalition.eu/sites/default/files/20170112%20Towards%20a%20CBA%20for%20EE%202030%20-%20for%20web.pdf>

#### **1.4. Ensure energy efficiency measures are cost-effective and the impact on consumers is monitored**

Energy efficiency measures must be cost-effective and properly monitored at a fair cost. Focus should be on measures targeting long-term savings which are relatively cost-effective, practical for many consumers and relatively certain to last for many years. Transparency and scrutiny of the impact of these schemes on energy savings and costs as well as a regular review of the impact that these schemes have on both the consumers' energy bills and energy consumption is needed.

#### **1.5. Ensure metering and billing for heating, cooling and hot water benefits consumers**

By introducing new articles in the Energy Efficiency Directive, the European Commission intends to clarify metering and billing for heating, cooling and hot water. BEUC supports proposals to improve consumption information and welcomes the Commission's effort to improve consumers' bills. However, due to different situations across Europe, the EU legislation should focus on the outcome for consumers, rather than specifying concrete technical solutions. For instance, there are concerns about the ability of consumers to respond to provided information and better control their bills as they often live in properties where they have a very limited possibilities to improve the energy efficiency of the building.

### **2. How to ensure consumers get better information about the building performance?**

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The European Commission's proposal updating the Energy Performance of Buildings Directive (EPBD) intends to strengthen the links between funding for building renovation and energy performance certificates (EPCs). From the consumer perspective, EPCs are an important tool but there are several loopholes which need to be addressed by co-legislators. EPCs should be up to date, used more proactively and their validity and accuracy needs to be improved to provide better information to consumers, allow them to compare and get suitable advice on how to improve their homes.

### **3. How to help consumers to easily adopt more sustainable lifestyles?**

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BEUC welcomes the release of the Ecodesign work plan 2016-2019 and of related Commission acts. Ecodesign brings about economic savings for consumers every year, as demonstrated by a study commissioned by ANEC and BEUC last year. Ecodesign also provides more information to consumers and helps improve the overall quality and durability of consumer products.

Therefore, BEUC welcomes that the work plan contains a clear political mandate to continue with the unfinished work, to revise existing product groups and to start work on new product groups. In addition, we strongly support provisions on durability and urge the Commission to look into resource efficiency more systematically. We note however that the list of new products to be covered under Ecodesign is unambitious. We advocate for more consumer products such as mobile/smart phones to be taken on board.

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