

INF RSE-EUROPE

International Network for Sustainable Energy

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INFORSE-Europe Comments on the Proposal by THE EUROPEAN PARLIAMENT AND OF THE COUNCIL For Amendment of the directive 2012/27/EU on Energy Efficiency (EED,COM(2016)761)

We support a binding energy efficiency target of at least 30% and we want the target to be increased to 40%, which is suggested by the European Parliament, and which is found to be the socio-economic optimal level.

We find that there should be national energy efficiency targets, in addition to the common EU targets.

We propose that the demand for 3% annual renovation of state-owned buildings is extended to other public buildings, including municipal buildings.

We recommend that a common EU definition is set for which enterprises that shall be covered by the obligatory energy audits. We also recommend a common EU guideline for what an energy audit must cover as a minimum.

We also support that the European Commission regularly measure progress in energy efficiency in the EU countries and if the increases in energy efficiency are not in line with the 2030 target, the Commission shall take supplementary actions to increase energy efficiency.

It is important that the targets and commitments are updated every 5 year, so the commitment and ambitions follow the 5-year cycle of nationally determined contributions (NDCs) to the Paris Agreement.

The energy efficiency directive must also cover industrial furnaces and ovens, as well as steam boilers. Ecodesign preparatory studies have shown considerable potentials for energy savings with EU-regulations for these installations, but the studies also found that neither Ecodesign nor other EU-regulations are covering these installations and that Ecodesign is not the best form of regulation for these products. Regulation via EU-ETS is not functional and the directive on medium-sized combustion plants (MCP) is not covering energy efficiency This is why we propose that the energy efficiency directive shall cover these installations specifically.

For specification of comments, reasons, etc., please contact INFORSE-Europe, att. Gunnar Boye Olesen (INFORSE-Europe Coordinator)