



Position Paper

25 April 2014

EUROCHAMBRES response to the public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework

A. Energy efficiency targets and measures

1. Do you think the right approach in addressing the shortfall is:

- a) To define energy efficiency target(s)
- b) Reinforced implementation of existing legislation, including active policy on infringements
- c) Proposing new legislation
- d) other

Please specify your response (max. 1000 characters)

In general, defining a rigid compulsory ceiling regarding the overall energy consumption seems problematic, not least because weather conditions and economic trends can lead to ups and downs in consumption. Thus, EUROCHAMBRES is convinced that energy efficiency has to be achieved by voluntary initiatives, rather than by mandatory requirements.

However, the EU and its Member States have to provide the right framework conditions, as for example the facilitation of public-private partnership schemes between stakeholders (local authorities, financial institutions and Chambers of Commerce and Industry) in order to promote the use of energy management tools and practices.

The harmonized implementation and enforcement of existing EU energy-efficiency legislation across member states must remain a priority for the EU before drafting new regulations.

B. Energy efficiency sectors

2. Do you think that further policy measures are needed at EU level to foster energy efficiency in buildings?

- Yes No No opinion

Please give details. (max. 1000 characters)

In general, renovating Europe's existing building stock (public and private) has an important savings potential. Therefore, private property owners and tenants need to be incentivised and provided with information and technical support to make the necessary efforts for improving the energy efficiency of buildings. In this context, it is important to remove obstacles in national property laws and to address the issue of "split incentives" between landlords and tenants.

However, there is no need for additional legislation, since the Energy Performance of Buildings Directive is the appropriate legislation framework to tackle the energy efficiency aspects of buildings and technical building systems.

3. Do you think that further policy measures are needed at EU level to foster energy efficiency in industry?

Yes No No opinion

Please give details. (max. 1000 characters)

Yes, more soft policy measures (e.g. financial incentives) are needed but not more legislation. Using energy efficiently is the most direct way for industries to cut energy costs and is indisputably in the best interests of business itself. Business rationale and competition work as the best drivers. However, energy efficiency actions must be encouraged through practical and cost-effective support measures, rather than through additional mandatory requirements.

EUROCHAMBRES launched a new IEE-funded project in March 2014 that will develop and implement practical energy management solutions, which aim to deliver 10-15% energy savings for hundreds of SMEs in nine member states, translating into greenhouse emission reductions of around 8500 t CO₂e/year. Such concrete and voluntary initiatives, addressing the economic needs of businesses via trusted intermediaries like Chambers, must be multiplied and expanded.

4. Do you think that further policy measures are needed at EU level to foster energy efficiency in transport?

Yes No No opinion

Please give details. (max. 1000 characters)

As the largest consumer of final energy consumption, transport is rightly one of the key priorities of the Commission in addressing energy efficiency. Chambers attach great importance to sustainable mobility and transport and its sustainable development for the future. This involves making both, passenger and goods transport more efficient and decoupling them from their negative impact on the environment.

Without doubt, the transport sector has to contribute its part to the reduction of emissions and to realise energy savings, which can be achieved through a combination of technology solutions and behavioural changes.

In particular, concrete measures could include: financial support for mobility management, investment in energy efficient vehicles (CNG, LNG, Hybrid and electric vehicles), trainings to reduce fuel consumption, separate charge categories (road pricing bonus) for buses, and telematics services for public transport to ensure a change towards energy efficient mobility.

5. Do you think that further policy measures are needed at EU level to foster energy efficiency in electrical equipment?

Yes No No opinion

Please give details. (max. 1000 characters)

The most important aspects of energy efficiency in electrical equipment are already regulated by the Ecodesign and the Energy Labelling Directives. By setting mandatory technical standards for placing products on the market, both directives are very powerful instrument and the Commission should, therefore, apply them very cautiously.

Any further extension of the scope of the Ecodesign directive - be it to more product groups or to industrial systems and processes - would generate complex trade-offs and create more regulatory burdens for businesses, especially SMEs. Before further developing Ecodesign instruments, the Commission must ensure the good functioning of the decision making process under the existing directive, especially with regard to the participation and interests of SMEs, and conduct a cost-benefit-analysis of its implementing measures.

6. Do you think that further policy measures are needed at EU level to foster energy efficiency in generation and distribution?

Yes No No opinion

Please give details. (max. 1000 characters)

In order to successfully increase energy efficiency, the whole value chain has to be considered, which also involves the supply side. Especially with regard to generation capacities and the modernisation of the infrastructure, existing EU legislation has to be fully implemented (e.g. third energy package, the Electricity and Energy Efficiency Directives and the direct electricity price regulation). The use of energy efficiency potential in electricity, gas and district heating infrastructure should be based on economic criteria. Imposing energy efficiency criteria on network operators must not lead to negative impacts on energy prices.

Enhancing the use of combined heat and power (CHP) and district heating and cooling can further contribute to reduce heat losses in the energy generation process. However, CHP cannot be implemented everywhere and in every case and therefore, the legal framework must provide certain flexibility (e.g. concerning the authorisation of plants).

7. Do you think that further financial mechanisms and instruments are needed at EU level to mobilise energy efficiency investments?

Yes No No opinion

Please give details. (max. 1000 characters)

A EUROCHAMBRES survey among 2000 SMEs in 12 countries highlighted that financial reasons represent a major barrier to investments in energy efficiency. Therefore, the financial instruments are a crucial element in the process of promoting and enhancing energy efficiency throughout Europe.

Especially, cohesion policy funding could be used more effectively by taking into account the individual starting point and level of progress of each member state in terms of energy efficiency. However, in order to enhance Europe's process of becoming more energy efficient, the role of private investment is equally

important. Besides incentives provided by a market-based approach, the availability of suitable financing products should be improved in order to enhance and facilitate access to finance for private investors.

8. Do you think that further measures are needed to build the capacity of actors in the energy efficiency sector?

Yes No No opinion

9. What are the most promising technology solutions that can help deliver energy savings in the 2020 and 2030 time horizon? How can their development and uptake be supported at EU level? (max. 1000 characters)

Instead of selectively promoting single technologies which cannot address all aspects of energy efficiency, a mix of technologies will be required. According to the principle of technology neutrality, EU supporting measures should basically be open to any emerging technology. Pre-selecting applied technologies, based on today's state of the art, risks hampering industrial innovation.

10. Further comments (max. 1000 characters)

As the implementation phase of the Energy Efficiency Directive will only be concluded in June 2014, the consultation's aim to collect stakeholders' views on the progress towards the 2020 energy efficiency target appears pre-mature at this point. All the more, EUROCHAMBRES urges the Commission to carefully evaluate the progress being achieved in the Member States and to identify potential obstacles that prevent countries from fully implementing the directive, before taking any further legal steps in the context of the EU's energy efficiency agenda.

In EUROCHAMBRES' understanding, the term 'policy measure' does not only refer to legislative acts, but also to incentives (e.g. financial and technical support). Thus, the need for further policy measures can, in no case, be equated with the need for further legislation. In all policy areas that are addressed in this consultation, the implementation and enforcement of existing must remain a priority before drafting new regulations.

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EUROCHAMBRES – The Association of European Chambers of Commerce and Industry represents over 20 million enterprises in Europe – 98% of which are SMEs – through members in 43 countries and a European network of 1700 regional and local Chambers.

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