



Position Paper

29 January 2016

EUROCHAMBRES response to the public consultation on the Review of Directive 2012/27/EU on Energy Efficiency

Part I – General questions

1. Article 1: Subject matter and scope and Article 3: Energy efficiency target

Article 1 provides the general framework for the promotion of energy efficiency within the Union in order to ensure the achievement of the EU 20% energy efficiency headline target by 2020. In addition and more specifically, **Article 3** requires that each Member State sets an indicative national energy efficiency target based on either primary or final energy consumption, primary or final energy savings or energy intensity. In setting the targets, Member States should take into account a number of provisions set out in Article 3(1).

As regards the EU energy efficiency target for 2030, the European Council agreed in October 2014 on an indicative target at the EU level of at least 27% (compared to projections) to be reviewed by 2020 having in mind an EU level of 30%. Therefore, the existing policy framework should be updated to reflect the new EU energy efficiency target for 2030 and to align it with the overall 2030 Climate and Energy framework.

1.1. What is the key contribution of the EED to the achievement of the 2020 energy efficiency target?

[Free choice: max. 1000 characters]

The EED introduced a number of energy saving measures contributing to the 20% efficiency target. Notably, the enhanced role of the public sector in improving energy efficiency in public buildings (Art. 4) and in public purchasing (Art. 5) represents an important element of the EED. Through this leading role, the public sector contributes to the development of new markets for energy efficient technologies and services and has an exemplary role for other market actors. Through performing obligatory or voluntary energy audits or by applying energy management systems (Art. 8), European businesses also contribute to the achievement of efficiency targets. Moreover, the use of smart meters (Art.9) holds certain potentials for monitoring and consequently, controlling the energy consumption.

However, many EU member states still have not managed to fully and correctly transpose these article, jeopardising the overall achievement of the 2020 target.

1.2. How has the EED worked together with the Effort Sharing Decision, other energy efficiency legislation (on buildings, products and transport) and ETS? Could you describe positive synergies or overlaps?

[Free choice: max. 1000 characters]

The interdependencies between the 20-20-20 targets have revealed the structural weaknesses of the current framework and have shown that energy efficiency legislation needs to be better coordinated with other relevant legislation to avoid conflicting action. An example for overlapping policies are stricter fuel standards, which led to a more energy- and carbon intensive refining process. The ongoing debate on the CO₂ price, which inter alia resulted from the decline in production, the increased use of renewable energy sources and improved energy efficiency provides further evidence of conflicting targets.

These interfering objectives led to multiple bureaucratic and financial burden for energy intensive industries. Thus, in the future, a prioritisation between targets will be necessary. Incentives to save energy and to increase the uptake of RES should mainly derive from EU policies on reducing emissions. Moreover, it has to be considered that cutting energy costs and using energy efficiently is indisputably in the best interests of business itself.

1.3. How has the EED worked together with existing national legislation? Could you describe any positive synergies or overlaps?

[Free choice: max. 1000 characters]

A large majority of our members complains about 'gold plating' with regard to the national transposition of the EED, leading to significant levels of bureaucratic burden in several Member States. This was also one of the main findings of EUROCHAMBRES' transposition study of Art. 8 of the EED. Especially with regard to minimum criteria for energy audits, qualification criteria for auditors and record keeping obligations, Member States adopted very different standards.

1.4. What are the main lessons learned from the implementation of the EED?

[Free choice: max. 1000 characters]

The main lesson learned is that the Commission has to put more effort in the correct and timely transposition of the EED into national legislation. Delayed transposition and missing national legislation create a high degree of legal uncertainty for businesses and can lead to a distortion of the internal market.

1.5. Which factors should the Commission have in mind in reviewing the EU energy efficiency target for 2030?

[Free choice: max. 1000 characters]

The EU has to support European businesses in achieving efficiency gains and adopt measure that boost (rather than impair) their competitiveness on the global market. Defining a rigid and 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. Therefore, EUROCHAMBRES believes that energy efficiency has to be achieved by voluntary initiatives, rather than by mandatory requirements. Using energy efficiently is the most direct way for businesses to cut energy costs. Thus, business rationale and competition work as the best drivers. However, the EU and its Member States should provide the right framework conditions and funds supporting investment. (see next question).

With regard to energy efficiency measures in the public building sector, the EU should continue its ambition. Moreover, in some countries more efforts are required to promote investments in energy efficient equipment and practices.

1.6. What should the role of the EU be in view of achieving the new EU energy efficiency target for 2030?

[Free choice: max. 1000 characters]

- EUROCHAMBRES launched an IEE-funded project in 2014 (STEEEP) that will develop and implement practical energy management solutions, which aim to deliver 10-15% energy savings for hundreds of SMEs in 9 MS, translating into GHG 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.
- Public-private partnership schemes between stakeholders (e.g. local authorities, business associations, financial institutions and Chambers) should be enhanced to promote energy audits and the use of energy management systems.
- The EC must increase pressure on those MS, that have not fully implemented the directive, particularly on the provision of sufficient financial incentives for SMEs to undergo energy audits.

1.7. What is the best way of expressing the new EU energy efficiency target for 2030:

- Expressed as energy intensity
- Expressed in an absolute amount of final energy savings
- Expressed in both primary and final energy consumption in 2030
- Expressed only in primary energy consumption in 2030
- Expressed only in final energy consumption in 2030
- Other (please specify)

1.8. For the purposes of the target, should energy consumption be:

- Expressed as energy, regardless of its source (as now)
- Expressed as avoided non-renewable energy

- Expressed as avoided fuel-use (but including biomass)
- Other (please specify)

2. Article 6: Purchasing by public bodies of energy efficient buildings, goods and services

One of the objectives of the EED is to improve and strengthen energy efficiency through public procurement. **Article 6** of the Directive states that Member States shall ensure that central governments purchase only products, services and buildings with a high energy-efficiency performance. The central governments of the Member States should “lead by example” so that local and regional procurement bodies also strengthen energy efficiency in their public procurement procedures.

The Commission is carrying out an assessment of Article 6 of the EED and the preliminary findings show a rather limited experience in the Member States so far in implementing the requirements of Article 6. One of the main barriers to implementing the requirements is the lack of clarity and guidance across the existing EU rules on public procurement. On the other hand, experiences in some Member States indeed demonstrate that the measures required by the EED on public procurement have helped to educate and involve procurement bodies in the use of energy efficiency criteria, spreading the exemplary role of central governments also at regional and local levels.

2.1. In your view, are the existing EU energy efficiency requirements for public procurement sufficient to achieve the needed impact of energy savings?

- Yes
- No
- No opinion

In general, individual purchasers or public authority should make wise and far-sighted purchases and not only focus on low prices in the short term. Public procurement can stimulate innovation and improve sustainability practices and there is a need for exchange of good practices on how to integrate sustainability concerns in public contracting.

However, EUROCHAMBRES strongly opposes any initiative which would integrate general sustainability policy targets in mandatory procurement rules. The bidding process is already complex and costly, particularly for SMEs. If only highly efficient products, buildings and services are to be purchased, the scope for decision making is overly constrained and would lead to substantial administrative requirements in public procurement procedures.

Thus, EUROCHAMBRES does currently not see a need to amend energy efficiency requirements for public procurement.

2.2. How could public procurement procedures be improved in the future with regard to high energy efficiency performance?

[Free choice: max. 1000 characters]

Public procurement of energy efficient products should not be undermined by budgetary law provisions. Thus, energy performance levels of products and services should be given greater consideration, without introducing strict thresholds.

2.3. Do you think that there is sufficient guidance in your country to characterise "energy efficient products, services and buildings"?

- Yes
 No
 No opinion

Please explain

In most Member States, general information material (websites, guidelines) is available. However, some national Chambers consider workshops and training programmes for SMEs most useful, which are currently only provided in a small number of countries.

2.4. Have you seen information campaigns or other public initiatives in your or in another EU country that explain public procurement of energy efficient products, services and buildings?

- Yes
 No

If yes, how useful have they been to increase awareness? Please describe.

[Free choice: max. 1000 characters]

The main problem is not the availability of information but limited time resources of public authorities to use this information.

3. Article 7: Energy efficiency obligation schemes

Article 7 together with Annex V requires that Member States set up an energy efficiency obligation scheme to ensure that obligated parties (energy distributors and/or retail energy sales companies that are designated by each Member State) achieve a given amount of energy savings (1.5% annually) from annual energy sales to final customers over the period 2014 to 2020. As an alternative to setting up an energy efficiency obligation scheme, Member States may opt to take other policy measures to achieve energy savings among final customers to reach the same amount of savings.

The Commission is required to assess the implementation of this Article and submit a report by 30 June 2016 to the European Parliament and the Council, and, if appropriate, to supplement the report with a legislative proposal for amendments.

In line with the EED, Member States had to notify the measures and methodologies on implementation of Article 7 by 5 December 2013. Further information from Member States was received in the notified National Energy Efficiency Action Plans (due by April 2014).

According to the latest available information from the notifications received from Member States¹, 16 Member States notified an energy efficiency obligation scheme by putting an obligation on utilities to reach the required cumulative energy savings by 2020 under Article 7. Four Member States out of these (Bulgaria, Denmark, Luxembourg and Poland) will use it as the only instrument to achieve the required energy savings. 12 Member States (Austria, Croatia, Estonia, France, Ireland, Italy, Latvia, Lithuania, Malta, Slovenia, Spain and United Kingdom) will use the obligation scheme in combination with alternative measures. On the other hand, 12 Member States (Belgium, Cyprus, Czech Republic, Germany, Greece, Finland, Hungary, Netherlands, Portugal, Romania, Slovakia and Sweden) have opted to only use the alternative measures to reach the required savings instead of putting obligations on utilities.

3.1. Are you aware of any energy efficiency measures that have been carried out or are planned in your country, by the utilities or third parties in response to an energy efficiency obligation scheme?

- Yes
 No
 No opinion

Please explain your answer:

3.2. In your view, is Article 7 (energy efficiency obligation scheme or alternative measures) an effective instrument to achieve final energy savings?

- Yes
 No

If yes, please explain your answer:

So far, only a small number of Member States has established EEOs and at this stage, an assessment of their functioning appears too early. In order to successfully implement EEOs the following quality criteria have to be met:

- Cost efficiency
- Minimal administrative burden
- Public awareness for saving potentials in buildings and processes
- Open access to competition

¹ <http://ec.europa.eu/energy/en/topics/energy-efficiency-directive/obligation-schemes-and-alternative-measures>

- Efficient registration, documentation and monitoring system

The flexibility provided to Member States to achieve the 1.5% savings with alternative measures should be maintained, as it allows for taking into account specific national situations and framework conditions.

3.3. What are, in your view, the main challenges or barriers to implementing Article 7 effectively and efficiently in your country? Please select up to 5 options from the list.

- To select or introduce the right set of measures for achieving 1.5% energy savings (annually)
- Too great flexibility to use wide range of measures: energy efficiency obligation scheme and alternative measures
- Strong opposition from energy suppliers and distributors to set up an energy efficiency obligation scheme
- Lack of effective enforcement
- Lack of sufficient knowledge and skills of involved parties
- Lack of awareness (by the end-users) of the energy efficiency obligation schemes or alternative measures
- Developing the calculation methodology in line with the requirements of Annex V
- Ensuring sound and independent monitoring and verification of energy savings
- Avoiding double counting
- High administrative burden
- Ensuring consistent application of the requirements with other energy efficiency legislation (e.g. building codes)
- Limited timeframe (2014-2020) that makes it hard to attract investment for long term measures
- Other (please specify)

3.4. Do you believe that the current 1.5% level of energy savings per year from final energy sales is adequate?

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- No opinion

Please explain your answer:

In general, undifferentiated energy saving levels that apply to all Member States are problematic, as they disregard individual early-actions, different economic structures and energy consumption habits and the actual technological and economic saving potentials.

3.5. Should energy efficiency obligation schemes have specific rules about energy savings amongst vulnerable consumers?

- Yes
 No
 No opinion

Please explain your answer:

4. Articles 9-11: Metering, billing information and cost of access to metering and billing information

Articles 9-11 deal with consumer empowerment, by asking Member States to put in place requirements about metering, access to billing information and cost of access to metering and billing information, allowing consumers to make decisions about their energy consumption. These issues are also currently being looked at within the Electricity Market Design/Delivering a New Deal for Energy Consumers initiative. It may be relevant to consider certain aspects of these Articles in the EED review. The same is true for the subject of "demand response" (as set out in paragraph 8 of Article 15, but on this topic explicit questions were already included in the Market Design consultative communication published in July 2015).

4.1. Overall adequacy: Do you think the EED provisions on metering and billing (Articles 9-11) are sufficient to guarantee all consumers easily accessible, sufficiently frequent, detailed and understandable information on their own consumption of energy (electricity, gas, heating, cooling, hot water)?

- Yes
 No
 No opinion

Please explain your answer:

In general, the provisions are sufficient to guarantee access to the information mentioned above. At the same time, the provisions are very comprehensive and require a major effort and investments from Member States, network operators and energy providers. The effects of the implementation of the required infrastructure (e.g. smart meters) will only be visible in the long term. Any tightening or revision of the provisions do not seem necessary at the moment.

4.2. Do you think it appropriate that the requirement to provide individual metering and frequent billing (Articles 9(1), 9(3) and 10(1)) is subject to it being technically feasible and/or cost effective?

- Yes
- No*
- No opinion*

Please explain your answer:

The focus must remain on measures that are technically feasible and cost effective. A negative cost-benefit ratio would inevitably result in non-application of the measures.

4.3. Should such conditions of being technically feasible and/or cost effective be harmonised across the EU?

- Yes*
- No*
- No opinion*

Please explain your answer:

4.4. How would these conditions of being technically feasible and/or cost effective affect the potential for energy savings and consumer empowerment?

- Yes*
- No*
- No opinion*

Please explain your answer:

4.5. Smart meters: Do you think that A) the EED requirements regarding smart metering systems for electricity and natural gas and consumption feedback and B) the common minimum functionalities, for example to provide readings directly to the customer or to update readings frequently, recommended by the Commission² together provide a sufficient level of harmonisation at EU level?

- Yes
- No*
- No opinion*

Please explain your answer:

If no, do you think the common minimum functionalities should be the basis for further harmonisation?

² C(2012)1342

- Yes
- No
- No opinion

Please explain your answer:

4.6. What obstacles have national authorities/actors faced in introducing on a large scale individual meters that accurately reflect the final customer's actual energy consumption? Do you have any good experiences to share on how to overcome these obstacles?

[Free choice: max. 1000 characters]

A lack of standards and requirements hampered the use of smart meters in many regions. Energy suppliers need legal certainty to conduct the exchange of meters and the installation of new accounting systems.

In spite of a range of technical and organizational requirements for network operators, energy suppliers and service providers, one of the main barriers is to ensure a cost-effective instruction of smart meters and a high level of data security and protection.

5. Article 20: Energy efficiency national fund, financing and technical support

The analysis of the July 2014 Energy Efficiency Communication and the recent EEFIG Report³ showed that the energy efficiency investment market is still relatively small scale compared to its potential or the volumes needed to meet the EU's 2030 objectives. The European Structural and Investments Funds address the market gaps related to investment projects including those in energy efficiency, and the European Fund for Strategic Investments provides EU guarantee for investment projects – including those for energy efficiency. The European Energy Efficiency Fund carries relevant lessons.

Moreover, significant funding for energy efficiency comes from national public sources and the private sector. The effectiveness and impact of energy efficiency investments funding strongly depends (*inter alia*) on the implementation of the energy efficiency legislation, including the EED.

5.1. What should be the most appropriate financing mechanisms to significantly increase energy efficiency investments in view of the 2030 target?

[Free choice: max. 1000 characters]

Financial factors are a main obstacle hindering the deployment of energy efficient and renewable energy technologies. Particularly, SMEs lack financial recourses to invest in energy efficiency measures and technologies. Small companies in particular often do not have the capacity to allocate the responsibility of energy issues to members of staff. Also, the costs of external consultancy are still perceived as too high.

³ EEFIG - Energy Efficiency Financial Institutions Group Report: Energy Efficiency – First fuel for the EU economy, 2015, www.eefig.eu

Besides, there is still a lack of tax incentives and direct investment subsidies. In recent years, many investment decisions have been postponed because of the difficult macroeconomic situation.

For achieving greater energy efficiency investments by business, actions providing concrete on-site support have to be expanded and public-private partnerships should be encouraged.

5.2. Should there be specific provisions aimed at facilitating investment in specific areas of energy efficiency?

- Yes
- No*
- No opinion*

If yes, specify your answer from the below list:

- Building renovation
- Efficient appliances and equipment in households
- District heating and cooling network development
- Energy use by industries
- SMEs
- Companies
- City and community infrastructures in relation to transport, waste heat recovery, waste-to-energy
- Other (please specify)

5.3. Do you agree that one way to increase the impact of energy efficiency investments could be through making the energy performance/savings monitoring mandatory under Article 20 whenever public funds/subsidies are used for EE investments? Such monitoring could be done, for example, via on-line platforms, by users in the regular intervals.

- Strongly agree
- Agree
- Disagree
- Strongly disagree
- No opinion

6. Article 24: Reporting and monitoring and review of implementation

The Energy Union Strategy foresees an integrated governance framework for EU energy and climate policies to ensure that agreed climate and energy targets are reached and to enable Member States to better coordinate their policies at a regional level.

6.1. Do you think that the existing reporting and monitoring system under the EED is a useful tool to track developments with regard to energy efficiency in Member States?

- Yes
 No
 No opinion

If no, how do you think it could be improved in the future?

[Free choice: max. 1000 characters]

6.2. Do you think that the reporting of national indicators (for example, value added/ energy consumption, disposable income, GDP etc. for year (n-2)⁴ under Annex XIV (1)(a) of the EED should be simplified?

- Yes
 No
 No opinion

Please explain your answer:

The current reporting requirements in this context lead to massive red tape.

6.3. Do you think additional indicators (in addition to those referred to in Annex XIV (1)(a) – (e)) are needed to improve monitoring to assess Member States' progress towards their energy efficiency targets?

- Yes*
 No
 No opinion

⁴ In the year before last [year X(1) – 2], where "X" is the current year.

Part II – Technical questions (on Articles 6 and 7)

7. Article 6: Purchasing by public bodies of energy efficient buildings, goods and services

7.1. Do you believe that measures on public procurement of energy efficient products, services and buildings should become mandatory also for public bodies at regional and local levels?

- Yes
 No
 No opinion

Please explain your answer:

EUROCHAMBRES strongly opposes any initiative which would integrate general sustainability policy targets in mandatory procurement rules, since they could lead to a narrowing of the market as well as distortion of competition, which both run counter to the creation of an EU-wide internal procurement market. The bidding process is already complex and costly for businesses. If only highly efficient products, buildings and services are to be purchased, the scope for decision making is overly constrained and would lead to substantial administrative requirements in public procurement procedures. Therefore, sustainability criteria should not be addressed by implementing compulsory rules but rather by providing guidelines or soft law measures.

7.2. In your view, what are the main barriers that preventing the use of energy efficiency requirements in the existing public procurement procedures (please select from the list and explain your reply:

- There is a lack of awareness about the use of energy efficiency requirements in public procurement
 There is insufficient expertise and/or knowledge on the use of energy efficiency requirements in public procurement
 Thresholds are too high which is why energy efficiency requirements do not apply to many contracts
 Incompatibility of energy efficiency requirements with other procurement criteria (sustainable requirements, low price, safety requirements, technical requirements)
 Higher energy efficiency criteria in public procurements may imply higher prices
 Lack of clarity of the energy efficiency requirements for public procurement
 Energy efficiency requirements for public procurement are not very clear and difficult to check

[Free choice: max. 1000 characters]

7.3. In your view, should all EU public procurement rules relating to sustainability (including in particular energy efficiency in buildings, the use of renewable energy sources, etc.) be gathered into a single EU guidance framework?

- Yes
 No
 No opinion

Please explain your answer:

Chambers are in favour of a harmonised guidance framework and are willing to offer their knowhow on ecology and public procurement to further elaborate nonbinding criteria catalogues. A single EU guidance framework would entail synergy effects and optimise coherency, transparency and efficiency of the related policies.

7.4. Do you think that there is sufficient guidance/framework to know what is meant by "energy efficient products, services and buildings"?

- Yes
 No
 No opinion

Please explain your answer:

Our members reported about different situations in their countries.

7.5. While energy efficient products will be cheaper to operate, their initial cost might be higher and a longer period of time will be needed to "pay back" this higher cost. Is this a problem and if so, how can public authorities overcome it?

[Free choice: max. 1000 characters]

The attractiveness of energy efficient services and technologies depends highly on the length of the payback period. While many (in particular small and medium-sized) purchases are willing to accept payback periods of up to two years, acquisitions that only pay off in the longer term provide less motivation for investments.

8. Article 7: Energy efficiency obligation schemes

8.1. Emerging evidence suggests that most of the measures introduced under Article 7 have long lifetimes (20-30 years) and will continue have an impact beyond 2020. Do you share this view?

- Yes
 No
 No opinion

Please explain your answer:

A number of measures will, indeed, have an impact beyond 2020. However, in some countries only measures that have an effect in the current period are taken into account which leads to a discrimination of long-term measures.

8.2. What is your view on the potential benefits (listed) of energy efficiency obligation schemes?

| | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|---|----------------|-------|----------|-------------------|------------|
| Lower energy bills for consumers | | | | x | |
| Better awareness of energy efficiency potential by consumers | | | x | | |
| Better relationship between energy suppliers, distributors and customers | | | x | | |
| Lower energy generation (and transmission) costs for the utilities | | | x | | |
| Improved business and administrative environment for up-coming innovative energy services | | | | | x |
| Aggregation of small-scale investments (pooling/bundling) | | x | | | |
| Development of new financing models – e.g. energy performance contracting | | | | | x |
| Stimulation of energy efficient renovation of buildings | | | x | | |
| Increased competitiveness in the energy markets | | | x | | |

| | | | | | |
|-------|--|--|--|--|--|
| Other | | | | | |
|-------|--|--|--|--|--|

Please explain your answer:

8.3. Are you aware of any developments in the energy services markets that have benefited particular actors (e.g. service providers, suppliers, distributors, etc.) in Member States having an obligation to define the obligated parties under the energy efficiency obligation scheme?

- Yes
 No
 No opinion

Please explain your answer:

8.4. If you think that some requirements of Annex V need more precise guidance please list those requirements and specify briefly what further information you think would be useful.

[Free choice: max. 1000 characters]

8.5. As you might know, the current framework of Article 7 is set until 2020, linked to the energy efficiency target for 2020, which will expire at the end of 2020. In your view, should the Article 7 obligations continue beyond 2020 in view of the new energy efficiency target for 2030?

- Yes
 No
 No opinion

If yes, what factors should be considered for the future Article 7 (please select up to 5 options from the list, and explain your reply if possible):

- The amount of savings to be achieved should be set at a more ambitious level for post 2020 (exceeding the existing 1.5%)
 The energy efficiency obligations scheme should be kept as the only possible instrument to achieve the required savings
 The possibility to choose between the energy efficiency obligations scheme and/or alternative measures should be retained
 The possibility to exclude sales in transport from the baseline should be removed
 The possibility to exclude sales in transport from the baseline should be kept but restricted to the fixed amount to ensure the level playing field

- The exemptions under paragraph 2 – applying a lower calculation rate (for the first years), and excluding sales in ETS industries, as well as allowing savings from measures targeting energy generation and supply – should be removed altogether
- The exemptions under paragraph 2 should be retained but the level and number of exemptions should be reviewed
- The possibility for 'banking and borrowing' energy savings from different years should be removed (paragraph 7(c))
- The possibility for 'banking and borrowing' energy savings should be kept with a possibility to count savings towards the next obligation period (paragraph 7(c))
- Other (please specify)

8.6. Do you think that the scope of eligible measures allowed under Article 7 should be clarified?

- Yes
- No
- No opinion

If yes, please explain your answer further:

- The scope of eligible measures should only be end-use energy savings (as it is at the moment)
- The scope of eligible measures should be expanded
- Other (Please specify)
[Free choice: max. 1000 characters]

If the scope should be expanded, please specify which of the following possibilities would be appropriate:

- Measures to switch fossil fuel heating and cooling fully or partially to renewable energy (e.g. through individual appliances, district heating and cooling, centralised distributed units supplying larger building complexes or groups of buildings)
- Measures to increase efficiency of district network infrastructure and generation, including through thermal storage facilities
- Measures to make energy generation from small scale generation more efficient, below the ETS threshold
- Switch to self-consumption, auto-generation and energy positive buildings
- Participation in demand response, including from providing storage capacities
- Primary energy savings from the utilisation and recovery of waste heat (e.g. in district networks)
- Savings from energy management systems
- Energy savings from better organisation of activities
- Other (please specify)

8.7. Would there be benefits in greater harmonisation of some of the requirements of Article 7 to allow more consistent implementation across Member States?

| Provision of Article 7/Annex V | Strongly agree | Agree | Disagree | Strongly disagree | No opinion |
|--|----------------|-------|----------|-------------------|------------|
| Calculation methods | | x | | | |
| Materiality | | | | | x |
| Additionality | | | | | x |
| Lifetimes | | x | | | |
| Price demand elasticities ⁵ for taxation measures in real terms | | | | | x |
| Indicative list of eligible energy saving measures | | x | | | |
| Monitoring and verification procedures | | x | | | |
| Reporting | | x | | | |
| Other | | | | | |

[Please explain your answer: max. 1000 characters]

8.8. What role should the EU play in assisting the Member States in the implementation of Article 7?

[Free choice: max. 1000 characters]

The EU should play an advising role coordinating the member states and providing a harmonised, transparent, efficient and yet flexible approach for incentivising energy efficiency improvements without any distortion of competition.

Moreover, the EU should encourage Member States to organise training programmes and information campaigns targeted towards all main actors.

⁵ Price demand elasticity is a measure used in economics to show the responsiveness, or elasticity, of the quantity demanded of a good or service.

8.9. Please state which best practice examples could be promoted across the EU and how?

[Free choice: max. 1000 characters]

In Germany, policy makers and the business community agreed on the establishment of 500 so called energy efficiency networks with an anticipated emissions saving potential of 5 million tons of CO₂ until 2020. Through exchange of experience and best practices, the members of each network try to achieve a joint saving target. The scheme prioritises voluntary measures over mandatory requirements and shows that energy efficiency works best when based on the economic reality of business. A similar scheme has also been established in Croatia.

8.10. Would it be appropriate and useful to design a system where some types of energy savings achieved in one Member State would count towards obligations carried out either by governments or by economic operators in another country, just as the option to cooperate on greenhouse gas emissions reductions already exists?

[Free choice: max. 1000 characters]

Yes. In a number of European countries there are still many low-hanging fruits which could easily be 'harvested' through a comprehensive knowledge-transfer.

8.11. Would it be appropriate and useful to design a system where energy efficiency obligations would also include elements aiming at gradually increasing the minimum share of renewable energy applicable to energy suppliers and distributors?

[Free choice: max. 1000 characters]

8.12. Could the option of establishing an EU wide 'white certificate' trading scheme be considered for post 2020?

- Strongly agree
- Agree
- Disagree
- Strongly disagree

No opinion

[Please explain your answer:]

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