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Public consultation on the energy efficiency framework for the decade ahead

Fields marked with * are mandatory.

Introduction

As announced in the 2026 Commission Work Programme, the European Commission plans to keep Europe on track to meet its climate goals and put forward an enabling framework for the decade ahead securing Europe's competitiveness ans sustainability, including the setting-up of the energy efficiency framework and the phase-out of fossil fuels subsidies. This initiative aims to help prepare an enabling and future-proof energy and climate policy framework to support the EU's efforts to achieve its objectives of decarbonisation, affordability, security and competitiveness.

The initiative will contribute to reaching the proposed target of reducing net greenhouse gas emissions by 90% in 2040 compared to 1990, as set out in the provisionally agreed amendment to the European Climate Law. Energy efficiency is expected to play a central role in cost-effectively reaching this target, while strengthening EU competitiveness, improving energy security and ensuring affordability for citizens and businesses. The energy efficiency framework for the decade ahead will be developed in conjunction with other ongoing and planned initiatives across EU climate and energy law, including the review of the Governance Regulation, the post-2030 national climate targets and flexibilities, the renewable energy framework, the EU Emissions Trading System (EU ETS), the social dimension of the Energy Union and other relevant energy policy initiatives and enabling instruments.

The Energy Efficiency Directive sets out a comprehensive framework for promoting energy efficiency across the EU, including binding EU-level objectives, national contributions, sectoral measures, public sector leadership and planning, monitoring and reporting rules. It supports strategic medium- and long-term energy planning through its links to integrated national energy and climate plans (NECPs) set out in the Governance Regulation, and contributes to the achievement of the EU's 2030 energy and climate objectives and long-term goals. It also provides the basis for the Commission to monitor progress at EU and Member State level and to take corrective action if ambition or implementation is insufficient.

Given evolving policy needs and the transition towards the post-2030 period, the Commission will assess how the energy efficiency framework has functioned to date and identify areas where it could be further streamlined, strengthened or adapted for the decade ahead. This assessment will consider the increasing importance of energy efficiency in the design and operation of a decarbonised, cleaner, more electrified and

integrated energy system, the need to support industrial competitiveness and innovation, and the importance of ensuring social fairness and a just transition while ending the EU's fossil fuel import dependency and reducing subsidies for fossil fuels, administrative burden and costs.

Building on this assessment and on the Commission's political priorities for 2024-2029, the Commission will examine options for the future development of the EU energy efficiency framework, with a view to ensuring an effective, flexible and forward-looking framework for the decade ahead.

In this context, the Commission is launching a public consultation to gather views from all interested parties. The consultation is based on a questionnaire consisting of two parts:

- Part 1 collects background information about you.
- Part 2 focuses on key aspects of the energy efficiency framework for the decade ahead, notably:
  - the effectiveness and coherence of the current energy efficiency policy framework;
  - the role of energy efficiency in the new climate and energy framework (political and strategic direction, sector-specific provisions and financing framework and enabling tools);
  - the streamlining of the regulatory framework and the reduction of the administrative burden (enhancing coordination across sectors and policies).

You can save your responses as a draft and finish them later. Apart from some mandatory questions, you can answer questions on the sections which are relevant to you. When answering questions with a free text box for additional comments please be concise. At the end of the questionnaire, you can also upload a document with further comments and views, as appropriate.

About you

* Language of my contribution

- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ◉ English
- ○ Estonian
- ○ Finnish
- ○ French
- ○ German
- ○ Greek
- ○ Hungarian

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* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

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* Surname

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* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
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- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
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- Hong Kong
- Hungary
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
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- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago

- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d’Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Iceland
- India
- Indonesia
- Iran
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- Ireland
- Isle of Man
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- Jordan
- Kazakhstan
- Kenya
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- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
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- Lebanon
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- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena Ascension and Tristan da Cunha
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna
- Western Sahara
- Yemen
- Zambia

- Democratic Republic of the Congo
- Denmark
- Lesotho
- Liberia
- Saint Kitts and Nevis
- Saint Lucia
- Zimbabwe

Role/position (if applicable)

*Organisation name

255 character(s) maximum

Bioenergy Europe

*Are the organisation's main headquarters within the EU?

- (●) Yes
- ( ) No

*Organisation size

- ( ) Micro (1 to 9 employees)
- (●) Small (10 to 49 employees)
- ( ) Medium (50 to 249 employees)
- ( ) Large (250 or more)

In which sector(s) do you or your members operate? Please select all that apply.

- [ ] Public sector/government - national level
- [ ] Public sector/government - regional level
- [ ] Public sector/government - local level
- [ ] Research and education
- [ ] Social economy
- [ ] Construction/buildings

Energy sector

- [ ] Transmission system operator (TSO)
- [ ] Distribution system operator (DSO)

- [ ] Regulator
- [ ] Energy supplier, retailer or aggregator
- [ ] Power exchange/market operator
- [ ] Energy trader
- [ ] Energy producer
- [ ] Energy project developer
- [ ] Energy service company (ESCO) and other energy service providers
- [ ] Energy technical, legal or financial advisory
- [ ] Energy storage operators and other market participants providing storage services
- [ ] District heating or cooling provider
- [ ] Data centre or Information and Communication Technology processing company
- [ ] Manufacturer of clean technologies

Financial and insurance sector

- [ ] International financial institutions (IFIs) and National promotional banks and institutions (NPBIs)
- [ ] Credit institutions
- [ ] Investment funds
- [ ] Investment services

Energy-intensive industry

- [ ] Steel
- [ ] Non-ferrous metals
- [ ] Cement
- [ ] Chemicals and chemical-based fertilisers
- [ ] Glass and ceramics
- [ ] Paper
- [ ] Production of hydrogen or gases including low carbon, biomethane, biogases
- [ ] Other

Transport

- [ ] Aviation

- [ ] Maritime
- [ ] Road transport
- [ ] Rail
- [ ] Other

Waste management, including incineration

- [ ] Technology provider or waste management manufacturer
- [ ] Company of mission of public service

Land use/bioeconomy

- [ ] Agriculture value chain
- [ ] Forestry value chain
- [ ] Other

Please provide a short description of your activities in the abovementioned sectors.

500 character(s) maximum

Representation of the european bioenergy sector

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

97810874431-67

* How many years of experience do you have with the Energy Efficiency Directive?

- ( ) Less than 1 year
- (•) 1-5 years
- ( ) More than 5 years

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

- **Anonymous**
  Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.
- **Public**
  Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the personal data protection provisions

Energy efficiency framework for the decade ahead

1. Effectiveness and coherence of the current energy efficiency policy framework

The current energy efficiency policy framework could do more to support a broader set of strategic objectives for the decade ahead. This includes accelerating the transition towards climate neutrality, strengthening EU competitiveness, enhancing energy security and system resilience, supporting strategic autonomy, and addressing challenges along the value chains for clean and net-zero technologies.

Energy efficiency policies should ensure energy efficiency in the design and operation of the future decarbonised energy system to integrate high shares of renewable energy, eliminate energy waste, increase excess and waste heat reuse, and minimise the cost of the transition. Energy efficiency policies could also further contribute to the phasing out of fossil fuels and inefficient fossil fuel subsidies, and to more systematic integration of skills, workforce development and job creation aspects. Energy efficiency also plays a central role in increasing climate resilience and supporting adaptation to climate impacts in a more integrated energy system.

Finally, there is scope for enhancing coherence and synergies between the energy efficiency framework and other policy areas, including environmental (notably air quality) and climate policies, transport, industry, buildings and urban development, agriculture, macro-economic and industrial policy, and the social dimension of the Energy Union to maximise overall effectiveness and cost-efficiency.

1. To what extent do you agree with the following statement?

"The main objectives of the Energy Efficiency Directive (EED), notably to implement energy efficiency as a priority across all sectors, remove barriers in the energy market and overcome market failures that impede energy efficiency, are still relevant for the post-2030 framework."

	Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree	No opinion
* Please select your answer:	○	○	○	○	◉	○

Please explain your answer.

The objectives of the EED remain highly relevant for the post-2030 framework. Energy efficiency continues to play an essential role in reducing costs, improving energy security, strengthening competitiveness and supporting decarbonisation. The Energy Efficiency First principle remains particularly important, but further efforts are still needed in areas such as industry and energy production. At the same time, energy efficiency should be pursued alongside stronger deployment of renewable heat and the replacement of outdated fossil heating systems with efficient renewable solutions, including sustainable bioenergy.

2. To what extent has the EED achieved its objectives so far?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Please select your answer:	○	○	○	◉	○	○

Please explain your answer.

The Energy Efficiency Directive (EED) has positively contributed to improving energy efficiency. however, its implementation and outcomes vary across Member States. The heating and cooling sector, in particular, still heavily relies on fossil fuels, and the pace of modernizing and replacing inefficient heating systems is inadequate. For the period beyond 2030, the framework should further support the deployment of renewable heating solutions, enhance local heat planning, and expedite the replacement of fossil fuel-based technologies with efficient renewable alternatives.

3. Which elements have contributed most to the effectiveness of the EU energy efficiency policy framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being a very low contribution and 5 a very high contribution.)*

	1	2	3	4	5	No opinion
* The "energy efficiency first" principle	○	○	○	◉	○	○
* EU-level targets and/or national contributions	○	○	○	◉	○	○
* National planning and reporting requirements	○	○	○	◉	○	○
* The energy savings obligation	○	○	○	◉	○	○
* The public sector's exemplary role	○	○	◉	○	○	○
* Energy audits and energy management systems	○	○	◉	○	○	○
* Consumer information and metering	○	○	◉	○	○	○
* Energy efficiency in heating and cooling	○	○	○	○	◉	○
* Local heating and cooling plans	○	○	○	○	◉	○
* Financing and technical assistance	○	○	○	○	◉	○
Other	○	○	○	○	○	○

4. Which factors have limited the effectiveness of the current framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being a very low contribution and 5 a very high contribution.)*

	1	2	3	4	5	No opinion
* Insufficient ambition	○	○	○	◉	○	○
* Limited harmonisation and cross-border interoperability across the national energy efficiency frameworks	○	○	◉	○	○	○
* Complexity of provisions and administrative burden	○	○	○	○	◉	○
* Uneven implementation across Member States	○	○	○	◉	○	○
* Insufficient enforcement	○	○	○	○	○	◉
* Limited access to finance	○	○	○	○	◉	○
* Limited business case	○	○	○	○	○	◉
* Skills shortages	○	○	◉	○	○	○
Other	○	○	○	○	○	○

5. To what extent has the EED stimulated energy efficiency efforts in the following sectors?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Buildings	○	○	○	◉	○	○
* Heating and cooling	○	○	○	◉	○	○
* Industry	○	○	◉	○	○	○
* Information and communication technologies (ICT)	○	○	○	○	○	◉
* Transport	○	○	○	○	○	◉
* Commercial services	○	○	○	○	○	◉
* Public services	○	○	○	○	○	◉

6. To what extent have energy management systems and energy audits proven to be effective ways of optimising businesses' energy performance and contributing to costs savings?

	Not at all	To a little extent	To some extent	To a moderate extent	To a large extent	No opinion
* Please select your answer:	○	○	○	○	◉	○

Please explain your answer.

Energy audits and energy management systems have proven effective in identifying cost-effective energy saving opportunities. They should continue to be supported, together with implementation support and financing

7. Which national policies and measures implemented to fulfil the energy savings obligation (Articles 8-10 of the EED) have proven to be the most effective under the current framework? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being not effective at all and 5 very effective.)*

	1	2	3	4	5	No opinion
* Energy efficiency obligation schemes (EEOS)	○	○	○	○	○	◉

* White certificates schemes	○	○	○	○	○	◉
* Energy efficiency financing programmes, including financial instruments and subsidies	○	○	○	○	○	◉
* Information and behavioural campaigns	○	○	○	○	○	◉
* Industrial programmes	○	○	○	○	○	◉
* Public sector interventions	○	○	○	○	○	◉
* Taxation, including carbon taxes	○	○	○	○	○	◉
Other	○	○	○	○	○	◉

8. Which factors have influenced the effectiveness of the application of Annex V of the EED for the implementation of the energy savings obligation?

Between 1 and 3 selections

- ☑ Complexity of provisions
- ☐ Different methods for calculating energy savings
- ☐ Uneven implementation across Member States
- ☐ Limited exceptions to the principle of additionality
- ☐ Insufficient guidance
- ☐ The exclusion of savings from measures concerning the direct combustion of fossil fuels
- ☐ Low interest on energy savings monetisation due to high transaction costs linked to complexity
- ☐ Other

9. Which provisions of the EED were the most effective for increasing energy efficiency in heating and cooling?

Between 1 and 3 selections

- ☑ Provisions on local heating and cooling planning
- ☐ Provisions on the development of high-efficiency cogeneration
- ☐ Provisions on energy efficiency in district heating and cooling
- ☐ Provisions on waste heat recovery
- ☐ Provisions on metering and billing information
- ☐ Other

2. Effectiveness and coherence of the current energy efficiency policy framework

a. Political and strategic direction

In the context of the revision of the Governance Regulation, the Commission has asked for evidence in the period between 18 December 2025 and 12 March 2026 on the preferred target architecture for the post-2030 framework, including as far as energy efficiency is concerned. It is asking stakeholders to respond to questions on this topic in the context of that consultation as long as it remains open.

If you have not participated in the consultation on the Governance Regulation by the 12 March 2026 deadline, the following question on the revision of the Governance Regulation is replicated here.

1. The EU currently has a 2030 energy efficiency target with indicative national contributions. How do you think energy efficiency should be expressed and what should the design be to support the necessary uptake of energy efficiency to achieve the EU's 2040 climate objectives? (*Please rank the following options or accept the initial order.*)

Use drag&drop or the up/down buttons to change the order or accept the initial order.

- Option 2: Keep a similar structure with a binding EU energy efficiency target as in option 1, while allowing for flexibilities that reflect Member States' specificities.
- Option 1: Continue with the current structure of a binding EU energy efficiency target, supported by national contributions determined by formulas.
- Option 1, 2, 3 or 4 complemented by/combined with monitoring KPIs for key energy system components (such as electrification, waste heat reduction or re-use), while ensuring transparency and comparability.
- Option 3: Set a single, overarching clean energy target for the EU with embedded minimum thresholds for key energy parameters, including energy efficiency.
- Option 4: Set a single, overarching electrification target for the EU with embedded minimum thresholds for key parameters (such as renewable energy and energy efficiency).
- Another option or a combination of options

If stakeholders have something to add or specify regarding the post-2030 target architecture, would they please do so here:

Bioenergy Europe supports maintaining a binding EU energy efficiency target while allowing flexibility for Member States' specific circumstances. Hoewwever, it is fundamental that the post-2030 framework avoids reducing system efficiency to electrification alone. Energy efficiency must be assessed across the whole system and combined with renewable heat deployment, including sustainable bioenergy, district heating, high-efficiency cogeneration and local heat planning.

If you selected "Another option or a combination of options", please specify:

1000 character(s) maximum

* 2. How should energy efficiency progress be benchmarked/monitored after 2030?

- ○ In terms of energy consumption
- ○ In terms of energy intensity
- ○ Other
- ◉ No opinion

3. Which mechanisms would best ensure the achievement of post-2030 energy efficiency objectives?

Between 1 and 3 selections

- ☐ Better monitoring and reporting
- ☐ Corrective or enforcement mechanisms
- ☐ A better financing framework for energy efficiency
- ☐ Better technical assistance
- ☐ Better application of the "energy efficiency first" principle
- ☐ Other

4. Should the future EU energy efficiency policy ensure efficiency of the whole energy system, by focusing equally on energy efficiency potential on both the supply and the demand side?

- ◉ It should
- ○ It should not
- ○ No opinion

Please explain your answer.

5. What type of policy measures will be effective at ensuring energy efficiency in the design and operation of the future decarbonised energy system? *(Please assign a numerical weight from 1 to 5 to each option below, with 1 being not effective at all and 5 very effective.)*

	1	2	3	4	5	No opinion
* Better application of the "energy efficiency first" principle in national energy system planning	○	○	○	◉	○	○
* Calculating whole-system costs to prioritise energy efficiency options on the supply and demand side	○	○	○	○	◉	○
* Encouraging the use of AI in the design and operation of the energy system	○	○	○	○	○	◉
* Decentralising energy system planning and empowering the local level in efficient system design and system integration	○	○	○	○	◉	○
* KPI or target, for example for waste heat reduction	○	○	○	○	○	◉
A combination of the above measures	○	○	○	○	◉	○
Other	○	○	○	○	○	○

If you selected "A combination of the above measures" or "Other", please specify here:

6. Regarding a potential energy savings obligation, which instruments should be favoured to achieve end-use savings nationally and in end-use sectors?

- ○ Energy efficiency obligation schemes (EEOS)
- ○ White certificates schemes
- ○ Energy efficiency auctions
- ◉ National energy efficiency funds and dedicated energy efficiency financing programmes, including financial instruments
- ○ Taxation and fiscal incentives
- ○ Other

b. Sector-specific provisions

* 1. In which sectors or areas would additional energy efficiency efforts be most needed?

Between 1 and 3 selections

- ☑ Buildings
- ☑ Heating and cooling
- ☑ Industry

- [ ] Information and communication technologies (ICT), including data centres
- [ ] Energy system
- [ ] Transport
- [ ] Commercial services
- [ ] The public sector
- [ ] Financing
- [ ] Other

2. Which provisions of the EED on the public sector will be the most relevant for the future and should be continued/strengthened?

Between 1 and 3 selections

- [ ] Energy management systems and energy audits for public bodies
- [ ] Energy consumption reduction targets for the public sector
- [ ] Member States' assistance to regional and local authorities
- [ ] The obligation to renovate 3% of public buildings every year
- [ ] Energy savings in public buildings
- [ ] Obligatory energy efficiency criteria in public procurement

* 3. Should the implementation of energy management systems and energy audits in businesses be continued/strengthened?

- ( ) It should
- ( ) It should not
- (•) No opinion

6. Which provisions of the EED related to heating and cooling will be the most relevant for the future and for phasing out fossil fuels and should be continued /strengthened?

Between 1 and 3 selections

- [x] Local heating and cooling plans linked to national energy and climate plans (NECPs) and national air pollution control programmes (NAPCPs), as well as air quality plans
- [x] Provisions on efficient district heating and cooling
- [ ] Provisions on clean technologies for heating and cooling, including heat pumps, geothermal systems and solar thermal technology

- [x] Provisions on high-efficiency cogeneration
- [ ] Provisions on waste heat recovery from the power sector, industry, services and data centres
- [ ] Provisions on metering and billing information
- [ ] Other (or new) provisions

* 7. Should waste/excess/production heat recovery become mandatory when cost-effective re-use options have been identified through a cost benefit analysis or energy audits?

- ( ) It should
- ( ) It should not
- (•) No opinion

8. Should heating networks (e.g., district heating) be prioritised in urban areas to unlock efficiency and prevent a lack of capacity in the local electricity grid or the soaring cost of electricity distribution?

- ( ) Yes, by requiring a minimum share of heating networks in the total heating and cooling supply
- ( ) Yes, by empowering local authorities to decide on the urban areas to be supplied by heating networks
- ( ) Yes, by requesting lower national taxation on heat delivered from heating networks (minimum or zero taxation rates for VAT and excise)
- ( ) Yes, through an investment-enabling financing and funding framework for the development of heating networks
- (•) Yes, through an investment-enabling financing and funding framework for clean technologies for heating and cooling, designed to decarbonise buildings and industry
- ( ) Other prioritisation measures
- ( ) No prioritisation needed

9. How should data centre regulation evolve post-2030? (*Please assign a numerical weight from 1 to 5 to each option below, with 1 being a strong disagreement for the option and 5 a strong agreement.*)

	1	2	3	4	5	No opinion
* No regulation is needed	○	○	○	○	○	◉
* Maintain the current framework of Article 12 of the EED (the public disclosure of data, a reporting scheme, and a rating scheme)	○	○	○	○	○	◉
* Make the current framework of Article 12 and Annex VII to the EED more uniform across the EU	○	○	○	○	○	◉
* Add EU-wide minimum performance standards for data centres to the framework	○	○	○	○	○	◉
* Add sustainability conditions to permitting or state financing	○	○	○	○	○	◉
* Add measures to support the integration of data centres into the energy system	○	○	○	○	○	◉
Other	○	○	○	○	○	◉

c. Financing framework and enabling tools

* 1. What type of financing framework do you consider the most relevant for the achievement of the energy efficiency objectives?

- ○ A prescriptive financing framework, specifically linking financial incentives to binding energy efficiency improvements in line with regulatory requirements
- ◉ An enabling financing framework, where public financing helps market actors to leverage the energy efficiency business case, and private and public stakeholders to access finance for their energy efficiency projects
- ○ A monitoring framework focused on performance tracking through reporting and the benchmarking of energy efficiency, with limited public intervention
- ○ None of the above frameworks is considered sufficiently effective at achieving energy efficiency objectives
- ○ No opinion

2. What are the most important financing support and enabling tools to facilitate energy efficiency investments and uptake?

- ☑ Energy efficiency grants and subsidies
- ☐

Energy efficiency preferential loans and bankability support, by means of public financing programmes (such as public guarantee as collateral, a tax discount on the interest rate, etc.)

- [x] Blended financing combining grants, financial instruments and technical assistance
- [ ] Tradable energy efficiency certificates (White certificates)
- [ ] Advisory services and project development assistance facilities
- [ ] Public-private partnerships such as concessions and other equity co-investment structures
- [x] Fiscal incentives and penalties through taxation
- [ ] Financing through service agreements/ operational expenditures (energy efficiency as a service and other innovative energy services, leasing, etc.)
- [ ] Financing by means of credit agreements, such as energy efficiency lending products (secured and unsecured)
- [ ] Energy service company-based and third-party financing (off balance sheet)
- [ ] Green securitisation and asset-backed securities to boost lending activities and capital markets
- [ ] Other

3. How relevant do you consider the following improvements to the EU framework for energy efficiency financing and energy services? (*Please assign a numerical weight from 1 to 5 to each option below, with 1 being the least relevant and 5 the most relevant.*)

	1	2	3	4	5	No opinion
* Harmonising and simplifying the energy efficiency financing framework by ensuring the strict alignment of eligibility rules for energy efficiency investments and energy services across the relevant regulatory framework (energy efficiency legislation, financial services regulation, EU Taxonomy, the State aid framework, EU funding programmes, EU budget rules and Do No Significant Harm, and other relevant frameworks)	○	○	○	○	◉	○
* Providing a coherent set of EU-level definitions and standard templates for energy efficiency loans, energy services						

(companies and providers), energy performance contracting, and other relevant innovative financing and emerging energy service-based models	○	○	○	◉	○	○
* Giving market participants clearer guidance and information, while improving programme design and implementation, notably in terms of responsiveness, relevance and operational efficiency	○	○	○	○	◉	○
* Clarifying EU accounting rules and financial treatment of energy services contracts and service-based financing	○	○	○	◉	○	○
* Establishing a common template for an energy efficiency certificate (EEC) to increase investors' confidence in the monetary value of energy savings and provide a minimum basis for cross-border interoperability	○	○	◉	○	○	○
* Simplifying energy savings monitoring and verification measures to enable cross-border interoperability, reduce transaction costs and favour energy efficiency investments and market scaling	○	○	○	◉	○	○
* Establishing national energy service companies' databases and ensuring their cross-border interoperability and mutual recognition	○	○	○	○	○	◉
* Supporting the establishment of (national) performance guarantees and refinancing opportunities for energy service companies and energy performance contracting	○	○	○	◉	○	○
* Mandating the provision of project development assistance and advisory support to facilitate the uptake of energy efficiency investments	○	○	○	○	◉	○
* Supporting the use of financial instruments and public guarantees as a default way of establishing national support frameworks for energy efficiency	○	○	○	○	◉	○
* Encouraging and supporting closer cooperation with financial institutions and market actors, for example through the Energy Efficiency Financing Coalition, and helping Member States to develop national collaboration platforms, such as national hubs	○	○	○	○	◉	○
* Developing national or local level collaboration among actors in specific sectors, assets or technologies in order for them to reach agreement on shared goals (model partnership agreements, e.g. on waste heat recovery)	○	○	○	○	◉	○

3. Streamlining the energy efficiency policy framework and reducing administrative burden

* 1. Should the energy efficiency framework be streamlined or implementation made more flexible while preserving its objectives for the decade ahead?

- (●) It should
- ( ) It should not
- ( ) No opinion

* If you think so, which measures or provisions should be streamlined (e.g., the "energy efficiency first" principle, the energy savings obligation, energy management systems and energy audits, energy-efficient district heating and cooling requirements etc.)?

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* 2. In your view, which provisions of the EED could be incorporated into other regulations/directives (e.g., public procurement, energy performance of buildings, financing regulations, legislation regulating metering and billing and consumer-related provisions etc.) and in which ways?

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* 3. In your view, are there provisions in the EED, for which the administrative costs of implementing exceed the benefits?

Administrative burdens can arise from overlapping reporting requirements, inconsistent methodologies across Member States and complex implementation procedures. Efforts should focus on simplification and harmonization

* 4. Are there any parts or provisions in the EED that are obsolete or have proven to be unsuitable for the achievement of its objectives?

Certain provisions should be modified to more effectively reflect the requirements of a decarbonised, resilient, and resource-efficient energy system. In particular, it is essential that provisions concerning efficient district heating and high-efficiency cogeneration are aligned with the objectives of phasing out fossil fuels and do not inadvertently create a dependence on fossil natural gas. In accordance with the waste hierarchy and circular economy principles, it is important to acknowledge residual waste streams and appropriately sorted materials that lack higher-value applications as locally available complementary energy resources. Incorporating these resources into efficient district heating and cogeneration should be a priority.

* 5. In the post-2030 framework, are there energy efficiency reporting obligations that could be removed, simplified, streamlined or merged with other reporting obligations in the broader energy policy architecture?

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Final questions

Do you have any additional comments on points not addressed in the previous questions?

1000 character(s) maximum

The post-2030 energy efficiency framework should reinforce the contribution of renewable heat to Europe's decarbonisation and competitiveness. More focus on heating is needed, which remains highly dependent on fossil fuels and offers significant untapped potential for cost-effective emissions reductions. Energy efficiency should increasingly be applied through a whole-system perspective, integrating supply-side and demand-side optimisation, renewable heat deployment, efficient district heating, high-efficiency cogeneration, and heat recovery. The framework should support the replacement of outdated fossil heating systems with renewable solutions, including sustainable bioenergy, while contributing to the phase-out of fossil fuels, including natural gas. Where secondary fuels are needed for operational resilience, properly sorted residual waste with no higher-value use under the waste hierarchy should be allowed as a complementary local resource, avoiding increased reliance on fossil na

Alternatively, you may submit evidence or position papers on topics falling under the scope of this review.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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