

Politik och kommunikation  
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European Commission

## Swedenergy comments on consultation of roadmap/Inception impact assessment for a review of the Directive 2012/27/EU on energy efficiency

### About Swedenergy

Swedenergy is a Swedish association for about 400 companies producing, distributing, selling and storing energy. Our aim is from knowledge, a holistic approach on the energy system and in collaboration with our surrounding environment develop the energy sector – to the benefit for all.

Swedenergy supports an ambitious increase of the climate goal for 2030

Swedenergy is a strong supporter of the 2050 climate neutrality target, and of an increased 2030 climate goal ambition of at least 55 per cent. Further expansion of climate-friendly electricity, heating and cooling is an indispensable path for the EU, since reducing GHG emissions requires urgent and far-reaching action.

Swedenergy believes option 2 should be considered

Swedenergy believes option 2 on the introduction of non-regulatory alternative policy instruments should be considered since we still are in an implementation phase of the latest revision of the energy efficiency directive from 2018. EU Commission should address the need of adequate implementation in Member States of the recent revision before proposing new regulatory measures.

We are questioning more administrative burdensome detailed energy efficiency regulatory measures which lacks cost-efficiency. One such example is the rules on individual heat metering at apartment level in the present directive which is a counterproductive energy efficiency regulation and which lacks cost-efficiency. We believe further energy efficiency measures instead should focus on efficient measures such as ecodesign and energy labelling of products. Any further energy efficiency measures must also be better linked to present regulations and policy tools where there is a lack of coordination between such as energy performance certificates for buildings, energy mapping regulations and inspection requirements.

Maintain present energy efficiency targets

Swedenergy believes that target levels of the 2018 directive on energy efficiency should be maintained and that the increased climate ambition should be borne by the climate legislation, i.e. the Effort Sharing Regulation (ESR) and the EU ETS. We are against roof targets for energy efficiency which limits the energy use as such and believe that an

energy intensity target gives better conditions to take into account energy efficiency in the energy system in a holistic way.

Swedenergy believes carbon pricing to be the most efficient tool to foster energy efficiency and renewable energy. Therefore, we also propose that the EU ETS should be extended to cover more sectors, inter alia by including the entire heating sector. We also think it is necessary to have a coherent framework where the different legal frameworks on energy efficiency, energy performance of buildings, renewable energy and emission trading are better aligned to each other.

Further energy renovation measures should include a district approach

Swedenergy believes a "district approach" concept with an energy systems perspective should be introduced in further energy renovation measures. The district approach refers to the holistic renovation schemes which are applied to a number of buildings in a pre-defined spatial area, such as districts or neighbourhoods, which also includes finding the most viable efficiency measures from an energy systems perspective. Measures should also be based on more efficient use of the actual used energy not on "purchased energy", and be based on technology neutrality.

On revision on primary energy factor (PEF)

On Primary Energy Factor (PEF): any review of the values should be based on a solid assessment of the evolution of the power and energy mix. It should be in line with standard FprEN 17423 to determine PEF and CO<sub>2</sub> emissions.