

SUT answers on EU consultation on the Review of Directive 2012/27/EU

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

The development of energy efficiency work will affect citizens in many different ways. All the consequences are difficult, if not impossible, to predict. We therefore believe that it is important to include consumers early in the legislative process regarding new and changing EU-directives. This applies to consumer organizations as well as consumer groups with different social mixtures from all countries.

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

It is clear that the 28 EU Member States face very different conditions regarding energy efficiency and the only common ground is the need to save energy. How to do this best differs a lot depending on the country. Therefore, The Swedish Union of Tenants believes that any new and changing EU directives should contain significant opportunities for national adaptation. This, we believe, is crucial in order to achieve a sustainable development of Europe's energy and climate performance, and to deliver affordable energy to consumers and minimize the risk of energy poverty.

Some countries have a significant share of renewable energy already, while others do not. In northern Europe there is a need for heating, and in the southern Europe there is a need to cool buildings. The motivation to invest in energy efficiency schemes also differs a lot across EU. We believe that these and other differences are so vast that national adaptation of the regulatory framework is fundamental when European energy strategies are developed.

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

Because of the different situations in the EU member states the role of the EU regarding energy efficiency measures in buildings should be to set realistic and ambitious targets and to increase public financing for energy efficiency measures. Also the role could be to collect and disseminate best practices between countries and to fund development and research in new solutions and test beds. The role should not be to decide on detailed technical requirements for buildings (like regulatory demands on metering and billing systems in buildings).

We believe that the preconditions for energy efficiency measures in buildings and housing regulations vary so much across Europe that it is impossible to have detailed technical requirements for buildings across Europe without creating huge negative economic and ecological consequences as a result.

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

It is doubtful whether an overall energy efficiency target is relevant for achieving a sustainable Europe at all. What we need is to reduce the use of fossil fuels and increase the use (and production) of renewable energy. An energy efficiency objective therefore should be aimed at the use of non-renewable energy sources.

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)?

No, the article 9-11 should not contain demands on specific technical solutions. For example, heat cost allocators should be removed from article 9. To have a specific technical solution in legislation about energy efficiency is dangerous – what happens when a better technical solution is developed? EU directives should be independent of what technical solutions that are used to comply with the goals of the directive. To mention a specific technical solution in a directive will hamper the development of new techniques for energy efficiency and consumer empowerment.

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, this is absolutely crucial in order to achieve lower energy consumption in buildings across Europe and therefore to support a sustainable development in Europe. In order to be sustainable, energy efficiency measures in buildings need to be economically, technically, socially and ecologically sound. All these dimensions need to be balanced in order to have a sustainable development of European energy performance in buildings.

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

No

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

Additional public funding is crucial for further energy efficiency investments in buildings. Many energy efficiency measures are not cost-effective strictly seen from a property owner's perspective. From a broader sustainability perspective, more energy efficiency measures should be implemented. It is then essential that the financing of these actions can be done in a socially sustainable manner. The Swedish Union of Tenants therefore agrees with the European Commission's analysis that further financial instruments are needed to achieve sustainable energy efficiency in buildings.

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