

Public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework

INFORMATION ABOUT THE RESPONDENTS	
Are you responding to this questionnaire on behalf of/as: -single choice reply-(compulsory)	Organisation
Please enter your name or the name of your company/organisation: -open reply-(compulsory)	European Association of Crafts and SMEs (UEAPME)
Please indicate your principal country or countries of residence or activity: -single choice reply-(compulsory)	Other
Please specify which other country. -open reply-(compulsory)	EU Association
How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(compulsory)	Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. Energy efficiency targets and measures	
1. Do you think the right approach in addressing the shortfall is: -multiple choices reply-(compulsory)	a) To define energy efficiency target(s) - d) other
1.a.1. How should these target(s) be expressed? -single choice reply-(compulsory)	As a hybrid of the two represents a better benchmark upon which to frame a 2030 objective
1.a.2. At what level should they apply? -multiple choices reply-(compulsory)	National
1.a.3. Should they be: -single choice reply-(compulsory)	Indicative
Further comments on targets -open reply-(optional)	
<p>The energy efficiency targets should be maintained, but on a voluntary basis. Such targets should be realistic. A mix of national and sectoral level approach should apply. It would be better to have national targets that take into account the sectors that are more exposed. Moreover, setting intermediate achievable goals can help to achieve the long-term goal. As for the building sector, UEAPME is of the opinion that it is better to encourage energy users to perform energy savings works rather than to force them. Indeed the obligation to perform renovation works can lead to the loss of support schemes and hence encourage undeclared work.</p>	
Please specify your response d) -open reply-(optional)	
<p>The EC should assess the progress made at national level towards the 2020 target. It should work on the implementation of existing energy efficiency related legislation in order to reach the current target. All Member States should advance at a similar pace on the implementation in order to avoid different levels of energy efficiency (EE) across the EU. Likewise, the EC should monitor the Member States (MS)' implementation and make sure that the legal provisions are 'implementable'. Implementation can also be improved by</p>	

clarifying some legal provisions as well as by enhancing the consistency of legislation. In addition to this, a clear communication from the EU signalling the importance of EE can result in more attention to the matter at national level. Within the various EE programs, the the exchange of best practices should be further promoted at EU level. The emphasis though should be on national programs addressed exclusively to SMEs.

B. Energy efficiency sectors

2. Do you think that further policy measures are needed at EU level to foster energy efficiency in buildings?
-single choice reply-(**compulsory**)

Yes

Please give details. -open reply-(**optional**)

It is important to increase EE in buildings and assist the sectors with more potential for EE improvements as they will contribute in the medium term to energy savings and help achieve the targets. The EPBD is the appropriate legislative framework to tackle EE aspects of buildings and technical building systems. However, its implementation at national level needs to be improved since expected energy savings have not yet been delivered. The EU should encourage MS to put in practice measures fostering EE. Construction SMEs should be able to access training courses as well as access self-assessment instruments enabling them to check the quality of energy improvement works. Wider communication campaigns play an important role in explaining the need for EE renovation works. Energy savings certificates should be better explained and their image improved. The EU level could encourage MS to facilitate construction SMEs to group themselves and propose global offers.

3. Do you think that further policy measures are needed at EU level to foster energy efficiency in industry?
-single choice reply-(**optional**)

No

Please give details. -open reply-(**optional**)

Rather than introducing new policy measures, it is more important to ensure that the EU legislative framework currently in force, especially the EED, is first fully and correctly implemented before adopting additional regulations. Industry should continue its efforts in this area as EE is a means to reduce the high energy costs industry is confronted to as well as a means of reaching the GHG emission reduction target. SMEs in the industrial sector should be better assisted so as to undertake EE improvements through trainings and technical support. Last but not least, financial mechanisms to promote energy efficiency investments among this type of SMEs would be necessary.

4. Do you think that further policy measures are needed at EU level to foster energy efficiency in transport?
-single choice reply-(**optional**)

Yes

Please give details. -open reply-(**optional**)

As the largest consumer of final energy consumption, the transport sector both goods as well as passengers should be one of the key priorities of the Commission in addressing EE. Measures in this sector will play a key role in achieving the energy efficiency goals. Effective measures, such as trainings to reduce fuel consumption, and telematic services for public transport to ensure a change towards EE mobility should be urgently addressed. Besides, the promotion of electric vehicles can contribute significantly to enhance the EE in transport. MS should be stimulated to financially support investments in vehicles propelled by alternative fuels and to co-finance the expansion of a tank network for alternative fuels. In order to improve EE in transport, it is advisable to strengthen Trans European Transport networks and of roads and to allow the international, cross-border application of existing logistic concepts and aerodynamic modifications to vehicles.

5. Do you think that further policy measures are needed at EU level to foster energy efficiency in electrical equipment?
-single choice reply-(**optional**)

No

Please give details. -open reply-(**optional**)

The European Ecodesign Directive and the Energy Labelling Directive already cover most significant aspects of energy efficiency concerning electrical equipment. The two pivotal directives should be better implemented. In spite of this, measures addressed to SMEs such as better information and trainings about the benefits of using EE equipments. We recommend to look at the EE potential of the installation sector. An idea would be to set up programs aimed at carrying out assessments of electric installation systems in order to understand the EE potential an upgrade might have. The reason is that high rates of buildings installations are very old and ineffective. It is important to recognise the important role of the entrepreneur or SME in both providing advice and carrying out the necessary improvements of the system.

6. Do you think that further policy measures are needed at EU level to foster energy efficiency in generation and distribution? -single choice reply-(optional)	Yes
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Please give details. -open reply-(optional)

The EU's primary task should be to complete the internal market for energy. A full implementation of the EU legislative framework is needed (third energy package, the Electricity and EE Directives) especially at national level, before setting any additional policy measures. The current regulatory framework in many MS and the varying political support do not create consistent conditions for the deployment of smart grids. The expansion of cross-border infrastructure should be a priority so as energy can flow freely and customers in all MS can rely on fair energy costs and permanently available energy. The EU has an important role to play in the promotion of the liberalisation and decentralisation of the energy market. SMEs wishing to access the energy market should not be disadvantaged compared to the traditional and well-established energy providers. In this line, access to data should not be limited to the large energy players.

7. Do you think that further financial mechanisms and instruments are needed at EU level to mobilise energy efficiency investments? -single choice reply-(optional)	Yes
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Please give details. -open reply-(optional)

UEAPME is aware of the various EU funds addressed at improving EE. Among them, the Structural funds are of particular interest as they are managed at regional level and can be used according to the specific needs of the actors in the territory. UEAPME proposes to assess the use of the EE funds. Every MS should be able to compare itself to others on the use of the funds and learn from good practices in this domain. The Energy Services Companies (ESCOs) should be promoted at EU level. It is important to increase the number of SMEs using the ESCOs services. In some cases, large ESCOs are not interested in working with SMEs due to the risk of SMEs going into bankruptcy. Thus there should be guarantees for SMEs' ESCO financing. SMEs should be able to provide ESCO services and thus become ESCOs themselves. Pushing forward the model of Energy Performance Contracting and aggregation of companies for the market uptake could be a way to unlock this market for SMEs.

8. Do you think that further measures are needed to build the capacity of actors in the energy efficiency sector? -single choice reply-(optional)	Yes
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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? -open reply-(optional)
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Any single promising technology will not address all EE aspects; instead, a mix of technologies will be necessary. According to the principle of technology neutrality, policies should not favour a specific technology solutions. The EU needs to remain open towards emerging technologies. Pre-selecting applied technologies risk hampering innovation. At the same time, technology should be regarded as not only reducing the conventional demand but also as managing the real demand. Its scope should go beyond products or elementary systems and be more holistic, for instance considering the interaction of the building with its environment or dealing at district level. In spite of the said, advancing on the energy storage technologies (for electricity and for heating, cooling and air cooling) is crucial for the success of the energy transition. With regards to the building sector, home automation as well as shell and plant engineering offer huge potential for savings.

10. Further comments -open reply-(optional)

In relation to question 7: Last but not least, financial support from the EU proves necessary for cross-border investments like grid infrastructure.

Please give details. -open reply-(optional)