



Public consultation on the energy efficiency framework for the decade ahead

CONSULTATION RESPONSE

June, 2026

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 (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025DC0870&qid=1761126156157>), 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 and 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

English

*I am giving my contribution as

Non-governmental organisation (NGO)

*First name

Guillermo

*Surname

Ramo Fernández

*Email (this won't be published)

guillermo.ramo.fernandez@gmail.com

*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.

Belgium

Role/position (if applicable)

*Organisation name

255 character(s) maximum

Bellona Europa

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

- Yes
 No

*Organisation size

Medium (50 to 249 employees)

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

If you are a civil society organisation or a public administration, please indicate your main area of focus or your area of competence.

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.

*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 (<https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement>)

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:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please explain your answer.

The core objectives of the Energy Efficiency Directive (implementing energy efficiency as a priority across all sectors, removing market barriers, and overcoming market failures) remain fully relevant for the post-2030 framework. Looking towards the 2040 target of a 90% reduction in net greenhouse gas emissions, energy efficiency becomes even more strategically important: it is the first resource that contains prices, reduces fossil fuel import dependence, and lowers exposure to energy market volatility. Bellona calls for the post-2030 framework to retain and deepen its objectives, building on the progress made since 2023 rather than revisiting the fundamental rationale.

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:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer.

The EED has set an important structural framework, but implementation has been uneven and delivery against the headline targets remains insufficient. The mandatory transposition deadline was missed by a significant number of Member States, meaning that key provisions have not yet entered fully into national law.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*EU-level targets and/or national contributions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*National planning and reporting requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*The energy savings obligation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*The public sector's exemplary role	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Energy audits and energy management systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Consumer information and metering	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Energy efficiency in heating and cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Local heating and cooling plans	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Financing and technical assistance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Limited harmonisation and cross-border interoperability across the national energy efficiency frameworks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Complexity of provisions and administrative burden	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Uneven implementation across Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Insufficient enforcement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Limited access to finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Limited business case	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Skills shortages	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Heating and cooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Industry	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

*Information and communication technologies (ICT)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Commercial services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Public services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answer.

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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*White certificates schemes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Energy efficiency financing programmes, including financial instruments and subsidies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Information and behavioural campaigns	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Industrial programmes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Public sector interventions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Taxation, including carbon taxes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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 (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/16034-Update-of-the-governance-of-the-Energy-Union-and-climate-action/public-consultation_en) 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 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 1: Continue with the current structure of a binding EU energy efficiency target, supported by national contributions determined by formulas.



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).



Option 3: Set a single, overarching clean energy target for the EU with embedded minimum thresholds for key energy parameters, including energy efficiency.



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.



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:

Option 1 combined complemented with KPIs while maintaining binding targets.

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

1,000 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

Please explain your answer.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Calculating whole-system costs to prioritise energy efficiency options on the supply and demand side	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Encouraging the use of AI in the design and operation of the energy system	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Decentralising energy system planning and empowering the local level in efficient system design and system integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*KPI or target, for example for waste heat reduction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A combination of the above measures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

Please explain your answer.

4. What should the main criterion for the implementation of energy management systems and energy audits in businesses be?

- The size of an enterprise (e.g., small or medium-sized enterprises (SMEs), non-SMEs)
- Energy consumption
- The operational sector (e.g., industry, transport, services)
- Greenhouse gas emissions
- Other

5. What should the scope of applicability of energy management systems and energy audits in enterprises be?
(For the terms, see Article 3 §1 in Title I of the Annex to Commission Recommendation 2003/361/EC)

- Autonomous enterprises only
- Autonomous and linked enterprises
- Autonomous, partner and linked enterprises
- Other

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

- 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
- Provisions on efficient district heating and cooling
- Provisions on clean technologies for heating and cooling, including heat pumps, geothermal systems and solar thermal technology
- 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

Please explain your answer.

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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Maintain the current framework of Article 12 of the EED (the public disclosure of data, a reporting scheme, and a rating scheme)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Make the current framework of Article 12 and Annex VII to the EED more uniform across the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*Add EU-wide minimum performance standards for data centres to the framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Add sustainability conditions to permitting or state financing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
*Add measures to support the integration of data centres into the energy system	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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.)
- 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
- 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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

*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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Giving market participants clearer guidance and information, while improving programme design and implementation, notably in terms of responsiveness, relevance and operational efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Clarifying EU accounting rules and financial treatment of energy services contracts and service-based financing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Simplifying energy savings monitoring and verification measures to enable cross-border interoperability, reduce transaction costs and favour energy efficiency investments and market scaling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Establishing national energy service companies' databases and ensuring their cross-border interoperability and mutual recognition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Supporting the establishment of (national) performance guarantees and refinancing opportunities for energy service companies and energy performance contracting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Mandating the provision of project development assistance and advisory support to facilitate the uptake of energy efficiency investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*Supporting the use of financial instruments and public guarantees as a default way of establishing national support frameworks for energy efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
*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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

*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?

Public procurement energy efficiency criteria could be integrated directly into the Public Procurement Directive, making energy efficiency criteria part of the standard award criteria framework rather than a separate obligation.

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

None.

*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?

No opinion.

*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?

No opinion.

Final questions

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

1,000 character(s) maximum

Attached Bellona Europa's position paper on the EED and RED revision.
<https://network.bellona.org/content/uploads/sites/6/2026/04/Renewables-and-Efficiency-Building-up-Europes-Energy-Future-3-1.pdf>

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

Renewables-and-Efficiency-Building-up-Europes-Energy-Future-3-1-compressed.pdf

Contact

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