



# ecee response to Commission consultation for Energy Strategy for Europe 2011-2020

2 July 2010

ecee welcomes the opportunity to provide its views on the Stock taking document, Towards a new Energy Strategy for Europe 2011-2020. This is an important document that can affect the strategic direction of the European Union over the foreseeable future that will set the foundation for a needed sustainable, low-carbon. The groundwork for such a foundation must start now. And the document is correct in saying that such a future is not possible without significant energy savings.

ecee welcomes the flagship initiative to promote a “Resource-efficient Europe” and only wish that theme had been more widely used throughout the document. Regardless it is an important way forward as Europe realises more and more that it is in a finite world and it has to manage accordingly. A holistic approach to all resources is definitely needed.

As the document states, it is an evolving environment and Europe has to have the innovation and flexibility to react to a changing world. That includes ensuring others outside our borders are not left behind in their own development and that actions taken within Europe do not adversely affect others.

ecee would like to provide the following comments relating to energy efficiency and energy saving:

- The document discusses the results from the 2007 Energy Action Plan and we must note that the SET-Plan has no reference to energy efficiency at all. If energy efficiency is to play such a key role, this is not encouraging.
- The same must be said for the Economic Recovery Plan and we can only note that anything there is on energy efficiency is largely due to the efforts of decided Members of the European Parliament.
- In discussing the remaining gaps and shortcomings (section 1.2), ecee agrees that a number of the National Energy Efficiency Action Plans were disappointing but we fail to see in this document how the Commission intends to address that. There needs to be some mechanism that is more pro-active in stemming those shortcomings early in the process. With the next NEEAPs due in 2011, ecee hopes that more guidance and oversight will be possible. NEEAPs are important instruments that should not simply be called “disappointing” a few years after they are prepared.
- ecee agrees that implementation of energy legislation has largely been poor and ecee particularly worries about the Energy Performance of Buildings Directive. While we support the recent recast, there is every effort needed that implementation is improved and it is hoped that will be available in the upcoming EEAP. We also

## **About the European Council for an Energy Efficient Economy (ecee)**

ecee is a non-profit, membership-based European NGO. The goal of ecee is to stimulate energy efficiency through information exchange and co-operation. To facilitate this, ecee provides an information service through its website and e-mail newsletter, arranges workshops and conferences, and takes active part in the European Policy making process.

One of ecee’s principal events is the Summer Study, held for five days every odd year in the early summer. The Summer Study attracts more than 350 people and offers a unique resource of evidence-based knowledge and access to reliable information.

strongly believe that there needs to be greater emphasis on compliance of activity (e.g. construction meeting building codes with EU legislation at the Member State level and that the EU has an overseeing role in this.

- ecee welcomes the statement: “The EU has to realize all the 20% potential for cuts in primary energy consumption by 2020.” Such verbs give ecee hopes that the Commission will be proposing mandatory targets if the potential “has” to be realized. And it has to.
- The document refers to the success of appliance labelling but says nothing about Eco-design. ecee hopes that the Commission will re-affirm its commitment to this important programme and that it will provide adequate resources to ensure effective implementation.
- ecee welcomes the emphasis on ICT technologies, particularly smart meters. ecee believes they can have an important impact, but also wants to caution against a belief that this technology will bring about increased energy efficiency without an integrated approach where synergies are created with other energy efficiency measures. ecee would like to see funding for such technologies in programmes such as the SET-plan and the economic recovery plan. ecee believes such technologies – correctly deployed – are as important or maybe even more important than many of the renewable energy technologies being funded.
- Concerning transport, ecee would like to see more emphasis on better fleet management, even through ICT, and more emphasis on modal shifts towards less energy-intensive transport systems.
- In section 2.2 on implementation of EU legislation, ecee welcomes the emphasis on effective implementation. ecee would like more information on how the Commission will monitor and ensure effective implementation. Implementation also has to be stressed in the issues for consideration in the short-term (box on page 13).
- ecee welcomes that the Commission is committed to work with Member States to ensure maximum compliance but ecee would like the emphasis on maximum impact. It is important to stress the positive aspects of EU legislation
- On making progress towards a low-carbon energy system, ecee agrees it will require the use of various instruments but it also requires a different mindset. The paper mentions innovation many times but ecee does not see this strategy as being innovative. The emphasis is still too focussed on energy supply (including renewables).
- Real innovation would reflect that a sustainable energy policy is built on an energy efficiency first foundation without which meeting future CO<sub>2</sub> free energy demand is likely to prove costly with significant impacts for the most vulnerable EU households and severe implications for our international competitiveness. While the strategy implies that, it is not reflected in the programmes or the resources made available. ecee wants Europe to provide leadership in technological innovation but we do not see a well-rounded and balanced approach to innovation. Europe could be a world leader if it tackled energy demand more effectively.

ecee believes this document is an important start to a dialogue that will lead to a truly sustainable, low-carbon future for Europe. ecee will be pleased to participate throughout this process.

// end //