

## **BEE Feedback**

on Revision of Directive (EU) 2018/2002 on energy efficiency

Berlin, 21<sup>st</sup> September 2020



## Feedback

The German Renewable Energy Federation (BEE) welcomes the COM proposal to reduce GHG emissions by at least 55 percent by 2030. In order to be able to achieve an ambitious greenhouse gas reduction target of at least 55 percent by 2030 compared to 1990, an equally ambitious increase in the targets for the share of renewable energies in gross final energy consumption and energy efficiency are necessary. When revising the Directive (EU) 2018/2002 the Commission should consider that there are numerous calls for at least 60 up to 65% greenhouse gas emission reductions, including from the EP's ENVI (asking for an at least 60% reduction target). Therefore, for Europe's 2030 climate ambition we agree, that the existing target for energy efficiency of 32.5 % by 2030 needs to be increased. Given the analysis laid out in the impact assessment the increase should be in the order of magnitude of at least 40% instead.

The overall strategy to reduce energy consumption and reach climate neutrality should focus on expanding the use of renewable energies as primary energy source, because the reduction of carbon emissions by the use of renewable energies such wind and solar or biomass is increasingly cheap. When revising EED the role of innovative technologies like heatpumps or solarthermal applications should certainly be strengthened. To tap the full cost-effective potential of these efficient technologies renewable energies, need to be promoted.

In order to support the use of these efficient energies and technologies, a mix of measures is needed. This consists of corresponding price signals (high minimum price for CO<sub>2</sub>), regulatory frameworks and attractive funding. To reduce the final energy consumption a dynamic expansion of renewable energies, especially in the building sector is required.

Furthermore, the revision should implement binding targets and milestones for the share of energy efficiency in all sectors to underpin the reduction of GHG-emissions. Such goals and milestones must be set both for the European level and for each Member States in order to achieve the commissions goal to reduce GHG emissions by at least 55 percent by 2030. But the revision must also respect the subsidiarity principle as well as the Member States' right to choose their own energy mix. It must strike the balance between mandatory target achievement and flexibility for member states in choosing their preferred mix of renewable energy, energy efficiency and energy savings.

The increase of energy efficiency through renewable energies must also be tapped more intensively in the other sectors. The transport sector in particular has enormous potential in that regard. The expansion of renewable energies in these sectors would also contribute to increased sector coupling and thus to an increase of energy efficiency and the resilience of the energy system.



As German umbrella association for the renewable energy sector, the German Renewable Energy Federation (BEE) bundles the interests of 55 specialised associations and companies. We connect the wind, bio, solar, geothermal and hydropower sector with each other. That way, we represent 30,000 individual members, among them more than 5,000 companies, 316,000 jobs and more than 3 million power plant operators.

Our goal: 100 percent renewable energy in electricity, heating and transportation.

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