

Miguel Arias Cañete
European Commissioner for Climate and Energy
200 Rue de la Loi
1049 Bruxelles
Belgium

26 January 2016

Ambitious revision of the EU Energy Efficiency Directive

Dear Commissioner

In December the world welcomed a new international climate agreement. As business associations, consumer and environmental groups, who represent major parts of Germany's civil society and economy, we would like to thank you for your efforts in bringing this agreement about. Cost-effective energy saving measures are key to fulfilling the EU's commitment to contribute its fair share to limit global warming to 1.5°C. Therefore we very much welcome your statements concerning the priority of energy efficiency, the level of ambition and the legal nature of the EU energy efficiency target for 2030.

We would like to use the Commission's ongoing public consultation process on the review of the Energy Efficiency Directive (EED) as an opportunity to highlight some aspects of the review, which we feel are crucial for Europe's environmental and economic prosperity:

- First of all we would like to reiterate our support for making the EU energy efficiency targets for 2020 and 2030 binding, as binding targets have proven to be much more effective than indicative ones and provide the needed planning security for investors. In addition a binding character helps to institutionalize the Energy Efficiency First principle and to fill it with life.
- Further, we strongly urge you to adopt a binding energy efficiency target of 40 percent for 2030, having in mind the multiple benefits of energy efficiency to health, employment, and to mitigate climate change, energy poverty and energy import dependency. The current level of 27 percent will not suffice to unlock these potentials.

- We strongly support the removal of the current sunset clause on article 7, as it undermines Member States' commitment in implementing long-term efficiency measures. Furthermore, it is of overall importance to weed out the loop-holes regarding article 7.
- In order to highlight the role model function of public authorities and the state itself, we call for an increase of the renovation rate for public buildings and for extending the scope of buildings the renovation rate is applied to.
- To endorse a consistent and forceful implementation of the EED by all EU Member States, we encourage you to adjust reporting guidelines and duties, including the introduction of a binding reporting template. While we welcome the aspiration to streamline reporting obligations under the new 2030 energy regime, we would like to emphasize that this must not take place at the expense of the stringency and thoroughness of the reporting mechanism.

Although it is still early days to assess its full effectiveness, it is already clear that the EED has positively influenced the development of energy efficiency policies in Germany. Accordingly we support the strengthening of the EED through the revision process in order to unlock the full potential of energy efficiency as a way of reconciling climate ambition with cost-efficiency, domestic job creation and energy security.

Dear Commissioner, we would like to assure you of our full support in increasing the ambition and effectiveness of the EED in the revision process and would be delighted to continue this dialogue in a personal conversation.

Yours sincerely,



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Chairman



Prof. Dr. Hubert Weiger,
Chairman



Dr. Aribert Peters,
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