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ENERGY EFFICIENCY FOR EUROPE'S

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First views on a post-2030 energy efficiency framework

Energy Efficiency for Europe (formerly EFIEES) is the voice of private energy service companies (ESCOs) and their national associations across Europe. Our members represent over 100.000 professionals committed to the design and implementation of energy efficiency measures in public and private buildings, industrial facilities, as well as to the efficient operation of district heating & cooling networks.

Energy Efficiency for Europe strongly supports the European Commission's commitment to keeping the EU on track to meet its climate objectives, while fostering a competitive, sustainable, and resilient energy future. The development of a post-2030 energy efficiency framework is not only a critical milestone in achieving the EU's decarbonisation and economic objectives, but also a necessity as the EU confronts its second energy crisis in just four years. Energy Service Companies (ESCOs), as key actors of the energy transition, stand ready to support the Commission in ensuring that the EU delivers on its climate ambitions and guarantees energy security. To this end, Energy Efficiency for Europe suggests focusing on the following strategic priorities when designing EU post-2030 energy efficiency framework:

1. Ensuring stability and effective implementation as core principles

The post-2030 framework must first and foremost **consolidate the EU's existing climate objectives** while ensuring the **effective and uniform implementation of the Fit for 55 package** across all Member States. Regulatory stability is a prerequisite to competitiveness and investments, while helping to avoid unnecessary administrative burdens that could hinder progress.

A **predictable and stable regulatory environment** is indeed essential for unlocking investments in energy efficiency and renewable energy projects. Market actors, including ESCOs, rely on long-term visibility and clear business cases to be able to invest in decarbonisation projects. Frequent or unpredictable changes to regulations risk undermining confidence, and delaying essential infrastructure upgrades needed to meet the EU's climate targets.

The 2030 objectives and their supporting provisions are still in the process of being transposed and implemented at the national level, with disparities and delays in progress among Member States. While looking at the post-2030 framework, the EU must prioritise ensuring full and

effective implementation of the existing framework. This should notably include a **rigorous assessment of the impact of the provisions introduced under the Fit for 55 package**, with a view to identifying best practices and addressing any remaining gaps.

Should revisions to existing directives prove necessary in the short term, they must be highly targeted and narrowly focused, primarily to ensure alignment with the 2040 climate target while **preserving and replicating the architecture established for 2030**. This approach will safeguard continuity, prevent policy fragmentation, and ensure that the EU's climate strategy remains both ambitious and achievable.

2. Elevating 'Energy Efficiency First' from principle to action

Article 3 of the Energy Efficiency Directive (EED) recast further enshrined the Energy Efficiency First (EE1st) principle in EU law but its effective and widespread implementation is now critical to achieving the EU's climate and energy targets. In a geopolitically volatile world, energy efficiency indeed stands as a cornerstone of the EU's energy security and competitiveness, reducing dependence on external energy sources while strengthening resilience against price shocks and supply disruptions. However, the recent updates of the National Energy and Climate Plans (NECPs) have shown **uneven integration of this principle within Member States national policies and inequal plans to implement it.**

To harness the full potential of the EE1st principle in the post-2030 framework, it must be integrated across the entire energy value chain. This means evaluating efficiency at every stage, from production to end-use consumption, and **fully recognising primary energy as a key reference metric**. In this sense, it is and will also be crucial to prioritise the reduction of energy demand, as a prerequisite to any switch to renewable energy sources.

The effective implementation of the Energy Efficiency First principle will also depend on the successful transposition of recent EU Commission guidance into concrete national policies. Key non-legislative acts, such as the Affordable Energy Action Plan, the Clean Investment Strategy, and the upcoming Heating and Cooling Strategy and Electrification Action Plan, already include, or will include, essential recommendations to advance energy efficiency in Europe. Moving forward**, the post-2030 energy efficiency framework must not only build on these initiatives but also ensure their robust implementation**.

3. Continuing and strengthening support to ESCOs and Energy Performance Contracts

As emphasised by the Affordable Energy Action Plan, **Energy Service Companies (ESCOs) are important drivers of the energy transition,** bridging the gap between ambitious climate policies and their practical implementation. By delivering tailor-made and district-level solutions, they enhance and accelerate electrification efforts, ensuring that energy efficiency and decarbonisation are achieved in a practical, scalable, and economically viable way. ESCOs indeed act as **project aggregators**, integrating expertise, financing, and fit-for-purpose technologies. Through Energy Performance Contracting, they streamline complex projects,

bundling multiple solutions to maximise efficiency gains while guaranteeing real energy and CO_2 emissions savings over time.

Among the provisions that the Fit for 55 package introduced, **Article 29 of the EED recast** stands out by mandating an **Energy Performance Contracting feasibility assessment** for the renovation of public large non-residential buildings with a total useful floor area above 750 m^2. This measure, that fully supports ESCOs solutions, could unlock significant energy savings and reduce emissions across the EU. However, despite the transposition deadline having passed, several Member States are still in the process of adopting the recast EED and its provisions, let alone implementing them effectively. For countries that have transposed the EED recast on time, it remains too early to fully assess the impact of these provisions on the ESCO market. Therefore, when designing the post-2030 framework**, unlocking the full potential of ESCOs will require safeguarding and rigorously enforcing these existing provisions**, while monitoring their market impact over time.

4. **Ensuring a stable definition of EDHC and enhancing support to waste heat**

Another important provision of the EED recast is **Article 26 which introduces a new definition for Efficient District Heating and Cooling (EDHC) systems**. This update sets a **clear and ambitious roadmap for the sector to achieve net-zero emissions by 2050** with a gradual integration of renewable energy sources and waste heat recovery into district networks energy mix.

Since the entry into force of the revised EED, the Article 26 has guided projects designs, mid and long-term planning, and infrastructure investments. It provides the necessary visibility for the sector to align its strategies with the EU's climate objectives. However, as previously noted, full transposition and implementation of the revision remains uneven across Member States, and still yet to be fully completed. Accelerating the transposition process is critical to ensuring that all regions can benefit from the economic, environmental, and social advantages of Efficient DHC systems. Any post-2030 energy efficiency legislation must **uphold the foundational principles and definition established in Article 26**, avoiding disruptions that could deter investment in energy-efficient and low-carbon technologies and hamper project development.

This **stability should be paired with targeted support for waste heat recovery**, a cost-effective and underutilised solution for decarbonising heating and cooling. Industries, data centres, and urban infrastructure generate vast amounts of waste heat that can and should be captured and repurposed. Doing so will enhance energy efficiency, reduce reliance on fossil fuels and lower energy costs for consumers. The upcoming EU Heating & Cooling Strategy will be a good opportunity to reinforce these priorities and should be designed in synergy with the post-2030 frameworks to maximise impact.