

First views on a post-2030 renewable energy 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 goals while fostering a competitive, sustainable, and resilient energy future. The development of a post-2030 framework for renewable energy 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. To achieve these objectives, Energy Efficiency for Europe suggests focusing on the following strategic priorities:

1. Guarantee stability and effective implementation as core principles of the post-2030 framework

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. As regards the revised Renewable Energy Directive (RED III), the recently updated



National Energy and Climate Plans (NECPs) have shown uneven transposition and implementation of some key provisions such as article 23 which sets out how Member States are to mainstream renewable energy in heating and cooling. 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. Ensure that renewable energy is efficient energy

To achieve its climate ambitions for 2040 and beyond, the EU must **ensure that energy efficiency and the uptake of renewable energy go hand in hand**. This synergy was clearly recognised in the design of the Fit for 55 package and should continue to be actively promoted and supported at both EU and Member State levels within the post-2030 frameworks. Integrating these two dimensions is essential not only to meet decarbonisation targets but also to strengthen system resilience, reduce costs, and maximise the benefits of the energy transition. Energy efficiency is indeed a key enabler of renewable energy uptake: by reducing overall energy demand and smoothing consumption patterns, efficiency measures make renewable energy more cost-effective, maximise its utilisation, and strengthen system reliability.

Within the post-2030 renewable energy framework, energy efficiency should thus be prioritised **in line with the Energy Efficiency First principle**. This principle emphasises that cost-effective measures, which enhance both energy demand and supply efficiency, must be central to energy planning, policy development, and investment decisions. Its implementation recognises that the transition cannot rely on a single solution: **all available options, including thermal energy and other sector-specific measures, must play a role, as there is no one-size-fits-all approach**.

Practical implementation of this principle can be achieved through **energy management solutions, such as Energy Performance Contracts**, which can simultaneously target energy and CO₂ savings while guaranteeing performance over time. Already acknowledged within the existing energy efficiency framework, **these dynamic solutions offered by Energy Service Companies (ESCOs) should be more systematically integrated into the renewable energy framework**. They significantly contribute to managing demand peaks and variations, thereby supporting system flexibility, reliability, and security. Promoting such integrated approaches within the post-2030 renewable framework will be essential to fully enhance the potential of renewable energy while maintaining efficiency, stability, and cost-effectiveness.



3. Enhance support to waste heat recovery and district approach

The RED III allows Member States to partially count waste heat towards their renewable energy share in order to meet the binding and non-binding sectoral targets established by the revision. Specifically, waste heat is recognised in Article 15a (buildings), Article 22a (industry), Article 23 (heating and cooling), and Article 24 (district heating and cooling). As a cost-effective and underutilised energy efficiency solution, waste heat recovery plays a critical role in decarbonising our energy system. Industries, data centres, and urban infrastructure generate vast amounts of excess waste heat that can and should be captured and repurposed. This approach, **treating waste heat as equivalent to renewable energy**, was one of the revision's important features and **must be safeguarded and expanded in the post-2030 renewable energy framework** to guarantee an effective support to the EU's energy transition.

To fully harness the potential of waste heat, **careful attention should be given to the further development of efficient district heating and cooling systems**. Such systems can not only help further decarbonising the heating and cooling sector but also support energy affordability and security. European regulations already recognise the benefits of a district-level approach, yet the local dimension of heating and cooling must be more fully considered in future EU and national strategies. The upcoming EU Heating & Cooling Strategy presents an important opportunity to reinforce these priorities and the post-2030 frameworks should be developed in close synergy with it to maximise impact.