

Public Consultation on the Evaluation and Revision of the Action Plan for Energy Efficiency [COM(2006) 545]

Profile of the respondent	
Your profile	Organisation
Region	European Union
Which European Union country?	Some EU Member States (for organisations only)
Which EU Member States?	Germany, France, UK, Ireland, Belgium, Luxembourg, Finland, Austria, plus Norway and Switzerland.
Would you like your reply to be published online?	Yes
Organisation name	Eurofuel (The European Heating Oil Association)
Organization type	Industry and private sector, incl. their associations, excl. SMEs
What type of activities are addressed by your organization (multiple choice question)	Energy Efficiency services in the residential sector Energy Efficiency services in the tertiary and industry sectors Construction Energy-using products and appliances Energy production, supply, transmission or distribution
Briefly describe the nature of your involvement in energy efficiency	Whole supply chain activities, from efficient appliance manufacture, to energy distribution, and energy-efficient design advice (construction-heating interactions)
1. General questions	
1.1. The Action Plan for Energy Efficiency of 2006 identified 6 key areas and proposed 10 priority actions (out of a total of 85 actions and measures). Which of the actions and measures of the 2006 EEAP should be continued / redefined / discontinued, and why? (Max. 4000 characters)	
All of the 6 key areas and 10 priority actions are still valid. In Eurofuel's area of expertise (heating systems, buildings and liquid fuels energy distribution), Eurofuel urges rapid progress to be made, measured ideally by primary energy as the single most important parameter. However, careful attention should be paid to ensuring that synergies are taken advantage of re. the Energy Performance of Buildings Directive recast, Energy-using Products Directive heating & cooling systems implementation and the Energy and End-Use Services Directive.	
1.2. Which new challenges have emerged since 2006 and should be addressed in the new Action Plan for Energy Efficiency? (Max. 4000 characters)	
Economic distress of many SMEs, consumers, and industry in general, resulting in threats to EU industry competitiveness/ survival. Positively, there has been progress in implementing and recasting energy efficiency legislation re. buildings, heating appliances & energy services. There should be more "carrots" than "sticks" in the new Action Plan for Energy Efficiency, and also more provision for training of heating installers, and consumer awareness.	
2. Specific questions	
2.1. The existing Energy Performance of Buildings Directive (2002/91/EC) and its recast, as well as other relevant legal acts, go a long way for introducing ambitious but realizable energy performance requirements for buildings and increase consumers' awareness. However, much more can be done.	Yes
How do you assess the need for moving towards a requirement that all new buildings have low or zero energy consumption and carbon emissions after certain date? (Max. 4000 characters)	

This should ultimately be a requirement, but the emphasis of the EPBD recast should be on improving energy efficiency in existing buildings (80%-plus of the buildings in existence until 2020), and on facilitating eco-efficient measures (combinations of conventional fuelled-systems and renewables) regrading replacing heating systems.

How do you assess the need for introducing an EU level measures concerning training of architects, builders and installers? (Max. 4000 characters)

This is important, but existing national schemes must not be overlooked, and must be fully taken into account . Mutual recognition of national qualifications is crucial. Eurofuel fully endorses the Annex in the Renewables Directive regarding training of installers. Developing training should be performed in conjunction with existing conventional fuel and renewables installers/ training bodies.

What other measures at EU level need to be undertaken? (Max. 4000 characters)

Eurofuel supports the Commission's and European Parliament's EPBD recast, e.g., no 1000m2 threshold, and Eurofuel would like to see the development of a common EPBD methodology, to be worked out with Member States' authorities. A common Least Life Cycle Cost method for EPBD and heating/ cooling systems would also be very helpful.

<p>2.2. Sustainable transport and energy consumption of cars is currently addressed in the Greening transport package (COM(2008)433), the Regulation on Emission performance standards for new passenger cars (COM(2007)0856), the proposed Directive on labelling of tyres (COM(2008)0779), the proposal on greening car taxation (COM(2005) 261) and the 'Green Cars' initiative. The Commission is also working on a proposal on light commercial vehicles and a revision of CO2/cars labelling. Do you consider that additional measures at EU level need to be undertaken?</p>	<p>No opinion</p>
<p>2.3. The Eco-Design (2005/32/EC) and Energy Labelling (92/75/EEC) framework Directives are significant steps as regard to product policy. A number of implementing measures have been already or are soon to be adopted and the ongoing amendments of the two Directives provide for their more ambitious and wider application. Do you consider that additional measures can be taken forward in order to increase the impact of these instruments?</p>	<p>Yes</p>
<p>In your view what should these measures be? (Max. 4000 characters)</p> <p>The labelling measures must be consumer-friendly, and understandable. The role of Energy-related Products needs to be carefully examined in parallel to that of EuP. Cost must be seriously and realistically taken into account by the Commission, in any future proposals.</p>	
<p>2.4. Lack of access to appropriate financing is an important bottleneck for making a real step forward in our ambitions on energy saving. Innovative financing instruments are now being developed by institutions such as EIB, EBRD, national promotional banks and private banks in particular in association with the Covenant of Majors initiative. Demonstration projects of the application of energy efficient technologies in a competitive manner, e.g. 'smart cities', could also be considered. Do you think other financing measures at EU level are needed?</p>	<p>No opinion</p>
<p>2.5. Well targeted fiscal incentives could be a driver for energy efficiency investments and innovation. The EU has already taken measures to make it easy for Member States to allow for more advantageous VAT rates for some labour-intensive services, such as renovation and repairing of</p>	<p>Yes</p>

private dwellings. Do you consider that additional measures at EU level need to be undertaken to shape consumer choices?

In your view what these measures should be? (Max. 4000 characters)

VAT reductions for labour-intensive services related to energy-saving are important, and should be revisited. Another important "carrot" for consumers could be to examine income tax rebates for energy-saving measures, to be developed with Member States. This has been employed in the USA with some success.

2.6. Education and training on energy efficiency are vital ingredient of a successful energy efficiency policy. These were already mentioned above regarding buildings but the challenge is much broader. Do you consider that measures/actions at EU level to catalyze training at school and university level should be undertaken?

No opinion

2.7. Awareness of final consumers on energy savings possibilities and their benefits is still low. This in particular concerns domestic consumers and SMEs. Some actions to target different groups are already undertaken at national and EU level. For example, the Sustainable Energy Europe Campaign is focusing on grouping social stakeholders and market actors to undertake joint action. Do you think that further communication action at EU level is needed?

No opinion

2.8. Furthermore, small and medium size companies (SMEs) are the backbone of EU's economy as they make up more than 99% of all firms and employ 67% of the EU's workforce but may need more support for implementing energy saving measures. Do you consider that specific measures to target SMEs are necessary?

Yes

In your view what should these measures be? (Max. 4000 characters)

ESCOs and SME interactions should be encouraged and facilitated, via up-front provision of financing to enable energy-efficient heating systems to be installed (in Eurofuel's sphere of activities). The same problem could be similarly addressed for public institutions such as hospitals, etc.

2.9. Public sector should lead by providing best practice examples. Positive progresses have been made under the voluntary Green public procurement policy and the proposals for mandatory procurement of energy efficient products in the framework of the recast of the Energy Labelling Directive. The leading role of public authorities has also been emphasized under the recast of Energy Performance of Buildings Directive proposal. Do you consider that further actions at EU level should be undertaken?

Yes

What further actions would you suggest at EU level? (Max. 4000 characters)

ESCOs and SME interactions should be encouraged and facilitated, via up-front provision of financing to enable energy-efficient heating systems to be installed (in Eurofuel's sphere of activities). The same problem could be similarly addressed for public institutions such as hospitals, etc.

2.10. The role of energy utilities can be substantial but at present they have insufficiently developed a market for energy efficiency services. Ways to create adequate framework conditions for this market to take-up in liberalized electricity and natural gas markets should be sought, possibly

Yes

in cooperation with the Regulators. Do you consider that actions at EU level should be undertaken?	
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In your view what should these measures be? (Max. 4000 characters)
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There should be a level playing field between the large electricity and gas market players and the SMEs involved in the distribution of oil products. Huge advances have been made by heating oil supply-distributor SMEs regarding opportunities for energy saving, which the Energy Services Directive makes available (e.g., France, Austria).

2.11. Energy efficiency offers significant market opportunities. Do you consider that specific measures at EU level should be adopted to provide incentives for companies to enter these markets, in particularly as regards SMEs?	No opinion
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2.12. In relation to the above question do you consider that there is a need for the introduction of a EU-wide White Certificate scheme?	No opinion
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2.13. The Directive on energy end-use efficiency and energy services (2006/32/EC) already provides for national indicative energy savings target which differs from the ones for renewables and for the greenhouse gas emissions. Giving the increasing priority for ensuring that investment in energy consumption reduction are made in all Member States do you consider that a move towards binding targets is needed?	Yes
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How should these binding targets be set up and at what level? (Max. 4000 characters)
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The targets of the present framework are possibly adequate, but must be enforced. Further enhanced targets must be discussed in detail with Member States, and any voluntary agreements already set up to implement Directive 2006/32/EC must be respected.

2.14. Measurement and verification of energy savings is essential aspect for monitoring the results of any measures introduced at national and EU level. Although some targeted measures are being implemented, do you consider that more systematic and harmonized approach at EU level is needed?	Yes
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In your view what should these measures be? (Max. 4000 characters)
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Systematic and precise measurement of Primary Energy used should be emphasised in any overall energy use management/ monitoring at EU level. This is the most effective parameter, and ensures parity between all energy sources, conventional or renewable, and also whether from grid/ network supplies or small-scale. Regarding EPBD, EU-wide measurement protocols should be part of this.

2.15. Energy efficiency should become a vector of international co-operation and a subject of international financing programmes, in particular regarding EU neighbouring countries. Do you agree with statement?	No opinion
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3. Other remarks

3.1. Please add your additional remarks in the section below. (Max. 5000 characters)
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Eurofuel welcomes the Commission's initiative in commencing this consultation on the Energy Efficiency Action Plan, to be developed during 2009-2010. Energy efficiency (the utilisation of "Negawatts") must be taken as seriously - via mandatory targets - as the uptake of renewables, and the reduction in emissions of Greenhouse Gases.
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Meta Informations

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