

Public consultation on the review of progress towards the 2020 energy efficiency objective and a 2030 energy efficiency policy framework

INFORMATION ABOUT THE RESPONDENTS	
Are you responding to this questionnaire on behalf of/as: -single choice reply-(compulsory)	Organisation
Please enter your name or the name of your company/organisation: -open reply-(compulsory)	Austrian Federal Economic Chamber (WKÖ)
Please indicate your principal country or countries of residence or activity: -single choice reply-(compulsory)	Austria
How would you prefer your contribution to be published on the Commission website, if at all? -single choice reply-(compulsory)	Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)
A. Energy efficiency targets and measures	
1. Do you think the right approach in addressing the shortfall is: -multiple choices reply-(compulsory)	d) other
Please specify your response d) -open reply-(optional)	
<p>The right approach in addressing this shortfall is to ensure the correct and full implementation of existing energy efficiency related legislation (e.g Energy Efficiency Directive, Energy Performance of Buildings Directive, Ecodesign and the Energy Labelling Directive), based on economic criteria. Instead of additional legislation, the focus must be put on setting voluntary energy efficiency incentives. Furthermore, improvements of consistency and coherence of the above mentioned pieces of legislation are needed. Especially for integrated multifunctional products, which may be subject to several inconsistent or even contradictory regulations this is of outstanding importance. While Ecodesign and Energy Labelling Directives are generally coherent other pieces of EU environmental legislation are acting in isolation (e.g. substance restrictions under RoHS and/or REACH).</p>	
B. Energy efficiency sectors	
2. Do you think that further policy measures are needed at EU level to foster energy efficiency in buildings? -single choice reply-(compulsory)	No
Please give details. -open reply-(optional)	
<p>To foster energy efficiency, the further and increased refurbishment of buildings is definitely required. We believe that there is a large untapped potential in the buildings sector in all EU Member States. No new policy measures are needed though, since the Energy Performance of Buildings Directive (EPBD) is the appropriate legislative framework to tackle the energy efficiency aspects of buildings and technical building systems. However, its implementation at national level needs to be improved since expected energy savings have not been delivered yet. Instead of creating new measures an earlier revision of the EPBD is necessary to better address the existing buildings. Since over 80% of the existing buildings will still exist in 2020, the refurbishment of all these buildings, including technical installations and internal equipment, should be prioritized.</p>	

3. Do you think that further policy measures are needed at EU level to foster energy efficiency in industry?
-single choice reply-(optional)

No

Please give details. -open reply-(optional)

In Austria a lot of energy efficiency measures concerning the industry sector have already been taken by the companies. Austria has one of the most energy efficient industrial sectors in the world. Remarkable advance could be reached voluntarily, which should be considered in the adaption of "early actions". However, we believe that companies should and will continue their efforts as they attempt to decrease their energy costs through economically-prudent energy efficiency measures. A better market uptake of the energy efficient equipment and technologies is necessary. Though, EU legislative framework, especially the Energy Efficiency Directive, needs to be first fully implemented before adopting any additional policy measures. Further policy measures would risk jeopardizing the industry competitiveness with additional costs and administrative burdens without real benefits. There should be no mandatory legislative requirement of industry to save energy.

4. Do you think that further policy measures are needed at EU level to foster energy efficiency in transport?
-single choice reply-(optional)

Yes

Please give details. -open reply-(optional)

The transport sector will play a key role in achieving energy efficiency goals. Effective measures, such as promotion of mobility management (subsidies), investment in energy efficient vehicles (CNG, LNG, Hybrid and electric vehicles), trainings to reduce fuel consumption, separate charge categories (road pricing bonus) for buses, and telematics services for public transport to ensure a change towards energy efficient mobility should be urgently addressed. Additionally more tolerances concerning limits of weight and dimensions of vehicles as well as enforcing of co-modality (interface of transport modes) need to be considered. As the largest consumer of final energy consumption, transport is rightly one of the key priorities of the Commission in addressing energy efficiency.

5. Do you think that further policy measures are needed at EU level to foster energy efficiency in electrical equipment?
-single choice reply-(optional)

No

Please give details. -open reply-(optional)

The European Ecodesign Directive and the Energy Labelling Directive already cover most significant aspects of energy efficiency concerning electrical equipment. Instead of new policy measures, the two pivotal directives should be enforced and better implemented.

6. Do you think that further policy measures are needed at EU level to foster energy efficiency in generation and distribution?
-single choice reply-(optional)

No

Please give details. -open reply-(optional)

Further policy measures in generation and distribution could be considered as there remains an untapped potential to increase energy efficiency. A full implementation of the EU legislative framework is needed (third energy package, the Electricity and Energy Efficiency Directives and the direct electricity price regulation) especially at national level, before setting any additional policy measures. Consequently, existing potentials have to be identified and analysed, which should lead to the determination of whether further measures are necessary. Even though industry has done huge investments in energy efficiency technologies (including smart appliances) the market uptake is insufficient. In addition, the current regulatory framework in many Member States and the varying political support do not create consistent conditions for the deployment of smart grids to maximise the use of the existing infrastructures, from generation to end-use, in Europe.

7. Do you think that further financial mechanisms and instruments are needed at EU level to mobilise energy efficiency investments?

Yes

-single choice reply-(optional)

Please give details. -open reply-(optional)

Investments in energy efficiency need to be of highest priority in all sectors. The declining balance method or tax incentives should foster investments on system-level. Appropriate financial mechanisms and instruments are of utmost necessity and allow available energy efficient equipment and technologies to deliver their full potential in terms of energy savings. Financial mechanisms and instruments to support energy efficiency investments – foreseen by the EED – have to be implemented at national level urgently. Further effort must be dedicated to raise awareness of the existing and future financial incentives and grants to foster energy efficiency investments. To deliver their full potential, subsidies and financing schemes supporting building renovation need to be predictable and stable over time. Administrative burdens related to financing measures should be limited to the strictly necessary level.

8. Do you think that further measures are needed to build the capacity of actors in the energy efficiency sector?

Yes

-single choice reply-(optional)

9. What are the most promising technology solutions that can help deliver energy savings in the 2020 and 2030 time horizon? How can their development and uptake be supported at EU level?

-open reply-(optional)

Any single promising technology will not address all aspects of energy efficiency; instead, a mix of technologies will be necessary. According to the principle of technology neutrality any specific technology solutions should not be favoured. We must remain open towards emerging technologies. Pre-selecting applied technologies on basis of today's knowledge risk hampering industry innovation. Therefore the following principles need be taken into account: • Tools and mechanisms to support development and uptake of promising technology solutions should be technology-neutral and focus on results • Technology should be regarded as not only reducing the conventional demand but also as managing the real demand • Scope should go beyond products or elementary systems and be more holistic, for instance considering the interaction of building and its environment or dealing at district level.

10. Further comments -open reply-(optional)

Currently EU member states are in the process of implementing the Energy Efficiency Directive. As the implementation process is not finished, the WKÖ considers that the timing of such a consultation is unusual, especially because it is premature to set any further measures. However, WKÖ is convinced that energy efficiency has to be achieved by voluntary initiatives, rather than by mandatory requirements. Through the national implementation of the Energy Efficiency Directive, deficiencies and potentials can be analysed and exposed. Only then further steps can be taken.

Please give details. -open reply-(optional)