

Energy efficiency directive EED

Key points:

- TIF is in favor of tightening the energy efficiency target at EU level, as it tackles climate change while generating markets and demand for energy-efficient solutions in EU.
- Energy efficiency in industry can be improved in many ways, for example by improving the energy efficiency of production machinery, buildings, and utilizing waste heat in production processes.
- Energy consumption cap is problematic when the energy sector is shifting from fossil fuels to carbon free and renewable energy sources. Emission reduction needs to be prioritized and **therefore we propose removing the cap on energy consumption** (Art. 4, energy efficiency target). TIF prioritizes combatting climate change, not in Europe alone but globally. **Therefore, reducing GHG emissions is more important than cutting total energy consumption** particularly when electricity is produced by using fossil free energy sources. **One option to store energy is to convert renewable energy to hydrogen** and further to various fossil free carbon hydrate fuels (power-to-x, P2X). Hydrogen and green gas fuels offer transport sectors a viable means to cut emissions and to meet even the most ambitious climate change targets. In the future hydrogen will be used also as a reductive agent in fossil free steel making process.
- A voluntary energy efficiency scheme has been running successfully for many years in Finland. We support the proposal to save the alternative policy measures in Art. 10 (Alternative policy measures).
- The Technology Industry fully supports the Commission's proposal to roll out the "Renovation Wave Initiative". There are vast energy savings potential in the renovation of old buildings and the technology needed already exists.
- The changes proposed by the Commission to the definitions of bioenergy used in the context of energy efficiency in heating and cooling must be rejected **or co-firing waste-based fuels and industrial residues - in line with natural gas - should be allowed** (Art. 24 on heating and cooling supply). We are in favor of maintaining the current threshold on 20 MW for the energy sector and Industry. The reason is that 20 MW is also the threshold for the ETS system. Reducing the threshold to 5 MW might hinder renewing existing power plants (Art. 24:4).
- Subsidiarity principle needs to be respected and social security belongs to national competencies. Therefore we do not support the proposal of linking social issues to the Energy Efficiency Directive (Art. 22: Empowering and protecting vulnerable customers and alleviating energy poverty).