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UFE's reply to the EC call for evidence on the Energy efficiency legal framework after 2030

Achieving the EU's objective, requires an accelerated electrification of end uses, which structurally enhances energy efficiency across the economy. **Energy efficiency plays a key role in reducing the EU's reliance on fossil fuels imports, provided it delivers tangible CO₂ emissions reductions, particularly in buildings, and supports economic growth.** The development of a new framework provides therefore an opportunity to address the shortcomings of the revised Energy Efficiency Directive (EU/2023/1791), in particular by more accurately reflecting the contribution of low-carbon electricity to the EU's decarbonisation objectives:

Adopting a comprehensive climate-efficiency approach

The future energy efficiency framework should encourage the electrification of end uses, as one of the most effective ways to combine higher energy efficiency with deep GHG emission reductions. **Alongside energy efficiency, the objective of reducing GHG emissions should be at the core of the new framework**, through the consumption of decarbonised energies, as energy savings alone do not systematically result in a significant reduction in GHG emissions. Indeed, the **energy efficiency first principle (EEFP) does not necessarily steer investments towards the most cost-effective solutions for decarbonising the energy system as a whole**, notably the electrification of end-uses, if all the costs necessary for the proper functioning of the energy system in question (network reinforcement investments, flexibility, security of supply, consideration of sustainability and circular economy principles and operational security of the entire system) are not taken into account.

- **UFE recommends completing the EEFP with a CO₂ non-degradation principle per kWh consumed.** This should be clarified in the EED and in all other legislative files in which the EEFP principle is embedded, including the Governance Regulation, the Energy Performance of Buildings Directive, the Renewable Energy Directive, and the TEN-E Regulation. This would better reflect climate efficiency and ensure that any energy efficiency measures or action promoted will actually lead to a reduction of GHG emissions per unit of consumption. Such a principle will also support a quicker phase-out of fossil-fuel energies,

which will bring tangible results on the national decarbonisation trajectories.

Improving the energy metrics

In the current Energy Efficiency Directive, **the predominant use of primary energy as a key metric can create structural disadvantages for electricity compared to fossil fuels** and may therefore hinder electrification. While primary energy indicators aim to reflect upstream energy impacts, they rely on convention-based conversion factors that can evolve over time and differ depending on policy choices.

By contrast, final energy consumption is directly measured through meters and is more closely aligned with consumer behaviour and energy bills, which are the primary concern for end-users.

To ensure a fairer, more transparent and more consumer-oriented framework, **we support that final energy should systematically be reported**, alongside primary energy, to better reflect consumer realities and environmental impacts. This dual approach would better reflect both consumer realities and environmental outcomes while avoiding distortions such as assigning different primary energy values to two buildings with the same characteristics (insulation, ventilation systems, etc.) or same measured final energy consumption, solely due to the energy carrier used.