



## ALLIANCE OF ENERGY INTENSIVE INDUSTRIES VOTING RECOMMENDATIONS ON THE REVISION OF EED

Dear Members of the ITRE Committee,

We, the Alliance of Energy Intensive Industries representing more than 30,000 companies that together, are Europe's largest energy consumer and directly employ more than 2.8 Million people, would like to share our voting recommendations ahead of the important vote regarding the **Revision of the Energy Efficiency Directive** taking place on the 28<sup>th</sup> of November. Our main areas of concern regard Article 3 on Energy Efficiency targets and Article 7 on the Energy Savings obligation.

### Article 3 - Energy Efficiency Target

The EU's EE target should be realistic, in line with the bottom-up potential of each segment of the economy and the planned renovation rate in buildings. It should also leave room for industrial growth by introducing flexibility in the EU-target formulation. Energy efficiency can support industry's competitiveness but only under the condition that it leaves room for industrial growth by introducing flexibility in the target formulation and only takes into consideration "real" energy efficiency improvement towards its achievement.

Focusing on primary energy consumption, which englobes all kind of savings be they achieved through more efficient energy production or at the level of final energy use, allows for more economic growth. Member States must therefore keep the possibility (as under the current framework) to fix their national contribution either in terms of primary and/or final energy consumption.

For these reasons, the Alliance of Energy Intensive Industries call for ITRE Members to:

- **SUPPORT COMPROMISE AMENDMENT 1A**
- **REJECT COMPROMISE AMENDMENT 1**

### Article 7 - Energy Savings Obligation

Energy use in industry which is also regulated by the EU ETS must be excluded from any Energy Savings Obligation and participation in energy savings schemes must remain on a fully voluntary basis. Withdrawing the current exemption for energy use in ETS Annex I after 2020 would place a double cap on the energy consumption of industry and disturb the level-playing-field for countries with a high share of ETS installations.

We also believe that Member States should keep the possibility to count early action towards the achievement of their obligation. Otherwise those countries with comprehensive early actions in the field of energy efficiency would face problems in the future to reach the 1,5% EE-contributions in the period starting in 2021.

For these reasons, the Alliance of Energy Intensive Industries call for ITRE Members to:

- **SUPPORT COMPROMISE AMENDMENT 4 A**
- **REJECT COMPROMISE AMENDMENT 4**