



**COUNCIL OF EUROPEAN MUNICIPALITIES AND REGIONS  
CONSEIL DES COMMUNES ET REGIONS D'EUROPE**

## **Réponse du CCRE sur**

**Le LIVRE VERT sur l'efficacité  
énergétique ou comment consommer  
mieux avec moins  
(COM (2005) 265 final)**

**Bruxelles, février 2006**

**Conseil des Communes et Régions d'Europe \* Council of European Municipalities and Regions**

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**PRINCIPAUX POINTS**

Le CCRE:

- ⇒ Accueille favorablement les objectifs du Livre vert, et notamment l'objectif de 20% d'économie d'énergie d'ici 2020;
- ⇒ Souligne que l'UE a besoin d'une vision claire et à long terme sur l'efficacité énergétique et le changement climatique;
- ⇒ Souligne que les collectivités locales et régionales ont un rôle essentiel à jouer dans l'accomplissement de ces objectifs, et sont prêtes à jouer activement ce rôle, pourvu qu'elles aient le soutien de cadres réglementaires et financiers adéquats des niveaux nationaux et européen;
- ⇒ Demande que les collectivités locales et régionales soient mieux prises en compte dans la formulation des politiques énergétiques de l'UE;
- ⇒ Plaide en faveur d'un dialogue fort entre les institutions européennes et les gouvernements locaux et régionaux, et demande que les collectivités locales et régionales soient formellement invitées à participer au Forum sur l'énergie durable.

### Remarques préliminaires

1. Le Conseil des Communes et Régions d'Europe (CCRE) accueille favorablement l'adoption par la Commission européenne du Livre vert sur l'efficacité énergétique, qui montre l'importance que la Commission européenne accorde à la nécessité d'augmenter l'efficacité énergétique en Europe. Le CCRE estime qu'une initiative européenne dans ce domaine est en effet essentielle. L'efficacité énergétique est un outil primordial pour réduire la consommation d'énergie, entraînant des économies dans les dépenses énergétiques, moins de pollution, une meilleure qualité de l'air, et la protection du climat.
2. Le CCRE accueille favorablement l'objectif de 20% d'économie d'énergie d'ici 2020 fixé par le Livre vert.
3. Les collectivités locales et régionales, en leur qualité d'entités publiques les plus proches des citoyens, peuvent contrôler et influencer de nombreuses décisions en matière d'énergie et ainsi influencer la qualité de vie des citoyens au niveau local.
4. Le CCRE représente les intérêts des collectivités locales et régionales fédérées au travers de 47 associations nationales dans 34 pays. De plus en plus sensibilisés au changement climatique et à la contribution de l'utilisation de l'énergie d'une part, et à la possibilité d'économiser l'énergie et de réduire les dépenses publiques d'autre part, les gouvernements locaux et régionaux mettent en œuvre de plus en plus de mesures permettant d'améliorer l'efficacité énergétique.
5. C'est dans ce contexte que le réseau du CCRE sur les questions énergétiques a été établi en 2003, à la suite de discussions avec la Commission européenne, afin d'augmenter l'engagement des gouvernements locaux et régionaux dans les questions énergétiques au niveau européen et de renforcer la coopération entre les collectivités locales et régionales et la Commission. Le réseau travaille en étroite coopération avec d'autres organisations et plate-formes, telles que Energie-Cités et le groupe de réflexion ManagEnergy. Le réseau prépare un guide, à l'attention des élus et gestionnaires locaux et régionaux, sur les politiques énergétiques durables au niveau local, qui sera publié par le CCRE au printemps 2006. Le CCRE a en outre participé activement à la préparation et à la promotion des engagements d'Aalborg<sup>1</sup>, qui comportent des actions en matière de politique énergétique.
6. Comme indiqué dans le Livre vert sur l'efficacité énergétique, les services énergétiques ont un caractère essentiellement local. Les collectivités locales et régionales jouent un rôle primordial dans les politiques énergétiques. Elles peuvent agir en qualité de consommateur, de planificateur, de régulateur, de conseiller, de fournisseur, de gestionnaire.... Le CCRE regrette par conséquent qu'un seul paragraphe succinct du Livre vert soit consacré au niveau local et régional.
7. Le CCRE souhaiterait que la participation des gouvernements locaux et régionaux de l'UE au « Forum européen sur l'énergie durable », que la Commission européenne a décidé de mettre sur pied, soit clairement établie, et que les réseaux de collectivités locales et régionales, tels que le CCRE, soient formellement invités à participer.

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<sup>1</sup> [www.aalborgplus10.dk](http://www.aalborgplus10.dk)

## **La nécessité d'actions au niveau européen et d'une vision à long terme sur l'efficacité énergétique et le changement climatique**

8. Une des principales forces du Livre vert réside dans sa démonstration que l'objectif de 20% d'économie d'énergie est rentable, réaliste et offre une solution où tout le monde sort gagnant (avantages environnementaux aussi bien qu'économiques). Le CCRE accueille favorablement l'objectif de 20% d'économie d'énergie fixé par le Livre vert. En fait, les problèmes actuels liés à l'environnement, à l'économie, à la politique et à l'approvisionnement énergétique font que l'UE n'a d'autre choix que d'atteindre cet objectif.
9. A vrai dire, le CCRE estime que cet objectif de 20% d'économie ne devrait pas être considéré comme un objectif final, mais seulement comme un objectif intermédiaire. Afin de limiter les rejets de CO<sub>2</sub> dans l'atmosphère de façon à ce que l'augmentation globale de la température reste limitée à 2°C (une augmentation qui cause déjà de sérieux problèmes dans diverses régions du globe), les émissions devraient être fortement réduites sur le long terme. Le CCRE souhaiterait que le Livre vert souligne cette perspective à long terme pour la politique énergétique de l'UE.
10. Le Livre vert repose en grande partie sur les directives, initiatives ou projets communautaires existants. Comme dans les initiatives précédentes, il a une approche très technique. Les outils techniques sont en effet fondamentaux. Néanmoins, les instruments liés aux problèmes sociaux, à la santé publique, au mode de vie et au comportement devraient être davantage examinés.
11. En outre, l'UE a besoin d'une stratégie sur la manière d'intégrer l'efficacité énergétique, l'approvisionnement en énergie renouvelable et la sécurité de l'approvisionnement. Le Livre vert examine correctement les obstacles à l'encontre d'une utilisation plus efficace de l'énergie et propose une série de domaines et d'actions politiques à envisager, mais il tend à ne pas présenter une vision claire quant aux changements structurels en profondeur qui sont nécessaires pour s'acheminer vers une société européenne énergétiquement efficace.
12. Ce Livre vert n'est pas la première initiative de la Commission européenne dans le domaine de l'efficacité énergétique. Un plan d'action sur l'efficacité énergétique a déjà été adopté en 1998. D'autres initiatives ont également été lancées (par exemple le Livre vert sur la sécurité de l'approvisionnement énergétique en 2000) qui étaient liées à l'efficacité énergétique. Ces initiatives n'ont toutefois pas fourni de résultats tangibles quant à la manière dont l'énergie est utilisée dans l'ensemble de l'UE. Le CCRE estime qu'une première étape importante serait d'analyser les manquements des initiatives précédentes afin de développer une nouvelle approche qui puisse fournir des résultats concrets.
13. Le CCRE est conscient que l'énergie n'est pas une politique commune de l'UE et que l'UE a une capacité limitée dans ce domaine. La Commission européenne doit s'assurer du soutien total des autres institutions européennes et des Etats membres en ce qui concerne cette initiative. Ce n'est qu'avec ce soutien que le Livre vert peut proposer des mesures significatives pouvant contribuer à atteindre l'objectif énoncé. Des objectifs contraignants pour les Etats membres sont indispensables si nous voulons parvenir au changement majeur nécessaire dans nos habitudes et notre organisation en matière d'énergie. Les gouvernements nationaux, ainsi que le Conseil des Ministres de l'UE, doivent tendre vers cet objectif également.

Les mesures permettant d'améliorer l'efficacité énergétique peuvent grandement contribuer aux objectifs ambitieux liés au changement climatique qu'ils se sont fixés, soit à titre individuel, soit via le Conseil européen<sup>2</sup>.

14. Le CCRE estime que le niveau européen est bien placé pour donner l'impulsion politique générale en matière d'efficacité énergétique. Le caractère mondial des questions liées à l'énergie (approvisionnement et stratégie, environnement et changement climatique, etc.) et la réalité du marché intérieur européen (aides d'état, règles de marchés publics et de concurrence, mise en place du marché européen de l'énergie) poussent l'UE à agir en faveur de l'efficacité énergétique.

Afin d'atteindre l'objectif du Livre vert, une étroite coordination entre les différents niveaux de gouvernement est indispensable. Les niveaux les plus élevés (UE, national) doivent fournir le cadre réglementaire et les incitations financières et mettre en œuvre leurs propres actions, tandis que les niveaux local et régional s'efforceront de prendre les mesures nécessaires.

15. Le suivi de ce Livre vert, et les plans d'actions futurs, doivent offrir la possibilité d'une véritable avancée vers une société européenne plus énergétiquement efficace. Cette initiative doit rassembler tous les acteurs concernés et aboutir à l'adoption de mesures concrètes dotées d'objectifs réalistes, fixés à la lumière des progrès déjà réalisés dans certains Etats membres, mais avec des objectifs contraignants.

16. Le CCRE préconise une hiérarchie énergétique qui place à son sommet l'économie d'énergie et l'utilisation efficace de l'énergie. La priorité doit être d'utiliser moins d'énergie, et d'éviter la consommation d'énergie – les mesures permettant d'améliorer l'efficacité énergétique contribuent à cet objectif. En deuxième lieu, l'énergie que nous ne pouvons pas éviter de consommer doit être utilisée efficacement. C'est l'objectif de ce Livre vert. Les politiques d'efficacité énergétique sont en général plus rentables que le développement d'énergies renouvelables. Cependant, le développement des énergies renouvelables constitue toujours une troisième voie essentielle pour répondre au besoin restant d'utiliser l'énergie d'une manière qui soit durable pour l'environnement. En dernier lieu, toute poursuite de l'utilisation de carburants fossiles doit être aussi propre et efficace que possible (cogénération, transfert vers des carburants fossiles « plus propres », technologies plus efficaces et plus propres, etc.).

**1. Diminuer le besoin d'énergie**

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**2. Utiliser l'énergie de manière plus efficace**

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**3. Utiliser les énergies renouvelables**

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**4. Toute poursuite de l'utilisation de carburants fossiles doit être aussi propre que possible**

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<sup>2</sup> Voir les conclusions du Conseil européen des 22-23 mars 2005 : « L'Union européenne espère étudier avec d'autres parties des stratégies pour réaliser les réductions des émissions qui sont nécessaires et estime que, à cet égard, il conviendrait d'envisager pour le groupe des pays développés des profils de réduction de l'ordre de 15 à 30 % d'ici à 2020 par rapport aux valeurs de référence prévues dans le protocole de Kyoto et, au-delà, dans l'esprit des conclusions retenues par le Conseil ("Environnement") »

## **Contribution des collectivités locales et régionales aux objectifs du Livre vert et aux activités de l'Union européenne**

17. Comme mentionné dans le Livre vert sur l'efficacité énergétique, les services énergétiques ont un caractère essentiellement local. Le CCRE regrette par conséquent que le Livre vert n'examine pas de manière plus approfondie le potentiel du niveau régional et local à contribuer à l'efficacité énergétique. Un seul paragraphe succinct est consacré au niveau local et régional. Un mélange de mesures européennes, nationales et locales est en effet nécessaire. Les collectivités locales et régionales sont désireuses de contribuer à la réalisation de cet objectif, aussi longtemps que des cadres législatifs, réglementaires et fiscaux appropriés seront fournis au plus haut niveau, et aussi longtemps qu'un financement stable et à long terme des collectivités locales et régionales sera garanti.
18. Le CCRE est très préoccupé par le fait que dans le Livre vert, aucune participation formelle des gouvernements locaux et régionaux de l'Europe ne soit explicitement envisagée dans le « forum européen de l'énergie durable », que la Commission européenne a décidé de mettre sur pied. Le Livre vert propose que ce forum soit composé de représentants de la Commission, des Etats membres, du Parlement européen, de régulateurs nationaux de l'énergie et de représentants de l'industrie européenne et d'ONG. Bien souvent, les Etats membres sont amenés à représenter le niveau régional et local dans de tels forums ; toutefois, les gouvernements nationaux ne disposent pas nécessairement de l'expertise et de la connaissance appropriées et ne relayent pas les préoccupations des collectivités locales et régionales aussi bien que ne le feraient les principaux intéressés.
19. Le CCRE souhaiterait par conséquent recommander la participation spécifique et officielle des représentants des gouvernements locaux et régionaux au Forum de l'énergie durable. On pourrait y parvenir soit en demandant aux Etats membres de nommer des représentants respectifs, soit en invitant des représentants des associations de gouvernements régionaux/locaux au Forum. Le CCRE et ses associations membres seraient ravis d'apporter leur soutien à cette dernière procédure.

## **Recommandations du CCRE pour le Plan d'action de l'UE pour l'efficacité énergétique:**

Ce plan d'action devrait:

- ⇒ Exiger des Etats membres de développer des plans d'action nationaux pour l'efficacité énergétique;
- ⇒ Chercher à encourager une étroite coordination entre les différents niveaux de gouvernement (européen, national, régional, local), et notamment par des dispositions dans les plans nationaux mentionnés ci-dessus ;
- ⇒ Proposer des outils volontaires pour encourager les collectivités locales et régionales à développer la maîtrise de l'énergie, par exemple en impliquant davantage de villes dans l'initiative ManagEnergy ;
- ⇒ Introduire des instruments pour encourager les collectivités locales et régionales à insérer des critères d'efficacité énergétique dans leurs marchés publics ;
- ⇒ Proposer des mécanismes pour l'intégration de critères d'efficacité énergétique dans toutes les politiques publiques et examiner la manière d'intégrer des critères respectifs dans les politiques et le commerce au niveau international ; l'UE pourrait introduire un « processus de Cardiff sur l'énergie » ;
- ⇒ Annoncer une extension du champ d'application de la directive sur les bâtiments dans le long terme et proposer une orientation aux gouvernements nationaux, régionaux et locaux sur la manière de développer des mécanismes de contrôle relatifs à la mise en oeuvre correcte de la directive ;
- ⇒ Introduire des mesures visant à améliorer l'étiquetage des produits utilisant l'énergie et étendre leur application à d'autres biens de consommation tels que le matériel informatique et l'électronique grand public ;
- ⇒ Encourager les Etats membres à se doter de réglementations nationales en matière d'énergie qui fixent des normes de qualité pour le réseau électrique et à imposer des tarifs garantis pour l'électricité provenant de sources renouvelables et de la cogénération, de même qu'un accès garanti au réseau national pour l'électricité générée localement.
- ⇒ Fixer des conditions cadres pour le marché afin de servir une société plus énergétiquement efficace, y compris des politiques de taxation et de subvention, de même que des critères techniques.
- ⇒ Développer un modèle de financement européen pour les investissements destinés à améliorer l'efficacité énergétique avec des taux de financement liés aux économies de CO<sub>2</sub> réalisées pendant la durée de vie de l'investissement ;
- ⇒ Accorder un financement européen aux collectivités locales et régionales pour des campagnes d'information publique sur l'efficacité énergétique ;
- ⇒ Proposer des mesures visant à développer une consultance et des services en matière d'efficacité énergétique et à encourager la formation de professionnels et artisans de l'énergie ;
- ⇒ Encourager un transfert modal au niveau des transports de la route vers des formes plus durables de transport ;

- ⇒ Proposer de nouvelles mesures de tarification des infrastructures de transport, prenant en considération le suivi du Livre blanc sur les transports de 2001 ;
- ⇒ Encourager les systèmes locaux de tarification anti-embouteillage par des échanges de bonnes pratiques ;
- ⇒ Annoncer l'adoption rapide par la Commission européenne des normes d'émission EURO VI pour les poids lourds ;
- ⇒ Proposer des instruments reliant l'efficacité énergétique aux problèmes sociaux, à la santé publique, au mode de vie et aux comportements.



## Part II: Responses to questions in the Green Paper (p. 8-11)

*Please find below our answers to the questions that we found the most relevant for local and regional authorities.*

### **1. How could the Community and the Commission in particular, better stimulate European investment in energy efficiency technologies? How could funds spent supporting research in this area be better targeted?**

CEMR suggests that EU research policy and funds should focus more on renewable energies with local application. Renewable energies can significantly increase the security of supply and the stability of the EU economy.

### **3. In the context of the Lisbon strategy aiming to revitalise the European economy, what link should be made between economic competitiveness and a greater emphasis on energy efficiency? In this context, would it be useful to require each Member State to set annual energy efficiency plans, and subsequently to benchmark the plans at community level to ensure a continued spread of best practice? Could such an approach be used internationally? If so, how?**

CEMR members are not in favour of top-down mandatory energy efficiency plans to local and regional authorities. The principle of subsidiarity must be respected so that each member state can choose which administrative level would be responsible for the implementation of energy efficiency measures.

However, CEMR supports the idea of mandatory Energy Efficiency Plans for member states. These plans should comprise minimum Community objectives, while encouraging member states to aim to act beyond the common objectives. This will push national governments to adopt targets and measures to increase energy efficiency, while leaving them the freedom to choose the appropriate targets, measures, and implementation level. The plans should be integrated with environment, transport, and economical policy areas. The plans will make governments accountable to their actions to improve energy efficiency. The plans will increase the awareness and commitment for energy efficiency within the administrations and the public. A peer review and benchmarking organised by the European Commission would allow moving towards common practises and standards, based on the best ones as drivers.

Nevertheless, the plans should not be annual. One year perspective is too short considering the time span of the needed measures and investments. Instead, CEMR proposes to have plans of a duration of minimum three years, accompanied with an annual executive programmes.

The EU should provide guidelines for developing such plans. The guidelines should propose elaborate examples of energy efficiency measures based on existing best practise. The plans should be developed on the basis of a bottom-up approach. In order to be effective, since many energy decisions are taken at the local and regional levels, it should be required that national governments actively associate, at an early stage, the regional and local authorities. Local and regional targets and measures

must be decided at the local and regional levels, in cooperation with the national level. Such measures must be adequately funded.

**4. Fiscal policy is an important way to encourage changes in behaviour and the use of new products that use less energy. Should such measures play a greater role in European energy efficiency policy? If so, which sort of measures would be best suited to achieve this goal? How could they be implemented in a manner that does not result in an overall increase in the tax burden? How to really make the polluter pay?**

We believe that relying only on the market is not effective enough to achieve the desired results within reasonable time. The EU should set framework conditions for the market to serve a more energy efficient society. This framework should include taxation and subsidy<sup>3</sup> policies as well as technical requirements.

Indeed, the internalisation of environmental external costs allows the promotion of greener tools such as energy-efficient technologies. An increased use of existing fiscal instruments can help correct market failures. Taxation policies are important to ensure that a viable and strong market is put in place for the efficient technologies that do exist but that are currently more expensive than the less efficient ones. Taxation on extremely energy inefficient products can for instance be considered (e.g. conventional light bulbs). On the contrary, one might consider a VAT exemption for systems using renewable energies or for insulation material. If unanimity is not reached on tax measures (e.g. VAT exemptions), the EU tax and competition rules must allow national governments to implement such measures domestically, provided that they are non-discriminatory.

CEMR supports some elements of the proposal of the European Commission to re-structure passenger car taxation<sup>4</sup>. Linking the annual tax base to CO<sub>2</sub> emissions can be an essential policy measure to tax-differentiate between the polluting vehicles and the cleaner vehicles, thus promoting the latter ones. CEMR is however more cautious about the removal of registration taxes: by boosting the sales of cars, such a reform could have effects contradictory to the environmental aims of the overall measure. Moreover, CEMR would have liked the European Commission, in the context of the air quality legislation, to also link the tax base to the emissions of particulate matters.

Generally, CEMR believes energy taxation can be an important tool for limiting road transport, saving energy and increasing energy efficiency. Obviously increased energy prices can push the consumers to save. In order to mitigate potential negative effects on competitiveness and income distribution, the tax increases can be implemented without increasing the overall tax burden, in the context of a general fiscal reform, by which other taxes, such as those green and energy efficient products, or/and on labour, can be correspondingly decreased.

The 2003 directive on energy taxation allows, for the first time, two member states to tax the kerosene of flights between their two countries as part of a bilateral agreement. CEMR believes the European Commission should push some member states to make use of this provision, and by doing so, set an example for the taxation of kerosene. Generally, CEMR invites the European Commission to promote the taxation of air travel and kerosene at the EU and international levels.

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<sup>3</sup> subsidies on fossil fuels, e.g. support for coal production, should be gradually removed.

<sup>4</sup> COM / 2005 / 261

**5. Would it be possible to develop state aid rules that are more favourable to the environment, in particular by encouraging eco-innovation and productivity improvements? What form could these rules take?**

State aid rules must not hinder energy efficiency investments. The revision, in 2007, of the Community guidelines on state aid for environmental protection, should aim to facilitate further public investments in energy efficiency, for instance by providing exemptions to notify aid below a certain level. This will ease “red tape” constraints and help creating a more favourable regulatory environment.

**6. Public authorities are often looked to for an example. Should legislation place specific obligations on public authorities, for example to apply in public buildings the measures that have been recommended at Community or national level. Could or should public authorities take account of energy efficiency in public procurement? Would this help build viable markets for certain products and new technologies? How could this be implemented in practice in a way that would promote the development of new technologies and provide incentives to industry to research new energy efficient products and processes? How could this be done in a manner that would save money for public authorities?**

Local and regional authorities are willing to act as a role model in energy efficiency and other environmental policies, and many are already doing so, with numerous measures and projects undertaken as part of voluntary commitments such as Local Agenda 21 and the Aalborg Commitments. Public buildings are a field where local and regional authorities can make a difference and lead the way.

Energy management should become more widespread, particularly among big energy consumers like big companies and important municipalities (for example, for cities with more than 50.000 inhabitants or energy bills above 1 million € per year). In Germany, for instance, energy management in many cities proves to save energy worth 5 times the labour cost of the energy managers and staff (see [www.stuttgart.de/energie](http://www.stuttgart.de/energie) “Energiebericht 2004”). In this field EU funding, notably, would be extremely cost-effective.

As rightly pointed out in the Green Paper, the aggregated public procurement of national, local and regional and European authorities is significant. Public authorities should use their purchasing power to set the example and promote the development of the market of energy efficient technologies. In any case it is cost effective for the municipalities to consider life cycle costs instead of the initial investment costs.

Local and regional authorities are willing to apply ecological criteria in public procurement on a voluntary basis. Indeed, a consequent eco-procurement in the field of energy can reduce both energy costs and emissions and can also stimulate the market of energy efficient technologies. Local authorities can require energy efficiency labels in their procurement. The EU should facilitate the use of energy efficient public procurement through a clear and easy regulatory framework. The European Commission should promote it by providing guidance to local and regional authorities and by organising the exchange of best practises.

There can also be encouragements to promote leadership in public authorities<sup>5,6</sup>. This does not necessarily lead to any form of competitive disadvantage - in fact, on the contrary, it can enhance it.

An important tool is joint public procurement<sup>7</sup>, by which local and regional authorities group together in order to increase their purchasing and bargaining power and benefit from bulk prices. They can also use this instrument to, in cooperation with the private sector, boost greener products. Joint procurement can be particularly beneficial to the smaller authorities: by joining the group, they can benefit from the rebates and/ or new products secured by the bigger authorities. The European Commission could explore further the experience in joint public procurement and encourage its development by launching information campaigns as well as coordinating activities and exchanges of best practise.

## **7. Energy efficiency funds have in the past been used effectively. How can the experience be repeated and improved? Which measures can be adopted usefully at international, EU, national, regional and local level ?**

Energy efficiency funds are very important instruments to help local and regional authorities, as well as individuals and other stakeholders, to invest in energy efficiency projects and measures. In many countries<sup>8</sup>, such funds have been established. But they need to be developed further, and target the domestic usage market and the business usage (in the newer Member States in particular). At the local level one of the foci of such funds must be on accessing consumption data and using it effectively.

Financial incentives are very effective to direct consumers towards buying greener equipment and technologies. Currently European financing tools such as EIE ("Intelligent Energy Europe") require a lot of work. This is why some cities are reluctant to use these financing tools. CEMR recommends a EU funding model with funding levels related to the CO<sub>2</sub> savings achieved during the lifetime of the investment. This fund should be joint-financed by the European and the national levels. National energy agencies should handle the programme. A continuity in funding is crucial. For most municipalities it is very difficult to keep up to date with the

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<sup>5</sup> For example, the London Borough of Merton, in the UK, has placed a requirement in its planning law that stipulates that all new industrial, warehousing, office and live/work units outside conservation areas above a certain size must incorporate renewable energy production equipment to provide at least 10 % of predicted energy requirements.

<sup>6</sup> The city of Stuttgart sells its building lots only to those investors which agree to built 20 % better compared to the national building code which is already rather strict on a European scale. Many big investors agree on a voluntary basis to build more energy efficient.

<sup>7</sup> For instance, in 1996, the ZEUS international procurement of electric vehicles (cities from Greece, Denmark, UK, Italy, Sweden) bought 278 vehicles. Prices were reduced by 25-50 %. There was a market introduction in UK. Requirements in the contract included price limit on spare parts, maintenance and sanctions in case of late deliveries.

<sup>8</sup> In the UK for instance, the Energy Saving Trust (EST) provides assistance with local and regional authorities through information and advice, the Innovation Programme (grants for innovative local authority and housing association projects), and the Local Authority Support Programme. The EST also runs and maintains national labelling, endorsement and accreditation schemes, providing for consistency in product standards and labelling across the country. The EST runs an Energy Efficiency Best Practice Programme, providing information, advice and training, for free, on high-energy performance construction and refurbishment in the housing sector. The EST also runs programmes in transport and renewable energies.

changes in the funding schemes. Financial support for the establishment of energy management in the cities would be extremely cost-effective.

Technologies such as biomass, solar thermal or geothermal heat pump systems should be promoted and developed at the national and regional levels. The European Commission should provide funding schemes with a minimum threshold of support such as 30%. Part of the budget of the intelligent Energy program could be used for that purpose.

National governments should be encouraged to make a good use, in their national strategies, of the possibilities offered in the structural funds for the period 2007-2013 to finance energy efficiency measures.

**8. Energy efficiency in buildings is an area where important savings can be made. Which practical measures could be taken at EU, national, regional or local level to ensure that the existing Community Buildings Directive is a success in practice? Should the Community go further than the existing Directive, for example extending it to smaller premises? If so, how could the appropriate balance be achieved between the need to generate energy efficiency gains and the objective of limiting new administrative burdens to the minimum possible?**

The “Building directive” is an excellent starting point for moving towards more energy efficient buildings. It is important to ensure that this directive is applied, according to the initial idea, at the local and “grassroots” level. However, there are concerns about the necessary development of effective control mechanisms, which are indispensable to ensure a proper implementation of the directive. In Germany, for example, the national building directive is monitored at the regional level. But, in reality, no control takes place. The national government relies on the customers to do the quality control of their building project themselves. In general they lack the competence to do it.

Thanks to the directive, energy certificates are required when buying or leasing a building : this will significantly increase the pressure on the market and lead to a higher energy efficiency of buildings. Local authorities should foster this process by actively displaying the energy consumption of their buildings and informing the citizens on energy issues. Funding (for instance from energy efficiency funds) should be provided to help them doing so. The EU project DISPLAY<sup>9</sup> is an excellent example how such an active role can be developed. The European Commission should consider to define a required minimum energy-efficiency level with corrections for national climatic conditions.

CEMR believes that until the effect of the Building directive can be observed, no new measures should be introduced. Nevertheless, in the longer term, the directive should be evaluated and most probably extended in its scope, ambition and targets. A sense of urgency should be created : this issue does not just relate to the wasting of energy, but also to security of the energy supply and to the health and well-being of society. If buildings are not energy efficient they are often cold, have excess moisture and do not create the optimal environment for a healthy workforce. Energy efficiency criteria for buildings should be integrated into planning law across the board, rather than just pockets of excellence. CEMR calls on member states and the Commission to ensure a proper implementation of the Directive.

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<sup>9</sup> [www.display-campaign.org](http://www.display-campaign.org)

**9. Giving incentives to improve the energy efficiency of rented accommodation is a difficult task because the owner of the building does not normally pay the energy bill and thus has no economic interest in investing in energy efficiency improvements such as insulation or double glazing. How could this challenge be best addressed?**

The “Buildings directive” and the pressure generated by the need to inform about the level of energy consumption is extremely helpful for rented buildings as well. Inefficient homes are not just more costly financially, but also create fuel poverty and health implications such as asthma. Evidence shows that improving the insulation and internal environment in homes has knock-on effects in terms of reducing health problems and expenditure, and improving children's take-up of homework. Wide scale regeneration of rented accommodation provides for a better community spirit<sup>10</sup>.

**10. How can the impact of legislation on the performance of energy-consuming products for household use be reinforced? What are the best ways to encourage the production and consumption of these products? Could, for instance, present rules on labelling be improved? How could the EU kick-start research into and the subsequent production of the next generation of energy efficient products? What other measures could be taken at international, EU, national, regional and local level ?**

Labelling significantly helps to raise the level of awareness. Labels have to contain significant information. Additional national labels do not help. CEMR believes that the European label for appliances should be extended to other energy consuming goods like IT equipment and consumer electronics, and, at a later stage, to all energy using products, including buildings.

Energy star, GEEA and other labels should be re-structured so that the most efficient products are clearly distinguished<sup>11</sup>. The EU should gradually remove the most inefficient energy using products by raising the minimum permissible energy efficiency levels of appliances by 10 per cent or 20 per cent every few years in all categories where there is a significant difference in energy consumption between the best and worst. Energy advice centers should receive funding to promote energy efficiency labels and products.

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<sup>10</sup> Carrick District Council (England), together with tenant associations and other members of the Beacon Community Regeneration Partnership, implemented energy efficiency improvements in the Beacon Housing Estate in Falmouth, once one of the most deprived areas in Cornwall. In terms of results: energy efficiency improvements have been made to 900 homes; central heating and insulation measures have been installed in 300 properties in the first year, a total of EUR 274,000 (£186,000) was saved on fuel bills. The Regeneration Partnership believes a range of other changes can also be attributed to the housing improvements: there have been health improvements among residents, including a 50% drop in the numbers suffering from asthma; the local school reports a 100% improvement in the standard school examination results of boys; the crime rate has dropped dramatically, including a reduction in domestic violence incidents and the number of children on the ‘Children at Risk’ Register; vandalism is at an all-time low; there is increased employment; more people are wanting to move to the estate; and there is a remarkable upswing in community spirit.

<sup>11</sup> at the moment, we have for example almost only “A” refrigerators on the market. Thus the label does no help anymore the consumer to see if a product is energy efficient or not. The German eco-label “blauer Engel”, for instance, is re-evaluated regularly to make sure that technical progress is taken into account. Only the best products on the market should get the top ranking. Labels should be evaluated annually.

Furthermore, energy-efficiency consultancy and services need to be developed. Energy professionals, craftsmen and energy SMEs must be trained on energy efficiency products and equipments. National governments should be encouraged to notably use funds from the European Social Fund to develop such programmes.

**11. A major challenge is to ensure that the vehicle industry produces ever more energy efficient vehicles. How can this best be done? What measures should be taken to continue to improve energy efficiency in vehicles and at which level? To what extent should such measures be voluntary in nature and to what extent mandatory?**

CEMR believes stringent standards and legislation for vehicles' emissions are indispensable. Such regulation can not only help saving on energy use but also help the local and regional authorities reaching the objectives of EU air quality legislation. Since the early 1990s, the EURO emission standards for passenger cars and other vehicles have initiated a reduction in air pollution per driven kilometer. However, the improvements have been outstripped by the increase of the overall traffic growth, the lax standards for diesel engines, the lower taxes on diesel fuel and the trend for bigger cars.

CEMR welcomes the adoption, in December 2005, of the new Euro V standards on light vehicles' emissions, as announced in the Thematic Strategy on Air Pollution. CEMR is satisfied that sport utility vehicles would now be covered by the norms, and that the higher standards would require diesel vehicles to be fitted with particulate filters. CEMR has concerns, however, about the NOx limits<sup>12</sup>, which are not very stringent. CEMR calls on the European Parliament and the Council of Ministers, in the co-decision procedure, to strengthen the Euro V and to make provision for their enforcement as soon as possible. CEMR calls on the European Commission to adopt, in 2006, Euro VI standards on the emissions of heavy duty vehicles. Furthermore, CEMR believes that the labels applying to appliances should be extended to cars.

CEMR points out that accompanying taxation and education measures are indispensable in order to reap the full potential of stricter emission standards. The more polluting vehicles must be made significantly more expensive, and the purchasing decisions linked to lifestyle values must be encouraged to change.

**12. Public information campaigns on energy efficiency have shown success in certain Member States. What more could and should be done in this area at international, EU, national, regional and local level ?**

Public information campaigns are very important in order to raise the awareness of consumers on energy efficiency but also on linked challenges such as pollution, climate change and public health issues. These campaigns should also aim to diffuse values more respective of the environment and to influence a change in lifestyle habits. Local and regional authorities, if provided with adequate funding, are well placed to organise such campaigns at the local level.

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<sup>12</sup> diesel cars sold in the EU from 2008/9 must emit no more than 200mg/km of NOx, whereas US standards from 2007 set a maximum of 87mg/km

EU campaigns should explain the urgency of the situation. They should make the link between energy efficiency and health issues; for instance, poor quality and inefficient buildings are not just a matter for the environment, but a matter for people's general health and well-being. EU (or EU funded) campaigns should make links between energy and fuel poverty and health problems more explicit.

CEMR would like to point out that national and EU campaigns on energy efficiency have to compete with aggressive advertisement campaigns from the private sector (for instance to promote air conditioning equipment or fuel hungry cars) that many times diffuse the opposite messages and signals to customers. Therefore, the EU and national governments should do more to promote responsible and sustainable consumption.

Generally, CEMR believes that, in order to maximise their impact, campaigns should be designed for a long duration and should focus on a specific topic (e.g. appliances). The European Commission and national governments should consider a way to get energy companies and/ or the grid companies to finance local and regional level campaigns. This could be done via regional and local energy efficiency funds (that could be financed by energy companies, or by a levy on energy consumption).

Training and information campaigns targeted at electricity and energy craftsmen, and architects, are essential too.

Education on energy efficiency is very important. However, CEMR believes education and information campaigns constitute a complementary tool to the framework reforms that are indispensable for a real change towards an energy efficient society. For instance, if the market does not need nor price people trained in energy efficiency technologies, this training is of little use. The more pressure the energy market generates, the higher is the need for people with an appropriate training. Energy costs, but also regulatory requirements such as the building directive, will generate the need for skills on building energy certification. Similarly, raising the awareness of citizens on energy efficiency will produce results mainly if the market forces also push them to purchase more efficient products.

CEMR welcomes the launch by the European Commission of the Sustainable Energy Europe campaign.

**13. What can be done to improve the efficiency of electricity transmission and distribution? How to implement such initiatives in practice? What can be done to improve the efficiency of fuel use in electricity production? How to further promote distributed generation and co-generation?**

The regulator must define quality standards for the grid. The level of the fees that the grid operator sets for the energy companies should depend on the grid's quality standard. Co-generation can be fostered with guaranteed tariffs that the producer gets for electricity from CHP. Gas and fuel used for co-generation should be tax-free. Local authorities that generate energy locally should be encouraged to do so through planning and through developing local partnerships whereby joint planning for energy capacity can be developed across the public sector, and with the private sector. Where energy is generated locally and there is excess capacity there must be free and easy access for the excess energy to be sold back to the national/regional grid to ensure that energy is not wasted.



**14. Encouraging electricity and gas providers to offer an energy service (i.e. agreeing to heat a house to an agreed temperature and to provide lighting services) rather than simply providing energy is a good way to promote energy efficiency. Under such arrangements the energy provider has an economic interest that the property is energy efficient and that necessary investments are made. Otherwise, electricity and gas companies have an economic interest that such investments are not made, because they sell more energy. How could such practices be promoted? Is a voluntary code or agreement necessary or adequate?**

Energy service companies (ESCO) work on an extremely difficult terrain. If the baseline used for calculation changes, the ESCO and the customer have to agree on new conditions. This may limit the energy savings ESCOs can achieve through the sales of energy efficiency services. General saving potentials can be higher if all energy customers are pushed to invest to reduce the energy bill because of economic pressure. CEMR believes taxation policy can help to develop strong and viable markets for energy-efficient technologies and energy efficiency services.

**17. A new balance between modes of transport – a major theme of the strategy set out in the White Paper that the Commission adopted in 2001 on a European transport policy for 2010 – is still a top priority. What more could be done to increase the market share of rail, maritime and inland waterway transport?**

CEMR strongly believes a transport modal shift is necessary. In order to improve the quality of life of citizens in EU cities, villages and regions, and in order to comply with the EU legislation on air quality, we need to decrease the share of the car in our transport habits and increase the share of other modes. Public transport must be improved and developed. Land use policies must avoid urban sprawl and integrate housing and public transport policies<sup>13</sup>.

Local taxation schemes such as congestion charges can help limiting car use while providing additional finance to public transport.

CEMR calls on the European Commission to develop EU systems of benchmarking and exchange of best practices on urban transport planning and policies that will allow cities to move towards more environmentally friendly transport modal splits. In 2005 CEMR published a manifesto<sup>14</sup>, “Achieving sustainable mobility in Europe’s towns and municipalities”, that calls for sustainable mobility policies to be developed and placed at the core of EU, national, regional and local actions. It also calls for better quality public transport as well as for the promotion of alternatives to the use of private cars.

Furthermore, CEMR participates in an EU project, NICHES<sup>15</sup>, that aims to promote the transferability and diffusion of innovative local transport schemes.

**18. In order to improve energy efficiency it is necessary to complete certain**

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<sup>13</sup> For instance, in Copenhagen, for 50 years, a strong planning policy and the integration of urban, housing and transport policies have led to a rather balanced modal split: in 2000, trips from home to work are shared as follows : 31% by public transport, 30% by car, 33% by bicycle, and around 6% by foot.

<sup>14</sup> [http://www.ccre.org/bases/T\\_599\\_21\\_3524.pdf](http://www.ccre.org/bases/T_599_21_3524.pdf)

<sup>15</sup> [www.niches-transport.org](http://www.niches-transport.org)

**infrastructure projects from the trans-European transport network. How should the investments needed for infrastructure projects be developed, using what sources of financing?**

The GALILEO satellite navigation system can have important potential in terms of general transport infrastructure charging, whereby EU drivers would be charged by the kilometer according to criteria such as time and peak hours, energy efficiency and emissions, population density etc. CEMR would welcome further developments of the initiative and debate the European Commission launched, following the publication of the 2001 Transport White Paper, on transport infrastructure charging. There should be caution, if GALILEO is used to improve traffic flow, that this does not lead to the generation of additional traffic and thus to an increase in energy consumption.

**19. Among the measures that could be adopted in the transport sector, which have the greatest potential? Should priority be given to technological innovations particularly through standards defined jointly with the industry, or to regulatory measures such as a limit on fuel consumption of cars?**

Standards to reduce the emissions level in private vehicles must be a priority, as should tackling the rising emissions growth from air travel and its impacts, including transport and travel around airports. The planning system should be more flexible to incorporating the new re-fuelling infrastructure that is necessary for a hydrogen economy, and to boost the use of LPG etc. National, regional and local authorities have a role to play here; it should not be left just to the industry.

**20. Should public authorities (state, administrations, regional and local authorities) be obliged in their public procurement to buy a percentage of energy efficient vehicles for their fleets? If so, how could this be organised in a manner that is technology neutral (i.e. it does not result in distorting the market towards one particular technology).**

CEMR certainly supports the development of the market for cleaner and alternative fuel vehicles. Many local authorities are frontrunners in this field (the city of Stockholm<sup>16</sup>, for instance). On public procurement, CEMR is not in favour of imposing obligations to use procurement, as proposed by the draft directive proposal on the "promotion of clean road transport vehicles"<sup>17</sup> particularly for costly items such as vehicles. Guidance and criteria on how to use public procurement to promote clean vehicles would be much welcome. Authorities must be able to keep a minimum level of flexibility as to the products and technologies they want to buy. Local and regional authorities are willing (and already doing so in many cases) to use on a voluntary basis their procurement to buy energy efficient and cleaner products.

*® see also response to question 6*

**21. Infrastructure charging, notably paying to use roads, has started to be introduced in Europe. A first proposal was made in 2003 to strengthen the charging of professional road transport. Local congestion charges have now been introduced in some cities. What should be the next steps in infrastructure**

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<sup>16</sup> see [http://www.miljobilar.stockholm.se/templates/MIS\\_Article\\_2132.aspx](http://www.miljobilar.stockholm.se/templates/MIS_Article_2132.aspx)

<sup>17</sup> COM(2005) 634

**charging? How far should “external costs” such as pollution, congestion and accidents be directly charged to those causing them in this manner?**

On the revision of the Eurovignette directive, CEMR lobbied the European Parliament, insisting on the need to preserve the freedom of local authorities to set up their own road pricing schemes, asking for the possibility of a toll mark-up in urban areas, and stressing the importance of the internalisation of external costs. CEMR welcomes the agreement between the Parliament and the Council of Ministers at the end of 2005, by which the scope of the directive is extended to all vehicles above 3.5 tonnes (as also advocated by CEMR) and the freedom of local authorities is preserved. Nevertheless, CEMR would have liked to see a requirement to include external costs in the toll base.

CEMR supports the development of transport infrastructure charging. The experience of London<sup>18</sup> has proven to be largely positive. CEMR recommends that the revenue of congestion charges is earmarked towards public transport.

CEMR would call on the European Commission to promote the exchange of best practises on congestion charging. ® see also response to questions 17, 18

**22. In certain Member States, local or regional energy efficiency project financing schemes, managed by energy efficiency companies, have proven very successful. Should this be extended. If so, how?**

The European Commission could develop local financing tools like revolving funds. These funds should be fed locally, nationally and by the European level. These funds should be used to invest in highly cost efficient projects at the local level. The pay-back should be used to finance additional projects. A stringent reporting for these projects would be necessary.

® see also response to question 7

**23-25. Should energy efficiency issues be more integrated in the Union’s relationships with third countries, especially its neighbours? If so, how? How can energy efficiency become a key part of the integration of regional markets? Is it necessary to encourage the international financial institutions to pay more attention to demand management issues in their technical and financial assistance to third countries? If so, what could be the most effective mechanisms or investments? How could advances in energy efficiency technology and processes in Europe be put to effective use in developing countries? Should the Union negotiate tariff or non tariff advantages within the WTO for energy efficient products and encourage other members of WTO to do the same?**

CEMR welcomes the fact that these issues are addressed by the Green Paper. International financial institutions must be required to 'climate proof' their policies and aid, as must the EU and national governments. Resilience to disasters and disaster reduction for developing countries should be more of a focus. Energy efficiency

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<sup>18</sup> In London, since the introduction of the congestion charge in 2003, congestion has reduced by 30% and traffic volume by 15%, while traffic speed has increased by 15%. Traffic changes related to the charging scheme are estimated to have led to savings of 19% in traffic-related emissions of CO<sub>2</sub>, and 12% in emissions of NO<sub>x</sub> and fine particles. Bus use has risen 38%, thanks to an improvement of 15% of bus journey times in central London and thanks to new investments in the bus fleet permitted by the congestion charge' revenue.

improvements in developing countries should not necessarily seek to control their energy demand but make better use out of the units of energy that are consumed. More focus should be placed on helping developing countries to exploit newer technologies and the existing resources they hold, particularly in terms of renewable energy (to that purpose, member states and industry can use the Kyoto tools such as Clean Development Mechanism). They have an opportunity here in terms of skills and technology development - China for instance is growing increasingly aware of the need to "de-carbonise" its economic growth.

The EU should promote and fund international partnerships at the local level through associations of local authorities. The EU should negotiate within WTO on tariff advantages and commercial agreements for energy efficient products (e.g. making voluntary agreements on car standards with non EU car manufacturers more efficient).

## **ANNEX**

### **Local and regional involvement in energy efficiency**

1. Energy issues have a major impact on the everyday life of EU citizens. Energy decisions have environmental and employment impacts with implications for sustainable development, and influence the security of energy supply. Municipalities, as the public body closest to citizens, can control and influence many energy decisions that can affect the quality of life of citizens.
2. The local governments work with all aspects of energy policies. Local and regional authorities can influence **energy demand** directly through the management of their own energy use, but also indirectly by informing and motivating end-users as to how they can use energy more efficiently. Energy management is a fast and easy way to reduce the energy consumption, merely by optimising the operation of buildings. Many cities already active in the field of energy management have been able to reduce the specific energy consumption of buildings by up to 40 %<sup>19</sup>. Strategic decisions related to urban development such as the promotion of high urban densities, integrated land use and transport planning influence the energy consumption of the citizens.

### **The local and regional authority as consumer and model**

3. In providing public services, local and regional authorities consume substantial amounts of energy for example for heating, hot water, lighting public buildings and public spaces, and providing public transport. Energy saving programmes and actions such as including high-energy efficiency requirements into public procurement can improve the energy performance in the long run and reduce public expenditure. The operation of buildings and transport vehicles owned by public authorities are areas in which considerable savings can be realised.
4. Local and regional authorities also need to set a good example through their own actions. The building certificates that local authorities have to display due to the EU “Building” directive will provide an additional incentive of reducing the energy consumption of public buildings and allow the inhabitants of the municipality to see themselves whether the public building is energy efficient.

### **The local and regional authority as planner and regulator**

5. Land use planning and the organisation of transport systems are responsibilities of most local and regional governments. Strategic decisions concerning urban development such as promotion of high urban densities and mixed use of buildings (balanced housing, services, jobs ratio) also influence the energy consumption of the citizens. For example integrated environmental and mobility planning can help to reduce the energy use of transport and change the mobility patterns of citizens. Measures that discourage car use and encourage non-motorised or collective transport are obvious examples. If supported by a good regulatory and financial framework, municipalities can

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<sup>19</sup> The city of Stuttgart for example was able to reduce the heat consumption of its premises by 43 % ([www.stuttgart.de/energie](http://www.stuttgart.de/energie) Energiebericht 2003)

develop sustainable mobility plans and encourage shifts towards more sustainable transport modes, notably through planning policies<sup>20</sup>.

### **The local and regional authority as advisor and promoter**

6. Local and regional authorities can help to inform and motivate end-users on how they can use energy more efficiently. Apart from savings that consumers make on their energy bills, intelligent energy use will lead to an increase in the quality of life in terms of comfort, and health through better outdoor and indoor air quality.
7. The opening of the EU electricity markets means that each company or a private customer can choose their energy producer. Local and regional authorities can give advice on how to choose electricity coming from renewable energy sources. In addition schemes for using local renewable solutions, such as solar panels, can be encouraged and subsidised.

### **The local authority as producer, supplier and manager**

8. Local and regional authorities take important decisions that have an impact on the energy supply side. Decisions on the energy mix in favour of renewable energy can promote local energy production and reduce dependencies on energy resources from other parts of the world. Combined Heat and Power (CHP) district-heating systems using biomass instead of oil provide a good example. Locally produced energy will also provide both local employment and positive social and regional development effects.
9. Energy companies should help local and regional authorities for their energy management by generalising **metering** in homes and buildings. It is most important that real data from intelligent metering in buildings is utilised to check their energy performance. People can only respond to behavioural changes where good quality data has been provided in real time. This is a key to making existing buildings perform and also monitoring new buildings. CEMR supports the provisions on metering and **consumer information** contained in the directive proposal on “Energy end-use efficiency and energy services” (COM (2003) 739)<sup>21</sup>. These are important tools for an effective monitoring of the implementation of the “Buildings” directive and of any legislation related to energy savings.

### **Local and regional authorities and climate change**

10. Local and regional authorities throughout the EU are growing increasingly aware of the issue of **climate change**. They realise that this problem can impact directly on them (extreme weather events, floods, changes in local ecosystems, impact on tourism etc.). Local actions can contribute to mitigate the effects of climate change at the local and global level. Many initiatives to fight climate change relate to the improvement of energy efficiency.

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<sup>20</sup> see also the manifesto on sustainable mobility published by CEMR in 2005 at: [http://www.ccre.org/bases/T\\_599\\_21\\_3524.pdf](http://www.ccre.org/bases/T_599_21_3524.pdf)

<sup>21</sup> and as agreed between the European parliament and the Council of Ministers in the resolution of 13-12-05 (P6\_TA-PROV(2005)0496)