Brussels, December 2022

EFIEES' Position on RED trilogue discussions

EFIEES is the voice of private energy service companies (ESCOs) and their national associations in 10 EU Member States. Our members represent over 100.000 professionals committed to the design and implementation of energy efficiency measures in public and private buildings, industrial facilities, as well as to the efficient operation of district heating & cooling networks.

Since the publication of the Commission's proposal to revise the Renewable Energy Directive (RED) EFIEES has been closely following the debates on this file, and especially the current trilogue discussions. Among others, we welcome the inclusion of waste heat and cold within the indicative RES target for the building sector, proposed by both the Council and the Parliament. Yet, we believe that Member States should also be able to count waste heat towards the annual increase of renewable energy sources to be set for the industry sector.

Indeed, it is of utmost importance to ensure that the developments of energy efficiency and renewable energy go hand in hand, are mutually reinforcing, and that they are consistently promoted and supported, both at the European and national levels. In that respect, tackling the untapped potential for energy and emissions savings in industry is integral to the effective decarbonisation of this sector and more generally to reach EU climate targets for 2030 and 2050. Waste heat, as a key efficiency measure, should thus be recognised and supported through the new annual objective set by Article 22a of the revised RED.

Moreover, waste heat recovery and use within the industry sector is also **contributing to the local economic competitiveness**, especially in times of an energy crisis. Allowing to count waste heat within the RES annual objective for this sector would indeed **foster industrial synergies**, and thus support both economic growth and decarbonisation of the industry.

Allowing to count waste heat towards Article 22a objectives would also be a matter of **consistency**, as it will indeed be possible for Member States to count waste heat towards all the other sectoral targets set by the RED.