



Ljubljana, 6.junij 2005

## Smernica o učinkoviti rabi energije in energetskih storitvah:<sup>1</sup>

### 8. JUNIJA GLASUJTE ZA VIŠJE OBVEZNE CILJE!

Spoštovani!

Evropski energetske sistemi doživljajo krizo. Spreminjanje podnebja predstavlja veliko grožnjo prebivalcem in gospodarstvu EU. EU je vse bolj in bolj odvisna od uvoženih fosilnih goriv: do leta 2002 naj bi uvažali 90% vseh fosilnih goriv po naraščajočih cenah. Da bi se spopadli z izzivom spreminjajočega se podnebja in energetske varnosti, imamo v Evropi velik in še neizkoriščen potencial: učinkovito rabo energije<sup>2</sup>.

Pozivamo vas, da se zaveste pomembnosti glasovanja o Smernici o učinkoviti rabi energije in energetskih storitvah, ki bo potekalo na zasedanju v sredo, 8. junija.

Čeprav pozdravljamo odločitev odborov ENVI in ITRE o podpori obveznih ciljev za varčevanje z energijo, verjamemo da je bil do sedaj neznanski potencial energetske učinkovitosti zanemarjen.

Zato pozivamo Evropski parlament, da brez obotavljanja zagotovi izrabo velikega potenciala za varčevanje energije. **Pozivamo vas, da glasujete za višje obvezne cilje varčevanja z energijo na letni ravni (vsaj 2.5 % za zasebni sektor ter 3 % za javni sektor) na plenarnem zasedanju 8. junija (člen 4, odstavek 2 in člen 5, odstavek 2).**

<sup>1</sup> COM(2003) 739

<sup>2</sup> Trenutni stroškovno-učinkoviti potencial za varčevanje energije se ocenjuje na 20 % do 30 % celotne trenutne rabe energije. Tehnološki potencial je že veliko večji: do 50 % trenutne rabe energije.

Potrebno je bistveno izboljšati besedilo smernice, saj bo smernica le tako kos izzivom energetske varnosti, konkurenčnosti evropske industrije in spreminjanja podnebja. **Vloga Evropskega parlamenta je lahko odločilna.** Kot izbrane predstavnike Slovencev in Slovenk vas vabimo, da prisluhnete skrbi državljanov in državljanek in **sprejmete ambiciozne ukrepe za preprečevanje nadaljnjega spreminjanja podnebja.** Kot je pokazala nedavna raziskava Eurobarometra je “za večino Evropejcev/k zdravo okolje vsaj tako pomembno za kakovost življenja kot stanje gospodarstva in družbeni dejavniki”, spreminjanje podnebja pa je ena od največjih skrbi prebivalcev/k EU.<sup>3</sup>

Skupaj z velikimi evropskimi okoljskimi organizacijami pozivamo Evropski parlament, da **z glasovanjem za visoke letne cilje varčevanja z energijo postavi učinkovito rabo energije v srce energetske in podnebne politike EU.**

Vnaprej se vam zahvaljujemo za vašo pozornost pri tako pomembni zadevi in vas lepo pozdravljamo!

Lidija Živčič  
Fokus društvo za sonaraven razvoj  
041/291091, lidija@focus-ngo.org

mag. Andrej Hanžič  
Slovenski E-forum, društvo za energetske ekonomiko in ekologijo  
01/4364144, se-f@siol.net  
www.ljudmila.org/sef

Akcijo podpirata še organizaciji:

**Umanotera, slovenska fundacija za trajnostni razvoj, ustanova**  
Alena Lipavec  
Metelkova 6, 1000 Ljubljana, 01/4397100, alena@umanotera.org, www.umanotera.org

**Inštitut za trajnostni razvoj**  
Anamarija Slabe  
Metelkova 6, 1000 Ljubljana, anamarija.slabe@itr.si, www.itr.si

Priloga:  
Zahteve evropskih okoljevarstvenih organizacij, ki se jim podpisane slovenske okoljevarstvene organizacije pridružujemo.

---

<sup>3</sup> <http://europa.eu.int/comm/environment/barometer/index.htm>

**Priloga:**

**Zahteve evropskih okoljevarstvenih organizacij za spremembe v Smernici EU o učinkoviti rabi energije in energetskih storitvah, ki se jim podpisane slovenske okoljevarstvene organizacije pridružujemo.**

**Amendment 1  
Art. 4(2)**

Current version	What it should be
2. The <i>targets</i> shall consist of an amount of energy to be saved that in the first three years following the transposition of the Directive is equal overall to at least 3%, in the next three years at least 4%, and in the three years after that at least 4.5%, of the amount of energy distributed and/or sold to final customers, as calculated according to Annex I. The costs of the measures adopted to achieve these targets should not exceed their benefits.	2. The targets shall consist of an amount of energy to be saved that in the first three years following the transposition of the Directive is equal overall to at least <b>5.5%</b> , in the next three years at least <b>7.5%</b> , and in the three years after that at least <b>9.5%</b> , of the amount of energy distributed and/or sold to final customers, as calculated according to Annex I. <b>The amount of energy to be saved is calculated against a business as usual energy consumption case. Delete:</b> [The costs of the measures adopted to achieve these targets should not exceed their benefits.]

**Justification**

The European Commission conservatively estimates that by using currently available technologies a cost-effective saving of 20% of the EU 15's energy consumption can be achieved. In the New Member States, the saving potentials are even higher, as these countries use up to twice as much energy per unit of GDP. Conservative estimates suggest that up to 30% of energy can be saved economically, even taking into account lower energy prices.

Furthermore, since the estimated potential has grown in the last few years, a 1% target is **not ambitious enough** given the need to meet climate change objectives. A 1% target is already achieved in various EU countries through vertical measures alone (i.e. energy efficiency programmes and services). A more ambitious target would benefit the whole EU-25 economic competitiveness and climate protection. Given the cost-effective reduction potential and the average technology turnover of 20 years, an average 2.5 % is an achievable target.

**With the suggested targets, the amount of energy saved between 2006 and 2015 will be on average 2.5% per year against a business as usual energy consumption case.**

The wording on the costs of measures undertaken needs to be deleted, given that

traditional cost-benefit analyses are unsuitable for addressing the complexity of climate change policy. In particular a strict cost-benefit approach will fail to take into account the external costs of power generation and the financial benefits of climate change mitigation, including avoided costs for the society, due to lower climate change impacts on human activities, ecosystems and natural resources.

### Amendment 2

#### Art. 4(6)

Current version	What it should be
<p>Upon the expiration of the period during which target is applied, the Commission will review the target mentioned in paragraph (2) and examine whether it shall present a proposal for a prolongation or amendment of this target.</p>	<p><b>At least 3 years before</b> the expiration of the period during which <b>the target mentioned in paragraph (2)</b> is applied, the Commission <b>shall</b> review the target <b>and</b> present a proposal for a prolongation or amendment of this target <b>to come into force no later than the end of this period. This shall be done taking into account climate change commitments undertaken by the time at EU and national level.</b></p>

#### Justification

In order to maintain continuity as well as to ensure that the potential of energy efficiency is fully exploited and that further energy efficiency targets are properly set, the Commission should prepare a new proposal taking into account the results achieved. Updated targets and a continuous commitment to energy efficiency are essential to reduce energy consumption. Continuity is also important for market actors (who need to plan their investments) and for consumers.

### Amendment 3

#### Art. 5(2)

Current version	What it should be
<p>2. The public sector targets shall consist of savings in the first three years following the entry into force of the Directive of at least 4.5% overall, in the next three years of at least 5.5% overall, and in the three years after that at least 6% overall of energy distributed and/or sold to this sector, allocated and</p>	<p>2. The public sector targets shall consist of savings in the first three years following the entry into force of the Directive of at least <b>7.5%</b> overall, in the next three years of at least <b>9%</b> overall, and in the three years after that at least <b>10.5%</b> overall of energy distributed and/or sold to this sector, allocated and</p>

calculated in accordance with Article 4(3) and the methodology in Annex I. For purposes of comparison and for conversion to primary energy, the conversion factors set out in Annex II shall be applied.	calculated in accordance with Article 4(3) and the methodology in Annex I. For purposes of comparison and for conversion to primary energy, the conversion factors set out in Annex II shall be applied. <b>The amount of energy to be saved is calculated against a business as usual energy consumption case.</b>
--	---

### Justification

The target for the public sector is re-set in order to be consistent with the amendment on Article 4(2) concerning the private sector. Europe is lagging behind on public procurement. For example the US Federal Administration has an obligation to purchase efficient equipment. This has driven the market for efficient products, such as Energy Star products. As already recognised in the Directive on the promotion of Biofuels (2003/30/EC) and in the Directive on energy performance of buildings (2002/91/EC), the role of public sector in changing consumption patterns can be decisive. Considering its potential, the public sector should take the lead in supporting public goods such as energy efficiency through higher targets.

### Amendment 5 Art. 10 (b)

Current version	What it should be
(b) costs for investments made on the energy end-use side by distribution companies can be recovered by including them in their distribution tariffs, where appropriate, having due regard for the need to ensure equal competition and a level playing field for other providers of energy services. Cost recovery may be allowed for costs incurred in fulfilling energy service obligations pursuant to Article 6(a), provided that such costs are deemed reasonable and competitive by the responsible authority.	<b>Support</b>

## Justification

According to the BEST study, article 10 reflects the best practices in Member States (UK, DK) that have a long successful history in promoting cost effective energy savings and in States which are launching energy efficiency programmes (Italy).

Energy efficiency must be part of the service delivered to customers as it provides both private and public benefits (i.e. decreased demand resulting in a lower price for all customers, increased reliability of the system, and cost-reductions) and to the environment (reduced emissions). Not allowing cost recovering for energy efficiency actions, which bring public benefits and respond to one of the priority objectives resulting from the Green Paper on security of supply is unacceptable and is against the objective of this directive. Energy efficiency programmes together with the other operating costs (i.e. the maintenance or the creation of a new power line, a turbine or costs for regulating voltage) concur to the security of supply and the quality of the service provided. The costs (investments) incurred should be recovered via the energy prices, the tariffs of the regulated part of the business or the general taxation.

From an environmental point of view, it should be noted that recovery of costs/investments in Energy Efficiency programmes through tariffs, prices or taxes on energy, could also be viewed as a way of partially internalising external environmental costs of energy use.

## Amendment 6 Annex III, par. 2

Current version	What it should be
<p><b>Eligible horizontal measures</b> Focused horizontal measures may be considered eligible if energy savings can be clearly measured and verified according to the guidelines in <b>Annex IV</b> of this includes the following (non-exhaustive):</p> <ul style="list-style-type: none"><li>- regulations, taxes, etc. that aim primarily at reducing energy end-use consumption;</li><li>- standards and norms that aim primarily at increasing the energy efficiency of products and services;</li><li>- campaigns that promote energy efficiency and energy efficiency measures.</li></ul>	<p><b>Delete</b></p>

### **Justification**

Including horizontal measures (i.e. taxes, regulations, standards and norms) would mean taking into account every possible action aimed at saving energy. The established target would, then, be inadequate to reach the original purpose of the directive, which is having new and additional energy demand reductions.

Moreover, accepting the introduction of horizontal measures would pose evaluation problems, since their effect would be measured towards a baseline trend, which can be easily overestimated. Thus, the real savings deriving from these measures would be difficult to quantify.