

Position paper on the review of the energy efficiency directive

Local Government Denmark has the following comments to the review of the energy efficiency directive.

Overall:

EU-level detailed regulation on how to reach the targets must be avoided, since it often causes sub-optimization and implementation problems.

Since the Agreement on Efficient Energy Consumption was signed in 2007, Danish municipalities has come a long way in initiating energy efficiency. Efforts made by both municipal enterprises and private homeowners towards using more renewable energy sources has been significant, ultimately reducing CO2 emissions.

Improving municipal energy efficiency concerns on the one hand energy-renovation of buildings and enterprises, and making more efficient use of square meters on the other. However, the results has varied across regions. In the light of the Danish municipal reform act, and the on-going public debate on global climate changes, Danish municipalities has invested a great deal of time and effort in overcoming these challenges. For example, about 70 out of the 98 Danish municipalities has set standardized goals for reducing CO2 emissions in collaboration with the Danish Society for Nature Conservation (DN). A large part of these goals concerns the energy efficiency of running municipal buildings, where some municipalities has made great efforts in 'energy-renovating' these buildings, whilst others have yet to come up with a way to institutionalize energy efficiency efforts.

Despite the regional differences, LGDK notes that every Danish municipality is on the right track towards energy efficiency. However, setting national standardized goals for reducing CO2 emissions and improving energy efficiency ultimately becomes challenging for municipalities already engaging in such efforts to meet the standardized goals. Municipalities who has already put a great deal of time and effort in to initiating a more efficient use of energy will struggle to meet standardized goals, in comparison to municipalities who have yet to transit towards using more renewable energy resources. A solution to this problem would be having the municipalities setting their own, individualized goals.

However, in order to measure improvements in energy efficiency we need to gather data. Today, Danish municipalities face a great deal of problems in gathering data from the energy companies in question, and the cooperation with the Danish Building and Housing Registry is far from running smoothly. One solution to this problem would be installing measuring instruments on all existing buildings; another would be to appoint the municipal administration to gather the data, although this process would cost many working hours. If

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we are to pass a new bill on standardized goals for municipal energy efficiency, the availability of data should be guaranteed on national level, making sure Danish municipalities get easy access to free energy data.

Renovation:

Earlier discussed demands on yearly renovation rates for public buildings owned by local and regional authorities should be avoided, not being a cost efficient tool.

Procurement:

LGDK opposes that measures on procurement of energy efficient buildings, goods and services should be mandatory for local and regional authorities. We instead emphasize the importance of fulfilling EU and member states obligations to support action of public authorities, through legal framework, development of criteria and cooperation in procurement.

Info about Local Government Denmark:

LGDK the interest organisation of all 98 Danish municipalities. The mission of LGDK is to safeguard common interests of the municipalities, assist the individual municipality with consultancy services and in addition ensure that the local authorities are provided with up-to-date and relevant information.

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