

Efficiency First means Consumers First: proposals for the Winter Package

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The Problem

Active and engaged consumers are essential for Europe to achieve the ambitions set out in the 'Clean Energy For All Europeans' proposals to modernise the EU's economy making it low carbon, secure and competitive. However, consumer support for energy efficiency and renewable energy investments, in the form of energy advisory services, is poorly provided for in the existing EU policy package, and the Winter Package does not rectify this.

The Detail

There is no clear definition of information and advisory services in the Energy Performance of Buildings Directive or Energy Efficiency Directive. There is little clarity on the spectrum of advice a consumer may need from awareness raising to full bespoke support, or on the level of input required to support deep, staged renovations. Existing provisions are piecemeal, overlapping and non-specific. Information and advice are not conceived from a consumer's perspective and provisions fail to promote assistance in the essential 'action' stages of the customer journey. Too much reliance is placed on the Energy Performance Certificate (EPC), which is severely limited in its potential to adequately support a consumer to achieve a deep renovation.

The Solution - essential changes to the EPBD and EED

- A definition of advisory services and 'one-stop-shops' should be included in the revised EPBD, Article 2;
- The overlapping information requirements of the EPBD and EED (specifically the 'generic information' requirements in EED Articles 12, 17 and EPBD Article 20) should be consolidated and clarified;
- A new requirement should be introduced in a revised EPBD Article 20 for a Member States to create a robust strategy for information and advice provision to consumers on technical, legal, financial and behavioural issues:
 - Article 20 should set out a clear requirement for advisory services that support consumers to achieve deep renovation, from outreach and awareness raising through to implementation and adjustment of user behaviour followed by monitoring of results, including a requirement for a long term building energy renovation plan.
 - The requirement for a new information and advice strategy should emphasise advisory services that assist consumers at the 'action' stages of a renovation, and encourage future stages of renovation. This could be delivered effectively through a 'one-stop-shop' approach.
 - The new requirement should be specific and measureable and stipulate that advice services must be evaluated regularly and evaluation reports published.
- The EPC is not an adequate advisory tool for deep renovation. A quantitative energy assessment of the building is required (whether or not linked to production of an EPC) and should be used to provide a long-term renovation plan for the building, which can be updated

over time as changes are made and handed on when a change of ownership or occupancy occurs.

- The Winter Package proposes that the requirement to draw up a building Renovation Strategy is transferred from the EED (Art 4) to the EPBD (Art 2a). The opportunity to improve the conceptualisation and presentation of information and advisory services should not be lost:
 - EPBD new Article 2 should be reworded to increase the focus in the Renovation Strategies on the whole policy framework beyond stock data/technical potential and finance provision, to include energy advisory services.
 - To support investment by consumers, the new Article should include a requirement for mechanisms to provide advisory services to facilitate deep, staged renovations and the transition to 'smart', integrated buildings.
 - The Commission's guidance on the National Renovation Roadmaps should provide for a more comprehensive elaboration on "policies and measures" (EED Article 4(c)). In particular, point 3((a)iii) which defines the need for an appraisal of "Information campaigns" should be changed to "*Information and advice services for consumers*".
- The Winter Package extends the requirement in EED Article 7 for Member States to deliver 1.5% energy savings to 2030. It also reinforces the opportunity for Member States to choose 'alternative measures' to the Obligation to deliver their energy saving target. Alternative measures listed in EED Art 7 include (Art 7, 9f) '*training and education, including energy advisory programmes*'. These should be listed as separate policy measures in recognition of their vastly different objectives and audiences and to promote the delivery of energy advice as part of the Article 7 policy mix.