11th of April 2022

To: Commissioner Kadri Simson  
Copy: Director-General Ditte Juul-Jørgensen  

RE: Complementary modelling for higher 2030 energy efficiency and renewable energy targets to inform the decision making process

Dear Commissioner Kadri Simson

Russia’s invasion of Ukraine has revealed once more Europe’s dependency on fossil fuels. The European Commission recently presented ‘REPowerEU’, a plan aiming to make Europe independent from Russian fossil fuels well before 2030, starting with fossil gas. The Communication encourages co-legislators to consider boosting the Fit for 55 proposals with higher targets for renewable energy and energy efficiency.

The European Parliament is already exploring higher levels of ambition for the 2030 energy efficiency and renewables targets through a range of relevant amendments tabled for the Energy Efficiency Directive (EED) recast and the Renewable Energy Directive (RED) revision respectively. ITRE chair MEP Busoi\(^1\) furthermore requested a complementary analysis for the RED revision.

It is important for the European Commission to support this process for both directives through adding further analysis to the current EED and RED Impact Assessments, indicating the benefits of higher ambition.

\(^1\) The ITRE chair, MEP Cristian-Silviu Bușoi requests to have this complementary analysis as soon as possible, and in any event in time for the September plenary session.
Energy efficiency measures and accelerated deployment of renewable energy technologies are both key pillars of the solution and can structurally help solve EU dependency from fossil based energy imports. The analysis should evidently also update the underlying cost assumptions, energy prices which show record increases over the last 12 months and the cost-effective potentials as well as potentials for energy savings and renewable energy. CAN Europe is calling for a level of ambition of at least 20%\(^2\) for energy efficiency and at least 50% for renewable energy for 2030.

The complementary analysis to the Impacts Assessments should be prepared within a short timeframe to be able to guide the decision making process on the 2030 renewable energy and energy efficiency targets. Ideally this means before the European Parliament and Member States finalise their respective positions. The RePower action plan in May 2022 should already indicate any progress made to this end.

Lastly, we would like to reiterate the need to look into the Gas Package proposals in light of the recent developments. A new impact assessment for the relevant legislative proposals\(^3\) needs to include assumptions on decreasing gas consumption across European end users triggered through the war and the measures to be put forward by REPower EU. It also needs to be updated in line with current fossil gas prices. Overall, the Gas Package should more than ever underpin a quick shift away from fossil gas.

We thank you for your consideration and remain at your disposal should you wish to discuss these issues further.

Yours sincerely,

Chiara Martinelli
Director, Climate Action Network Europe

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\(^2\) CAN Europe asks for a binding EU energy efficiency target of at least 45% balanced against projections of the 2007 reference scenario or of at least 20% balanced against projections of the 2020 reference scenario

\(^3\) Regulation and Directive revising common rules for the internal markets in renewable, natural gases and in hydrogen COM (2021/0425).