

**UPEI CONTRIBUTION TO
EUROPEAN COMMISSION CALL FOR EVIDENCE
“SETTING AN ENERGY EFFICIENCY FRAMEWORK FOR THE DECADE AHEAD”.**

Brussels, 16 April 2026.

UPEI, the voice of Europe's independent energy and mobility suppliers, has carefully read the call for evidence, published on 19 March 2026, inviting for an input on “setting an Energy Efficiency Framework for the decade ahead”. We will focus our input on the review and possible revision of EED - (Directive 2023/1791), as we see it as the main pillar of the EU policy on energy efficiency.

This is a preliminary answer, as the timing chosen (middle of one of the most acute crises faced by our sector since 1973) and the timeline (four weeks) did not give us much time to prepare more arguments. We will attempt to provide a more detailed answer to the public consultation before 12 June.

Building on our previous position papers, notably on the call for evidence on the Amendment Proposal to the European Climate Law and on our [position paper](#) of 11 February 2021, UPEI propose considering the following points, constantly keeping the link between ambition, market reality and investment conditions:

The revision should aim at:

1. Providing a coherent, stable, and forward-looking legislative framework.
2. Amending current legislation only to the extent that it is necessary to implement the revised European Climate Law's intermediary target of 90% by 2040.
3. Promoting an honest and full implementation of the technology neutrality principle, notably as regards infrastructure planning, methodological choices (e.g. primary energy factors), and regulatory design.
4. Combining policy ambition and practical achievability, considering the availability of renewable fuels, infrastructure constraints, technology maturity and realistic scaling times.
5. Considering flexibility mechanisms to address temporary imbalances between targets and market realities.
6. Building a diversified and resilient energy system that addresses the short, medium, and long-term geopolitical dimension by strengthening the role of renewable fuels, including liquid fuels, for resilience and security of supply.

Furthermore, the European Commission should:

7. Base the new revision on a proper evaluation of the revised EED implementation at national level, which as such is a major issue since not all Member States have

transposed the Directive in national legislation. In this context, EU-level targets must be translated into national implementation instruments, in order to avoid market distortions, inefficient allocation of renewable fuels and infrastructure, and barriers to trade inside the EU internal market.

8. Guarantee stable and predictable investment conditions, ensuring that operators and investors should not bear risks stemming from external constraints such as grid connection delays, permitting bottlenecks or upstream supply limits.
9. Amend the Directive to ensure that it promotes the complementary role of different technologies and avoids creating unintended competition between them.
10. Adapt the Directive to focus it on improving efficient energy use, regardless of the type of energy, rather than promoting specific energy carriers. This implies:
 - Stop banning specific technologies (notably in the building sector)
 - Promoting innovation in renewable fuels, where Europe has a lot of potential to build on.
 - Acknowledging that electrification is not the only solution, and that its forceful deployment creates grid infrastructure bottlenecks. Such limitations strongly suggest that a fully electrified pathway may not be feasible or optimal.
11. If energy efficiency objectives for transport are to be kept in the revised Directive, then ensure that different regulations are aligned and do not contradict or undermine each other.

Finally, based on our position paper of 11 February 2021:

12. Keep optional the Energy Efficiency Obligation Schemes and establish thresholds for Member States that chose to implement them.
13. Prevent the Primary Energy Factor from being used as a tool to favour specific technology options.

UPEI would highly appreciate the opportunity to discuss these points in a meeting at your best convenience and remains at your disposal to provide more detailed information. The upcoming presentation by the of a Heating and Cooling Strategy could also present entry points to discuss the matter.

ABOUT UPEI

[UPEI](#) represents nearly 2,000 European importers and wholesale/retail distributors of energy for the transport and heating sectors, supplying Europe's customers independently of the major energy producers. They are the interface between producers and consumers, using their own infrastructure and flexibility to supply existing demand for conventional and low carbon liquid fuels, as well as non-liquid alternatives as part of the energy transition. They cover more than a third of Europe's current demand.

The organisation brings together national associations and suppliers across Europe. Independent energy and mobility suppliers bring competition to Europe's energy market and are able to respond rapidly to changes affecting supply, contributing to security on a local, national, and regional level. They have developed and maintain a comprehensive

infrastructure for the sourcing, storage and distribution of transport and heating fuels, with a commitment to delivering a high-quality service to all consumers, including those in remote areas.

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