

To whom it may concern

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Dear Sir or Madam,

I write on behalf of the European Academies Science Advisory Council (EASAC), the association of the National Science Academies of EU member states, about the draft Energy Efficiency Directive currently under consideration by the EU institutions. More specifically, the ITRE committee at its meeting on the 28<sup>th</sup> February 2012 approved a draft report in which it was suggested that EU member states would have to set binding national targets on the reduction of primary energy use - see Annex I of 'Adopted amendments on the proposal for a directive of the European Parliament and of the Council on energy efficiency', report of the Committee on Industry, Research and Energy, 9.3.2012:

<http://www.europarl.europa.eu/document/activities/cont/201203/20120309ATT40359/20120309ATT40359EN.pdf>.

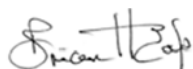
EASAC Council at its recent meeting in Dublin was concerned that the Directive should have a firm foundation in sound scientific analysis and evidence.

There are three specific areas in which we believe particular care should be taken:

1. We recognise and support the value of focusing attention on energy efficiency throughout the energy value chain including primary conversion. But it will be important to ensure that the accounting framework for a primary energy target does not result in disincentives for low carbon technologies such as renewable and nuclear energy. This is important since the main goals of EU energy policy are CO<sub>2</sub> emission abatement and security of supply.
2. Not all units of energy are of equal value. For example, a unit of electricity can generally provide more end-use energy services than a unit of fossil/biofuel energy, and an appropriate differentiation should be made according to the grade or value of different kinds of energy.
3. Whether national energy savings targets are binding or voluntary, they should be based on a sound analysis and agreed with member states in a transparent manner, and they should not cut across other elements of EU policy, for example on restoring healthy and growing economies. EASAC is particularly concerned about the lack of transparency and apparent consultation in the derivation of the ceilings for primary energy consumption in 2020 for individual countries.

EASAC would be very happy to engage with you on this important topic if you feel the national science academies of the EU can be of service.

Best regards



Brian Heap  
EASAC President