



Council of the European Union
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WK 15326/2022 INIT

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Energy
Subject:	SE comments on the Revision of the Energy Efficiency Directive (WK 14904/22 REV 2)

Delegations will find in the annex the SE comments on the Revision of the Energy Efficiency Directive (WK 14904/22 REV 2).

Sweden's written comments, EWP - EED 8th of November 2022

Sweden is generally positive to the compromise proposals and thank the presidency for a good work so far. Regarding the articles that were up for discussion, Sweden considers the following:

Article 8: Sweden believes that a gradual increase, as in the council's general approach, is necessary in order not to negatively affect the ongoing electrification and to be able to benefit from the requirements that follows from, for example, EPBD.

SE can show some flexibility regarding the level of the saving requirement if it in Annex V is clear that it is fossil energy that must first and foremost be reduced. This is as a result of the current energy crisis and to contribute to the increased climate ambition within the EU.

Article 23(6): SE believes that the proposal involves extensive administrative burden and that municipalities with less than 50,000 people should be exempted from the requirements.