

**Mr Waldemar Pawlak**  
President of the EU Energy Council  
Deputy Prime Minister and Minister for Economy  
Ministry of Economy  
Plac Trzech Krzyzy 3/5  
00-507 Warsaw  
Poland

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Dear President,

A progress report on the proposal for a directive on energy efficiency will be presented at the TTE Council on 24 November 2011.

I take this opportunity, on behalf of BUSINESSEUROPE's 41 member federations, to express our support for an ambitious European energy efficiency policy. It must strike the right balance between triggering investments where it makes economic sense while avoiding bureaucracy and giving member states sufficient leeway to promote energy efficiency.

We therefore welcome the fresh momentum given to energy efficiency through the Commission's proposal for a new directive. It has a valuable role to play in encouraging energy efficient actions in key sectors such as retrofitting of buildings.

Nevertheless, I would like to draw your attention to one point which must be at the heart of the debate: **we need a directive which stimulates energy productivity instead of reducing growth.**

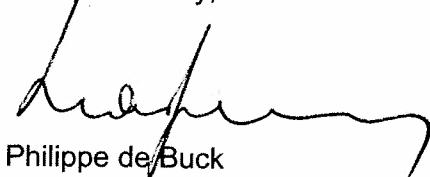
Yet the objective of 20% energy efficiency is expressed in such a way that it corresponds to establishment of a cap on energy consumption in the European Union by 2020 (i.e. 368 Mtoe energy savings by 2020). This approach contains serious risks of hampering the economic growth which the European Union needs to 2020 and beyond.

We therefore believe that any energy efficiency target – at European, national or sectoral level – should include elements which appropriately express energy consumption as a function of economic parameters.

I hope that you and your fellow Ministers will pay very close attention to this issue at your meeting on 24 November and in the Council's upcoming deliberations on this draft directive.

The attached position paper emphasises our views on other elements of the proposal.

Yours sincerely,



Philippe de Buck  
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