

## APPENDIX 2

# Reasoned opinion of the Riksdag

28 September 2011

The Commission's proposal for a Directive of the European Parliament and of the Council on energy efficiency (COM (2011) 370) has an important purpose, that is, of ensuring that the EU's objective of achieving 20 per cent primary energy savings by 2020 is reached. From a Swedish perspective, measures for efficient energy use are also an important means of achieving overall energy policy goals, such as reduced emissions of greenhouse gases, increased security of energy supply and increased competitiveness. The proposed directive is very broad and includes a number of extensive proposals for measures.

Since, according to the Commission's forecasts, there is a risk that the above-mentioned objective will not be achieved, the Riksdag has a basic understanding of why the Commission is proposing new, more intrusive measures. Efforts to achieve greater energy efficiency are not, however, helped by the fact that several of the measures put forward in the proposal for a directive are not compatible with the principle of subsidiarity. Detailed administrative management at EU level which does not allow for solutions that are adapted to local and regional conditions, for the benefit of cost-effective goal fulfilment should, in the opinion of the Riksdag, not be accepted. Neither is it acceptable that a proposal for a directive which, as an overall whole is assessed to "respect" the principle of subsidiarity, at the same time is permitted to contain aspects that entail that this principle is not observed in a satisfactory manner. These include, for example, the demands for a harmonised and quantified renovation rate of publicly owned buildings and that national heating and cooling plans should establish a framework for physical planning.

Overall – and in the light of the examination of the application of the principle of subsidiarity to the current proposal, as presented in the Statement 2011/12:NU8 from the Committee on Industry and Trade – the Riksdag considers that the proposal for the directive is not compatible with the principle of subsidiarity.