

BERLIN

What's Next for Companies? Strategies and Support Instruments under the EED

A Preview of Companies Session II & III



Session 08 – Companies III: Navigating the EED Maze

Unravelling Article 8/11 Transpositions in Member States

Impetus from the government for transformation

There are essentially three options for action

- **1. Inform** (e.g. energy efficiency networks)
- **2. Fund** (financial energy efficiency programmes)
- **3. Regulate** (EED, national transpositions)





Article 11 of the EED recast

Replaces the former Article 8

Companies with an average annual energy consumption > 10 TJ*

- Obligation to conduct an energy audit (irrespective of company size) at least every 4 years
- Audits must result in an action plan outlining feasible measures and timelines, with progress reported publicly.

Companies with an average annual energy consumption of > 85 TJ*

 Obligation to implement an energy management system certified to standards by October 2027

➤ Member States have developed varied approaches to managing and enforcing EAs obligations and the associated data collection on EEMs

Scope	Data sources / Method	Key findings	
Toro et al. "From Co	mpliance to Impact: Evaluating Energy Effic	iency Measures in Portugal and Ita	ly"
Martini et al. "Evalu	ating the Implementation of Energy Efficier	cy Measures from Art. 8 and the Pa	th to Art. 11 Compliance"
Boemi et al. "Enhan Efficiency in Industry	cing Energy Audits: Improving Data Quality	and Including Non-Energy Benefits	s to Promote Energy

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Toro et al. "From Compliance to Impact: Evaluating Energy Efficiency Measures in Portugal and Italy"					
Country case comparison: Art. 8 policies comparison in Portugal and Italy	Web Portal data on EAs and EEMs, questionnaire	Structured data collection exists in both countries Data-driven decisions: Energy data + digital tools guide investments and benchmarking Energy-intensive policies: Portugal uses prescriptive rules; Italy relies on restricted incentives			

Martini et al. "Evaluating the Implementation of Energy Efficiency Measures from Art. 8 and the Path to Art. 11 Compliance"

Boemi et al. "Enhancing Energy Audits: Improving Data Quality and Including Non-Energy Benefits to Promote Energy Efficiency in Industry"

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Cross-country comparison of EEMs data collection practices in 10 MS	Questionnaire to national experts, report review, interviews	High heterogeneity across MS; only few have structured, usable EEM databases — need for harmonised reporting formats.				
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Case Studies on audit data quality and role of Non-Energy Benefits	Audit case studies in 5 countries, quality checks	Many audits lack critical data; better data + NEB quantification improve implementation chances.				

Key takeaways

Concrete recommendations (for policy, auditors, companies)

- > Policy/portals:
 - define EU-compatible minimal data requirements (load profiles, invest, final+primary savings, NEB flags, ...)
 - link action plans to targeted funding
- > Auditors: adopt standard audit templates, in-depth analysis incl. EEM recommendations combined with NEBs

Companies: digitalise audit records, quantify NEBs in business cases



Session 05 – Companies II: Evaluating Decarbonization Strategies and Support Instruments

Evaluating Decarbonization Strategies and Support Instruments

In the past two years, Europe's energy system has undergone dramatic disruptions — from the sharp gas price hikes following the war in Ukraine, to ambitious climate commitments under the Green Deal and COP28. In this turbulent context, companies are at the forefront of the transition towards a low-carbon economy.

But how can we know which strategies, support instruments, and investments are truly effective?

Purpose of the Session

Explore how companies implement decarbonization strategies and how support instruments influence decision-making.

Why Evaluation Matters:

- Identifies effective strategies and gaps in policy design
- Helps link policy objectives to real-world company action
- Informs future program improvements and regulatory decisions

Key Question:

How can evaluation evidence guide companies and policymakers to accelerate decarbonization effectively?

	Scope, scale and strategy: Insights from the evaluation of company specific decarbonization plans (Löwenstein et al.)	Forklifts at the Forking Point: Evaluating Technology Open Funding Schemes with Dominating Technologies (Hirzel et al.)	Drivers and barriers for investment decisions about zero-emission renovations of non-residential buildings (Jonker et al.)
Purpose	To assess the effectiveness of Module 5 of Germany's largest energy efficiency program for industry, which funds strategic corporate decarbonization planning.	To evaluate the early performance of a technology-open electrification funding Module for micro and small enterprises, with a focus on the unexpectedly dominant role of electric forklifts.	To understand the drivers and barriers influencing investment decisions for zero-emission renovations in the non-residential building sector, and to inform policy and incentives.
Methodology	Analysis of 175 corporate transformation plans evaluated in 2023.	Evaluation based on the first 7 months of implementation (May–Dec 2023). Analysis of KPIs and qualitative assessment of strategy options for addressing dominance of specific technologies.	Twofold approach:Categorization of building owner types.16 semi-structured interviews with owners across sectors and sizes.
Key Findings	 Most companies demonstrated technical potential for ≥40% GHG reduction (Scope 1 and/or 2) over ten years. Main strategies: renewable electricity procurement, electrification, process optimization Scope 3 addressed in 35% of cases, but often weakly and inconsistently No mechanism to monitor whether planned measures are implemented. 	 The scheme is generally on track, with high application volume, but target values not yet fully met. Electric forklifts dominate applications, despite the open-technology framework. Their dominance may require policy attention, though not immediate corrective action. 	 Limited triggers exist to initiate deep renovations; typically occur every 15–20 years. Awareness of energy performance varies; many owners have incomplete knowledge of their portfolio. Drivers/barriers fall into 5 categories: organizational, financial, policy, knowledge & capacities, others. Cost-benefit analysis often discourages zero-emission renovations; policy incentive are needed to improve adoption.

Key takeaways

Concrete recommendations (for policy, auditors, companies)

Monitor and evaluate outcomes

Track implementation and impacts of company decarbonization measures to ensure policies are effective.

Support and incentivize action

Provide accessible funding, advisory services, and guidance to companies of all sizes and ownership types.

Promote holistic and innovative strategies

Encourage comprehensive GHG management (Scope 1–3) and technology diversity while fostering learning and best-practice sharing.

Align policies with real-world decision-making

Design incentives and interventions that match investment cycles, organizational capacities, and practical triggers for action.

Evaluation evidence is essential to guide effective corporate decarbonization policies and strategies.