

Energy Efficiency Directive: ensuring the success of energy management systems and audits

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Introduction

The TIC Council, as the voice of international independent third-party testing, inspection, certification and verification organisations, welcomes the Commission's proposal for a more ambitious Energy Efficiency Directive.

We welcome the introduction of energy management systems for all enterprises with an average annual consumption higher than 100TJ, which will be conducted solely by independent conformity assessment bodies. Overall, the new criteria based on energy consumption clarify the obligations of enterprises.

In this context, we would like to make the following recommendations to improve energy audits:

Enable all enterprises to use conformity assessment bodies for energy audits (Article 11.2)

We consider that enterprises consuming more than 10TJ should have the possibility to use a conformity assessment body for their energy audits.

TIC Council members have broad technical expertise and can provide tailored suggestions for improving energy consumption and applying the “energy-efficiency first” principle to enterprises of all sizes.

Moreover, conformity assessment bodies offer an objective range of improvement solutions as the follow-up of an energy audit, because they do not implement the solutions. As such, enterprises can benefit from finding the optimal solution that would reduce their energy consumption by using third-party conformity assessment bodies.

Furthermore, we recommend that experts conducting energy audits should be accredited according to the same criteria as conformity assessment bodies to ensure their independence and qualification. This would also ensure a level playing field among all interested providers of energy audits.

Ensure the independence of energy audits (article 11.3)

We recommend removing the possibility of having energy audits carried out by in-house experts or by other professionals who lack the necessary impartiality and qualification, such as facility managers or energy providers.

These professionals often lack the necessary independence from the enterprise. Member States also lack resources to conduct appropriate controls of energy audits conducted by in-house experts. As such, this provision could undermine the success of the Directive.

Use standards for energy audits (annex VI)

We strongly recommend that the criteria for energy audits (annex VI) should be based on international and European standards, exactly as the energy management systems.

Thereby, the audits will benefit from the knowledge transferred that is largely achieved through the use of standards. This should also facilitate the EU-wide implementation of energy audits and overall raise their quality.

Ensure proper accreditation (article 26)

We are very concerned about the request of article 26 that *“Providers of certification, and/or equivalent qualification schemes, including, where necessary, suitable training programmes shall be accredited according to Regulation (EC) No 765/2008”*.

The scope and criteria for accreditation according to Regulation 765/2008 are strict and refer only to the accreditation of conformity assessment activities. This Regulation sets the framework for granting the independence, technical capacity and expertise. Training programmes and providers of qualification schemes cannot be accredited according to this Regulation.

However, we support the accreditation of training programmes and qualification schemes according to the relevant regulatory framework to ensure that professionals conducting energy audits are properly trained and abide to strict quality criteria. Otherwise, the quality of energy audits may not bring the results desired by this Directive.

Finally, we would like to reiterate that all providers of energy audits and energy management systems should be accredited according to Regulation (EC) 765/2008.

The role of the TIC sector

Our members play a pivotal role already in the implementation of the Energy Efficiency Directive. As accredited independent conformity assessment bodies, they conduct energy management, audits, design review, inspections, technical controls and diagnostics.

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TIC Council is a global association representing over 90 international independent third-party testing, inspection, certification and verification organisations. Testing, Inspection and Certification (TIC) companies cater to a diverse range of industry sectors and a variety of standards and legislation. The industry represents an estimated one million employees across the world with annual sales of approximately USD 200 billion. For further information please see the [Report on the TIC sector](#).