
GCP EUROPE

The voice of HVAC & Water technicians (installers, plumbers & mechanical contractors) in Europe

Call for Evidence

Post-2030 Energy Efficiency Framework

April 2026

Contribution to the European Commission consultation

Introduction — A Delivery Framework

GCP Europe welcomes the European Commission's initiative to prepare a post-2030 energy efficiency framework. The future framework should reinforce the Union's objectives on affordability, competitiveness, resilience, energy security and decarbonisation.

In GCP Europe's view, the next framework should be designed more explicitly as a **delivery framework**. Energy efficiency policy is most effective when it translates obligations and policy signals into real works, real system improvements and real performance gains on the ground. A central objective of the post-2030 framework should therefore be to strengthen implementation quality and reduce the persistent gap between compliance processes and tangible delivery.

System Performance as Core Doctrine

For GCP Europe, such a delivery framework must also be clearly oriented towards **system performance**. In buildings, energy outcomes are determined not only by the characteristics of individual products, but by the performance of the installed system as a whole. Generation, distribution, emitters, controls, commissioning, maintenance, lawful operating conditions and user interaction all influence real-life results.

Future energy efficiency policy should therefore move further away from fragmented approaches that privilege isolated metrics or reporting obligations without sufficiently reflecting how performance is achieved in practice. This system-performance doctrine is a core element of GCP Europe's positioning and should guide the future framework more strongly.

The Role of HVAC & Water Technicians

This delivery and system-performance perspective is also why HVAC & Water technicians and mechanical contractors should be more clearly recognised in the future framework. They are among the key actors through whom energy efficiency becomes operational in buildings. Installation quality, system integration, commissioning and maintenance are decisive for real-world performance, persistence of savings, indoor environmental quality, safety and user outcomes.

The future framework should therefore better reflect the role of practical delivery actors and avoid policy designs that treat implementation capacity as secondary.

Six Priorities for the Post-2030 Framework

1. Strengthen the Link Between Diagnosis and Execution

In practice, many existing frameworks generate audits, inspections, EPCs, plans and recommendations without consistently ensuring conversion into works. The post-2030 framework should therefore encourage a more connected implementation chain linking diagnosis, technical advice, financing, qualified professionals, works, commissioning and verification.

The objective should be to create coherent pathways from identification of potential to effective delivery, especially for households and SMEs, for whom fragmentation and administrative complexity remain major barriers.

2. Simplification that Improves Implementation

GCP Europe supports efforts to reduce unnecessary administrative burden and improve coherence. However, simplification should focus on reducing friction between steps of the delivery chain, not on diluting the framework's capacity to generate action. In practical terms, simplification should make it:

- Easier to move from audits and inspections to financing and works
- Easier for SMEs to participate
- Easier for end-users to access qualified support

This would improve both the effectiveness and the political durability of energy efficiency policy.

3. Technical Building Systems and Operational Performance

More attention should be given to controls, digital tools, commissioning, maintenance, interoperability and optimisation over time. Energy performance in buildings depends not only on initial equipment choices but also on whether systems are correctly integrated, adjusted, monitored and maintained.

A stronger system-oriented approach would improve the reliability of expected savings and support more durable outcomes.

4. Retain and Strengthen Workforce Provisions

Experience from the implementation of recent legislation shows that no large-scale building renovation or efficiency upgrade is possible without a sufficiently large and properly trained workforce. Future efficiency policy should therefore continue to require Member States to assess and address workforce bottlenecks. Relevant measures may include:

- Skills-gap assessments
- Training capacity and annual output
- Public lists of qualified professionals
- Stronger involvement of social partners and professional federations in implementation pathways

5. Delivery-Oriented Support and Financing

Energy efficiency policy will not scale if support schemes remain overly complex, fragmented or detached from real implementation chains. The future framework should encourage practical, accessible and installer-friendly delivery models, including:

- Financing logic that accounts for design, commissioning and optimisation — not only equipment costs, and that exponentially rewards the installers of energy system based on total measurable efficiency gains
- Support for households and SMEs
- Standardised pathways where appropriate

Better integration of finance with the delivery chain would help reduce shallow retrofits, improve uptake and support higher-quality outcomes.

6. Digitalisation as a Practical Enabler

Building automation and control systems, energy management systems, interoperable digital tools, secure data access and human-centric AI can strengthen diagnostics, optimisation, maintenance and flexibility. However, such tools will only create value if they remain interoperable, secure, understandable and usable in practice — including by SMEs.

Future efficiency policy should therefore support digitalisation in a way that augments human capability and strengthens implementation quality.

Conclusion

In summary, GCP Europe encourages the Commission to design the post-2030 energy efficiency framework as a **delivery-oriented and system-performance-oriented framework**. This means:

- Improving the conversion of diagnosis into works
- Simplifying delivery chains rather than weakening ambition
- Recognising the central role of HVAC & Water technicians and mechanical contractors
- Supporting finance and digital tools that work in practice
- Placing greater emphasis on the real performance of technical building systems over time

Such an approach would help ensure that energy efficiency policy delivers not only targets on paper, but measurable value for households, businesses and the Union as a whole.

Sources and References

- GCP Europe — Strategic Positioning on Market Design and Finance Enabling Quality Installations
 - GCP Europe — Policy Positions on AI, Digitalisation and System Optimisation
 - GCP Europe — Joint Skills Statement linked to EPBD implementation
 - Directive 2012/27/EU as amended (Energy Efficiency Directive — EED), recast by Directive (EU) 2023/1791 — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023L1791>
 - Directive (EU) 2024/1275 on the Energy Performance of Buildings (EPBD recast) — <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024L1275>
 - European Commission — Call for evidence on the post-2030 energy efficiency framework (2026) — <https://ec.europa.eu/info/law/better-regulation/have-your-say>
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