

Swedenergy's views on the post 2030-framework

The post 2030 framework is scheduled to be revised during 2026-27 with the Commission's proposal expected in December 2026. Swedenergy has the following views on the **target structure** within the revision of the **governance regulation**:

- For the EU to reach its target of becoming the first climate-neutral continent by 2050, with a 55% GHG reduction target by 2030 and 90% by 2040, a strong post-2030 framework that is fit for decarbonization and electrification is essential.
- Swedenergy advocates **one overarching climate target**, that should stand above all other targets in a target hierarchy. Multiple targets with the same priority increase costs and require different, sometimes overlapping and, in the worst case, countervailing policy instruments.
- Swedenergy sees the Electrification Action plan proposal of **an indicative target for electrification** as a relevant way to ensure that the economic and climate benefits of electrification are fully leveraged. Sector-specific KPIs for transport, buildings, industry and other areas can accompany this target, while maintaining the flexibility to prioritize electrification where it is most cost-efficient.
- Regarding a renewables (RES) target, Swedenergy's view is that it was more justified and useful in the past, when RES needed an extra push (i.e. in the 2020 framework). However, in a post 2030 framework a **RES target is superfluous**, since most renewable power production today is built on market conditions. Hence, there is no need for more incentives, since ETS1 and ETS2 work as strong drivers of renewables.
- A more technology-neutral target would also have the benefit of promoting a healthy mix of system properties, such as much-needed firm capacity. Consequently, if there still is a strong political will to have a binding sub target on consumption, Swedenergy would **advocate a more flexible Clean power target**, that can include both RES and nuclear energy.
- Swedenergy is of the view that any new **energy efficiency target should be indicative** and set in qualitative terms, that better reflects the relevant challenges to be met. A qualitative target could be formulated as "Energy use should be efficient and contribute to strengthened resilience, competitive energy prices, a resource-efficient energy system, and the electrification of society. Efficient energy use entails the prudent management of energy resources, the leveling of peak loads, and an increased capacity for demand flexibility and energy storage".
- As a second-best solution is an energy intensity target. It's, however, vital that such a target is not set in a way in which nuclear power development is prevented.

As concerns the **underlying directives**, Swedenergy calls for a surgical revision in order to give member states and industry time to implement and evaluate the recently transposed legislation, and to ensure coherence. Focus should be on adapting to a higher climate ambition, and to simplify and remove unintended inconsistencies and obstacles to a rapid decarbonisation.

- This is particularly true for the **Renewable Energy Directive (RED)**, which was only recently implemented in most member states. Before initiating any revisions, the Commission should allow sufficient time for implementation to settle and evaluate the effects of RED III on markets, investment conditions and the functioning of the internal market.
- A leaked version of the RED IV impact assessment however suggests that the sustainability criteria for bioenergy may be subject to revision yet again, despite having been revised several times before having been put into practice and evaluated. Reopening the criteria would prolong uncertainty, create investment risk, and could restrict an important domestic energy source.
- The sustainable use of biomass for energy purposes is crucial for Europe's ability to meet the 2040 target and for its fossil independence. The current EU sustainability framework for biomass sourcing provides a solid basis for responsible and sustainable use of bioenergy in district heating, and CHP. Existing rules already ensure climate integrity, protection of biodiversity and responsible sourcing, while they allow national circumstances to be taken into account. **Consequently, the existing sustainability criteria for biofuels and biomass need not and should not be reopened.**
- Regarding the **Energy Efficiency Directive (EED)**, Swedenergy sees a need to review the current EU cap for energy, where the calculation methodology creates an undesirable obstacle to the necessary electrification of industry and transport. A cap target set in energy volumes is also counterproductive from a competitiveness standpoint, since it holds back new industrial establishments in EU.
- Rather than putting a cap on absolute volumes, the directive should address the environmental impact from energy use. For instance, the capacity dimension is missing where the most polluting energy production at peakload hours should be reduced with peak-demand reduction measures.
- A simplification focus in the EED revision has the potential to significantly reduce costs and support investments. In particular, the thresholds for energy audits and management systems are currently too low. If raised, and thereby addressing larger energy users, benefits would outweigh administrative costs. Also, the calculation methods for possible new annual energy savings requirements in article 8 should be simplified. Currently, the specific numbers for energy savings connected to energy poverty add far more complexity than benefits.

Swedenergy represents around 500 Swedish companies that produce, distribute, sell and store energy. Our goal is to develop the energy industry – for the benefit of all, based on knowledge, an overall view of the energy system and in cooperation with our environment.

For further reading:

[Swedenergy's position on EU ETS post-2030 architecture](#)

[Swedenergy's position on EU post-2030 Framework Fit For Decarbonisation and Electrification](#)

[Swedenergy's position on the Renewable Energy Framework for the decade after 2030](#)

[Swedenergy's response to public consultation on the energy efficiency framework for the decade ahead](#)