

European Commission legislative proposal to amend the Energy Efficiency Directive

A EURELECTRIC position paper

April 2017

EURELECTRIC is the voice of the electricity industry in Europe.

We speak for more than 3,500 companies in power generation, distribution, and supply.

We Stand For:

Carbon-neutral electricity by 2050

We have committed to making Europe's electricity cleaner. To deliver, we need to make use of **all low-carbon technologies**: more renewables, but also clean coal and gas, and nuclear. Efficient electric technologies in **transport and buildings**, combined with the development of smart grids and a major push in **energy efficiency** play a key role in reducing fossil fuel consumption and making our electricity more sustainable.

Competitive electricity for our customers

We support well-functioning, distortion-free **energy and carbon markets as** the best way to produce electricity and reduce emissions cost-efficiently. Integrated EU-wide electricity and gas markets are also crucial to offer our customers the **full benefits of liberalisation**: they ensure the best use of generation resources, improve **security of supply**, allow full EU-wide competition, and increase **customer choice**.

Continent-wide electricity through a coherent European approach

Europe's energy and climate challenges can only be solved by **European – or even global – policies**, not incoherent national measures. Such policies should complement, not contradict each other: coherent and integrated approaches reduce costs. This will encourage **effective investment to** ensure a sustainable and reliable electricity supply for Europe's businesses and consumers.

EURELECTRIC. Electricity for Europe.

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KEY MESSAGES

- Unlocking the market potential for energy efficiency in the EU is of critical importance to enable a strong, sustainable and competitive economy. As a key actor in this field, the electricity sector is committed to develop and deliver economic efficiency and energy services for European customers. Measures to enhance energy efficiency make most sense in the non-ETS sectors and the Energy Efficiency Directive (EED) is a key pillar to achieve this.
- The EED has been largely successful because it allows Member States to address their national challenges and pursue tailored strategies. Member States must retain full flexibility as to how they set and meet energy efficiency targets, as is the case now.
- Flexibility must also be maintained in Article 7 of the Directive. As Member States struggle to meet the annual savings targets in a cost-efficient manner, a prolongation of the binding target (provided it is agreed), must not go hand in hand with less tools to meet it.
- While the electricity sector is decarbonising under an ever decreasing ETS-cap, the sectors with enormous potential for energy efficiency improvements with real impact on climate, energy security and competitiveness lie outside of the ETS (such as buildings and transport). Achieving deep decarbonisation and efficiency through electrification provides a powerful pathway for these sectors. EURELECTRIC calls on policymakers to strongly recognise the role of electromobility and highly efficient electric technologies, such as heat pumps, to unlock greenhouse gas reductions. This recognition must also feature in the Energy Union Governance framework and should go hand in hand with the relevant financing tools.
- EURELECTRIC welcomes the attempt by the Commission to review the Primary Energy Factor (PEF). While the proposed new factor of 2.0 is a step in the right direction, it still incentivises electricity savings over direct fossil savings to meet the targets. As the electricity sector continues to add large amounts of renewable generation, an increased coupling of electricity with the transport and heating sectors could greatly help to reduce RES curtailment.
- The electricity sector reiterates its call for proper recognition and management of the impact of EU energy efficiency policy on the EU ETS. EURELECTRIC is concerned by the Commission Impact Assessment's estimated 2030 price levels for ETS allowances under the increased ambition scenarios, which decrease significantly with higher target levels. This would weaken the ETS instrument right after its current reform.
- In the discussion on a potential increase of the EU energy efficiency target EURELECTRIC's primary concerns are ensuring sufficient flexibility in setting and achieving the target as well as the proper management of the inherent impact on EU climate policy. In this context, EURELECTRIC is not convinced of the economic or environmental advantages of an increased energy efficiency target. The power sector further calls for the continuation of an indicative target, as currently successfully implemented.

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General Assessment of the Proposal

Unlocking the market potential for energy efficiency in the EU is of critical importance to enable a strong, sustainable and competitive economy. As a key actor in this field, the electricity sector is committed to develop and deliver economic efficiency and energy services for European customers. Measures to enhance energy efficiency make most sense in the non-ETS sectors and the Energy Efficiency Directive (EED) is a key pillar to achieve this.

The Energy Efficiency Directive has been largely successful because it allows Member States to address their national challenges and pursue tailored strategies. With the revision of the Directive, EURELECTRIC believes Member States must retain full flexibility as to how they set and meet energy efficiency targets, as is the case now. Flexibility must also be maintained in Article 7 of the Directive. As Member States struggle to meet the annual savings targets in a cost-efficient manner, a prolongation of the binding target (provided it is agreed), must not go hand in hand with less tools to meet it.

While the electricity sector is decarbonising under an ever decreasing ETS-cap, the sectors with enormous potential for energy efficiency improvements with real impact on climate, energy security and competitiveness lie outside of the ETS (such as buildings and transport). Achieving deep decarbonisation and efficiency through electrification provides a powerful pathway for these sectors. EURELECTRIC calls on policymakers to strongly recognise the role of electromobility and highly efficient electric technologies, such as heat pumps, to unlock greenhouse gas reductions.

EURELECTRIC also underlines the need for proper recognition and management of the impact of EU energy efficiency policy on the EU ETS. EURELECTRIC is concerned by the Commission Impact Assessment's estimated 2030 price levels for ETS allowances under the increased EE ambition scenarios, which decrease significantly with higher target levels. This would weaken the ETS instrument right after its current reform.

Detailed Assessment of the Proposal

I. Target setting & achievement

Topic	Article	Commission Proposal	EURELECTRIC's view
Energy efficiency targets	Articles 1 and 3	<p>The Commission proposes a 30% binding energy efficiency target at EU level by 2030.</p> <p>Target binding at EU level.</p> <p>Each Member State to set an indicative national energy efficiency target for 2020.</p> <p>The Commission may propose appropriate measures if not on track.</p> <p>When setting indicative national energy efficiency targets for 2020, and 2030 Member States shall take into account that the Union's 2020 energy consumption has to meet both a primary and a final energy target.</p>	<p>EURELECTRIC is not convinced of the presented economic or environmental advantages of an increased target.</p> <p>Disagree.</p> <p>Clarification required.</p> <p>Clarification required.</p> <p>Disagree.</p>

Comment:

EURELECTRIC notes the Commission's proposal for a binding EU-wide target of 30% for energy efficiency in 2030, which is an increase compared to the 27% indicative target that was agreed by the European Council in October 2014. We believe that this increase must be justified by a significant economic benefit of the target and the investments required for meeting it.

On the basis of the Commission's Impact Assessment which accompanied this proposal, EURELECTRIC is not convinced of the economic and the environmental advantages of an increased energy efficiency target. However, more important than the target level itself, we believe that related policy instruments should not be negatively affected and sufficient flexibility must be ensured to achieve the set targets. Specifically, EURELECTRIC is concerned about the interactions between energy efficiency and other energy and climate related targets and instruments, which are of key importance. The electricity sector has repeatedly called for careful consideration and management of the impact of the energy efficiency target on the EU ETS.

EURELECTRIC continues to call for a strong EU ETS as the cornerstone of the EU's energy and climate policy and supports the EU ETS as a key driver for market-based investments in low-carbon electricity generation. It will be essential to ensure that the functioning of the EU ETS is not undermined by other energy policy targets or measures. EURELECTRIC is concerned by the Commission Impact Assessment's estimated 2030 price levels of ETS allowances (EUAs) under

the increased ambition scenario, which are 35% lower compared to what they would be under a 27% energy efficiency target.¹ While lower EUA prices might allow for lower compliance costs, they would in this case not reflect a reduction in costs, but a reduction in demand due to the transfer of costs to other, less transparent mechanisms. Subjecting the ETS to such changes would undermine the stability of investing in low carbon measures in the ETS sectors.

A coherent approach which takes properly into consideration the interplay with the ETS, but also with the new Effort Sharing Regulation and the revised Renewable Energy Directive is essential. Any overlaps must be addressed while at the same time ensuring that potential synergies are unlocked. In this regard, EURELECTRIC believes that the ETS Directive should be complemented with provisions on an agreed methodology to transparently assess the impact of other policies on the ETS, as well as a methodology to appropriately recalibrate the supply side to overcome a negative impact of measures which reduce demand for allowances, such as an ambitious energy efficiency target.

Furthermore, it is important for the reviewed energy efficiency framework to recognise and encourage the environmental benefits and system synergies of increased electrification in sectors such as transport, heating and cooling, when considered in parallel with the ongoing decarbonisation of the electricity sector that is subject to the decreasing ETS-cap. The electricity sector's commitment to deliver carbon-neutral electricity by 2050 makes utilities a key enabler in delivering efficiency and decarbonisation in the downstream sectors. Electric engines and products often provide significant efficiency improvements while at the same time allowing for great decarbonisation potential. If this is not taken sufficiently into account in the development of the current framework for 2030, Europe runs the risk of not properly managing policy overlaps, which can undermine the cost-effective pathway to the decarbonisation of the EU economy by 2050, and be counter-productive in terms of European security of energy supply, with negative consequences for customers and environment.

We also note the Commission's proposal on Article 3(1)(a) which states that when setting indicative national energy efficiency targets for 2020, Member States shall take into account that the Union's 2020 energy consumption has to meet both a primary and a final energy target. Proposal is made for the setting of the 2030 target in Article 3(4). This clearly represents a significant change and reduction of flexibility for Member States, which is not supported by EURELECTRIC.

EURELECTRIC maintains its view that an indicative 2030 energy efficiency target at the EU level remains the best choice. This echoes the Commission's evaluation that the current indicative EU level target for 2020, together with the mix of binding EU measures and national action, including indicative targets set by Member States, has proved to be effective in driving strong progress by the Member States.

Going forward we believe that the focus at EU level must be on the areas with the highest potential for energy efficiency, which means primarily targeting the non-ETS sectors. Finally, we believe that the target should be delivered in a way that promotes investment and innovation through competitive energy services markets which reflect real costs and benefits, as well as the potential for the customers to have an active, positive role.

¹ According to the Commission's Impact Assessment on revision of the Energy Efficiency Directive (2016), the 2030 EUA price would fall from €42 to €27 if the target is increased from 27% to 30%. Higher targets are expected to depress the prices further.

A properly set ambition level of energy efficiency will further enable the development of energy service markets, create jobs and allow for new business models, a field in which European utilities have become increasingly active and invested.

II. Building Renovation

Topic	Article	Commission Proposal	EURELECTRIC's view
Long terms strategies for mobilising investment in the renovation of their national building stock	4	The Article is moved from the EED to the EPBD.	Agree.

Comment:

The scope of this Article fits better under the Energy Performance of Buildings Directive (EPBD). The changes proposed are addressed in [EURELECTRIC's position paper published in response to the EPBD review proposal](#).

III. Energy Efficiency Obligation Schemes

Topic	Article	Commission Proposal	EURELECTRIC's view
Energy Savings Obligations , Obligation schemes and alternative measures	7	<p>Extend the obligation period beyond 2020 to 2030</p> <p>1.5% annual saving target extended until 2030.</p> <p>The annual end use saving target to automatically extend for 10 years at a time until 2050 unless cancelled by the Commission.</p> <p>As part of the 25% which may be excluded from the calculation of the energy savings requirement Member States now able to take into account the installation of new RES on or in buildings.</p> <p>Annex V amended with regard to how energy savings are calculated and which savings are eligible for Article 7.</p> <p>Energy savings achieved after 31 December 2020 may not count towards the cumulative savings amount required for the period from 1 January 2014 to 31 December 2020.</p>	<p>Flexibility must be maintained.</p> <p>Flexibility must be maintained.</p> <p>Disagree.</p> <p>Clarification required.</p> <p>Flexibility must be maintained.</p> <p>Must count toward 2030 target</p>

Comment:

EURELECTRIC believes that Article 7 has been a successful tool for promoting energy efficiency, given the flexibility it provides in terms of identifying and addressing specific challenges for each country. The Article's revised structure under the current proposal is more streamlined and welcomed by EURELECTRIC. However, the cost-efficient delivery of energy savings must remain the key principle within this Article.

EURELECTRIC welcomes that with the new Articles 7a and 7b the obligation schemes and alternative policy measures are put on equal footing in the structure of the Directive. In order to underline that energy efficiency policy aims to improve the input-output ratio of energy, we call on policymakers to change the title of Article 7 to 'Energy efficiency obligation schemes & alternative measures'.

Following this, an equal recognition and treatment of both policy options in Article 7 is critical, also to ensure sufficient flexibility for Member States, which is of pivotal importance. This relates, on the one hand, to the way in which Member States are to set and meet the target either in terms of primary or final energy consumption, but it also relates to the specifics of Article 7 and the use of alternative measures. We also maintain our view that the strongest driver for energy efficiency should be competition. When reviewing Article 7 we therefore call on policymakers to ensure that energy service markets are not curbed or limited.

Keeping in mind that the proposal stipulates a ten year prolongation of the binding 1.5% savings target, EURELECTRIC does not support the Commission's proposal to automatically prolong the target beyond 2030. A regular review of the Directive is sufficient in this regard. Evidence from national implementation has shown that pursuing the 1.5% annual level of energy savings is very challenging for some Member States in view of increasing marginal costs. This is due to long-term measures being more costly and the decreasing potential for improvements due to efforts that have already been carried out. It further illustrates that a one-size-fits-all target for Member States is not flexible enough in view of the different situations and maturities across Europe. In some Member States this annual target has even shown to be disproportionate to the overall national energy efficiency target. These costs should not become disproportionate. Therefore, the review must ensure at least the same level of flexibility in theory and in practice.

Any change in the requirements on measures allowed under Article 7b should not weaken Member State options to pursue their efficiency strategies, making it even harder to meet ambitious targets. In this regard, keeping the 1.5% annual energy savings target in combination with a reduction in flexibility on meeting this target would represent a de-facto increase in ambition for most countries, which EURELECTRIC does not support.

Flexibility must also be maintained in Annex V of the Directive. While it is important to provide clear guidelines on which savings are eligible, it is crucial that such requirements ensure continuity for Member States in their strategies and implemented systems. The overarching goal must be better accountability for savings calculations without adding disproportionate administrative burden that would undermine the cost-effectiveness of the instrument or may lead to further delays in the proper implementation of the Directive. In this regard, there is a risk that the proposed approach to the concept of additionality and causality of savings would in effect undermine Member States' flexibility to implement efficiency measures which have proven to be useful and cost efficient. It is necessary to elaborate more clearly how existing measures would be affected under the proposed text.

EURELECTRIC also highlights that sectors which rely heavily on fossil fuels should be placed in special focus regarding decarbonisation, but also on energy efficiency. The transport sector is

such an example. It is therefore vital to explicitly recognise the replacement of internal combustion engine vehicles with electric vehicles as a measure to achieve energy efficiency, as electric motors are about 3 times more energy efficient. Furthermore, the installation of charging infrastructure for electric vehicles, which is a necessary precondition for electric mobility, must also be valued in this regard. EURELECTRIC calls on the Commission to issue a Guidance document on tapping the energy efficiency potential in the transport sector, while also recognising the additional important benefits of fuel switching, such as improvements in air quality, decentralised storage etc.

EURELECTRIC recognises the Commission’s intention to provide more flexibility to Member States under this Article which seeks to allow on/in building RES to be excluded from the calculation of the energy savings requirement. While we support the flexibility afforded to Member States under Article 7 it is necessary to stress that the introduction of on-building RES in this context should not lead to mixing the concepts of energy savings and decentral renewable generation in the future.

Another important point is to allow savings which result from actions undertaken before 31 December 2020 and which will still have an effect after this date to be included towards the 2030 target. It is crucial that specifically profound and long-term efficiency measures are not disincentivised. Without this provision, energy service and efficiency markets would be significantly curbed towards 2020.

Topic	Article	Commission Proposal	EURELECTRIC’s view
Energy efficiency obligation schemes	7a	Energy poverty provisions in obligation schemes. Control and verification system. Member States to publish the energy savings achieved by each obligated party.	Disagree. Clarification required. Should also measure effectiveness.

Comment:

EURELECTRIC notes an increased emphasis on energy poverty in the new Articles 7a and 7b. While EURELECTRIC agrees that energy efficiency financing schemes can be an effective long-term solution for tackling energy poverty (as those customers do not have the financial resources upfront to make such investments) we believe that support granted to people suffering from poverty should come from the general income of the State (i.e. through general taxation).

Given the constraints on resources across Member States, we agree that available assistance for energy efficiency should be focused on those who are most in need. However, supplier obligations are not the best way to fund and deliver energy efficiency measures. We must transition to using more progressive sources of funding (other than levies on energy bills), which takes into account customers’ ability to pay. More focus should be given to removing existing barriers to energy efficiency policies. Measures such as regulatory tools in the housing sector or financial incentives including tax exemptions should be considered.

In the context of Member States publishing the savings achieved by each obligated party, EURELECTRIC further suggests that this publication should be accompanied by a feedback on the effectiveness of the obligation scheme.

Furthermore, EU funding programmes such as the Structural Funds or the European Fund for Strategic Investments could also be used more systematically by Member States to improve energy efficiency in the housing sector, in particular for low-income families. Such an approach would also be more consistent with the Electricity Directive which states that Member States shall ensure the protection of energy poor or vulnerable customers in a targeted manner by means other than public interventions in the price-setting for the supply of electricity.

Topic	Article	Commission Proposal	EURELECTRIC's view
Alternative policy measures	Article 7b	Energy poverty to be addressed in alternative measures.	Disagree.
		Requirement list for alternative measures altered.	Flexibility must be maintained.

Comment:

The same comments made under Article 7a regarding energy poverty and flexibility apply here.

Topic	Article	Commission Proposal	EURELECTRIC's view
Determining energy savings under Article 7	Annex V para. 2(c) and (e)	Policies that accelerate the uptake of more efficient products or vehicles, full credit may be claimed provided the uptake takes place before the end of lifetime of the product or vehicle.	Flexibility must be maintained.
Requirements for alternative measures	Annex V para. 3(h)	The activities of the participating party or implementing public authority need to be shown to have caused the savings.	Flexibility must be maintained.

Comment:

As mentioned above, transport represents an important area for energy efficiency measures. EURELECTRIC therefore welcomes the fact that energy savings in transport are explicitly included under the energy savings obligation. However, we believe that products or vehicles which are replaced with more energy efficient products or vehicles at the end of the lifetime should be at least partly credited. This is especially true in the case of an internal combustion engine vehicle that is replaced by an electric vehicle. Since electric vehicles still tend to be more expensive in terms of purchasing costs, one cannot assume that the switch to an electric car would have taken place anyway at the end of the lifetime.

A further point of concern is the proposal in Annex V to show direct causality as it might not always be possible to achieve. For example, the installation of charging infrastructure for electric vehicles is central to the uptake for electric vehicles, which are about 3 times more efficient than

internal combustion engine (ICE) vehicles. However, it is hard to show that the installation on one certain charging station has caused a certain number of vehicle owners to replace their ICE vehicle with an electric one. Therefore, EURELECTRIC proposes to revert to the wording of the current Directive and state that the party’s activities must be demonstrably material to the archived savings.

IV. Metering and Billing

Topic	Article	Commission Proposal	EURELECTRIC’s view
Metering	9	Made applicable only to gas.	Agree.
	9a	New Article applicable to heating, cooling and domestic hot water from central sources.	Clarification required.
Billing	10	Made applicable only to gas.	Agree.
	10a	Complemented with new provisions applicable to heating, cooling and domestic hot water from central sources.	Clarification required.

Comment:

On individual meters: Considering lower heating demands from these buildings and their specific features, as well as the EU ambition for nearly zero energy buildings (NZEBs), the installation of meters will not lead to energy efficiency but to an increase of overall higher costs for consumers. EURELECTRIC believes that the deployment of meters in new buildings should follow the same conditions as for existing buildings and be subject to the fulfilment of economic and technical feasibility in order to exclude rising costs for the consumer.

On remote readability: EURELECTRIC supports the Commission’s proposal to move toward remote readability of meters. It is however important to ensure that the implementation of such a provision is technically feasible and cost effective. Member States should not be forced to impose such measures if they are technically impossible or even if they are financially unreasonable in relation to the potential energy saving.

On the Commission’s proposal relating to the scope of the term ‘final user’: The proposed scope appears to foresee obligations for the energy company even if there is no contractual relationship between the two actors. Such an impact should be clarified in more detail by the Commission.

V. Cost of Access to Metering & Billing Information for Gas, Heating and Cooling

Topic	Article	Commission Proposal	EURELECTRIC's view
Cost of access to metering and billing information	11	<p>Billing information and bills to be free of charge.</p> <p>Distribution of costs for individual consumption shall be on non-profit basis. Costs incurred may be passed to final customer.</p>	Agree.

VI. Energy Transformation, Transmission, Distribution

Topic	Article	Commission Proposal	EURELECTRIC's view
Energy transformation, transmission, distribution	15	<p>The sub-paragraphs relating to electricity (including transmission guarantee for electricity from high-efficiency cogeneration & priority or guaranteed access to the grid for electricity from high-efficiency cogeneration) are deleted. The provisions are moved to Article 11 of the Electricity Regulation.</p> <p>Member State obligation to ensure that “national regulatory authorities encourage demand side resources to participate alongside supply in wholesale & retail markets” deleted.</p> <p>New equivalent provisions to be included in the legislative proposals made under the Market Design Initiative.</p>	Agree.

VII. Exercise of the Delegation

Topic	Article	Commission Proposal	EURELECTRIC's view
Delegation	23	<p>Proposal deletes the current time limit on the delegation.</p> <p>Replaced by five year period set out in the common understanding of the European Parliament and the Council on delegated acts.</p>	Clarification from Commission required.

Comment:

EURELECTRIC believes that important policy decisions must be taken with the proper involvement of all European institutions. We therefore call for more explanation from the Commission as to the reason why such an extended delegation of power is necessary.

VIII. Review and Monitoring of the Implementation

Topic	Article	Commission Proposal	EURELECTRIC's view
Review and monitoring	24	Regular review clause added. First review by February 2024, and every five years thereafter Review report may include additional measures. Article 24 will be amended by the legislative proposal for a Regulation on Energy Union Governance.	Agree.

IX. Primary Energy Factor

Topic	Article	Commission Proposal	EURELECTRIC's view
Primary Energy Factor	Annex 4	The PEF footnote with its 2.5 PEF is replaced by the following: '(3) Applicable when energy savings are calculated in primary energy terms using a bottom-up approach based on final energy consumption. For savings in kWh electricity Member States may apply a default coefficient of 2.0. Member States may apply a different coefficient provided they can justify it.'	Supportive of change, but more changes required.

Comment:

While often seen as a technical detail, the Primary Energy Factor (PEF) will continue to have a profound impact on whether Europe's future fuel of choice in the downstream sectors will be fossil fuel based or carbon-neutral (e.g. RES, nuclear). Specifically in the Energy Efficiency Directive, the PEF will determine whether, and to what extent, Member States are incentivised to save fossil fuels or electricity (which, in 2014, was on average already 55% carbon-neutral in the EU).

The Commission's Discussion Paper for the review of the default Primary Energy Factor (May 2016) was a first step in the right direction. However it does not do enough to avoid a fossil fuel lock-in effect as it does not adequately recognise the impact of the PEF on the achievement of the EU's climate change targets and its security of energy supply. We believe that this would not only hinder the EU's decarbonisation agenda, but would also prolong the EU's energy import dependence on fossil fuels.

We believe that the revised PEF must be forward-looking and take more into account the quickly increasing share of low carbon electricity in the EU's power generation mix as well as its advantages in terms of security of supply. In this regard, we strongly advocate applying a factor 0 to all RES sources, as well as a factor of 1 to nuclear sources, in the overall PEF calculation methodology.

EURELECTRIC pursues in all its activities the application of the following sustainable development values:

Economic Development

▶ Growth, added-value, efficiency

Environmental Leadership

▶ Commitment, innovation, pro-activeness

Social Responsibility

▶ Transparency, ethics, accountability



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