

**Question for written answer E-004105/2026
to the Commission**
Rule 144
Markus Buchheit (ESN)

Subject: Actual implementation costs of the Energy Efficiency Directive (EU) 2023/1791 vs. national overachievements

Directive (EU) 2023/1791 (Energy Efficiency Directive) has been in force since November 2023, and had to be transposed by October 2025. The Commission estimated the costs of the legislative process ex ante. With its draft law of 16 September 2026 (Printed paper 21/8027), the German Government aims to ease the burden on the economy: recurring compliance costs are expected to fall by around EUR 760 million per year, whilst one-off costs are expected to fall by around EUR 2.9 billion. It justifies this by claiming that the Energy Efficiency Act went beyond the EU requirements. There does not seem to be any survey of the costs actually incurred.

1. Does the Commission have any data or way of quantifying the actual costs incurred from the Directive for private households, businesses and public authorities? If so, what are these costs per Member State and overall? If not, why not?
2. What proportion of the German transposition costs does it regard as mandatory under EU law and what proportion does it regard as national overachievement beyond the minimum requirements of the Directive?
3. Does the Commission plan to carry out an ex-post evaluation of the Directive's costs? If so, by when? And will this also cover which costs and energy savings can be attributed to the Directive and which would have occurred anyway?

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