



Ms Teresa Ribera

Executive Vice-President for Clean, Just and
Competitive Transition

European Commission

Rue de la Loi 200

1049 Brussels

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Dear Executive Vice-President,

RE: Energy policy target architecture post-2030

European businesses are fully committed to reaching climate neutrality by 2050. Delivering on this objective requires a pragmatic post-2030 policy framework which addresses existing complexities and the lack of a truly technology neutral approach. This framework needs to be simple and technology neutral to allow Member States and businesses to decarbonise at the least cost.

At a general level, a framework structured around the five Energy Union dimensions (energy security, internal market integration, energy efficiency, decarbonisation, and research, innovation & competitiveness), remains fully relevant and should be preserved.

A single binding GHG emissions reduction target should be at the core of EU's decarbonisation efforts. This ensures certainty for investments but also gives the necessary flexibility to reflect national constraints. Reaching net zero requires a multitude of solutions, and the closer we get to net-zero, the more solutions will be needed.

This calls into question the continued relevance of maintaining binding EU-level energy targets in a post-2030 policy framework¹. The current layering of targets and sub-targets in the energy field creates regulatory complexity and unnecessary rigidity. A simpler emissions-based framework would ensure the most efficient solutions will prevail in a technology-neutral approach, which would contribute to the affordability and security of the energy supply. Continued investment in renewable energy and energy efficiency will remain important beyond 2030, even within a simplified and more flexible target architecture.

At the same time, to maintain transparency and ensure progress on the climate ambition, it is important to continue tracking a limited number of energy-related KPIs at EU level to steer strategic investments. These KPIs should be designed in a way that is technology neutral. Examples could include the deployment of renewable and low-carbon energy, energy efficiency and the electrification rate. Together with the broader evolution of the National Energy and Climate Plans into investment plans, such KPIs should be used as diagnostic tools to mark the progress made without undermining the flexibility of an emissions-based architecture.

¹ DI and Ibec support binding renewable energy and energy efficiency targets post-2030.



While an emission-based framework describes the outcome, the enabling conditions will still be needed beyond 2030 to put in place instruments to de-risk investments in decarbonisation and in a competitive and resilient European energy system, address carbon leakage and retrieve a level playing field with international competitors. My team and I remain available to discuss the topic in more detail.

Yours sincerely,

Markus J. Beyrer
Director General