

Response of EREF to the public consultation of the European Commission concerning the review of EU renewable energy rules

As of 21 September 2020

EREF welcomes the COM proposal to reduce GHG emissions by at least 55% by 2030. This is the minimum necessary. COM should consider that the EP ENVI asked for at least 60% and that there are numerous calls for at least 65% GHG emission reductions; at least 45% renewable energy; and at least 40% energy savings. Therefore, the proposal for a reduction must go hand in hand with an ongoing assessment on whether the reduction target is sufficient for reaching the Paris Agreement obligations and whether the steps to achieve the goals are on track. When setting trajectories, we urge COM to focus the overall strategy to reduce GHG emissions and reach climate neutrality on avoiding emissions rather than later removing them from the atmosphere for storage and/or usage.

In order to be able to achieve a GHG reduction target of at least 55% by 2030 compared to 1990, the existing 2030 targets for renewable energies and energy efficiency need to be increased. The technologies for achieving a higher share of renewable energy generation are mature and available at low cost in the form of wind turbines, PV systems, biomass and hydropower systems and other renewable energy technologies in all end-use sectors. EREF strongly regrets that no binding targets for Member States are included in RED II.

When revising RED II, the role of distributed and decentralized energy generation from renewable energies and community self-sufficiency should also be strengthened. To ensure that the transformation to a fully renewables-based system can take place at the pace required, communities and local governments must be involved. Community energy projects increase the public support for the energy transition. Art. 22, 23 of the Directive already build a strong base for Renewable Energy Communities, but their lacking transposition needs further assessment by COM.

Regarding Art. 4, EREF believes that Member States should maintain the right of flexibility on how they design their respective renewable energy mix. This is the most efficient way of reaching the 100% RES target whilst taking the country-specific differences in to account.

The permitting process for new and repowered renewable projects remains too complex and lengthy despite the provisions in Art. 16, 17. Unclear regulatory frameworks and delays in legislation exacerbate investor uncertainty. Without permits, the renewable energy volumes spelled out in the NECPs remain academic.

The revision of RED II also needs to lead to a more transparent framework for Guarantees of Origin (GOs) in Art. 19. GOs are crucial to evidence the consumption of renewable energy. In order to avoid greenwashing, clear rules to guarantee the traceability and to ensure issuance

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of GOs to all renewable energy producers, with a consistent approach across all Members States, should be implemented.

According to the Inception Impact Assessment, elements from the EU strategies on Energy System Integration and Hydrogen should be considered in the revision of RED II. The building and transport sector in particular have enormous potential for an increased use of renewable energies. The sector-wide expansion of renewable energies would also contribute to increased sector coupling and thus to an increase in the resilience of the energy system. Locally produced green hydrogen is an option for complementing renewable deployment but is by no means a silver bullet for the energy transition. As the projected demands for hydrogen far outweighs the projected capacity to produce green hydrogen, it is important to focus on two elements: upscaling the renewable energy development and limiting the use of hydrogen to those areas where it really is the best or only available energy source to replace fossil energies. As a general approach for the Green Recovery from COVID 19, the Just Transition Fund and the EU Hydrogen Strategy, we strongly urge COM to adhere to a strict fossil energy phase out and all direct or indirect fossil subsidisation.