

Press Release

EREF – a call for constructive improvements of the European Commission’s proposal for the amendment of the current Renewable Energy Directive and Related acts

Brussels, 7 February 2022

EREF presented to the political groups and rapporteurs/shadow rapporteurs its [detailed list for amendment suggestions concerning the Commission’s proposal for an amended renewable energy directive \(RED III\) and related legislation](#).

EREF certainly and foremost welcomes the draft proposal for the amendment of the current Directive for the promotion of renewable energies (Directive (EU) 2018/2001 of the European Parliament and of the Council, as well as Regulation (EU) 2018/1999 of the European Parliament and of the Council and Directive 98/70/EC of the European Parliament and of the Council as regards the promotion of energy from renewable sources.

The objective for this Commission proposal is to assist fulfilling the priorities under the European Green Deal and the currently established framework under our European Climate law, all aiming to reach an almost complete Greenhouse-gas (GHG)- free society and economy in the European Union by 2050, as we are obliged to reach in the eyes of the world.

Call for stronger and binding targets

The most prominent change in this Commission proposal is under Article 3 and its new, reformulated paragraph a), calling now, that the EU Member States “shall collectively ensure the share of energy from renewable sources in the Unions gross final consumption of energy in 2030 is at least 40 %.” This is by far not enough and since there are still no binding targets for Member States set in this amended Directive, EREF cannot see any chance to reach the common and obliging goal by 2050 neither the midterm goals in less than 8 years, which are the focus of this exercise.

Quite some Member States have lowered their ambition during the last years and without binding targets there is a risk that the gap will broaden between frontrunners and the rest.

According to data from Ember/Agora, some Member States have a renewable energy penetration rate lower than 10 %. Without being obliged, EREF cannot see how the overall targets could be reached at all? [Ember and Agora Energiewende’s fifth annual report](#)

tracking Europe's electricity transition (25 January 2021) outlines that EU countries need to step up their 2030 ambition considerably. "At the moment, national energy and climate plans only add up to about 72 TWh new wind and solar per year, not the 100 TWh/year that are needed." EREF is convinced it is a myth, that this could be reached without binding Member States targets.

Planning and permitting – renewables first

EREF introduces quite substantial amendments for helping to improve the permitting and planning mechanism in the EU Member States and to put climate urgency at the forefront of public duty and consideration.

Joint Renewable Projects

EREF welcomes the proposal to have Member States cooperate on joint renewable energy projects. Yet, this requirement should be designed in more ambitious terms and oblige Member states and their competent authorities to issue assessments that demonstrate a country's potential transnational cooperation on renewable energy project.

Better monitoring on national achievements

Considered to be among the hardest barriers to remove, EREF advises that better monitoring and reporting mechanisms need to be put in place. In many Member States, Articles 15 and 16 have not been effectively transposed into national law – which is why first and foremost, further efforts to improve the cooperation among the EU and its Member states are required, to bring forward a consequent transposition of RED II. In this context and in addition, further clarification, and robust definitions, e.g., "proportionate and necessary" (in terms of national rules applied to renewables), might be useful to be added to RED III.

No auctioning needs for small projects

The RED II established a pioneering enabling framework for self-consumption installations. However, it does not tackle the need to remove barriers and facilitate mid-sized self-consumption installations, which are typically covering consumer-driven Commercial and Industrial (C&I) projects segment. Specifically, EREF proposes that the RED III should allow that aid can be granted without prior auctioning for installations up to a capacity of 10 MW (wind turbines with an installed electricity capacity of up to 6 MW or 6 generation units to be exempted from auctioning). PV-installations in the building sector should generally be exempt from the mandatory auctioning. Member states should not be allowed to forbid self-consumption in tenders.

Better linking – the story of buildings and heating and cooling

EREF proposes a further integration by linking this provision of the RED with the framework established in the Energy Performance of Buildings Directive (EPBD). For ensuring an effective deployment of renewables in the building sector, it is key to reduce their energy demand in line with the energy efficiency first principle. Hence, adequate planning consistent with the full decarbonisation of the building stock is needed, linking the new article 15a with the provisions of article 2a in the EPBD (upcoming EPBD revision to look at strengthening provisions on Long Term Renovation Strategies).

EREF welcomes that this provision of the RED III is strengthening the use of minimum levels of energy from renewable sources in buildings (and no longer restricted to new buildings and buildings undergoing major renovations) in line with the provisions of the EPBD. However, we urge the EU to include binding provisions for deployment of rooftop solar on public and private building stock with suitable roofs in the RED (and/or EPBD), following the energy efficiency first principle.

EREF welcomes the requirement for all public buildings to fulfil an exemplary role as regards renewable energy use. Furthermore, EREF would recommend reinforcing the provision with language promoting cooperation between local authorities and Renewable Energy Communities (RECs), particularly by using public procurement. Local authorities and RECs are natural partners in the energy transition at the local level.

While EREF supports to change the wording and specify to promote of heating and cooling from renewable energy sources, it might be useful, for the sake of effectively decarbonising the EU's heating sector, to put stronger requirements on Member states for assessing the potential and feasibility of renewables-based district heating and cooling infrastructure.

For more information, please contact

Dr. Dörte Fouquet
EREF Director
doerte.fouquet@eref-europe.org

Dirk Hendricks
EREF Secretary General
dirk.hendricks@eref-europe.org