

To:
Members of the European Parliament
Member States Attachés

Brussels, 10 November 2022

Dear Member of the European Parliament,
Dear Member State Representative,

On behalf of European energy associations and companies, Eurelectric would like to draw your attention to the **discussion around excluding hydropower from go-to areas in course of the revision of the Renewable Energy Directive**.

The European Commission's REPowerEU proposal aims to protect the environment while accelerating the deployment of renewable energy by designating go-to areas for renewable projects. **Ongoing discussions related to the exclusion of individual technologies are considered highly critical, as only by utilising all renewable energy sources minimal environmental impact can be ensured**. Hence, the Commission proposal was right to include hydropower among the technologies suitable for go-to areas. Indeed, there is a great potential for upgrading existing facilities as well as building new plants for example in heavily modified water bodies whose low environmental impact would meet the requirements.

In order to prevent negative impacts on the environment, the Commission's proposal provides for a series of measures by the Member States. While designating the go-to areas, a Strategic Environmental Assessment is required to show that no significant impacts are expected. When a project application is submitted, it must be screened again. This gives the necessary leeway to reject applications or to impose an ordinary environmental assessment if necessary.

The exclusion of hydropower plants below 10 MW adopted by the Environment Committee in the European Parliament contradicts the principle of technology neutrality and lacks any scientific justification. This differentiation of hydropower according to its capacity has been discussed in other forums but has never gained acceptance due to a lack of evidence. **The capacity of a plant is not a measure of contribution or impact**. The scientific evidence in favour of this argument has remained unchanged. Therefore, there is no justifiable reason to disadvantage small hydropower plants, as they provide renewable energy, flexibility and ancillary services to the power grid and thus contribute to the goals of the Renewable Energy Directive.

There should not be, by principle, any exclusion of a renewable technology from designated go-to areas. Accurate knowledge of local conditions and available sites is required to facilitate accelerated procedures while ensuring minimal environmental impact.

We trust that our concerns and suggestions will be given due consideration. We stand ready should you wish to discuss this issue with Eurelectric's environmental and hydropower experts.

Yours sincerely,
Eurelectric on behalf of supporting associations and companies (Please find logos on the following page)

Supporting associations and companies:

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