

Request to reject amendment in Article 2 Directive (EU) 2018/2001 (RED III)

Brussels, 14 November 2022

Dear Members of the European Parliament,

EREF and its members, national renewable energy associations from EU Member States, are highly concerned about the position of the ENVI Committee to exclude individual renewable energy technologies, especially bioenergy and small hydropower from so-called go-to areas under Article 2 (9a) of the amended Renewable Energy Directive (EU) 2018/2001.

The European Commission's REPowerEU proposal regards, among others, the acceleration of the deployment of renewable energy by designating go-to areas for renewable projects as main tool to increase Europe's energy independence and to speed up decarbonisation. Consequently, the Commission proposal included all renewable energies including hydropower and bioenergy among the technologies suitable for go-to areas.

It is for this reason that EREF thinks it is important that "go-to" areas should better be renamed as "acceleration" areas, conveying a more positive term, and not excluding other areas from the development of renewables.

In addition, the existing Directive (EU) 2018/2001 strengthens both bioenergy and hydropower as both technologies comply with the strict conditions under EU and national legislation on nature and water protection.

The potential exclusion of individual renewable energy technologies would go against the original purpose of this Directive, namely, to promote renewable energies. Such an exclusion would also expropriate an important local and regional contribution towards the energy system transformation towards a 100% renewable energy-based society. It would be a systemic error to discriminate some renewable energy technologies "cum grano salis" and undervalue their important social and environmental benefit for the local integrated system change, also under the current acceleration quest.

With billions of Euros currently spent to keep fossil fuels affordable and to safeguard our economies and social tissue as well as in full view of the short time framework of all that investment due to the Paris Climate Agreement, **we need to strengthen all renewable technologies and not to curtail some of them. All forms of renewable energy must be used to decarbonise the EU and to reach greater energy independency.**

And in view of the current COP 27 in Sharm El Sheik, a potential exclusion of some renewables from go-to or acceleration areas surely would send a wrong signal.

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