

EREF Contribution to the Implementing Act on Pre-Qualification and Award Criteria for Renewable Energy Auctions

EREF welcomes the Commission's efforts to specify non-price criteria under the Net-Zero Industry Act - a crucial step toward strengthening Europe's net-zero technology manufacturing ecosystems in the light of evolving European and global challenges. In the Competitiveness Compass and its work programme, the Commission underscores the need for simplification to secure European competitiveness and decarbonisation. In this spirit, the implementation of non-price criteria must not impose additional burdens beyond those already required by existing national regulations. Such an approach is essential to accelerate rather than impede the transition to a competitive, renewables-based energy system that supports domestic manufacturing and enhances supply chain resilience.

Avoiding Redundant Bureaucratic Barriers

While EREF acknowledges the underlying purpose of the new measures, it is imperative that the introduction of pre-qualification criteria, especially for "Responsible Business Conduct" and "Ability to Deliver" (Articles 4 and 6), does not burden project developers and operators with requirements beyond those already enforced under national regulations, such as environmental impact assessments. As stated in Article 3, non-price criteria should promote the rapid, efficient, and sustainable deployment of renewable energy while avoiding the creation of insurmountable entry barriers and disproportionate costs. Although the exemptions provided in Article 4(3) are a positive step, they must be further extended to ensure that SMEs and renewable energy communities are not burdened beyond criteria already addressed in the national permitting process. Avoiding such redundant bureaucracy, e.g. documentation obligations concerning identification of the bidder, is critical to preventing administrative overload and ensuring a level playing field for all market participants.

Cybersecurity and Data Security

Robust cybersecurity and data security measures are critical to protecting Europe's energy infrastructure, especially given today's challenging geopolitical landscape. EREF supports transposing these obligations into national law in line with the Network Information Security Directive (NIS-II). For renewable energy auctions, however, it is critical that the responsibility for providing necessary evidence of cybersecurity compliance rests on manufacturers rather than on project developers or operators, who have limited control over the technical equipment supplied. Consequently, manufacturers must prove that their products meet the required cybersecurity and data security standards and enable bidders to rely on this evidence in a streamlined and non-bureaucratic manner during the auction process. This approach must be adequately reflected in Article 5 to ensure that no unjustified burden-shifting occurs, which would constitute a barrier to efficient renewable energy auctions, as prescribed by Article 3.

Additionally, EREF welcomes the requirement in Article 5(1)(d) that an operator established in the EEA maintains operational control of the installation, and insists that this provision is applied rigorously to safeguard the integrity and resilience of European energy infrastructure.

Uniform Application of Award Criteria

Award criteria—including the mandatory resilience criterion— must be implemented uniformly across the EU. There should be clear, harmonized methodologies and defined timeframes for assessing the dependency of net-zero technologies and their key components on third-country sources. European supply chains for renewable energy deployment should not be subject to divergent procurement requirements among Member States, as such fragmentation would increase administrative costs and undermine fair competition. Uniform application is essential to maintaining a level playing field and supporting the overall competitiveness of Europe’s renewable sector.

Simplifying Sustainability and Environmental Criteria

While the opportunity to include sustainability and environmental criteria is welcome in principle, the current proposals are overly complex. Simplified and transparent criteria are needed to reduce the administrative burden on all market participants and to ensure that these measures effectively contribute to a sustainable, competitive, and more decentralized renewable energy market. In line with the general principles of Article 3, the criteria must not hinder market entry. A streamlined approach will help prevent deployment delays and foster innovation, without imposing disproportionate costs on smaller operators.

Conclusion

To recall, EREF strongly suggests that new pre-qualification criteria should not exceed existing national requirements, that cybersecurity standards must be robust yet balanced with the responsibility for evidence placed on manufacturers, that resilience and sustainability criteria should be applied uniformly, and that administrative burdens should be minimized for SMEs and independent producers. This approach is essential to achieve and safeguard a competitive, renewable-only energy system in Europe that truly supports domestic manufacturing and enhances supply chain resilience.

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