

# INFORSE-EUROPE

## International Network for Sustainable Energy

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### **INFORSE-Europe Comments on the Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the promotion of the use of energy from renewable sources (recast, COM(2016)767**

Klosterport 4F, 1. fl. DK-8000  
Aarhus C, Denmark  
Ph: +45-86227000  
Fax: +45-86227096  
[ove@inforse.org](mailto:ove@inforse.org)

INFORSE-Europe finds that the overall target of 27% renewable energy in 2030 is not ambitious enough to ensure a reduction of greenhouse gases in the EU in line with EU's reasonable share of greenhouse gas reductions to meet the Paris Agreement target of reducing global warming to 1.5 - 2°C. Therefore we propose a plan for an upward revision of the renewable energy target. This will also make it easier to increase the overall EU ambitions for reduction of greenhouse gases.

We also find that the proposal will weaken the support for development of renewable energy after 2020, when there are no new national renewable energy targets. Therefore we propose that with the amendments is introduced an option to set renewable energy targets for EU countries, if the development is not in track to reach the EU 2030 renewable energy target.

It is important that it continue to be possible to give national support for renewable energy that is transparent and cost-effective. This must have higher priority than whether the support is competitive or non-discriminatory. It must be possible to introduce discriminatory support if there are good reasons for this, for instance to prioritise local investments and investments with local benefits. This is often crucial to build and maintain public support for renewable energy. Art.4.3 should be changed so this priority becomes clear.

We find it is a serious mistake to force the EU countries to open their renewable energy support schemes for projects in other countries. It will deteriorate the public support for renewable energy, as well as the public support for EU. Therefore we propose to delete the entire art.5 from the proposal.

We are happy to see that the proposal increases the focus on sustainability of biomass, which will enable biomass to play a positive role as replacement of fossil fuels. It is important that the effective reduction of greenhouse gases with biomass is evaluated in a relevant time-perspective, for instance until 2050. The time perspective must be included in Annex V. It is also important that the sustainability criteria are updated whenever new knowledge on sustainability and on the biomass markets becomes available. Therefore it should be possible to revise criteria and materials in part A and B in Annex IX, both by including new materials and by removing materials already in the list, if it turns out that these materials are less sustainable than previously expected. This should be changed in art.7.5.

We appreciate the proposal for a short approval procedure for replacing old renewable energy plants with new plants, but if the new plants are considerably larger or have larger impacts on the surroundings than the old ones, the approval procedure must include the same requirements for environmental impact assessment (EIA) and consultation of neighbours as for new plants. This must be added in art.16.5 (on re-powering).

We do not think it is helpful for the transition to renewable energy to allow for certificates of origin from high-efficiency combined heat and power (CHP) plants that are not based on renewable energy. Therefore we propose to delete the part of art. 19 on certificates of origin for high-efficiency CHP.

It is important that the EU countries continue to develop the power system to feed-in a growing amount of variable production from renewable energy. This requirement must be kept as in the existing directive in art. 20 (it is to be deleted with the proposed amendments).

It is important that the consumers' right as producers of smaller amounts of renewable energy (prosumers) are ensured. Therefore we support that the proposed art.21 is included in the directive.

It is important that local organisations rights to produce renewable energy are ensured. Therefore we support the inclusion of the proposed art.22 in the directive.

Energy for heating and cooling must be changed to renewable energy faster than 1%/year. We propose a rate of change of at least 5%/year and that this is included in art.23.

To protect district heating, that is an effective distributor of renewable energy, the district heating consumers rights to be disconnected from district heating following art.24.4 shall be limited to consumers that replace district heating with local supply of renewable energy.

Renewable energy in transport must include electricity from renewable energy with a factor 4 for both cars, trains, and other means of transport, because of the high efficiency of electric motors compared with internal combustion engines. This shall be included in art.25 and in relevant annexes.

Sustainability of biomass shall be a requirement for all installations above 1 MW, not only for installations above 20 MW. This shall be changed in art.26.

For specification of comments, reasons, etc., please contact INFORSE-Europe, att. Gunnar Boye Olesen (INFORSE-Europe Coordinator).