

Public Consultation on the post-2020 Renewable Energy Directive Executive summary EGEC response

10 February, 2016

The Renewable Energy Directive (RES-D) has been successful in establishing a more comprehensive framework for the medium-term development of renewable technologies. As underlined in its mid-term evaluation¹, binding national targets and plans have been effective, along with other binding provisions such as that for grid access. Non-binding provisions such as those addressing administrative procedures, spatial planning, building codes, and information and training have proven to be less effective.

In order to implement the crucial Paris agreement, EGEC believes the revision of the RES-D is an extraordinary opportunity to foster a vibrant home market with clear growth perspectives for all RES technologies. In its response to the public consultation, EGEC makes the following, non-exhaustive, recommendations:

- Without national binding targets, **binding measures and a binding template for national energy and climate plans** is the only way to ensure transparency and predictability for investors. Trajectories and policy planning for each member state must be broken down by sector, technology and source.
- A number of 'gap-avoiders' and a last resort gap-filling instrument should be agreed in advance and enshrined in legislation. **These should be designed taking into account the different maturity and scale of the various RES technologies.**
- Particular attention should be given to those measures ensuring a measurable increase of renewable energy. **The revised RES-D should extend beyond 2020 the requirements to increase the share of renewables in 'Nearly Zero Energy Buildings', including through district heating.** Such a provision is in line and will complement the Energy Performance of Buildings Directive.
- **Conditionality should apply in the allocation of EU funds** so as to incentivise member states to raise ambition and give their fair share in achieving the common minimum 27% target.
- **EU mechanisms will facilitate access to targeted financing.** A risk insurance system should be developed to support the **next generation of RES**, including new geothermal technologies. In parallel, technical and financial assistance to local authorities is needed to further develop renewable energy at local level. A specific instrument should also be designed for small-scale renewable heating and cooling projects.

¹ [Mid-term evaluation of the Renewable Energy Directive](#), April 2015

- In order to increase the flexibility of the power system, **the revised RES-D should include new provisions to promote dispatchable renewable energy sources.** Member States must assess their potential and take it into account in their energy and infrastructure planning as well as in the design of support schemes.
- **Streamlined administrative procedures must be in place for all RES technologies.** In many countries an appropriate licencing regime for geothermal technologies is not yet in place. New EU technology-specific guidelines and concerted actions should fill this gap. In order to streamline administrative procedures, EGEC supports the idea of a 'one-stop-shop', the online application system, and the practice of simple notification for geothermal heat pump projects.
- **Renewable cooling has to be measured and promoted.** It is still unclear how renewable cooling technologies are taken into account in national statistics. This regulatory gap must be addressed, including through an EU-wide methodology to calculate free renewable cooling and an adjustment of the methodology to calculate the share of renewable energy from heat pumps.
- It is crucial to **improve the consistency between the RES Directive and other pieces of EU legislation.** As an example, **efforts to promote renewables in the heat sector are very often offset by the way 'energy efficiency obligation schemes' are designed.** As a matter of fact, subsidies to fossil-based heating technology (e.g. condensing gas and oil boilers) continue to be allocated in the framework of the implementation of Art. 7 EED. **The post-2020 framework must ensure that technologies non-compatible with decarbonisation are no longer promoted and subsidises.**

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