OVERVIEW OF KEY PROVISIONS

Renewable Energy Directive

Targets (art. 3)
- Support the binding minimum Union target of at least 35% share of energy from RES in 2030: such target is a minimum requirement for a thorough penetration of renewable energy in all segments of the energy sector, notably heating and cooling.

Support Schemes (art. 4, art. 6)
- The option to set up technology-specific support schemes is necessary (other criteria than cost are relevant: diversification of sources, sovereignty over energy mix, grid services, flexible RES v. intermittent RES);
- Specific provisions for demonstration projects to allow the emergence of innovative technologies;
- Investor certainty must be as strong as possible (early notice on changes in support schemes, no retroactive changes...).

Deployment of Renewables in Buildings (art. 15)
- Minimum level of RES in buildings (renovated and new) through both individual installations and district heating (15.5: Commission proposal and Parliament position);
- Introduction of a mandatory information to consumers on renewable options for heating and cooling (European Parliament 15.7);
- Local Authorities to include renewable heating and cooling infrastructures in their city planning, as planning is a key enabler for technologies at the building level and for district heating (European Parliament 15.4).

Definitions (art 2 and 7)
- Geothermal energy defined as "energy stored in the form of heat beneath the surface of solid earth";
- "ambient energy" definition should not mention "beneath the surface of solid earth" to avoid a wrong and confusing double-definition of the same energy source;
- There should consistency throughout the Directive with these definitions (notably in Art 7 and annex VII).
- A delegated act to set up the methodology for calculating the share of renewables from heat pumps, district heating and cooling allows for a robust method that prevents greenwashing (Parliament and Council).

Mainstreaming renewables for Heating and Cooling (art. 23)
- This provision needs to be ambitious to deliver on its title. The European Parliament’s "2 percentage point" objective is consistent with increased rates of renewables penetration. An ambitious objective can include flexibilities (e.g.: waste heat can be included only if...).
Provisions on the reporting on the completion of this objective are necessary to introduce accountability and comparability of Member States heating and cooling policies. Short of a binding objective accountability is essential;

Although the increase can be averaged over several years, it should be at least 2022-2025-2027-2030 (similar to the reference points agreed in the Governance regulation), to allow for corrective actions to be taken before the end of the decade when considering the EUROSTAT delay in data availability.

District Heating

Provisions should ensure investor certainty for operators engaging in RES investments for district heating, and information for consumers to incentivise the deployment of more RES-HC.

Sustainability (art. 26)

The European Parliament includes several references to the waste hierarchy and the distortion of material markets (see AM 321 & 332/rev). This, mainly negative, wording may place additional burden and costs on market operators, particularly as no exact definitions exist.

Both the sustainability and the GHG saving criteria for biofuels, bioliquids and biomass fuels should be fully harmonised at EU level in order to provide certainty to investors and economic operators. As a resulted amendment 249 in art. 26.7 should be rejected, while the Council’s proposal for art. 26.9 should be strongly supported, as it offers a pragmatic (albeit not immediate) solution.

On biomass to electricity, efficient power-only installations should be supported. The EC’s proposal is technology specific, presumably because it is centred on fuel efficiency, rather than exergy efficiency (see Best Available Techniques (BAT) Reference Document for Large Combustion Plants, P.85). Further, consistency should be maintained for biomass fuels, regardless of whether they are fired in unison with other fuels, as is the case for biofuels blended in petrol for transport applications.

Geothermal (new recital 31a)

This new recital voted by the European Parliament should be removed. It should not be part of the Directive as it is not aligned with the reality of environmental regulations for geothermal energy. It contradicts the principles of a technology neutral approach to the development of renewables and that of better regulation. Geothermal facilities are already covered by national and European environmental regulations, and must comply with these requirements.

The main outcome of this amendment, should it be included in the final version of the directive, would be to tarnish the image of geothermal, and hinder its development prospects. This goes against the objectives of this Directive ‘on the promotion of the use of energy from renewable sources’, and it is based on wrong justifications.
Governance of the Energy Union

**Trajectories**
- Support national Long-term climate and energy strategies that include a consideration of the heating and cooling sector.

**Gap fillers**
- Maintain the link to Renewable Energy Directive article 23 on heating and cooling;
- Heating and cooling projects and innovative renewable technologies projects must be explicitly eligible in the financing platform to fund gap filling actions.

Energy Efficiency Directive

**Targets and PEFs**
- A 2.3 PEF value reflects the actual efficiency of the system and is not artificially low, guaranteeing fair competition of different technologies on efficiency basis.

Market Design Regulation

- **Capacity Remuneration Mechanisms**: Flexible renewables like biomass or geothermal energy should explicitly be eligible in capacity mechanisms. The Electricity Regulation only refers to renewable sources as intermittent electricity producers, which does not reflect the reality for several renewable technologies;
- **Priority dispatch** and access should remain for small scale installations and demonstration projects.
The European Geothermal Energy Council (EGEC) is a non-profit international organisation representing the European geothermal industry. More than 120 members from 28 countries make EGEC a unique network, uniting and representing the entire geothermal sector.

Solar Heat Europe is the voice of the solar thermal industry, actively promoting the use of solar thermal technology for renewable heating and cooling in Europe. With around 80 members from 17 European countries, ESTIF represents the entire value chain.

The European Biomass Association (AEBIOM) is the common voice of the bioenergy sector with the aim to develop a sustainable bioenergy market based on fair business conditions. AEBIOM is a non-profit Brussels based international organisation founded in 1990 that brings together around 30 national associations and 90 companies from across Europe.