

Consultation on the Review of Directive 2018/2001/EU on the promotion of the use of energy from renewable sources

A Eurelectric response paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

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February 2021

KEY MESSAGES

The power sector is committed to deliver carbon neutral power supply well before 2050 and to make a key contribution to the decarbonisation of transport, buildings and industry through direct and indirect electrification. Eurelectric supports the ambition of net-zero greenhouse gas (GHG) emissions in the European economy by 2050 and an at least 55% target of GHG emissions reduction by 2030 as proposed by the Commission. This will go hand in hand with the upward revision of the EU's 2030 RES and EE targets, as indicated in the Commission's communication on the new 2030 climate ambition, to enable the increased 2030 GHG ambition. With only 10 years to meet the 2030 climate ambition we urge policy makers to progress swiftly with the update of the EU regulatory framework to provide long-term predictability and certainty to investors in generation, storage, demand-side management and distribution grids and to ensure the necessary investments while addressing the security of supply challenges. Eurelectric calls for a coherent policy framework. This revision should not disrupt the current implementation at national level and should preserve the regulatory stability for long-term projects.

The current 2030 EU RES target is at least 32% (as agreed in 2018). The overall target that can be achieved based on Member States commitments in their NECPs, according to the Commission, adds up to 33%. Eurelectric suggests exploring how to strengthen the EU RES Financing mechanism to establish it as a tool for regional or even European tenders to support the deployment of additional RES to reach the new RES target.

Transversal Energy System Integration

The recently published Energy System Integration Strategy sets the basis to create stronger links between energy carriers, infrastructures and the consumption sectors to deliver on a low-carbon European economy. The use of renewable and/or low-carbon electricity into more areas such as heating and cooling, buildings, industry and transport will play a central role, coupled with the energy efficiency benefits that electrification entails as well as the use of renewable and/or low-carbon gases for 'harder-to-abate' sectors. Eurelectric would like to draw attention to the necessity to adopt a coherent policy approach between the EU ETS and 2030 targets to ensure consistency between different policies and measures. In this context, direct electrification should be promoted in end-use sectors where fossil fuels remain the main fuel (transport, buildings and industry). In addition to direct electrification, in heating and cooling of buildings, direct and indirect

electrification of district heating and cooling has a major role in countries with existing city-level heating and cooling networks. Renewable and/or low carbon hydrogen notably produced on the basis of renewables or decarbonised electricity will have a key role to play in decarbonising sectors where direct electrification is not possible, helping with bridging the gap towards EU climate neutrality and zero pollution goal. However when it comes to the revision of the Renewable Energy Directive (RED II), it should be leveraged to promote the further uptake of direct and indirect electrification (via hydrogen and derivatives) based on renewable sources. Additionally, other renewables gases could also have a role to play.

RES in electricity

Getting the **market framework** right should be the most important focus: a strengthened and well-functioning ETS and a well-functioning market should be the main drivers for investments. Focus must be on implementing the Clean Energy Package and continuously working towards an integrated European market. Policymakers should allow the markets to work freely, as much as possible unhindered by distortions and interventions. Market barriers should be removed especially in the context of PPAs. A clear regulatory framework, adequate market designs and long-term price signals, together with higher societal engagement are critical.

For **PPAs**, in the RES Directive, Member States have to describe policies and measures facilitating the uptake of corporate RES PPAs in their integrated national energy and climate plans (NECPs) but only a few Member States have done it. Efforts are needed to solve that implementation gap.

Permitting is a pressing issue. Permitting delays are a problem across Europe for wind, solar, but also for hydropower and distribution networks (and the majority of new RES will be connected at distribution level in the future). The reasons for delays in permitting can be attributed to a number of factors such as complexity of the project, high number of statements and objections raised at different stages, lack of administrative and human resources for national and local competent authorities, work load of court-appointed experts, commissioning of new experts as well as new expert's report during the proceeding or standstills of the proceedings. A swift and thorough implementation of the current Directive is a must but more could be done to fast-track certain processes for instance for climate critical infrastructure including speeding-up permit granting for PCIs or a coordinated spatial planning and permitting process for generation sites, grids and the related project infrastructure¹.

Cross-border opening of national schemes should remain voluntary for Member States. Creating such schemes seems to entail significant transaction cost for Member States (concluding bilateral agreements, setting up joint schemes, etc.) Moreover, first experiences have shown that the outcome of such tenders depends heavily on differences in the national regulatory frameworks (permitting rules, taxes, network tariffs design, etc.) so that projects are not competing on a level playing field. Selected projects might therefore not be built where it is most cost-effective from a resource/system point of view.

Instead of mandating cross-border opening of national schemes, the EU RES Financing mechanism (foreseen under Article 33 of the Governance Regulation (EU) 2018/1999 of the Clean Energy for all European package) should be strengthened and established as a tool for regional or even European tenders. This may in particular be relevant for the efficient deployment of cross border offshore wind energy projects in the spirit of the EC's Offshore Renewable Energy Strategy.

The development of the National Energy and Climate Plans demonstrated a clear lack of coordination between Member States, with different assumptions being considered by each

¹ Eurelectric, [Statement on RES permitting](#), October 2020.

regarding their neighbouring Member States leading to a set of plans that in some regions are unrealistic if they are considered together. For example, Portugal's NECP assumes a net zero trade balance of electricity with Spain, while Spain assumes that it will be able to be a net exporter to Portugal of around 20% of its electricity demand. In the Baltic States there was a lack of coordination between national ministries when developing NECPs. As a result a significant wind capacity was forecasted, which in certain periods may exceed demand and Estonia, Latvia and Lithuania simultaneously could have a substantial surplus of generating capacity without clear understanding who is going to buy it. At the same time, taking into account lack of base load capacity and storages in low wind periods it is not clear how the system will be balanced. As such, there is a clear need to ensure better coordination in the design of the regional plans.

Regarding specifically **regional cooperation in the field of off-shore wind**, cross-border and regional cooperation need to improve in order to avoid sub-optimal developments based only on national perspectives and accelerate the first stages of development. Examples of cross-border projects include TenneT's North Sea Wind Power Hub or Amprion's Eurobar. Cooperation mechanisms such as the mechanism of "joint projects" under the Renewable Energy Directive should be also made available for projects developed under international consortia or joint ventures. For example, right now it is the most common way for developing offshore wind projects.

Renewable electricity in end-use sectors

The cost-effective, clean, and smart electrification of the European energy system will be essential to achieve the European Green Deal's objective of climate neutrality by 2050. The next decade will be crucial to ensure that European society reaps the benefits of decarbonised electricity. The appropriate policy framework should be in place as quickly as possible to enable the electrification and decarbonisation of end-use sectors, ensuring that the next decade is not a lost one and the avoidance of carbon lock-in investments not aligned with the decarbonisation goals.

The review of the Renewable Energy Directive should be an opportunity to stimulate the use of renewable electricity in transport and buildings while keeping a consistent approach with the Energy Efficiency Directive and others to avoid overlapping policies.

RES in buildings

The Renovation Wave should take a system-wide approach and work to fully leverage the potential of highly energy efficient, smart and flexible buildings as a key component of a decarbonised energy system, powered by renewable-based electricity. To decarbonise the building stock in the most efficient manner, Integrated Renovation Programmes (IRPs) should combine energy efficiency improvements with policies that boost on-site renewable generation, take advantage of energy consumption data, and promote demand side flexibility and transition away from pure fossil-based heat supply by prioritising electrification and then other decarbonised heating sources.

RES in transport

Eurelectric noted in the Impact Assessment for the Climate Target Plan the relatively low contribution of the road transport sector to GHG emissions reduction by 2030 (around 16% vs 2015) as well as the low renewable energy target for transport (around 24% including multipliers). Electric vehicles using renewable electricity are the most effective, efficient and sustainable way to increase the share of renewables in the transport sector decarbonise the sector, reduce its dependence on fossil fuels imports from outside Europe and eliminate air pollution. Incentivizing the uptake of renewable electricity in transport through the revision of the RED can help the clean and smart electrification in the transport sector which must be at the core of the Green Deal: EVs

are rapidly getting better and cheaper. With the development of a rapid EV charging infrastructure on the strategic road network and innovative charging solutions for those without off-street parking, EVs will become the default car of choice for new purchases in the 2020s as their upfront costs decline and drivers take advantage of their lower operational costs and ability to charge at home. Fleet vehicles given their regular use, sensitivity to cost and proportion of new sales will play a central role in this transition. With the right support, EU and national policymakers could unlock EV uptake, and allow them to make a much larger contribution to the EU's GHG target than outlined in the IA.

Currently, Article 27 of the Renewable Energy Directive sets out rules for counting RFNBOs towards the renewable energy target for transport. However, no specific provisions are included for direct renewables-based electrification of transport. We consider it important to regulate this area further as the EV and charging markets are developing at a fast pace and a common European approach would provide certainty for investors and would be appropriate for the cross border nature of transport.

The Sustainable Smart Mobility Strategy includes the idea of a credit mechanism. A credit mechanism is not a mandatory sub-target for renewable electricity, similar to e.g. the advanced biofuels target. Under a credit mechanism, fuel suppliers are enabled to use a wider range of compliance options than biofuels alone. For example in the Netherlands, fuel suppliers can choose to meet their obligations with crop-based biofuels, advanced biofuels or renewable electricity.

Indirect electrification through the production of renewable hydrogen from electrolysis based on renewable electricity is important for the decarbonisation of heavy duty transport such as long-haul trucks, ships and planes.

RES in industry

The Impact Assessment of the Climate target Plan shows a limited contribution to the reduction of GHG emissions by 2030 (around 22%) from industry, mainly driven by the use of more energy efficient processes and to a lesser extent due to fuel switching from fossil fuels to electricity. In addition to this development, Eurelectric would like to highlight the potential for the use of renewable electricity in a series of industrial processes. Direct electrification can be achieved using high voltage high-pressure electrode boilers to replace fossil fuel boiler in times of excess renewable generation. Similarly very high temperature thermal storage technology is now available to store renewable electricity and offset fossil fuel boilers over longer durations. Indirect electrification, e.g. via hydrogen produced from renewable electricity helps to develop renewables in industry. Renewable hydrogen can be used to replace carbon-based feedstock in refineries, steel and ammonia production.

The Commission should consider including in the Directive a methodological toolbox for the design of support schemes that include large-scale direct and indirect electrification.

Biomass as a part of RES

Biomass should remain an option for fulfilling ambitious carbon reduction targets. Biomass has the benefit of being a dispatchable source of renewable energy

Eurelectric does not support the adoption of additional sustainability and GHG emission savings criteria in the revision of the Renewable Energy Sources Directive. It is crucial that the availability of biomass is maintained equally to all market players. Further limitations on the feedstock would

negatively impact the functioning of the market and the freedom of movement of goods. Constant change in the criteria might have a negative effect on the market and development. The country or regional risk based approach is highly appropriate and it should be respected. The current sustainability and GHG emission savings criteria should be first implemented to gain experience and further insights into biomass markets. In a few years, more information will be available on the need for review and changes for the post 2030 period.

Power-to-X

The development of dedicated technologies to convert or store power surpluses from renewable energy sources (the so called “Power-to-X”) is another important aspect, which may foster the achievement of RED II targets as well as contribute to the objectives of system integration. In this context, Eurelectric highlights that the coupling of electricity & gas systems, notably through Power-to-Gas, is a key link in the transition to a net-zero economy, needed in "harder to abate" sectors to complement direct electrification.

The most important modification of RED II shall be the change of overall Union target for renewable energy. With higher climate ambition, the European Union can foster the technology maturity and cost-efficiency of Power-to-X products from electrolysers (hydrogen, e-fuels). The overall objective should be to unlock the benefit offered by greater synergies among sectors to provide decarbonised solutions to all sectors of the economy. More specifically, provisions on sustainable fuels such as renewable and/or low-carbon hydrogen produced by electrolysis is very important to drive the power-to-gas development. Additionally provisions on “green” electricity usage for transport (e-mobility) and heat production (heat pumps) shall be incorporated into the RED II.

The integration between electricity, gas, heating and cooling, transport and industrial sectors is key element to achieve RED II goals.

*Contribution ID: 914ff6de-f07f-46a1-a4de-b0adc7588c1e

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Fields marked with * are mandatory.

Introduction

This consultation aims to collect views and suggestions from stakeholders and citizens in view of the possible proposal for a revision of Directive 2018/2001/EU on the promotion of the use of renewable energy (RED II), planned for 2021.

Renewable energy is produced using the earth's natural resources, like sunlight, wind, water resources (rivers, tides and waves), heat from the earth's surface, or biomass. Using renewable energy, instead of fossil fuels, substantially reduces the emission of greenhouse gases, which is why renewable energy is also referred to as 'clean energy'.

Today, the energy sector is responsible for more than 75% of the EU GHG emissions, so increased uptake of renewable energy alongside energy efficiency has a key role to play in reducing GHG emissions in a cost-effective way. More energy from renewable sources also enhances energy security, creates growth and jobs, reduces air pollution when not based in combustion and strengthens the EU's industrial and technological leadership.

The review of RED II is carried out in the context of the European Green Deal[1] in which the Commission committed itself to review and propose to revise, where necessary, "the relevant energy legislation by 2021.

In the European Green Deal the Commission proposed to increase the Union's 2030 greenhouse gas (GHG) reduction target from 40% to at least 50% to 55%, with the objective of climate-neutrality by 2050.

On 17 September 2020, the Commission published its 2030 Climate Target Plan, which presents a new 2030 target of at least 55% net GHG emission reductions compared with 1990 levels on basis of a comprehensive impact assessment. Achieving at least 55% net GHG emissions reductions would require an accelerated clean energy transition with renewable energy seeing its share reaching 38% to 40% of gross final energy consumption by 2030.

This range of 38% to 40% is higher than the binding Union level target for 2030 of at least 32% of energy from renewable energy sources introduced by RED II. It is also higher than the share of renewables, between 33.1% and 33.7%, that would be achieved if Member States complied with the national contributions set in their integrated National Energy and Climate Plans (NECPs) for 2030. In addition, the Commission has adopted, or will adopt, other strategies containing a number of key actions supporting the increased climate ambition, which could be followed through in the review of REDII. This is the case, for instance, of the Energy System Integration[2] and the Hydrogen Strategies[3], adopted on 8 July 2020, the Renovation Wave Strategy[4], adopted on 14 October 2020, and the Offshore Renewable Energy Strategy, planned for 19 November. In addition, the European Green Deal includes a "Green Oath to do no harm", in particular by preserving biodiversity and reducing air pollution. To this end, the Commission adopted on 20 May 2020 an EU Biodiversity Strategy for 2030, which also contains commitments of relevance for the REDII review.

The answers to this questionnaire will feed into the review process of RED II, and more in particular into

the impact assessment that the Commission will carry out to assess whether a revision is needed and what revision would be the most appropriate. No evaluation of RED II will be done, since this Directive, adopted in December 2018, has not yet been transposed and implemented by Member States (its transposition deadline is on 30 June 2021), and a full-fledged evaluation of Directive 2009/28/EC (RED I) was done in 2016 when preparing the proposal for RED II.

The questions are formulated to respect the requirements of the Better Regulation rules[5]. The questions are divided into different sections: questions about the identity of respondents, general questions on revising RED II, questions on transversal elements derived from the Energy System Integration and Hydrogen Strategies, and technical questions on specific aspects of RED II, including questions on buildings and offshore renewables, in line with the Renovation Wave and the Offshore Renewable Energy Strategy. If you don't have an opinion on a question, do not reply.

[1] COM(2019) 640 final

[2] https://ec.europa.eu/energy/sites/ener/files/energy_system_integration_strategy_.pdf

[3] https://ec.europa.eu/energy/sites/ener/files/hydrogen_strategy.pdf

[4] https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/renovation-wave_en#documents

[5] https://ec.europa.eu/info/law/law-making-process/planning-and-proposing-law/better-regulation-why-and-how_en

NB: There is a session timeout for the submission of your contribution after 60 minutes; this is an automatic security feature. In order to avoid any loss of data, do not forget to use the "Save as Draft" option on the top right side of your screen before the 60 minutes expire. You can subsequently resume work on your contribution, and submit once completed.

Please note that this questionnaire will be available in all EU-languages as from 09/12/2020.

About you

Language of my contribution

I am giving my contribution as

First name

Surname

Email (this won't be published)

Organisation name

255 character(s) maximum

Eurelectric

Organisation size

Small (10 to 49 employees)

Transparency register number

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Check if your organisation is on the transparency register (<http://ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en>). It's a voluntary database for organisations seeking to influence EU decision-making.

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Country of origin

Please add your country of origin, or that of your organisation.

Belgium

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Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

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1. General questions on the review and possible revision of the

Renewable Energy Directive

REDII provides a general framework for the promotion of energy from renewable within the Union in order to ensure the achievement of the binding EU renewable energy target of at least 32% by 2030. It sets out rules on support schemes for renewable energy, on guarantees of origin for energy from renewable sources, on administrative procedures, on the integration of renewable sources in buildings, on selfconsumption and renewable energy communities, and on renewable energy in heating and cooling and in transport. It also sets out sustainability and GHG emissions criteria for bioenergy. On 17 September 2020, the Commission published its 2030 Climate Target Plan, where it presents an at least 55% net target for GHG emissions reduction in 2030. As result of this increased ambition, the plan indicates that renewables should represent from 38% to 40% of the gross final energy consumption in 2030.

1.1 How important do you think renewable energy will be in delivering the EU's higher climate ambition for 2030 and carbon neutrality by 2050?

- Very important
- Important
- Not very important
- Not important

1.2 Do you think REDII needs to be modified? (multiple answers possible)

- Yes, it needs to be more ambitious as result of the higher climate ambition in the European Green Deal and Climate Target Plan
- Yes, it needs to be more prescriptive to ensure that the EU renewable energy objectives are reached
- Yes, it needs to be less prescriptive, giving Member States more freedom on how to achieve their renewable energy objectives
- Yes, but only those adjustments required to reflect the European Green Deal objectives
- No, it strikes the right balance as it is
- No, even if there could be areas of improvement, legislation should not be modified so shortly after its adoption
- Other

1.3 If you answered 'yes' to the previous question, which parts of RED II do you think should be amended? (multiple answers possible)

- Overall Union target of at least 32% for renewable energy for 2030
- Target of at least 14% for renewable energy in transport by 2030.
- Indicative target of an annual increase of 1.3% point for renewable energy used in heating and cooling
- Indicative target of an annual increase of 1% point for renewable energy used in district heating and cooling and provisions on access to district heating networks
- Provisions on how to design support schemes for electricity from renewable sources
- Provisions on cooperation mechanisms between Member States
- Provisions on how to promote renewable energy in buildings
- Provisions simplifying administrative procedures for renewables project developers

- Requirements on guarantees of origin for energy from renewable sources
- Provisions on self-consumption and renewable energy communities
- Sustainability and GHG emission saving criteria for energy produced from biomass
- Provisions on sustainable low carbon fuels such as low-carbon hydrogen and synthetic fuels with significantly reduced full life-cycle greenhouse gas emissions compared to existing production
- Other

Please explain your answer

3,000 character(s) maximum

The power sector is committed to deliver carbon neutral power supply well before 2050 and to make a key contribution to the decarbonisation of transport, buildings and industry through direct or indirect electrification. Eurelectric supports the ambition of net-zero GHG emissions in the European economy by 2050 and an at least 55% target of GHG emissions reduction by 2030 as proposed by the Commission. This will go hand in hand with the upward revision of the EU's 2030 Renewables and Energy Efficiency targets to enable the increased 2030 GHG ambition. With only 10 years to meet the 2030 climate ambition we urge policy makers to progress swiftly with the update of the EU regulatory framework to provide long-term predictability and certainty to investors in generation, storage, demand-side management and distribution grids. Eurelectric calls for a coherent policy framework and for additional analysis on the necessary framework including market design. To avoid over-regulation, the revision should not disrupt the current implementation at national level and should preserve the regulatory stability for long-term projects.

With an upward revision of the RES target it makes sense that for the overall consistency of the framework sub-targets are raised. However, the multiplication of sub-targets in end-use sectors could create an inefficient allocation of resources and prevent the market from working properly. For that reason, non-mandatory targets should not become mandatory with the revision of the RES Directive. We would also be concerned with the addition of new targets/quotas etc as this would most notably weaken the role of the ETS. Besides the focus should be on how to reach the overall GHG and RES targets and what can be counted towards these targets (e.g. RES based electricity towards the transport sub-target).

The use of renewable and/or low-carbon electricity into more areas such as heating and cooling, buildings, industry and transport will play a central role, coupled with the energy efficiency benefits that electrification entails as well as the use of renewable and/or low-carbon gases for 'harder-to-abate' sectors. Electrolytic hydrogen and synthetic methane, as well as other type of renewable (biogas, biomethane) or decarbonised gases, require clear, relevant and simple definitions, to enable all stakeholders to handle the same tools and to speak a common language. To this goal, a classification of these gases should be established in a clear and consistent manner. The main criteria of this classification should be the emissions of the gaseous products over its whole lifecycle - i.e. starting with the production processes and until the delivery of the gas to the end-consumer's entry point. While this classification will have to be included in upcoming Commission proposals, Eurelectric would like to highlight that the focus of the RES Directive should remain however on renewables.

1.4 In which sectors do you think additional efforts to increase the use of renewable energy

are most needed for a potentially higher renewables target for 2030? (multiple answers possible)

- Electricity
- Gas
- Heating and cooling
- District heating and cooling
- Buildings
- Services (including ICT)
- Industry
- Transport
- Agriculture
- Other

1.5 Do you see scope for simplifying RED II or reducing regulatory burdens, including administrative burdens?

3,000 character(s) maximum

In its 2030 Climate Target plan, the Commission proposes an ambitious doubling of the share of renewables in electricity generation to at least 65 percent by 2030. The technologies to achieve this goal are already available at low cost in the form of (onshore and offshore) wind energy, PV, biomass, hydropower and other renewable energy sources. However, regulatory obstacles prevent the necessary expansion of renewable energies from being driven forward at the necessary speed. One major problem has for years been the question of acceptance and the availability of land for the expansion of onshore wind energy and PV plants. Here, the Member States need the committed support of the EU, especially with regard to a possible inconsistency with EU environmental law (e.g. use in nature conservation areas, scope of application of the Water Framework Directive) and the necessary flexibility in instruments to increase acceptance.

In the revision of RED II, general attention should be paid to ensuring that the directive creates a legally secure framework for supporting the expansion of renewable energies without getting lost in too many detailed requirements, in order to be able to cope with the dynamic challenges and the different conditions in the Member States in the long term.

Common renewable energy projects under the Renewable Energy Directive should be also made available for projects developed under international consortia or joint ventures.

Compliance with the current RED should be enforced at Member State level especially the maximum duration of 2 years for the authorisation process. It means increasing human resources in order to deliver the necessary volumes of authorisations. Repowering procedures of installations that come to end of life should be particularly simplified.

1.6 Do you think the level of the 2030 Union target for renewable energy should be raised within the range indicated in the 2030 Climate Target Plan (38 - 40%)?

- Yes
 No, it should be higher than 40%
 Other

1.7 Should the overall renewable target be binding at EU level or at national level?

- At both levels
 Only at EU level
 Only at national level
 At neither of the levels

2. Technical questions on Transversal Energy System Integration Enablers

In order to achieve climate neutrality cost-effectively the energy system needs to operate in a more integrated manner, across multiple energy carriers, infrastructures and consumption sectors. The Energy System Integration and Hydrogen Strategies published by the Commission in July set the vision to build an integrated energy system fit for climate-neutrality and turn hydrogen into a viable solution. This vision is established around three main pillars: 1) a more circular energy system, with 'energy-efficiency-first' at its core; 2) accelerating the electrification of energy demand, building on a largely renewables-based energy system; 3) promote renewable and low-carbon fuels, including hydrogen, for hard-to decarbonise sectors.

2.1 How important do you consider the following measures to build a more integrated energy system?

	Very important	Important	Not very important	Not important
Apply the Energy-Efficiency-First principle across the whole energy system	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the mobilisation of waste heat, for instance from industry or data centres	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the deployment of smart district heating and cooling networks that use renewable energy and thermal storage	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the use of renewable energy in buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the use of renewable electricity in industry	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the use of renewable electricity in the transport sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the production of renewable liquid fuels	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Accelerate the production of sustainable biogas and biomethane	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the production and use of renewable hydrogen	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Accelerate the digitalisation of the energy system	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Any other view or ideas related to the use of renewables that could contribute to building a more integrated energy system? Please specify.

3,000 character(s) maximum

First and foremost, into the electricity sector, the priority is to decarbonise the power sector. Then direct or indirect electrification should increase the renewable share in other sectors.

The use of renewable and/or low-carbon electricity into more areas such as heating and cooling, buildings, industry and transport will play a central role, coupled with the energy efficiency benefits that electrification entails as well as the use of renewable and/or low-carbon gases for 'harder-to-abate' sectors. Direct electrification should be promoted in end-use sectors where fossil fuels remain the main fuel (transport, buildings and industry). In addition to direct electrification, in heating and cooling of buildings, direct and indirect electrification of district heating and cooling has a major role in many countries, with existing city-level heating and cooling networks. Renewable and/or low carbon hydrogen notably produced on the basis of renewables or decarbonised electricity will have a key role to play in decarbonising sectors where direct electrification is not possible, helping with bridging the gap towards EU climate neutrality and zero pollution goal. However when it comes to the revision of the Renewable Energy Directive (RED II), it should be leveraged to promote the further uptake of direct and indirect electrification (via hydrogen and derivatives) based on renewable sources. Additionally, other renewables gases could also have a role to play.

The Energy System Integration Strategy recommends to advance towards a more circular energy system, with 'energy-efficiency-first' at its core.

2.2 How do you think the energy efficiency first principle should be reflected in the Renewable Energy Directive?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Promote the use of renewables in low-temperature efficient heating systems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the production of heat directly from renewable energy or waste heat with minimal energy transformation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Promote the installation of thermal energy storage together with the renewable heat generator	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote self-consumption of renewable thermal heat	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the reuse of waste heat from industrial sites, data centres, or other sources	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote the use of renewable electricity in end-uses across all sectors where this is cost-efficient	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prioritise the efficient use of renewable electricity by taking into account conversion efficiencies of renewable electricity in different end uses (eg. heat pumps have better efficiency than using hydrogen for space heating)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide information to consumers about the energy content of the energy they are purchasing, across carriers and sectors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prioritise the use of available renewable energy carriers in those end use sectors where they have the greatest decarbonisation impact for each unit of energy consumed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

Energy efficiency is not directly linked to renewable energy sources. Providing information on energy consumption to consumers is key and DSO is the proper actor to facilitate this process, thanks to data collection through smart meters.

2.3 How appropriate do you think the following measures would be in supporting the electrification of energy consumption?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Sectorial targets for electrification of end-use sectors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Further specific measures for electrification of buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for electrification of transport	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for electrification of industry	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for consumer empowerment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Guidance to Member States to address the high charges and levies borne by electricity and ensure the consistency of non-energy price components across energy carriers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Align taxation of energy products and electricity with EU Climate and Energy Policy goals	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further measures to foster digitalisation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further development of interconnections	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further development of transmission and distribution networks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

Going beyond and building on the existing certification and traceability framework, the Energy System Integration Strategy and the Hydrogen Strategy state that the Commission will consider additional measures to support renewable and low-carbon fuels, possibly through minimum shares or quotas in specific end-use sectors (including aviation and maritime), through the revision of REDII and building on its sectoral targets. Renewable fuels cover sustainable biofuels, bioliquids and biomass fuels, as well as renewable hydrogen and renewable synthetic fuels. Low carbon fuels cover hydrogen and synthetic fuels produced through a variety of processes, but with significantly reduced full life-cycle greenhouse gas emissions compared to existing production. According to the Strategies, the support regime for hydrogen will be more targeted, allowing shares or quota only for renewable hydrogen. They also state that the Commission will propose a comprehensive terminology for all renewable and low-carbon fuels and a European system of certification of such fuels, based notably on full life cycle greenhouse gas emission savings and sustainability criteria, building on existing provisions including in the Renewable Energy Directive.

2.4 How do you consider that “low carbon” fuels that are not renewable but provide significant GHG emissions reduction compared to fossil fuels, such as non renewable hydrogen and synthetic fuels with significantly reduced full life-cycle greenhouse gas emissions compared to existing production, should be treated?

- They should be promoted equally to renewable fuels and thus be mandatorily integrated in any end-use target or quota
- They should be promoted but less than renewable fuels
- Member States should have the freedom to decide whether to promote them alongside renewable fuels in any end-use target or quota
- They should not be promoted

2.5 Do you think the use of hydrogen and e-fuels produced from hydrogen should be encouraged (multiple answers possible)?

- Yes, regardless of the source used to produce them
- Yes, but only if produced from renewable energy
- Yes, but under a certain level of conversion losses
- Yes, but only if produced and used in a way that leads to no or low GHG emissions along their life cycle, compared to the fossil fuel they are replacing

- Yes, but only when its whole value chain is more energy efficient in comparison to alternative energy sources and carriers
- Yes, but only for limited uses where no other alternatives are feasible
- No
- Other

2.6 How effective do you think the following measures would be in supporting the uptake of RES and low-carbon fuels?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Minimum shares or quotas of renewable and low carbon fuels, including renewable hydrogen, in specific end-use sectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Carbon Contracts for difference[1]	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supply-side quotas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Market based support schemes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supply-side GHG-based targets	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

[1] Carbon contracts for difference are long term contract with a public counterpart that would remunerate the investor by paying the difference between the CO2 strike price and the actual CO2 price in the ETS in an explicit way, bridging the cost gap compared to conventional fossil-based production.

Other? Please specify

3,000 character(s) maximum

2.7 How important do you think the following principles are for a robust and comprehensive certification and verification system covering all renewable and low carbon fuels? (Multiple answers possible)

	Very important	Important	Not very important	Not important
The certification and verification system should cover all end-use sectors	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The certification and verification system should cover all renewable and low carbon fuels	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The certification and verification system should demonstrate that renewable hydrogen and renewable synthetic fuels are produced from additional renewable electricity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should follow as closely as possible the real energy flows and ensure that consumption of renewable and low carbon fuels takes place in certain target sectors (e.g. transport) in the Union, for instance by using a mass balance system.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system does not need to follow the real energy flows as it is sufficient to incentivise the promotion of renewable and low carbon fuels independently of where they are consumed in the Union, for instance by using a book-and-claim approach such as for Guarantees of Origin.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should follow as closely as possible the real energy flows only for liquid renewable and low carbon fuels, but allowing a book-and-claim approach such as for Guarantees of Origin is more appropriate for gaseous renewable and low carbon fuels injected into the natural gas grid	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The certification and verification system should ensure that the GHG impact of energy conversions along the value chain (e.g. renewable electricity used to produce renewable hydrogen) are fully taken into consideration, while avoiding double counting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where CO2 is used in the production of a fuel, the certification system should distinguish between fuels using CO2 of fossil origin and CO2 of non-fossil origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other principles? Please explain

3,000 character(s) maximum

It is crucial that the system is comprehensive and consistent across the regulatory framework. As stated in our answer to question 1.3 above, the focus of the RES Directive should remain however on renewables.

2.8 In the current system, only electricity suppliers are required to certify to consumers the share of energy from renewable sources by guarantees of origin. Do you think that this obligation shall be extended to suppliers of renewable fuels (such as biogas, biomethane or renewable hydrogen) as well, and possibly of “low carbon” fuels?

- Yes, for renewable fuels
- Yes, for renewable fuels and low carbon fuels
- No

2.9 Do you think the cooperation mechanisms set out in RED II should be extended to cover renewable hydrogen regardless of its end use, so that Member States can support renewable hydrogen projects in other Member States and in third countries while counting the energy produced as their own?

- Yes
- No

Please explain your reply

3,000 character(s) maximum

Renewable hydrogen may enable significant emissions reductions in hard to abate sectors, while offering the opportunity for the development of innovative solutions and new businesses. However, accelerating the learning curve requires support mechanisms to be provided across several stages of the value chain in order to address the current cost competitiveness gap and high investments required. With the cost of electricity being the major factor for the production cost of renewable hydrogen, there is a clear interest to develop the first projects in areas with lower cost renewable electricity, reducing the need for public support. As such, cooperation mechanisms are a way of enabling Member States that will require significant amounts of hydrogen to promote the necessary technological development in areas with lower cost competitiveness gaps.

The EU's 2050 decarbonisation scenarios and other international reports suggest that renewables, energy efficiency and electrification will have to deliver most of the required emission reductions. However, carbon capture technologies will potentially be needed to create the negative emissions required to reach climate neutrality and address emissions from hard-to-abate sectors.

2.10 Carbon-capture and storage/usage in the EU should play a prominent role in...

	Strongly agree	Agree	Disagree	Strongly disagree
Decarbonising the power sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Decarbonising energy intensive industries (e.g. chemicals, cement, steel)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Production of hydrogen (i.e. based on natural gas with CCS)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creating negative emission / carbon removal, e.g. via CCS applied to bioenergy[1] (BECCS) or direct air capture and storage	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing captured CO2 as a feedstock for other industries	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.11 In addition to how CCS and CCU are treated in other EU legislation, do you think REDII should be revised to encourage the uptake of CCS and CCU?

- Yes
- No

3. Technical questions on specific sectors

This section covers specific sectors covered by REDII and asks for your opinion on whether they should be changed/strengthened in order to improve the chances of achieving the EU's 2030 climate ambitions.

3.1 RENEWABLES IN ELECTRICITY

Mobilising private investment for the development in renewables is essential in the context of increased ambition. In REDII, there are now several provisions aiming to promote the use of renewable power purchase agreements (contract under which a natural or legal person agrees to purchase renewable electricity directly from an electricity producer "PPAs").

3.1.1 How would you rank the appropriateness of the following measures in tackling the remaining barriers for the uptake of renewable electricity that matches the expected growth in demand for end-use sectors?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Further foster regional cooperation in the deployment of renewable electricity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further streamline permitting procedures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further support the uptake of private renewable PPAs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish minimum mandatory green public procurement (GPP) criteria and targets in relation to renewable electricity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further support the uptake of energy communities and self-consumption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

This is not directly related to the RES Directive but it is important to improve the convergence of fiscal rules. It is necessary to address the taxation discrepancies between electricity and fossil fuels. A proper CO2 pricing on fossil fuels should be applied and it should integrate criteria on the climate performance of energy sources. Today, fossil-fuelled means of transport or heating are only marginally affected by CO2. Limiting the weight of taxes on electricity will help make electricity more affordable for households and contribute to minimise social and distributional impacts. This could be tackled in the review of the Energy Taxation Directive.

Eurelectric generally supports the application of carbon pricing in other sectors but is wary about implementation. Current price levels of the EU ETS will not deliver the needed emissions reductions in the road transport sector. New carbon pricing systems for other sectors could be explored in parallel for possible future integration, but further assessment must take place.

3.1.2 How do you think regional cooperation in deploying renewables electricity could be further promoted?

3,000 character(s) maximum

Cross-border opening of national schemes should remained voluntary agreements as defined in RED II. Creating such schemes seems to entail significant transaction cost for Member States (concluding bilateral agreements, setting up joint schemes, etc.) Moreover, first experiences have shown that the outcome of such tenders depends heavily on differences in the national regulatory frameworks (permitting rules, taxes, network tariffs design, etc.) so that projects are not competing on a level playing field. Selected projects might therefore not be built where it is most cost-effective from a resource/system point of view.

Instead of mandating cross-border opening of national schemes, the EU RES Financing mechanism (foreseen under Article 33 of the Governance Regulation (EU) 2018/1999 of the Clean Energy for all European package) should be strengthened and established as a tool for regional or even European tenders. This may in particular be relevant for the efficient deployment of crossborder offshore wind energy projects in the spirit of the EC's Offshore Renewable Energy Strategy.

The development of the National Energy and Climate Plans demonstrated a clear lack of coordination between Member States, with different assumptions being considered by each regarding their neighboring Member States leading to a set of plans that in some regions are unrealistic if they are considered together. For example, Portugal's NECP assumes a net zero trade balance of electricity with Spain, while Spain assumes that it will be able to be a net exporter to Portugal of around 20% of its electricity demand. In the Baltic States there was a lack of coordination between national ministries when developing NECPs. As a result a significant wind capacity was forecasted, which in certain periods may exceed demand and Estonia, Latvia and Lithuania simultaneously could have a substantial surplus of generating capacity without clear understanding who is going to buy it. At the same time, taking into account lack of base load capacity and storages in low wind periods it is not clear how the system will be balanced. As such, there is a clear need to ensure better coordination in the design of the regional plans.

Common renewable energy projects under the Renewable Energy Directive should be also made available for projects developed under international consortia or joint ventures. For example, right now it is the most common way for developing offshore wind projects.

3.1.3 How appropriate do you think the following measure would be in promoting the use of private renewable power purchase agreements?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Financial solutions/instruments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Removing administrative/legal barriers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creating green labels for buyers of renewables-based products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

None, market participants are already actively engaging	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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Other? Please specify

3,000 character(s) maximum

1. On option: „removing administrative/legal barriers“:
(Europe-wide) standardisation of contract components and terminology, reduction of administrative costs in connection with the issuing of guarantees of origin from small plants.
2. On option „Creating green labels for buyers of renewables-based products“:
No additional labels are required. RES PPAs are provided with guarantees of origin. Verification of the green attribute is done via guarantees of origin. Green labels should only be optional or should develop on the market.
3. All produced RES electricity should automatically receive GOs. According to Article 19 of REDII Member States can combine GOs and public financial support as long as the market value of the GO has been taken into account. This avoids the risk of double compensation. Giving GOs to all producers of renewable electricity would be in line with article 15.8 of RED II asking Member States to remove all barriers to corporate PPAs. Otherwise corporate buyers of renewable electricity can't prove they have bought renewable electricity.
4. In the RES Directive, Member States have to describe policies and measures facilitating the uptake of corporate RES PPAs in their integrated national energy and climate plans (NECPs) but only a few Member States have done it. There is an implementation gap that needs to be solved.
5. The local private purchase agreement could be promoted in extending the geographical scope of the collective self-consumption on a local base, outside a building.

Public authorities, thanks to their purchasing power and often high electricity consumption, can be real drivers for change. RED II does not contain any provisions on renewable energy obligations in public procurement.

3.1.4 Should there be specific obligations for public authorities to contribute to achieving a high level of renewable energy (multiple answers possible)?

- Yes, all public authorities should be obliged to buy green energy
- Yes, but only larger public authorities should be obliged to buy green energy
- Yes, but only if it does not cost more
- Yes, but only if the green tender is likely to trigger investment in additional green energy generation
- No

Please explain your reply

3,000 character(s) maximum

3.1.5 Do you think modifying REDII would be appropriate in order to further promote offshore renewable energy, following the adoption of the EU Offshore Renewable Strategy?

3,000 character(s) maximum

Getting the market framework right should be the most important focus: a strengthened and well-functioning ETS and a well-functioning market should be the main drivers for investments. Focus must be on implementing the Clean Energy Package and continuously working towards an integrated European market. Policymakers should allow the markets to work freely, as much as possible unhindered by distortions and interventions. Market barriers should be removed especially in the context of PPAs. A clear regulatory framework, adequate market designs and long-term price signals, together with higher societal engagement are critical. In the current state of off-shore wind development, Member States may consider de-risking instruments that do not distort the short-term market and give visibility to investors such as Contract for Differences (CfD).

It is imperative that the new simpler permitting rules in the revised 2018 Renewable Energy Directive are implemented quickly and thoroughly by Member States, in particular the single contact point and clear start and end dates for the permitting process. Moreover, national and local authorities should be adequately staffed with sufficient resources and expertise to conduct the process. The fast-track for the permitting process should be also considered as a useful tool aimed at fostering development of the potential of offshore wind in the EU. Eurelectric noted positively the proposal to revise the TEN-E Regulation.

Common renewable energy projects should be made available for joint ventures and consortia.

3.2 RENEWABLES IN HEATING AND COOLING

Under REDII, Member States must endeavour to increase the share of renewable energy in heating and cooling by an indicative 1.3 percentage point (ppt) per year up to 2030. Sources of waste heat and cold can be counted towards the 1.3 ppt up to 40%, and in Member States where waste heat or cold is not used, the yearly increase that the Member States must endeavour to achieve is 1.1 ppt.

The impact assessment accompanying the 2030 Climate Target Plan indicates that the share of renewable energy in heating and cooling would constitute around 40% in 2030. This would require an increase of the share of renewable energy in heating and cooling in Member States significantly higher than the yearly increase of 1.3 ppt.

3.2.1 How appropriate do you consider the following options for increasing the uptake of renewable energy in heating and cooling?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Increased energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct renewable heat use (from sustainable biomass, geothermal, solar thermal...)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Direct renewable electricity use (in electric heat pumps using ambient energy)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of renewable gases	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use of district heating and cooling networks that can supply in the same system waste heat and renewable heat	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please explain

3,000 character(s) maximum

The biggest energy efficiency gains will be provided by electrification (especially transport, heating and industrial processes).

Renewables gases are by definition a limited energy source, which must be used in the most efficient manner possible - i.e hard-to-abate sectors.

Financial incentives towards enabling excess heat and waste resources introduction into the district heating networks should be established. If coupled with lowering the medium temperature and combining district heating with heat pumps, significant reduction in energy and fuels consumption may be achieved.

Biomethane, as a renewable gas, can play a role in this goal, as it favours circular economy and local territories development, creating virtuous synergies between the energy and agriculture sector. It enhances Europe's energy independence and can deliver various benefits from an agricultural perspective: use of the digestate as biological fertilizer, development of cover crops increasing carbon storage in soils, reduction of water nitrate pollution and reduction of phytosanitary products usage. Biomethane is also a technology to decarbonise the transport sector, for instance, in the case of long-haul trucks and maritime transport. However, biomethane production development should not lead to conflicts of feedstock use. In this goal, dedicated crops for the sole or exclusive purpose of biogas production, should be avoided, while agriculture waste management carried out as valuation of by-products can be envisaged.

3.2.2 Should the current indicative target of 1.3 ppt (or 1.1 ppt, if waste heat and cold is not used), annual average increase of renewable energy in heating and cooling set for the period of 2021-2030 in Article 23 become a binding target for Member States?

Yes

- No

3.2.3 Should the annual average target of 1.3 ppt be increased?

- Yes, to the level leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- Yes, to a lower level than that leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- Yes, to a more ambitious level than that leading to the 40% share of renewable energy in heating and cooling indicated in the Climate Target Plan
- No

Under REDII, neither renewable electricity nor hydrogen and synthetic fuels produced from renewable electricity that is used for heating and cooling can be counted towards the target for heating and cooling, only thermal heating produced from renewable energy sources.

3.2.4 Do you think renewable electricity used for heating and cooling should be counted towards the target for heating and cooling?

- Yes
- No

3.2.5 Do you think that renewable hydrogen and synthetic fuels produced using renewable electricity and used in heating and cooling should be counted towards the target for heating and cooling?

- Yes
- No

The current Article 23 of REDII provides a list of measures that Member States can use to increase the share of renewables in heating and cooling. These are physical incorporation of renewables in energy fuels supplied, direct and indirect mitigation measures (e.g. installation of renewable heating systems), and other policy measures, e.g. fiscal measures and financial incentives.

3.2.6 Do you think the list of measures provided in the Directive that Member States can use to increase the share of renewables in heating and cooling should be expanded or made more detailed?

- Yes
- No

3.2.7 Do you think these measures should be made binding?

- Yes
- Only some of them
- No

Please explain your reply

3,000 character(s) maximum

Direct mitigation measures, such as the installation of highly efficient systems in buildings, should be made compulsory for new buildings and buildings subject to major renovations.
Moreover, these buildings should have strict environmental regulations on energy consumption and GHG emissions that effectively trigger the phasing-out of fossil fuels.

3.2.8 How would you rank the appropriateness of the following measures in increasing the share of renewable energy in heating and cooling?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Pricing instruments (taxes, levies and charges)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU guidance on support schemes for renewable heating and cooling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable heating and cooling obligation on energy suppliers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Stricter product regulation for heating and cooling appliances to ensure that gradually only renewable and climate neutral heating technologies can be placed on the market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Binding regulations on technical building systems for heating and cooling	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory heat planning and implementation at the appropriate level (local, municipal, regional) to ensure fulfilling the renewable heating and cooling target	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strengthen corporate energy purchase agreements for heating and cooling	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

We believe that the overall decarbonisation of the power sector should be the priority. The increase of renewable electricity used in heating and cooling will progressively increase as a consequence to the growing part of RES in the Member States' energy mix, resulting from the overall EU RES target by 2030.

3.2.9 Which of the following measures do you think could be appropriate to encourage public authorities to identify renewable heating and cooling potentials and plan their exploitation?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Strengthening the obligation to assess renewable potentials for heating and cooling in the frame of the comprehensive heating and cooling assessments under Article 14 (1) of EED and Article 15(4) of REDII	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A separate assessment obligation of renewable potentials for heating and cooling under RED II	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mandatory long-term strategies for decarbonising heating and cooling with binding milestones and measures taking into account synergies with other policy areas, such as the comprehensive heating and cooling assessments under Article 14(1) of the EED and the longterm building renovation strategies under Article 2a of the directive amending the EPBD.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

Overlapping regulations should be avoided and minimized, not increased. Adding new measures in RED II (or EED) targeted at buildings and their heating/cooling would be overlapping the requirements already existing in the Energy Performance of Buildings Directive 2010/31/EU (EPBD). Already in the existing EPBD there is a demand for Member States to establish long-term renovation strategies including milestones.

3.3 RENEWABLES IN DISTRICT HEATING AND COOLING

Efficient district heating and cooling can play an important role in mainstreaming renewable energy in heating and cooling. Under REDII Member States must endeavour to increase the share of renewable energy in district heating and cooling by an indicative 1 percent point per year up to 2030. Alternatively, Member States must ensure, subject to limited exceptions, that third party suppliers can connect and sell renewable energy and waste heat or cold to district energy networks. The 1 ppt target of annual average increase in renewables can be fulfilled by waste heat and cold in district heating networks (waste heat flexibility).

3.3.1 Should the current indicative target of 1 ppt annual average increase of renewable energy in district heating and cooling set for the period of 2021-2030 become a binding target?

- Yes
 No

3.3.2 Should the level of the current indicative target of 1 ppt annual average increase

of renewable energy in district heating and cooling be increased?

- Yes
 No

Please explain by how much

600 character(s) maximum

3.3.3 How would you rank the appropriateness of the following measures in encouraging the use of waste heat and cold by district heating and cooling networks?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Obligation for district heating and cooling network operators to connect waste heat and cold suppliers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligation for industrial and service sector companies (e.g. data centres) producing significant waste heat and cold to make available their waste heat and cold to district heating and cooling companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement for the relevant competent authorities to encourage cooperation between industrial and service sector companies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement for the relevant competent authorities to prepare the necessary plans (heat plans, energy plans, energy infrastructures plans, spatial plans, etc.), policies or regulations enabling the feeding of waste heat and cold into district networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific target for waste heat and cold use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Other? Please specify

3,000 character(s) maximum

3.3.4 Do you consider that third party access to district heating networks by renewable heat suppliers should be strengthened?

- Yes
 No

Please explain your reply

3,000 character(s) maximum

It shouldn't be an obligation, but regulation should incentivize district heating companies to produce or purchase renewable heating in a way that minimize costs and increases the competitiveness of district heating

Competitive district heating requires cost effective heat production, which again requires access to cheap heat sources and the ability to reap the economic benefits from the economies of scale and sector coupling. In the coming years cost effective heat production therefore to a larger extent will depend on heat from commercial companies such as industries, data centers, PtX facilities and operators providing flexible power consumption/ancillary services combined electrified heat production. It is however of vital importance for the competitiveness of district heating, that third party heat production is only utilized when it is the most competitive renewable heat sources, and therefore the district heating company must have the opportunity to select the most cost effective sources of renewable heat.

3.3.5 Which of the following measures do you think would be appropriate in strengthening the rights of consumers in district heating and cooling networks?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Improve information to consumers on the energy performance and renewable shares of district heating and cooling, including to low-income and vulnerable consumers.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased transparency of heat and cold supply prices to consumers and their components (e.g. energy and, network costs, taxes, levies)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen disconnection [1] rules for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make it easier for consumers to switch to renewable supplies within a network via either a single buyer model or third party access or guarantees of origin	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make it possible for consumers to feed renewable heat or waste heat and cold into the network (prosumer rights)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

[1] RED II allows customers to disconnect from those district heating or cooling systems that are not efficient or do not become efficient by 31 December 2025, in order to produce heating or cooling from renewable sources themselves.

Other? Please specify and/or explain your choice of the previous questions.

3.3.6 How appropriate do you think the following measures are in making district heating and cooling systems be better integrated within the overall energy system?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Better coordination with electricity and gas TSOs and DSOs to plan network investment and integrate flexibility to maximise renewable integration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Removing barriers to renewable thermal energy storage	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of the use of flexible renewable generation capacities (e.g. heat pumps, cogeneration, power to heat)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of district heating and cooling systems in EU, national and local energy infrastructure planning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of variable renewable electricity and heat in urban planning	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

3.4 RENEWABLE ENERGY IN BUILDINGS

Buildings account for 40% of energy use in the EU, and heating and cooling is responsible for around 50-80% of that energy consumption. Three quarters of heating and cooling in buildings is still supplied from fossil fuels. The EU building stock should be carbon-neutral by 2050. The Renovation Wave initiative aims to address the current low renovation rates across the EU and accelerate the transformation of the EU building stock into a highly energy efficient and decarbonised building stock by 2050. Contributing in this perspective, REDII requires Member States to introduce measures in their building regulations and codes to increase the share of energy from renewable sources in the building sector, but does not set any particular target or level for this. On average the percentage use of renewables in buildings is 23.5%.

3.4.1 Do you think that Member States should require a minimum percentage of renewable energy in the energy use of new buildings or buildings subject to major renovation?

- Yes
- Yes, only for new buildings
- Yes, only for buildings subject to major renovation
- No

3.4.2 If yes, what minimum percentage of energy consumed by a building do you think must come from renewable sources?

- 10%
- 20%
- 30%

- 40%
- 50%
- 100%
- Other

3.4.3 How would you rank the following measures in terms of their appropriateness in ensuring that buildings' heating and cooling systems are increasingly based on renewable energy while fossil fuels are gradually phased out?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Set minimum renewable energy levels (see 3.4.1) in REDII and ensure conformity in building regulations and codes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Simplify permitting and administrative procedures for the integration of renewable energy solutions in buildings	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set minimum renewable energy shares for heating and cooling in national building stocks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set specific renewable energy requirements at district or neighbourhood levels, i.e. nearly zero-energy districts.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Extend REDII provisions on selfconsumption, applicable to electricity, to heating and cooling	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen consumer information and accessibility of measures to deploy renewables in buildings' heating and cooling systems, in particular in low-income or vulnerable households	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

This is not directly related to RED II but it is important to improve the convergence of fiscal rules. It is necessary to address the taxation discrepancies between electricity and fossil fuels. A proper CO2 pricing on fossil fuels should be applied and it should integrate criteria on the climate performance of energy sources. Today, fossil-fuelled means of transport or heating are only marginally affected by CO2. Limiting the weight of taxes on electricity will help make electricity more affordable for households and contribute to minimise social and distributional impacts. This could be tackled in the review of the Energy Taxation Directive.

Eurelectric generally supports the application of carbon pricing in other sectors but is wary about implementation. Current price levels of the EU ETS will not deliver the needed emissions reductions in the road transport sector. New carbon pricing systems for other sectors could be explored in parallel for possible future integration, but further assessment must take place.

Heating systems in building are generally replaced when they break down, usually during winter when it is urgent, leading to suboptimal decisions favouring replacement with the same, generally fossil fuel appliance. A planned replacement of heating systems would enable consumers to make informed choices and prepare the installation of renewable and more efficient heating.

3.4.4 How would you rank the appropriateness of the following measures in improving the replacement of heating systems, in particular to encourage the replacement of fossil fuel appliances by renewable heating systems?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Heating system replacements should be coordinated with and be part of building renovation whenever there is major renovation of a building or at other trigger points in the life-cycle of a building for carrying out energy efficiency renovations[1].	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Building renovation programmes (at national, municipal and district levels) should specifically support the modernisation of heating systems by their replacement with renewable technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Performance Certificates and heating system inspections should indicate recommended dates, steps and possible options for renewable heating systems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
National building renovation strategies should specifically address the transition from fossil fuel to renewable and climate neutral heating with related investment plans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Fossil fuel heating systems replacement with renewable and other climate neutral ones (like waste heat) should be part of neighbourhood and district approaches to building renovation and urban renewal programmes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information campaigns should also target heating system replacement programmes with appropriate advice and information, including regarding financing and public support opportunities and solutions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Digitalization should give early warnings on the need for repair/maintenance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] A trigger point could be: a transaction (e.g. the sale, rental or lease of a building, its refinancing, or a change in its use) a renovation (e.g. an already planned wider non-energy-related renovation).

Other? Please specify

3,000 character(s) maximum

3.5 RENEWABLE ENERGY USE IN INDUSTRY

Industry is a big energy user being responsible for 25% of the final energy consumption. However currently there are no specific provisions or targets related to the use of renewable energy for the sector. The Commission’s Energy System Integration Strategy and Hydrogen Strategy have however identified industry as an economic sector where rapid progress is required to increase the use of renewable energy, be it through direct use of renewable heat, through electrification, or through the use of renewable and lowcarbon fuels to replace fossil fuels as feedstock and fuel.

3.5.1 Do you think there should be an obligation on industry or certain industrial sectors to use a minimum amount of renewable energy?

- Yes, on industry in general
- Yes, but for specific industries only
- No

3.5.2 How would you rank the appropriateness of the following additional measures to encourage the use of renewable energy in industry?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Creation of renewables-based industrial parks/clusters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Technical support, including training and skills development, for uptake and integration of renewables in small- and medium-size enterprises	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific innovation programmes to develop renewables- and electricity based production processes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy audits required under the Energy Efficiency Directive should cover renewable energy used by the enterprise	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplified permitting and administrative support for corporate sourcing of renewables, including for on-site and near-site generation as well as corporate renewable power purchase agreements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contracts for difference for zero-carbon products and services	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

3.6 RENEWABLE ENERGY IN TRANSPORT

Under REDII, each Member State must set an obligation on fuel suppliers to ensure that renewable energy makes up at least 14%^[1] of the energy used in that Member State in the transport sector.

The achievement of the target is facilitated by **several multipliers on energy content**:

- a multiplier of 4 for renewable electricity consumed in **road transport**
- a multiplier of 1.5 for renewable electricity consumed in **rail transport**
- a multiplier of 1.2 for renewable fuels consumed in **maritime and aviation transport**
- a multiplier of 2 for advanced **biofuels and biogas**

The impact assessment accompanying the 2030 Climate Target Plan indicates that the share of renewable energy in transport would constitute around 24% in 2030, calculated according to the methodology described above. Both the aviation and maritime sectors will need to scale up efforts to increase the use of sustainably produced renewable and low-carbon fuels. This will be assessed in greater detail in the context of the ReFuelEU Aviation and FuelEU Maritime initiatives.

^[1] Member States have the right to lower their target if they set limitations on food and feed-based biofuels going beyond RED II

3.6.1 Do you think that the level of the renewable target in transport should be increased?

- Yes, but less ambitious than indicated in the 2030 Climate Target Plan
- Yes, as ambitious as indicated in the 2030 Climate Target Plan (24%)
- Yes, but more ambitious than indicated in the 2030 Climate Target Plan (for instance 24% without multipliers)

No

Please explain your reply

3,000 character(s) maximum

Eurelectric is not really in favour of sub-targets for sectors. Eurelectric noted in the Impact Assessment for the Climate Target Plan the relatively low contribution of the road transport sector to GHG emissions reduction by 2030 (around 16% vs 2015) as well as the low renewable energy target for transport (around 24% including multipliers). However, as REDII already set one for transport, and in order to ensure the consistency of the whole EU framework with the 55% target of reduction of GHG emissions, we would support the increase of the RES sub-target for transport. What is key is the way this strengthening of the RES sub-target for transport will be supported.

We would still like to underline that there is no physical difference between the electricity used in mobility and the electricity produced in general. The priority should be the overall decarbonisation of the power system. The assessment of the RES sub-target for transport should be based on the average energy mix to avoid any distortion and double counting.

The best option for enhancing EVs/RES synergy is the development of smart charging. While the transport sector is one of the main GHG emitters, there are already several cost-competitive alternatives to decarbonize its energy use. However, the energy transition in this sector has significant barriers that need to be tackled, including the slow renovation of vehicle fleets. As such, there is a need to balance decarbonization efforts, considering the overall GHG emission reduction target and the potential contribution of each sector, as identified in the Impact Assessment. Additionally, the existing multipliers are essential to recognize the different emission reduction potential and associated impacts of the different energy vectors.

Currently, Article 27 of the Renewable Energy Directive sets out rules for counting RFNBOs towards the renewable energy target for transport. However, no specific provisions are included for direct renewables-based electrification of transport. We consider it important to regulate this area further as the EV and charging markets are developing at a fast pace and a common European approach would provide certainty for investors and would be appropriate for the cross border nature of transport.

The Sustainable Smart Mobility Strategy includes the idea of a credit mechanism. A credit mechanism is not a mandatory sub-target for renewable electricity, similar to e.g. the advanced biofuels target. Under a credit mechanism, fuel suppliers are enabled to use a wider range of compliance options than biofuels alone. For example in the Netherlands, fuel suppliers can choose to meet their obligations with crop-based biofuels, advanced biofuels or renewable electricity.

Indirect electrification through the production of renewable hydrogen from electrolysis based on RES electricity is important for the decarbonisation of heavy duty transport such as long-haul trucks, ships and planes.

3.6.2 Member States can count renewable electricity, sustainable biofuel and biogas,

hydrogen produced from renewable electricity (except if such electricity comes from biomass) and recycled carbon fuels[1] towards the 14% target in transport. Do you think Member States should also be able to count other low carbon fuels which have fewer emissions than fossil fuels, such as low carbon hydrogen?

- Yes
- No

[1] 'recycled carbon fuels' means liquid and gaseous fuels that are produced from liquid or solid waste streams of non-renewable origin which are not suitable for material recovery in accordance with Article 4 of Directive 2008/98/EC, or from waste processing gas and exhaust gas of non-renewable origin which are produced as an unavoidable and unintentional consequence of the production process in industrial installations.

3.6.3 Do you think that some renewable and low carbon fuels should be specifically promoted in transport, beyond being part of the obligation on fuel suppliers ?

- Yes
- No

3.6.4 If you answered 'yes' to the previous question, which of the following types of renewable and low carbon fuels do you think should be specifically promoted ? (Multiple answers possible)

- Advanced biofuels and other fuels produced from biological wastes and residues
- Renewable hydrogen and renewable synthetic fuels
- Low-carbon hydrogen and low carbon synthetic fuels (including through applying CCS techniques)
- Renewable electricity
- Recycled carbon fuels
- Other

3.6.5 Which types of renewable and low carbon fuels can be best promoted by an obligation on fuel suppliers, based either on energy content or GHG emissions, compared to other instruments?

- Liquid renewable fuels
- Liquid low carbon fuel
- Gaseous renewable fuels such as hydrogen
- Gaseous low carbon fuels such as hydrogen
- Renewable electricity
- Other

3.6.6 How would you rate the appropriateness of the following measures regarding the use of renewable and low carbon fuels in transport?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
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The scope of fuels that can be counted should be harmonised to ensure that all fuels that are eligible for counting towards the renewable energy target are supported in all Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should have flexibility to design the supply obligation using one of the following approaches: in terms of volume, energetic value or GHG emission intensity.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The fuels supply obligation should be based on GHG emissions targets to stimulate the uptake of best performing fuel options on the fuel market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The level of ambition should be fixed at the same level for all Member	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
States to create a level playing field and avoid market fragmentation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The multiplication factors for different types of renewable energy sources should be abolished to simplify the legislation and to increase the ambition level (limitations and sub targets would remain)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Set out specific measures to promote the use of renewable and low carbon fuels in aviation and maritime transport such as dedicated supply obligations, sub-targets or other incentives.[1]	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

[1] In parallel, the ReFuelEU Aviation and FuelEU Maritime initiatives are assessing legislative options to boost the production and uptake of sustainable fuels in the aviation and maritime sectors.

Other? Please specify

3,000 character(s) maximum

Electrification is the most cost-efficient way to bring transport to zero emissions, so it is important to converge on the right definition of sustainable fuel in view of supporting zero and low emissions vehicles. The use of renewable energy in transport can be promoted by supporting green tariffs (via PPA or other means) and the integration of RES generation and EV charging, which is a natural and easy-to-implement outcome on how individuals and companies can shift to electric mobility whilst also contributing to lower GHG emissions and benefit social and financially from clean energy generation. Additionally, it is important to recognize the benefits that electric mobility may have for the introduction of RES in other sectors. For example, EV batteries can be used as distributed storage to accommodate the variability of renewables, circular economy and second life batteries can be used in a wide array of applications (such as off-grid solutions, large scale power storage, to power EV charging stations or as part of a Local Energy Community system), and the technological development of batteries driven by EV demand will support their uptake in other sectors and uses.

3.6.7 How appropriate do you think the following measures would be in encouraging the use

of hydrogen and hydrogen-derived synthetic fuels in transport modes that are difficult to decarbonise?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Include hydrogen and hydrogen-derived synthetic fuels in a dedicated sub-target together with advanced biofuels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Set an additional dedicated sub-target for hydrogen and hydrogen-derived synthetic fuels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Allow double counting of the contribution of hydrogen and hydrogen-derived synthetic fuels towards the transport target or the fuel supplier obligation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Other? Please specify

3,000 character(s) maximum

3.6.8 How would you rank the effectiveness of the following measures in encouraging the use of renewable electricity in the transport sector?

	Very appropriate	Appropriate	Not very appropriate	Not appropriate
Support the purchase of electric vehicles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the installation of electric vehicle chargers in households and enterprises	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set stricter CO2 standards for cars	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensure the availability and interoperability of public recharging infrastructure	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish a minimum level of renewable electricity as a part of the target for renewable energy in transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Giving consumers information on whether they are recharging their electric vehicle with renewable energy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

3,000 character(s) maximum

Establishing a specific date for the vehicle emissions standards to be zero would give long-term visibility to automakers and consumers, promoting the shift from internal combustion engines.

3.7 BIOENERGY SUSTAINABILITY

The Biodiversity Strategy[1] acknowledges that, to mitigate climate and environmental risks created by the increasing use of certain sources for bioenergy, REDII already includes strengthened sustainability criteria (to be implemented on the ground starting 1 July 2021 at the latest) and promotes the shift to advanced biofuels. According to the Strategy, the use of whole trees and food and feed crops for energy production should be minimised. Moreover, the Farm to Fork Strategy for a fair, healthy and environmentally-friendly food system[2] contains concrete measures for a sustainable use of biomass. The Commission is continuously assessing the EU and global biomass supply and demand and related sustainability. An ongoing study on the use of forest biomass for energy production is expected to be finalised and published by the end of 2020. This will inform the Commission's policy-making, including the review and revision, where necessary, of the level of ambition of the Renewable Energy Directive. In order for Member States to count energy from forest biomass towards their renewable energy targets, Article 29 paragraphs 6-7 of REDII requires that the country of origin has laws in place to ensure the legality of harvesting and forest regeneration. If that cannot be shown, sustainability compliance must be shown at the level of the biomass sourcing area (e.g. through forest management certification or equivalent tools)

[1] COM/2020/380 final

[2] COM/2020/381 final

3.7.1 Do you think the sustainability criteria for the production of bioenergy from forest biomass in RED II should be modified? (only one reply possible)

- Yes, they should be made stricter
- No, they should not be modified

Please explain your reply

3,000 character(s) maximum

The sustainability criteria for forest biomass should not be changed again in the short term for reasons of protection of confidence and investment security for the period until 2030. The sustainability criteria are just being implemented and there's yet no data on the effect the country or regional risk-based criteria of the REDII will have. Constant change in the criteria might have a negative effect on the market and development. All suggested modifications should be carefully assessed, there should be a clear image on what the pursued goal is and what the impacts would a change have on both the energy production and forestry as well as on carbon sinks and forests as a whole.

3.7.2 The obligation to fulfil sustainability criteria for biomass and biogas in heat and power applies to bioenergy installations of at least 20 MW for solid biomass and 2 MW for biogas. Should these thresholds be lowered to include smaller installations?

- Yes
- No

3.7.3 Do you think that there should be limits on the type of feedstock to be used for bioenergy production under REDII?

- Yes, it should only be possible to use feedstock listed in Part A) of Annex IX of REDII[1] (therefore excluding used cooking oil and animal fats)
- Yes, it should only be possible to use the feedstock listed in Part A) and Part B) of Annex IX of REDII
- Yes, it should only be possible to use wastes and residues
- Yes, it should only be possible to use feedstock that does not have higher added-value in nonenergy sectors
- Yes, in some other way
- No

3.7.4 Do you think that the minimum GHG emission saving thresholds for biomass in heat and power, currently at 70% for installations starting operation from 2021 and at 80% for installations starting operation from 2026, should be extended and/or made stricter? (multiple answers possible)

- Yes, by extending them to heat and power installations that started operation before January 2021
- Yes, by increasing the threshold for GHG emission savings
- No
- Other

3.7.5 Do you think that the energy efficiency requirements applying to bio electricity-only installations (article 29, paragraph 11) should be made more stringent (multiple answers possible)?

- Yes, they should be extended to plants of less than 50 MW total rated thermal input
- Yes, the energy efficiency requirements should be higher
- No
- Other

Contact

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

Environmental Leadership

- Commitment, innovation, pro-activeness

Social Responsibility

- Transparency, ethics, accountability



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