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RSPB and Birdlife Europe briefing on the EU's 2030 Renewable Energy Policy Proposals

Birdlife Europe welcomes the opportunity that revisions of the 2020 renewable energy policies provides for making improvements to ensure the necessary renewable energy 'revolution' is sustainable.

Overall, we support and promote the use of renewable energy in the EU and the need for ambitious 2030 targets. We also specifically seek to strengthen environmental safeguards for renewable energy development to ensure that the Renewable Energy Directive does not conflict with the important framework provided by the Birds & Habitats Directives and to have a meaningful new policy to limit the use of bioenergy.

A summary of our policy asks is provided below, followed by further detail in respect of each of these asks.

BirdLife Europe Key Asks

- The **ambition of the revised Renewable Energy Directive (RED) must live up to the commitments made at the Paris Climate Summit** and should include a **long term commitment** to 100% low carbon energy by 2050.
- **Environmental constraints** must be factored into strategic planning for renewable energy development **to ensure coherence with the Nature Directives** and that measures do not contribute to the current global biodiversity crisis;
- A **limit to the overall amount of bioenergy** used to meet the 2030 targets should be set and the separate target for renewables in transport should be discontinued
- New **safeguards for the sustainable production and use of bioenergy** must be introduced
- **Strategic grid network planning** at EU and member state level must support the development of a sustainable and flexible European grid network that is **fit for the renewable future**.
- **Policy signals of a strong future for the renewables industry in the EU must be maintained**, such as mandated national support schemes and priority access and dispatch for variable renewables, **and added to**, for example a legislative framework for monitoring and reporting.
- **Reduction of energy waste** across the energy system is key to facilitating the integration of renewable energy sources in harmony with nature.

The ambition of the revised RED must live up to the commitments made at the Paris Climate Summit and should include a long term commitment to 100% low carbon energy by 2050

The 'at least 27%' target for renewable energy is not good enough, especially within the context of current limited EU action on energy efficiency. Climate change is the greatest long-term threat to humans and wildlife. A strong EU target and policies to stimulate urgent action on renewable energy deployment are essential to ensure that average global temperature increases stay within the 1.5°C above pre-industrial levels, which was agreed in at the Paris Climate Summit in December 2015. Providing a long term perspective by setting a 2050 commitment is critical to ensure long term grid infrastructure network is appropriately enhanced (as called for by the Renewables Grid Initiative) thus avoiding white elephants that will be found to have unnecessarily adversely impacted the environment (and society). Ensuring the enhanced targets that will enable the EU to meet its Paris commitments remain binding on member states will help provide certainty to industry that there is a viable future for it in the EU, thereby helping to de-risk investment and making deployment cheaper in the long term.

Environmental constraints must be factored into strategic planning for renewable energy development to ensure coherence with the Nature Directives and that measures do not contribute to the current global biodiversity crisis

There is sufficient potential to have clean and green renewable energy without damaging Europe's most important wildlife areas and species (including migratory species). However, there are currently insufficient environmental safeguards in the legislation. Renewable energy capacity can be built quickly and efficiently with intelligent strategic spatial planning that identifies low ecological risk areas for the different technologies, and safeguards that ensure environmental conservation. This would eliminate damaging conflicts between industry, NGOs and EU institutions as developments are rolled out. It would be regrettable if the energy legislation worked against existing environmental legislation. In particular the EU should ensure cross compliance between the Renewable Energy Directive and the Birds & Habitats Directives. The Governance of the Energy Union Regulations should require that a Strategic Environmental Assessment is carried out as part of the analysis needed to inform Member States national climate and energy action plans. This would need to show that they have taken into account ecological constraints when considering how much each technology can contribute their national ambition, and where in the country these are best promoted.

A limit to the overall amount of bioenergy used to meet the 2030 targets should be set and the separate target for renewables in transport should be discontinued

More than 60% of the 2020 renewable energy target of the EU has been filled with bioenergy. The 10% target for renewable energy in transport has driven almost solely the deployment of food

based biofuels, leading to indirect land use change and increasing emissions instead of reducing them. Wood and land resources in Europe won't be enough to meet the targets for renewable energy by 2030 in addition to all the needs from other sectors in an environmentally sustainable way if no limitations are applied. To minimize the policy driven pressure on our ecosystems, the contribution of bioenergy towards the renewable energy targets should be limited in the Renewable Energy directive to what EU countries can sustainably supply (this does not mean excluding imports but it means ensuring that renewable energy policy does not further increase the net global footprint of the EU).

New safeguards for the sustainable production and use of bioenergy must be introduced

The EU's renewable energy policies currently allow public incentives and subsidies for the use of all kinds of bioenergy including food and feed crops, whole trees and even biomass that fails to deliver greenhouse gas savings. EU should introduce new safeguards for all bioenergy that is to be counted towards the renewable energy targets or to receive financial support. These safeguards should exclude sources of bioenergy with high environmental and climate risks and ensure that bioenergy supported is ecologically sustainable, delivers genuine GHG savings and doesn't significantly increase our global land use footprint.

Grid network planning and encouragement of demand side response, at EU and member state level must support the sustainable development of a flexible European grid network that is fit for the renewable future

Grid connection and balancing system issues are often quoted as barriers to relying on renewable energy for all, or a large proportion, of our energy needs. However, much progress is being made and it has been shown that this does not have to be the case¹. There is a need to develop a European grid network that is fit for the renewable future; a smarter, more flexible system compatible with environmental needs is required. Market design must be improved to enable and encourage (rather than inhibit) prosumers and innovation in demand-side response. At the same time, member states should be required to include in their national action plans details about how they will adapt their grid network to accommodate the increasing proportion of renewable generation seeking access to the system, and the increasingly distributed sources of this supply, taking into account the role that innovation in demand-side response and energy storage can play in reducing the need for new powerlines.

¹ [http://www.greenpeace.org/eu-unit/Global/eu-unit/reports-briefings/2012%20pubs/Pubs%203%20Jul-Sep/E\[R\]%202012%20lr.pdf](http://www.greenpeace.org/eu-unit/Global/eu-unit/reports-briefings/2012%20pubs/Pubs%203%20Jul-Sep/E[R]%202012%20lr.pdf)

Policy signals of a strong future for the renewable industry in the EU must be maintained and added to.

National support schemes have played a pivotal part in delivering the substantial deployment of renewable energy seen so far. Significant uncertainty has been created by recent moves by a number of member states to cancel support schemes. Provisions enabling/allowing the adoption of support schemes should therefore be maintained. Priority access and dispatch for variable renewable energy sources like wind and solar should be maintained in the Renewable Energy directive, unless substantial measures are taken separately to level the playing field for renewables. With ongoing perverse incentives for fossil fuels, an ineffective carbon price, and flexibility issues yet to be resolved, renewable technologies cannot be expected to succeed without priority treatment. Priority access and dispatch is less important for electricity production from more conventional and non-variable renewable sources like biomass and hydropower and can even incentivize unsustainable forms of these renewable. Additionally, the development of national plans, and reporting on the delivery of these, need to be anchored in a legislative framework. All of these measures would help to provide investors with confidence that the EU is fully committed to the necessary transition to renewable technology and that Member States will deliver on their national plans.

Reducing waste across the energy system is key to facilitating the integration of renewable energy sources in harmony with nature

Energy savings and energy efficiency improvements reduce the requirement for new energy infrastructure, therefore helping to avoid associated impacts on wildlife. Interactions between the Renewable Energy Directive and Article 7 of the Energy Efficiency Directive must be carefully considered so as to avoid double-counting of activities towards Member States contributions. The governance regulations must ensure that Member States take substantial action to reduce energy waste *as well as* supporting renewable energy deployment. Market design rules should encourage energy productivity in the power sector, to reduce the substantial amounts of energy waste during generation and transmission². Finally, Member States should be required to encourage ‘repowering’ (the replacement of old equipment with more efficient equipment or extensions of existing sites) and not focus solely on the development of new sites, whilst ensuring new plants that have larger impacts on the existing location still undergo sufficient environmental assessment.

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² For example, in 2015 62% of UK energy production was wasted before it reached the point of supply. See The 2016 UK energy Productivity Audit - <https://www.energyinst.org/uploads/documents/2016-uk-energy-productivity-audit.pdf>