

## Comparative assessment on the designation of Renewable Acceleration Areas (RAAs) in selected EU countries

Briefing

April 2026

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## Introduction

As EU governments finalise the last details of the implementation<sup>1</sup> of the revised Renewable Energy Directive (EU) 2023/2413 (RED III), adopted in November 2023, into national law, the obligation to designate Renewable Acceleration Areas (RAAs) is emerging as a key test of the EU's ability to deliver a faster, fairer and more resilient energy transition. Solar and wind energy are key drivers of this transformation. They offer the fastest and most cost-effective pathway to phase out fossil fuels, strengthen energy security and achieve climate neutrality. Progress is already underway: in 2024, nearly half of EU electricity consumption came from renewable sources, with wind and solar leading the way. Yet, deployment on the ground is still not happening at the speed and scale required. By relying on robust spatial planning and environmental assessments that integrate biodiversity protection, land use and infrastructure needs at an early stage, they aim to reduce project-level conflicts and enable faster and more predictable permitting.

This briefing presents a comparative overview of how 12<sup>2</sup> EU countries are implementing the provisions about RAAs outlined in RED III, focusing on transposition, designation processes, governance arrangements, environmental criteria and public participation requirements. It identifies key implementation gaps and sets out targeted recommendations at EU level. The analysis is based on questionnaires completed by Climate Action Network (CAN) Europe and the European Environmental Bureau's national members and partners, and is reflected in the joint RAA Tracker and accompanying detailed national factsheets.

The full results are available through the RAA Tracker online:

<https://caneurope.org/publications/renewable-acceleration-areas-tracker/>

1. Implementation refers to the process through which legal obligations set out in RED III are translated into national law effectively applied on the ground, and operationalised in practice with the formal designation of RAAs.

2. Austria, Czechia, Croatia, France, Germany, Greece, Italy, Lithuania, Poland, Portugal, Romania and Spain.

























## Overall Assessment

Across the 12 EU countries assessed, progress on RAAs is uneven. Some countries have integrated the new rules smoothly into existing national frameworks, building on their established planning systems, while others are still at earlier stages with less coherent approaches.

At present, 6 of the 12 countries have completed the legal transposition of RED III's RAA provisions, establishing relatively comprehensive legal frameworks for primarily wind and/or solar energy, and in some cases also covering offshore wind, grids, and storage infrastructure. While legal frameworks are taking shape, implementation on the ground remains limited. No country assessed has yet formally designated all of its RAAs, missing the 21 February RED III deadline. With that said, several governments have announced indicative timelines for their first RAA designations.

Despite these delays, positive elements are emerging in some national contexts, particularly with regard to environmental safeguards, transparent governance arrangements, and public participation. These positive developments highlight that, when developed well, RAAs can support faster permitting while maintaining high standards of environmental protection and social legitimacy.

Overall, although full implementation is progressing more slowly than initially envisaged, the direction of travel points towards RAAs becoming a key planning tool for the efficient deployment of renewables. Continued efforts to clarify legal frameworks, strengthen coordination across authorities and ensure consistency with EU objectives will be important to accelerate this transition.

	Transposition into national law	RAAs designation
<b>AUSTRIA</b>		
<b>CROATIA</b>		
<b>CZECHIA</b>		
<b>FRANCE</b>		
<b>GERMANY</b>		
<b>GREECE</b>		
<b>ITALY</b>		
<b>LITHUANIA</b>		
<b>POLAND</b>		
<b>PORTUGAL</b>		
<b>ROMANIA</b>		
<b>SPAIN</b>		

Source: CAN Europe and EEB, April 2026

**Legend: Transposition** - **Green**: transposed; **Yellow**: partially transposed; **Orange**: transposition in process | **Designation** - **Green**: completed; **Yellow**: in advance stages; **Orange**: in early stages; **Dark Orange**: no or poor progress

While Germany is among the frontrunners in designating RAAs, the overall approach raises serious environmental and social concerns. Because RAAs largely mirror existing plans, there is very limited additional environmental screening (incl. no SEA) and very little public participation in the designation process.

## Transposition into national law, governance and scope

Despite noticeable progress, the transposition of RED III Article 15c with regards to the concrete designation of RAAs remains uneven across the selected countries despite the expired legal deadlines of February 2026. While a first group of countries has formally adopted national provisions, others remain in partial or early stages of transposition.

**6 of the 12 selected EU countries have transposed Article 15c into national law** through specific legislative acts or amendments to existing frameworks. Several countries have already moved ahead with transposing RED III, using different legal approaches. **Germany** has updated existing energy and planning laws, such as the Wind Energy at Sea Act (WindSeeG) and the Energy Industry Act (EnWG), while Italy has put in place a binding system of RAAs, building on its earlier “suitable areas” (aree idonee) framework through legislative decree.<sup>3</sup> **Romania and Poland** have also introduced acceleration areas into their national systems, linking them directly to spatial planning and renewable potential mapping. In **Czechia**, transposition has mainly been carried out through targeted amendments to existing planning, construction and environmental laws, rather than through dedicated frameworks. Most recently, in March 2026, the **Spanish government** ratified a Royal Decree-law, notably aiming to transpose the RAA provisions of RED III.

In contrast, several countries **are still in the process of transposition or have only partially transposed Article 15c into their national laws, such as France, Greece, Portugal, Lithuania and Croatia.**<sup>4</sup>

**The scope and characteristics of RAAs** are still being shaped in many of the selected countries, with ongoing efforts to define their size, location and technological coverage. While some countries, such as Austria, Spain, Germany and Czechia, have already begun to define the size, technological scope and spatial prioritisation of RAAs, in many cases these elements remain either undefined or only partially specified in national legislation. Overall, wind and solar energy are expected to form the core of most RAAs, often complemented by provisions for grid infrastructure and, in some cases, storage. Some countries published mapping efforts, providing a non-binding basis for assessing areas suitable to be designated as acceleration areas - such as in the Czech Ministry of Environment for wind and solar areas.

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3. Despite progress at national level, risks of politically driven restrictions in RAA designation are emerging in some regions - such as in the temporary moratorium on new renewables projects in the autonomous region of Sardinia. This case illustrates how political opposition can interfere with the designation process: a temporary regional moratorium on renewable projects in 2024 effectively halted permitting while RAAs were being prepared. Although the moratorium was later annulled by the Constitutional Court, this episode highlights the risk of overly restrictive measures being introduced without proper spatial planning or evidence-based assessment.

4. France has not yet formally transposed the provision but relies on an existing legal framework (Energy Code and the APER Law), which introduces renewable zoning approaches without fully meeting RED III requirements. A draft law currently under parliamentary discussion aims to complete transposition. Greece has taken initial steps as the Ministry of Environment and Energy launched public consultation for a draft law transposing the remainder of RED III and RAA-related provision. Portugal has launched a draft Decree-Law under consultation, while Lithuania has only partially transposed RED III through amendments to its renewable energy law, without establishing a dedicated legal regime for RAAs. Croatia, for its part, has not yet transposed Article 15c.

The **integration of grid and storage infrastructure within RAAs remains uneven across the EU**. Germany, Italy, Poland and Romania explicitly include grid and storage infrastructure within the scope of RAAs, in line with Article 15e of RED III, thereby supporting a more systemic approach to energy system integration. Spain also provides for coordination with grid planning, notably through the involvement of the transmission system operator.

Across the selected countries, a clear trend is **the prioritisation in artificial land surfaces and degraded land** with low environmental impact, including industrial sites, transport infrastructure corridors, degraded land and built-up areas. This approach is explicitly embedded in the legal frameworks of Romania and Poland, and is also reflected in emerging practices in Spain, Austria and France.

While RED III allows the designation of RAAs in sea areas, **the scope and use of RAAs for offshore wind remain unevenly defined across the countries**. In Germany, offshore RAAs have been operationalised through the Wind Energy at Sea Act (WindSeeG) and the federal Site Development Plan (Flächenentwicklungsplan) – with almost all pre-identified offshore wind areas (approx. 22 GW) retrospectively designated as RAAs, effectively making RAAs the default planning standard for offshore wind expansion. Italy, and Romania have also established a legal framework for offshore RAAs, respectively under Legislative Decree No. 190/2024 and the Government Emergency Ordinance No. 59/2025. In France, offshore RAAs are expected to be embedded within existing maritime planning instruments (Documents stratégiques de façade – DSF), although the ongoing transposition process has yet to be clarified.

Regarding the **governance models** used, a range of governance models to designate RAAs have been adopted so far, often reflecting the national existing institutional structures. For instance in more decentralised systems, such as **Austria, Italy and Poland**, regional authorities play a central role in identifying and designating RAAs. This can enable greater sensitivity to local conditions and priorities, while also requiring strong coordination mechanisms to ensure coherence at national level. In other countries, including **Croatia, Greece and Lithuania**, governance frameworks are still being defined, with ongoing discussions on the allocation of responsibilities and the development of procedural guidance.

Across all contexts, strengthening clarity on roles, timelines and decision-making processes will be key to ensuring effective implementation. Adequate administrative capacity and coordination between energy, environmental and spatial planning authorities will also be essential to support the designation and management of RAAs.

## Environmental safeguards

Under the RED III, RAAs should be located in areas where renewable energy projects are not expected to have a significant impact on nature and can therefore benefit from faster and simpler permitting procedures and, in most cases, exemptions from project-level environmental impact assessments. Countries shall exclude Natura 2000 sites and other national protected areas, and other areas based on environmental sensitivity mapping – and determine effective mitigation measures for each technology and area. The designation of RAAs must be based on a Strategic Environmental Assessment (SEA)<sup>5</sup> and, if it is likely to impact a Natura 2000 site, an appropriate assessment.<sup>6</sup>

Environmental considerations are therefore a central component of the RAA framework. While several of the assessed countries have begun to develop tools and approaches, progress remains uneven, reflecting different national planning approaches and timelines.

**Approaches to excluding environmentally sensitive areas vary significantly in scope across the assessed EU countries.** Countries such as **Czechia, Italy, Poland, and Spain** have provided clear statutory exclusions for Natura 2000 sites, nationally protected areas, and for additional areas such as migration routes and critical habitats. In contrast, **France and Germany's** legal frameworks are less comprehensive: for example, in Germany, certain categories of protected areas such as natural parks or Ramsar sites may still be included in RAAs, particularly onshore. And areas 'likely to have significant impacts' under the Birds and Habitats Directives remain to be clarified.

**Sensitivity mapping exercises, biodiversity databases and geographic information systems (GIS) are increasingly being used to inform spatial planning.** This data is essential to identify areas where renewable energy can be deployed with limited environmental impact. Some EU countries such as **Czechia, Spain, Italy, and Poland**, have developed environmental or biodiversity mapping tools to directly inform RAA identification, often drawing on GIS layers, national biodiversity databases, or dedicated mapping portals. **Croatia, Portugal and Lithuania** have partial mapping frameworks established, whereas **Germany, Greece and Romania** are still lacking integrated national sensitivity maps. Even where tools exist, there are still implementation gaps: for example, France has advanced national mapping systems and biodiversity observatories in place, but certain RAAs still overlap with sensitive areas due to non-uniform application.

4. Defined in Directive 2001/42/EC ('SEA Directive'). SEAs are larger-scale planning assessments conducted before projects are chosen; these should consult the affected public and evaluate environmental, social, and economic impacts of potential renewable energy infrastructure.

5. Art. 6(3) of Directive 92/43/EEC ('Habitats Directive'). Where an appropriate assessment is conducted, the RAA can only be approved if it is proven that it will not harm the affected Natura 2000 site's ecological integrity.

**Requirements for Strategic Environmental Assessment (SEA) also diverge across the assessed countries.** Czechia, Italy, Poland, Spain, Romania, and some Austrian regions provide for SEAs in the process of RAA designation, although the depth of the assessments can vary, particularly where responsibility lies with the regional authorities (e.g. Italy and Austria). France and Germany have relied on existing SEAs that predate the RAA framework, rather than conducting additional assessments. In Lithuania and Portugal, SEAs are under preparation.

**Mitigation frameworks reveal a similar pattern.** Only a few countries have introduced binding, predefined mitigation measures for RAAs, with Spain being the frontrunner. In several of the assessed countries, mitigation requirements are anticipated in legislation or SEA processes, but remain as yet undefined (e.g. Poland, Romania).

At the same time, further work is needed in some cases to ensure that environmental safeguards are consistently applied at the planning stage, rather than primarily at project level. Strengthening ex ante assessments, including the use of Mitigation measures at RAA level, can help to reduce conflicts, improve legal certainty and support more efficient permitting processes.

Ensuring that RAAs contribute to both climate and biodiversity objectives will be essential to their long-term success and public acceptance.

## Public participation, public engagement and transparency

RED III requires EU countries to ensure early and effective public participation in the designation of RAAs, primarily through the procedures established under the SEA Directive. This includes identifying and involving the public affected or likely to be affected and ensuring access to relevant information during the planning process. RED III also emphasises the need to promote public acceptance of renewable energy projects, including through the direct or indirect participation of local communities.

**Public participation and engagement play a crucial role in the successful implementation of RAAs.** In many of the selected countries, consultation processes are embedded within existing spatial planning or environmental assessment procedures, providing a foundation for stakeholder engagement. However, the current process remains uneven across the selected EU countries with noticeable differences in both the timing and quality of stakeholder engagement.

**A first group of EU governments have introduced relatively structured participation frameworks,** although with varying levels of ambition and effectiveness. Portugal has developed a particularly proactive approach through the “Renováveis Participa” platform, managed by EMER 2030, which provides an open and accessible interface for citizens, municipalities, NGOs and other stakeholders to contribute to the designation process. Contributions are integrated into the SEA, and additional thematic working groups have been established, including with civil society and academia. **Austria** also demonstrates early engagement practices, with public consultations already carried out at regional level (e.g. Upper Austria and Carinthia), including feedback opportunities linked to SEA processes.

**In contrast, several countries rely on minimum or procedural participation requirements,** often limited to SEA consultations or formal planning processes. In Poland, public participation is foreseen during the preparation of RAA plans and SEA procedures, but these are typically limited to formal notices and written submissions, which risk remaining largely invisible to the public. More meaningful engagement is expected to occur through local spatial planning procedures, although this may lead to fragmented and uneven participation across regions. **Czechia** similarly integrates participation within standard spatial planning procedures, primarily through written comments, with concerns that recent political developments may further restrict these processes. **Germany** represents a particular case where public participation has been significantly reduced in the context of RAAs: consultation largely took place upstream during wind energy planning or offshore spatial planning, while the actual designation of RAAs has occurred with limited or no additional public engagement, raising concerns regarding transparency and procedural legitimacy.

As RAA frameworks are further developed, there is an opportunity to enhance participation by engaging stakeholders earlier in the planning process and by improving access to information on criteria, methodologies and decision-making. Early and meaningful involvement of local communities, civil society organisations and other stakeholders can help to build trust, address concerns and strengthen public acceptance of renewable energy projects.

In addition, **clearer communication on the benefits of renewable energy deployment, including transparent, fair and meaningful benefit-sharing for community hosting or in proximity of wind and solar projects, can support a more positive and constructive dialogue.** Strengthening these elements is key to ensuring that RAAs, and the overall context of renewables project deployment, are not only effective from a technical perspective, but also widely accepted.

## Recommendations for high-quality RAA designation

RAAs represent a significant opportunity to advance Europe's energy transition in a way that is both fast and fair. While implementation is still evolving, the experiences across the selected EU countries highlight both the progress achieved and the areas where further efforts are needed.

By strengthening environmental safeguards, improving governance and enhancing public participation, RAAs can become a powerful tool to deliver renewable energy at scale while safeguarding biodiversity and ensuring public support. Continued cooperation between EU institutions and EU governments will be essential to fully realise this potential and to ensure that the transition to a renewable energy system is both rapid and resilient. The following recommendations are developed based on the national recommendations included in the RAA Tracker.

### **Deliver RED III through strong spatial planning and high-quality RAAs:**

1. **EU countries and the European Commission** should treat spatial planning and RAAs as adaptive, living planning tools for renewables deployment until climate neutrality is met, ensuring they are regularly monitored and, where necessary, adjusted to safeguard environmental integrity, strengthen public support and deliver on EU and national targets.
2. **EU countries** should take concrete steps to improve coordination across levels and sectors by bringing together national and regional authorities, spatial planners, and grid operators, and energy, environment, agriculture and maritime authorities, with meaningful involvement of civil society.
3. **EU countries** should ensure that the designation of RAAs is fully coordinated with grid and storage planning, to avoid selecting areas that cannot be connected to the grid or creating additional permitting burdens.
4. **EU countries** should provide sufficient financial, technical and human resources to planning authorities to guarantee high-quality, evidence-based and legally sound RAA designation processes, supported by EU-level funding and capacity-building where needed.

5. **EU countries** must ensure that RAAs are used to enable renewable energy deployment via evidence-based assessment throughout the designation process, avoiding politically motivated restrictions that could undermine the EU's climate and energy objectives.
6. **The European Commission** should continue to provide hands-on implementation support through updated guidance, recommendations, and technical exchanges. This should be combined with firm enforcement, including infringement proceedings where necessary, to ensure legal certainty and avoid investment delays. The European Commission can continue actively promoting best practices from across the EU, drawing on expertise from local authorities, planners, experts, and civil society to identify suitable areas for renewables.

**Uphold high environmental standard to avoid litigation and ensure legal certainty, & stable renewable deployment:**

7. **EU countries** must ensure that renewable acceleration respects EU and national environmental assessment and protection rules. Strong biodiversity and water protections are essential to maintain momentum in the transition, while weakening them would increase litigation risks, undermine public buy-in, and slow progress towards EU climate targets.
8. **The European Commission** should further support EU governments with implementation guidance on biodiversity integration in RAAs – focusing on:
  - a. Minimum expectation for using best-available biodiversity and sensitivity data,
  - b. Excluding high-sensitive areas (and preventing any copy-paste practice of RAA designation from former planning).
  - c. Automatically requiring SEAs and upfront mitigation measures and regular monitoring – especially for any cumulative impacts such as in offshore areas and in high land pressure regions.

## **Strengthen public consultation, community involvement and benefit sharing:**

9. **EU countries** must prioritise early and meaningful public involvement, particularly through public consultation, as central to RAA designation processes, and the overall rollout of renewables.
10. **EU countries** should clearly communicate what RAA designation changes in practice for local communities (procedural streamlining, safeguards, monitoring obligations), while also highlighting opportunities for engagement and local benefit participation.
11. **EU countries** should embed minimum standards for transparent, fair and meaningful benefit-sharing mechanisms within national regulatory frameworks, alongside strong implementation support.

## **Further Reading**

- NGOs Joint Overview of Renewable Energy Spatial Planning and Designation of Acceleration Areas in Selected EU Member States (Oeko-Institut, May 2024): <https://caneurope.org/app/uploads/2026/02/re-spatial-planning-acceleration-in-eu-ms-13052024.pdf>
- NGOs Joint Follow-up Overview of Renewable Energy Spatial Planning and Designation of Acceleration Areas in Selected EU Member States (Oeko-Institut, October 2025) <https://caneurope.org/app/uploads/2025/10/oeko-institut2025-follow-up-spatial-planning-acceleration-2-1.pdf>
- CAN Europe report: “Community Engagement and Fair Benefit Sharing of Renewable Energy Projects” (April 2025) : <https://caneurope.org/app/uploads/2025/04/cane-april-2025-community-engagement-and-benefit-sharing-1.pdf>
- EEB RED III Guidance: [Public participation in renewable energy projects and community benefits](#) (October 2025)
- EEB Policy brief: [The Top Ten Barriers to Faster Renewables Deployment](#) (July 2025)

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This website tracker by CAN Europe and the European Environmental Bureau (EEB) assesses the status of renewable acceleration areas (RAAs) in selected member states as EU Member States implement the Renewable Energy Directive's (RED III) new rules on spatial planning. It aims to highlight good practices, identify gaps, and support constructive dialogue with national authorities and EU institutions.

<https://caneurope.org/publications/renewable-acceleration-areas-tracker/>

