



*Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With over 170 member organisations from 38 European countries, representing over 1.500 NGOs and more than 47 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe.*

## Inception impact assessment – Revision of the Renewable Energy Directive

Submission by CAN Europe, September 2020

**To ensure we reach net zero emissions by 2040, EU Member States need to phase out fossil fuels and commit to a strong reduction in energy consumption and a transition of our energy system to one that is 100% based on sustainable renewable energy sources (RES) by 2040. The current 2030 EU RES target is not in line with the Paris Agreement objective to limit temperature rise to 1.5°C. In the coming decade and beyond, EU Member States need to significantly increase the deployment of sustainable renewable energy. CAN Europe calls for an EU binding target for the share of energy from renewable sources in gross final energy consumption of at least 50% by 2030.**

In addition to the increased level of ambition, the current RED needs to be implemented and revised so it becomes the driver of a comprehensive policy framework supporting the further deployment and uptake of sustainable renewable energy:

- Full implementation of the existing legislation needs to speed up, to pave the way for higher ambition. This means better addressing barriers that hinder energy efficiency, low carbon products and processes, and renewable energy investments, starting immediately with maximising the opportunities offered by the policies and measures that are already in place.
- Even though the national contributions in the NECPs could be sufficient to slightly surpass the current 2030 EU RES target as indicated by the EC's analysis, it is obvious that some Member States turn a blind eye to the minimum commitment indicated in the country-specific benchmarks. The current system fails to push these governments to higher ambition. Therefore we call for binding national targets to ensure an adequate level of ambition for all countries and strong tools to deliver them.
- A swift and strong increase of renewable energy use requires an integrated energy system where electricity, heat, transport, non-fossil gas, buildings and industry sectors interact more closely to use energy infrastructure more efficiently. The guiding principle of sector integration should be to facilitate the quick upscaling of RES in all sectors while prioritising energy savings and energy efficiency. The RED revision should support the adoption of this guiding principle in legislation.
- Electrification of industrial processes, low temperature heat and mobility based on renewable electricity allows for a quick upscaling of renewables and primary energy savings. Only those hard-to-abate sectors such as steel and chemicals or aviation, long-

distance shipping and heavy-duty road transport, could partly rely on non-fossil gases (renewable hydrogen, based on surplus renewable electricity or produced through additional renewable generation capacities). Dedicated support schemes should incentivise additional renewable generation capacities to feed electrolyzers that cover the demand for renewable hydrogen. We do not support general quota targets for different gaseous energy carriers as they would not target the necessary market introduction of renewable hydrogen. The guiding principle of sector integration is not to boost any kind of gaseous energy carrier but to enhance renewables and efficiency.

- The EU's inadequate sustainability criteria for bioenergy need to be reformed, in order to ensure bioenergy is only incentivised where it delivers significant, near-term reductions in emissions compared to fossil fuels. A cap to limit the use of biomass for energy production to levels that can be sustainably supplied needs to be introduced. Criteria should disallow the use of feedstocks that are likely to increase emissions compared to fossil fuels (incl. crop-based biofuels, energy crops, tree trunks, stumps) and ensure efficient use of biomass resources. EU policies including the RED should not be based on the false assumption that forest biomass is carbon neutral and should ensure emissions from biomass burning are fully accounted for.