24th of May 2022



Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With over 179 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.

RE: CAN Europe recommendations regarding the RePowerEU plan and its interlinkages with the Fit for 55 package

Dear Permanent Representative,

Ahead of the special meeting of the European Council, planned for the 30th and the 31st of May, **CAN Europe would like to share with you recommendations on how the REPowerEU plan can shape future negotiations on the Fit for 55 package,** with a focus on energy savings and renewable energy across different sectors to make sure the EU embarks on a more ambitious energy transition pathway and without increasing fossil gas import dependency.

In the REPowerEU plan, the European Commission proposed increasing both the energy energy efficiency and renewables targets for 2030. This is a step into the right direction, but the proposed targets would however not get us on the safe side with regards to the Paris Agreement, which means achieving at least 45% energy savings and 50% renewables share by 2030, as illustrated in <u>CAN Europe's PAC scenario</u>. More energy savings and a faster and stronger roll-out for renewable energy are needed for both energy security and to limit global warming at 1.5° C.

The right measures to achieve these targets can help wean off Russian gas by 2025, as CAN Europe's latest publication <u>Repower for the people</u> shows. To increase solar and wind energy deployment, Member States should make better use of brownfields and **accelerate the rollout of rooftop solar photovoltaic**, including by a faster solar PV obligation for new and existing buildings. Spatial planning and mapping of most suitable areas are instrumental to exploit the local potential of renewable energy sources. The faster deployment of wind and solar energy

should however not come at the cost of biodiversity protection nor of effective engagement of citizens and local communities.

Both the uptake of renewable energy and energy savings measures need to complement each other to fast-track decarbonisation. The 'EU Save Energy' Plan outlines a set of suggestions for co-legislators which need to guide the discussions in the European Council, including stepping up the energy savings obligation's annual energy saving rate. Energy renovation shall upgrade our old and inefficient buildings to ensure a rapid ingress of renewable energy sources in their energy mix, which is why **the ambition level of the Minimum Energy Performance Standards (MEPS) needs to increase,** accompanied with adequate support measures for low-income households to <u>not to leave them behind</u>.

EU financial instruments need to be <u>fully aligned</u> with an ambitious RepowerEU strategy, both in terms of quality and quantity while preventing the financing of climate harmful investments. In this vein, we welcome in principle the frontloading of the Recovery and Resilience Facility (RRF) investments, and the repurposing of several EU instruments for delivering higher energy efficiency and renewable targets. However, particularly concerning proposals include the waiving of the "Do No Significant Harm" from the Recovery and Resilience Facility. Indeed, the waiving of DNSH means that additional finance mobilised through various sources, including from the auctioning of allowances held in the Market Stability Reserve (MSR) of the EU Emissions Trading System (ETS) could be dedicated, among others, to fossil fuel projects. This proposal in particular should be <u>firmly rejected</u> as it risks undermining the EU ETS and its ability to reduce emissions.

The REPowerEU package should truly guide the way to a more ambitious 'Fit for 55' climate and energy package. **RED**, **EED** and **EPBD** are the core files striving for accelerating the energy transition. We would like to ask you to consider an exclusive focus on those policies and measures which come as an alternative to fossil fuels and will truly deliver energy security.

Kind regards,

horo Mortinell.

Chiara Martinelli Director, Climate Action Network Europe



www.caneurope.org - 2022 Contact: info@caneurope.org