

## Public Consultation on the EU renewable energy rules – review

### CEER Response for the European Commission

12 February 2021

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This is a response to the European Commission’s Public Consultation on the EU renewable energy rules – review (<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12553-EU-renewable-energy-rules-review/public-consultation>).

The consultation period was from 17 November 2020 to 9 February 2021. CEER’s response is public and will also be found on the [European Commission’s website](#), as CEER submitted the response on 8 February 2021. Per the European Commission, the idea of the consultation was to “seek stakeholder views on how the Renewable Energy Directive should be revised. The Commission is preparing a review and a revision of the Renewable Energy Directive to ensure that renewable energy contributes to the achievement of the increased greenhouse gas (GHG) emissions reduction target set in the 2030 Climate Target Plan for 2030, as well as to implement the measures proposed in the Energy System Integration and Hydrogen strategies, the Renovation wave initiative, and other initiatives adopted under the European Green Deal.”

The consultation consisted of a number of questions via an online questionnaire. The questions and CEER’s responses can be found below.

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

Fields marked with \* are mandatory.

## Introduction

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

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

## About you

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### \* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish Italian
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- Polish
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- Slovenian
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### \* I am giving my contribution as

- Academic/research institution
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- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)

- Public authority
- Trade union
- Other

\* First name

Charles

\* Surname

Esser

\* Email (this won't be published)

charles.esser@ceer.eu

\* Organisation name

Council of European Energy Regulators (CEER)

\* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

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\* Country of origin

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

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- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
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- South Georgia and the South Sandwich Islands
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- Cape Verde
- Cayman Islands
- Central African Republic
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- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
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- Jordan
- Kazakhstan
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- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
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- North Macedonia
- Norway
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- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
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- United States
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Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected.

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##### **Anonymous**

Only organisation 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 as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

**Public**

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

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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 self-consumption 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

Please specify

While the current situations and also the specific challenges are diverse across MS and thus there should be sufficient freedom for targeted strategies at the national level, it appears to be inevitable that coordinated and urgent efforts have to be undertaken for entering a more ambitious decarbonisation path, particularly in hard-to-abate sectors (such as heavy-duty transport and energy intense industry). Hydrogen may be a vector for such sectors and the EU hydrogen strategy underlines the relevance of “various options for incentives at EU level, including the possibility of minimum shares or quotas of renewable hydrogen or its derivatives in specific end-use sectors (for instance certain industries as the chemical sector, or transport applications), allowing demand to be driven in a targeted way.” Against this background, it appears that a higher level of prescriptiveness could have merits.

**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 specify

Please explain your answer

A comprehensive terminology for different types of gases and a EU system of certification needs to be developed. Based on that, it should be considered how low-carbon energy (i.e. low carbon hydrogen) can be reflected in the Guarantees of Origin (GO) system. GOs as described in Art. 19 should cover all types of gases.

This is also relevant for the billing information provided to consumers: The electricity directive (Annex I) contains provisions obliging the supplier to disclose the energy sources. The obligation to disclose the energy sources should be introduced in the gas directive too.

Currently many different but yet interrelated accounting systems exist in parallel for renewable energy, climate impacts, etc: The RES target in Directive 2018/2001, Art. 3; the mandatory RES share in the transport sector in Directive 2018/2001, Art. 25; ETS CO<sub>2</sub> reduction targets and of course the GO system. Since these systems appear to be not sufficiently aligned and may even show contradictions, there should be a new holistic approach to ensure a coherent and efficient overall system. The concept of GOs could serve as basis for such a development (i.e., being expanded to incorporate also the above-mentioned aspects and systems such as CO<sub>2</sub> emission reduction in the case of consumption of renewable gas certified with GOs). This would require an orchestrated and coordinated approach for revising different legal frameworks (energy, transport, ETS, etc).

Art. 19 should clarify that off-grid installations are covered by this article, too. Nonetheless it must be ensured that double issuing and double counting are excluded.

It's strongly recommended to clarify the situation with the EEA & third countries. A clear communication from the EC on the status of the bilateral contracts with these countries would be very helpful.

The directive shall aim to improve consumer awareness about the sources of energy consumed in a given year & month. Disclosure timeframes shall get shorter and not last longer. An expiry of 18-months after production is far from being close to real time consumption and does not allow for an improvement in the disclosure information flow that ends with the consumer. If possible, production year and consumption year shall match when cancelling GOs for disclosure purposes.

Art. 19.11 needs further guidance as it could be interpreted that GOs can be used for disclosure purposes only if issued in countries with which there is direct import/export of physical energy. Is the use of heating and cooling GOs limited within a given heating and/or cooling network?

It is not clear in case of energy conversion whether the converted GO will have a validity of 12 months from the date of the conversion (and thus whether possible to extend the validity of a GO by converting the underlying energy carrier of the GO) or whether within the 12 months GO lifetime, a GO shall be converted and cancelled. This shall be specified to prevent abuse of the GO system.

**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

Please specify

The use of fossil fuels accounts for around three quarters of the GHGE. Accordingly, given the important but highly ambitious objective to achieve climate neutrality by 2050, all energy-intensive sectors need to ramp up their efforts and increase the share of renewable energy used.

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

**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

Please specify

The 2030 climate plan states in this context that “the greenhouse gas emissions reduction target of 55% achieved through the combination of intensified policies and the extension of the EU ETS is assessed to reach a share of renewables of around 38.5%” but underlines directly in the following sentence that “renewables will need to be deployed at larger scale to contribute to the higher climate ambition and to promote the Union’s industrial leadership on renewable technologies. An increased renewables target will provide the necessary predictability and investment certainty for further renewable energy deployment across all sectors.” Consequently, it is evident that this target should be further increased.

### 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Renewable liquid fuels are key for decarbonising hard-to-abate sectors (maritime, aviation, etc.).

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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify



### 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further specific measures for consumer empowerment	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further measures to foster digitalisation	<input type="radio"/>	<input type="radio"/>	<input checked="" 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

It appears appropriate to revise and harmonize the current frameworks of energy-based taxes and levies applied for similar activities, avoiding possible double charging for storage and conversion activities. In order to reduce distortions, taxes and levies could be applied only to the consumption side and/or could partially be moved to the general taxation framework. In this regard, regulators welcome the European Commission's proposal to review the Energy Taxation Directive in order to align and harmonise the taxation of energy products and electricity with EU environment and climate policies, in particular regarding storage and hydrogen production.

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

Please specify

Concerning the encouragement of hydrogen that leads to low GHG emissions, a maximum threshold value for GHG emissions would need to be defined.

In the context of 'deep decarbonization', hydrogen and e-fuels will have an important role to play. Second, it appears very appropriate to encourage and promote the use of such energy carriers in the already identified hard-to-abate sectors. Moreover, at least MS should have the liberty to set additional measures in further sectors to address their specific situations and challenges.

Not only energy efficiency gains should be taken into account when comparing different alternatives, but also cost efficiency.

## 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Carbon Contracts for difference [1]	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supply-side quotas	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Market based support schemes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Supply-side GHG-based targets	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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[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**

The Renewable Energy Directive already prescribes targets for shares of renewable energy, at national levels and for certain sectors.

Article 4 and 5 mainly address renewable electricity. Considering the increasing importance of renewable gases including hydrogen, specific provisions to give the possibility to Member States to establish support schemes for energy from these sources should be added to Article 4 and 5.

As stated in the EC's hydrogen strategy and in the German hydrogen strategy, it might make sense to also incentivize renewable hydrogen by introducing quotas of renewable hydrogen (or its derivatives) in specific end-use sectors such as steel or chemical industry.

A pilot scheme at EU level for a Carbon Contracts for Difference programme as outlined in the EC's hydrogen strategy, in particular to support the production of low carbon and circular steel, and basic chemicals, should be developed. This appears to be crucially important for triggering market demand which, in turn, is the basis for investments and initiatives along the entire supply chain.

**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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>

<p>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.</p>	○	●	○	○
<p>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</p>	●	○	○	○
<p>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</p>	●	○	○	○
<p>Where CO<sub>2</sub> is used in the production of a fuel, the certification system should distinguish between fuels using CO<sub>2</sub> of fossil origin and CO<sub>2</sub> of non-fossil origin</p>	○	○	●	○

Other principles? Please explain

Additionality, in the current form (i.e. only applied for transport), does not take the different situations in MS sufficiently into account. It does not differentiate between MS which already have a substantially above-average renewable energy mix and others, that rank below average, and thus, in some cases, hinders a more progressive development of renewable fuels. If the concept of additionality shall be maintained or even expanded in the future, these issues need to be addressed in order to enable a broad decarbonisation across the various sectors.

With regards to the origin of the CO<sub>2</sub> (fossil or non-fossil) it could be beneficial to consider whether the CO<sub>2</sub>

— if it were not used for the production of a fuel — would have been emitted anyway or if it was solely provided for this production process.

With regards to GOs, a mass-balancing system cannot work in a network-based commodity system (electricity, gas). At least for these sectors, book-and-claim shall be the choice. However, the certification system should be broad and ideally span consistently across all sectors. If in some sectors there are further certification requirements that are currently met with mass balancing, it needs to be carefully considered how this can be ensured. However, this does not justify a broader application of mass balancing.

Furthermore, on a voluntary basis and for low carbon fuels, the confirmation that GOs are handled together with the specific production unit can be an interesting information for final customers and therefore could be provided as additional information to the disclosure mix.

**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

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 type="radio"/>
Decarbonising energy intensive industries (e.g. chemicals, cement, steel)	<input 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing captured CO2 as a feedstock for other industries	<input type="radio"/>	<input 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

Please specify

### 3 Technical questions on specific sectors

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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 new 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further streamline permitting procedures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further support the uptake of private renewable PPAs	<input type="radio"/>	<input type="radio"/>	<input checked="" 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

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

**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 checked="" type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
None, market participants are already actively engaging	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

### Other? Please specify

Power purchase agreements (PPAs) are useful as they allow new renewable installations to be built (additionality) and are a way of reducing public subsidies. Administrative and legal barriers to fulfill that objective should be removed but we do not favor support in the form of special advantages or subsidies. We also see PPAs as being for larger entities and not only private ones. This is why we have chosen “not very appropriate” in question 3.1.1 in regard to “Further support the uptake of private renewable PPAs” despite seeing the usefulness of PPAs.

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

We generally find it appropriate that minimum mandatory green public procurement (GPP) criteria and targets in relation to renewable electricity are established (per question 3.1.1 but would not go so far as to make a blanket statement that all public authorities must purchase green energy.

### 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?

## 3.2 RENEWABLES IN HEATING AND COOLING

Under REDII, Member States must endeavor 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 endeavor 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 checked="" type="radio"/>	<input 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"/>
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Other? Please explain

**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

**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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input 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

**3.2.9 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

### 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 endeavor 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

**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 checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specific target for waste heat and cold use	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify



### **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

Assessing the need for regulation of networks consists of i) examining whether a natural monopoly exists or is likely to exist on the relevant market for which the infrastructure is considered an essential facility and of ii) assessing whether under these market circumstances there is likely the risk of an abuse of dominant position by the owner of the facility. Vertically integrated entities, which own the infrastructure and use it to supply the product which they produce, could have the possibility to preclude potential competitors to access the infrastructure in order to consolidate their own market position.

All these criteria are certainly fulfilled when it comes to district heating networks.

So, generally, third party access to district heating networks should be strengthened. Nonetheless, in certain circumstances, exceptions should be possible, e.g. in case third party access could affect the business case of a vertically integrated entity. If regulation for district heating networks accounts for this risk, and therefore access for third parties is negotiated, a decision not to allow access to a third party should be well substantiated, transparent and open to appeal.

### 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen disconnection [1] rules for consumers	<input type="radio"/>	<input checked="" 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 checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Removing barriers to renewable thermal energy storage	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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

Please specify

It can be expected that the threshold is context-specific (both in relation to the country and also to the specific situation of the building); therefore, it should be provided at the national level only. However, a principle that could be provided by EU legislation is that the threshold may not be below the average share in the specific sector (hardship clauses possibly necessary).

Building regulation may be an instrument to 'control and steer' the scale-up respectively fade-out of different heating systems. However, it might be difficult to control which energy is then used for this specific heating system.

**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 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 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 checked="" type="radio"/>	<input type="radio"/>	<input 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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

renewables in buildings' heating and cooling systems, in particular in low-income or vulnerable households				
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Other? Please specify

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 type="radio"/>	<input checked="" 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
building renovation and urban renewal programmes				
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 type="radio"/>	<input checked="" 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

### 3.5 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

Please indicate which ones

First of all, the use of renewable energy is not an end in itself but a strategy to comply with climate targets (which, in turn, particularly requires a fade-out of fossil fuels). Therefore, there is no straightforward answer to renewable energy obligations; but some principles that need to be considered and guide the answer:

- If industrial companies are – through a clear and comprehensively applicable price tag on carbon – sufficiently incentivized to reduce GHGE by an amount that leads to compliance with climate targets, there appears to be a subordinate need for renewable energy obligations (companies internalise the climate targets in their economic decision making);
- If such a carbon price-based incentive is not (sufficiently/comprehensively) in place, renewable energy targets could be an important element to compensate for this lack. Given the ambitious climate targets and the fact that the industry is a major emitter, also the industry needs to contribute accordingly (like we have seen it already in the past, but efforts need to be ramped-up in general).
- As a result of EU industrial strategy on the one hand and the industry-related considerations of the EU energy system integration strategy and the EU hydrogen strategy on the other hand, we understand that there are already some sectors targeted.



### 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contracts for difference for zero-carbon products and services	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other? Please specify

### 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

The transport sector is responsible for around a quarter of all GHGE in the EU, despite all efforts, the development has rather been sideways. Accordingly, setting a higher ambition level appears both justified and required.

**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
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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

remain)				
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 checked="" type="radio"/>	<input 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

### 3.6.7 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set an additional dedicated sub-target for hydrogen and hydrogen-derived synthetic fuels	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input 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

The criteria for e-fuels should be reconsidered to give hydrogen realistic chances play out its benefits in the mobility sector. The current criteria are very restrictive and should be reconsidered. In particular, the criterion of additionality, in the current form (i.e. only applied for transport), does not take the different situations in MS sufficiently into account (e.g. does not differentiate between MS which have already a substantially above- average renewable energy mix and other that rank below average). In some cases, this hinders a more progressive development of such renewable fuels. If the concept of additionality should be maintained or even expanded in the future, these issues need to be addressed in order to drive a broad decarbonisation across the various sectors.

Note per our response above, we favor either to “[I]include hydrogen and hydrogen-derived synthetic fuels in a dedicated sub-target together with advanced biofuels.” or to “[S]et an additional dedicated sub-target for hydrogen and hydrogen-derived synthetic fuels.” although we realise that the choice will like have to be do either one or the other in the end.

**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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support the installation of electric vehicle chargers in households and enterprises	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Giving consumers information on whether they are recharging their electric vehicle with renewable energy



Other? Please specify

### 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 policymaking, 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

The criteria have just been amended and made stricter with RED II. Before reconsidering them again, it would be beneficial to see how they work.

**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 4 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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