

Renewable Energy Strategy

IDENTIFICATION

1. Please enter your **name** and, where relevant, the **name of the organisation** you represent. Please include also an **e-mail** address for contact purposes for use only if we need clarification about your responses.

-open reply-(optional)

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2. Are you responding to this questionnaire on behalf of /as:

-single choice reply-(optional)

NGO

3. Please indicate your country -single choice reply-(optional)

Denmark

4. How would you prefer your contribution to be published on the Commission website, if at all?

-single choice reply-(optional)

Under the name indicated (I consent to publication of all information in my contribution and I declare that none of it is under copyright restrictions that prevent publication)

A. GENERAL POLICY APPROACH

A.1. Is there a role for new targets for renewable energy sources post-2020 assuming that any targets must be consistent with climate mitigation and energy efficiency policies and targets as is currently the case with the 20/20/20 targets in the Europe 2020 strategy?

-multiple choices reply-(optional)

Yes, a mandatory target at EU level is appropriate

A.1.1. Please explain the reasons for your answer (such as the scope and contribution from GHG targets/ETS, the need to address other environmental, security of supply or technological development benefits) -open reply-(optional)

The experience with non-binding targets and other voluntary agreements is poor. In the light of the climate urgency we need a fast transition from fossil fuels to RES.

A.2. Are other policy elements necessary to promote renewable energy post-2020, such as:

-multiple choices reply-(optional)

Abolition of support mechanism or subsidies to other energy sources - Public procurement obligations in support of renewables - Better financing possibilities - Continue to ensure sustainability and scalability - Other (please specify)

B. FINANCIAL SUPPORT

B.1. Do you consider that financial support will continue to be necessary to support renewables post 2020 given their expected greater penetration? -single choice reply-(optional)

For selected technologies/circumstances/markets (please specify)

B.2. If renewable energy sources require support post-2020, how do you think this can best be achieved with a view to achieving a

Phase out support schemes over time (please specify for which technologies if applicable)

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| cost-effective deployment? -multiple choices reply- (optional) | |
| B.3. Do you think it would be useful to develop common approaches as regards Member States' financial support for renewables? -single choice reply-(optional) | N/A |
| B.4. Should the structure of financial support be gradually aligned EU-wide? -single choice reply-(optional) | No |
| B.5. With regard to questions B.3. and B.4. please specify if you see a difference between the different sectors (electricity, heating and cooling, transport). -open reply-(optional) | |
| | |
| B.6. How do you see the relation between support schemes for renewable energy and the requirements of the internal electricity market for the period after 2020 against the background of a rising share of renewables? -multiple choices reply-(optional) | Member States need to be able to continue to operate support schemes on a national level and retain control over who benefits from national schemes |
| B.7. Do national support schemes and differences between such schemes distort competition? -single choice reply-(optional) | Yes, some support schemes are more distorting than others (please specify which you consider most distorting) |
| C. ADMINISTRATIVE PROCEDURES | |
| C.1. Which of the following issues relating to administrative procedures, information and training do you consider acting as a serious impediment to further growth of renewables following Member States' implementation of the provisions of the Directive? -multiple choices reply-(optional) | Length and complexity of administrative procedures relating to authorisation/certification/licensing - Lack of information on support schemes or other - Lack of credible and certified training and qualification - Other (please specify) |
| C.1.1. Please provide explanations and specific examples where available -open reply-(optional) | |
| In some EU countries small renewable energy plants are faced with same procedures as large power plants, this holds back development. There is a general lack of credible, independent information for small investors (households and SMEs) that can benefit from small renewables installed locally (solar, heat pumps, small biomass) In many EU-countries the available training courses are too few to meet the raising demand. In some EU countries there is a lack of funding, not the least for public buildings and common solutions with district heating. | |
| C.2. Which policy response to the problems identified above do you consider appropriate? -single choice reply-(optional) | Other (please specify) |
| D. GRID INTEGRATION OF ELECTRICITY FROM RENEWABLE ENERGY SOURCES | |
| D.1. Do you consider that any of the following national rules and framework conditions will still create obstacles to renewable energy | |

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| production after 2020? -multiple choices reply- (optional) | |
| D.1.1. Please specify which obstacles and the nature and degree of them for each -open reply-(optional) | |
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| D.2. Which renewables-specific grid related rules do you consider necessary and proportionate in a post-2020 perspective? -multiple choices reply-(optional) | |
| D.2.1. Please explain why -open reply-(optional) | |
| | |
| D.3. With regard to system integration of wind and solar power, what measures do you consider most important to increase the flexibility reserve of the system: -multiple choices reply-(optional) | |
| E. MARKET INTEGRATION | |
| E.1. In which of the following ways could renewable energy be made responsive to market signals? -multiple choices reply-(optional) | |
| E.2. How can it be ensured that market arrangements reward flexibility? -multiple choices reply-(optional) | |
| E.3. In how far do you think today's market design needs to be adapted to provide an appropriate framework for renewables -single choice reply-(optional) | |
| F. RENEWABLES IN HEATING AND COOLING | |
| F.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in the heating and cooling market beyond 2020? -multiple choices reply-(optional) | Costs/lack of financial support - Building regulations etc. - Lack of awareness - Lack of suitable information - Lack of public support - Lack of capacity (installers, other) - Other (please specify) |
| F.2. What pathways do you consider to be the most promising for further increasing the share of renewable energy in heating and cooling beyond 2020? -multiple choices reply-(optional) | Geothermal - Solar thermal - Electrification together with higher share of renewables in electricity production - Other (please specify) |
| F.3. How do you see the interaction of promoting further use of renewable energy in heating and cooling and enhancing energy efficiency in this sector? -open reply-(optional) | |
| As always energy savings and energy efficiency must have first priority. As heat demand is diminished with heat efficiency, more care should be taken to avoid over-sizing. The overall renewable energy supply must be subject to energy efficiency requirements via building regulation, Ecodesign regulation, green public procurement etc. . Low-temperature heat supply should be supported, in particular to increase the yield of heat pump systems and the direct use of geothermal energy in district heating. | |
| G. RENEWABLES IN TRANSPORT | |
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| G.1. What do you consider to be the main barriers against a stronger uptake of renewable energy in transport? -multiple choices reply-(optional) | Costs - Pace of technology development - Lack of infrastructure - Lack of awareness - Lack of suitable information - Other (please specify) |
| G.2. What sectors of transport do you consider to be the most promising for further increasing the share of renewable energy? -multiple choices reply-(optional) | Road for passengers - Road for goods - Rail |
| G.2.1. Please explain your answer -open reply-(optional) | |
| <p>Electrification of road transport can become a main consumer of renewable energy and help the integration of the intermittent wind and solar power. The use of biofuels is in our view not environmentally defensible. The biofuel target should be removed immediately. Railways and light rail can use electricity with high efficiency without need for batteries. This is the most efficient and environmentally benign way of shifting transportation to renewable energy - apart from bicycling.</p> | |
| H. SUSTAINABILITY | |
| H.1. Do you think that additional sustainability criteria are necessary in the post 2020 period? -multiple choices reply-(optional) | Yes, sustainability criteria should apply to both all biomass and fossil fuels - Yes, additional criteria should be introduced to promote only the best performing biomass (please specify which) |
| H.1.1. Please explain -open reply-(optional) | |
| I. REGIONAL AND INTERNATIONAL DIMENSIONS | |
| I.1. Do you consider current rules for cooperation between Member States sufficient to fulfil their purpose, i.e. realisation of cost-efficient renewable potential in the EU? -single choice reply-(optional) | N/A |
| I.2. Do you think the EU should further facilitate cooperation with third countries when it comes to the development of the potential for renewable energy? -single choice reply-(optional) | Yes, cooperation with third countries should be further promoted (please specify how and with whom, i.e. only neighbouring countries or more widely) |
| I.3. Should investments in electricity networks in some Member States (i.e. Spain, Greece, Italy) be prioritized for this purpose? -single choice reply-(optional) | No (explain why) |
| I.4. Which measures do you consider appropriate and necessary in order to foster cooperation with third countries in this area? -single choice reply-(optional) | Other measures (please specify) |
| I.5. In its Communication on security of supply and energy cooperation – "The EU Energy Policy: Engaging with Partners beyond our Borders", the European Commission proposes to promote cooperation on renewable energy projects with the Southern Mediterranean countries and to gradually build a renewed EU-Mediterranean energy partnership focus on electricity and renewable energy. How do you consider this should relate with the EU internal renewables policy? What should be the priorities? -open reply-(optional) | |

EU can assist the countries in North Africa to increase generation of renewable energy - but not in order to benefit from the production through import. Focus should be on renewable energy solutions that can reduce energy poverty and poverty in general in these countries caused by the increasing fossil fuel prices

I.6. The possibility to explore regional cooperation and a coordinated, more strategic approach to grid connection for the rapidly growing volume of offshore wind generation in the North Sea is currently being explored in the framework of the North Sea Countries Offshore Grid Initiative (NSCOGI). Do you think such cooperation should be further fostered? What benefits do you think could arise from it? Do you consider that this experience could be generalised and applied elsewhere? -open reply-(optional)

For Europe as a whole it is important to recognize that the cost effective development of an electricity based renewable energy system can only happen with the instalment of a huge on shore capacity. We therefore recommend not to focus too much on offshore wind but also develop on shore capacity: it is cheaper, and if developed carefully it can become accepted and owned locally.

J. TECHNOLOGY DEVELOPMENT

J.1. For a first set of renewable technologies, namely wind, solar, bio-energy, the SET Plan aims at a cost-competitive market roll out of renewable energy by 2020. It also aims at enabling integration of renewable energy into the electricity grid and smart cities and communities. In your view, what would be the remaining key challenges of these technologies to be addressed by research and innovation in view of the 2050 objectives?

-multiple choices reply-(optional)

Other (please specify)

J.2. Which additional measures and/or instruments should be developed to address these technologies and their remaining challenges and to ensure that the EU innovation fabric is geared to supporting the significant deployment up to 2050? -open reply-(optional)

J.3. In your point of view, which technologies other than those covered by the current industrial initiatives should be given priority in the post-2020 perspective? Please justify with reference to the criteria mentioned above, i.e. large-scale availability and willingness of industry to engage in public private partnerships?

-open reply-(optional)

Geothermal energy that has an important potential in many EU countries - particularly in connection with low temperature district heating. Wave power also has an important potential in several EU countries

J.4. How successful do you consider the existing measures have been and which have been the main drawbacks? -single choice reply-

(optional)

Successful but some drawbacks (please specify which)

J.5. Do you consider that assistance in technology development should be linked to a certain result to be achieved by a certain deadline?

-open reply-(optional)