

ICLEI Europe's response to the EU Renewable Energy Rules as part of the Fit-for-55 consultation process



This position was formally submitted to the European Commission, and is accessible on the European Commission website [here](#).

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ICLEI Europe welcomes the consultation to ensure that Europe achieves at least 55% (and not 50%) reduction in greenhouse gas (GHG) emissions by 2030, compared with 1990 levels, as this is more in line with the goal outlined in the Paris Agreement.

We also welcome that the proposed amendment takes appropriate note of the need for Member States to cooperate with public and private stakeholders, as well as with renewable energy communities, to provide the necessary skills for a transition to a more inclusive and sustainable energy sector.

Unfortunately, many Member States have not yet carried out a sufficient assessment of barriers to the development of renewable energy communities as required by Article 22 of the revised Renewable Energy Directive 2018/2001/EU (RED II). Proper implementation of this assessment and of the other provisions pertaining the establishment of renewable energy communities must be monitored to ensure the creation of adequate, stable enabling frameworks at the Member State level. Only once renewable energy communities are properly enabled and scaled-up can their full potential be tapped.

ICLEI welcomes that the proposal does not suggest any changes to Article 21 on renewable self-consumers and that the rules on renewable energy communities in Article 22 remain unchanged. The role of the European Commission in monitoring proper transposition and implementation by Member States is essential in order

to accelerate a just, inclusive and citizen-centred energy transition. Progress with respect to transposition is not yet happening at the required speed – it is essential that all Member States move to swift and effective transposition based on the (already passed) deadline of the original Directive.

We also welcome and support the Commission's approach to assess the National Energy and Climate Action Plans (NECPs) and the biannual progress report against the at least 55% GHG reduction target, in correspondence with responsible effort sharing amongst EU Member States. However, NECPs and their progress reports should more explicitly outline and connect to regional and local planning of sustainable, renewable and efficient energy. This would make NECPs more effective to steer, monitor and ensure that envisioned targets are achieved. This is particularly important for those sectors in which too little progress toward decarbonisation has been reached so far (such as transport, heating and cooling in industry and buildings). ICLEI thus supports sector-specific targets and measures.



Heating and cooling (HC) accounts for half of the energy demand in Europe. About 66% is still fossil fuel based and the EU average share of renewables for HC amounts to only 22.1% (2019). Thus, ICLEI Europe calls for:

- Establishing an internal market for HC and energy storage that privileges energy efficiency and renewable energy services instead of gas or other fossil fuels;
- An annual binding (not indicative) increase of at least 1.3% renewables in HC at the national level;
- An annual binding target of 2.1% renewable energy and excess heat and cold in district heating and cooling;
- Enabling Heat Purchase Agreements to be made (e.g. by local authorities) that foster the increase of renewables and use of excess heat in the local energy system;

- Empowering and easing the possibility for community energy and collective actions to be part of the heating and cooling market;
- Making HC planning obligatory for a defined size of municipalities (as is done, for example, in Baden-Württemberg, Germany) and assigning resources for them to do so adequately.

Based on the impact assessment of the 2030 climate target plan and assessment of the final NECPs, ICLEI rejects Option 1 (no policy change) and requests the uptake of Option 5 (combination of non-regulatory measures, raising the ambition level of REDII and amending REDII to translate into binding legal measures, where needed) to achieve a comprehensive and systematic transformation towards a sustainable energy system.

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ICLEI Europe

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ICLEI Europe provides its 160+ members in Europe, North Africa, the Middle East and West Asia with a voice on the European and international stage, a platform to connect with peers and tools to drive positive environmental, economic and social change. ICLEI Europe works closely with an extended network of local and regional governments and national and international partners on a broad range of topics.

This paper reflects the position of the ICLEI Europe network of Local and Regional governments as a whole, and may not reflect the position of every Member individually.

