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Rue de la Loi 200

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Brussels, 13 May 2020

RE: Getting permitting of renewable investments right is critical to deliver the Green Deal

Dear Executive Vice-President,
Dear Commissioners,

We are writing to set out the concerns of the European renewable energy sector about the impact of slow permitting across Europe on the European Green Deal and the EU's 2050 decarbonisation targets.

To achieve the targets and as part of the upcoming post COVID-19 Recovery Plan, the European Union must focus on projects that will support the delivery of the European Green Deal and will generate economic activity as soon as possible in all sectors of our economy – power, transport, heating and cooling for industry and buildings. Renewables are the technologies of choice: they are scalable, shovel-ready, cost-competitive and labor-rich. They will be the cornerstone of a climate neutral energy system by 2050 according to your Long Term Decarbonisation Strategy.

Addressing permitting bottlenecks is critical to unlock renewables' potential and make investments happen. But as things stand, national licensing frameworks do not keep pace with the scale and volume of renewable investments needed to deliver an EU green recovery - let alone the European Green Deal.

Permitting rules and procedures for new and repowered renewable energy projects remain too complex and lengthy despite the provisions in the reviewed Renewable Energy Directive asking Member States to simplify and shorten them. Slow processes prevent the use of the most efficient technologies available which would be able to deliver the transition at the lowest cost for the society. Unclear regulatory frameworks and delays in legislation exacerbate investors' uncertainty.

The European Commission spotted this issue last year when assessing the draft 2030 National Energy and Climate Plans (NECPs). And was right to ask all the Member States to substantiate the measures for simplified permitting as part of the NECPs' country-specific recommendations.

But to this date almost all the final NECPs remain equally silent on the policies that will speed up permitting on the ground. Most Member States have not even planned for additional administrative or human resources to issue the permits needed to meet their 2030 renewable energy goals.

This is a red flag for the industry. Without an appropriate and simplified framework for permitting, the 2030 national renewable energy commitments remain purely academic.

We therefore call on the European Commission to take further action to remove existing bottlenecks for the permitting of renewable energy projects in Europe. This should be one of the key “implementation flagship initiatives” to support the transposition of the Clean Energy Package provisions and the delivery of Europe’s 2030 and 2050 climate and energy targets. The initiative should:

- Ensure Member States effectively transpose and enforce the permitting rules in the 2018 Renewable Energy Directive for new and repowered renewable energy projects i.e. single contact point, shorter process;
- Audit Member States on whether they have the human and administrative resources to process the permit applications needed for the renewable energy commitments made in the 2030 National Plans; and
- Clarify with Member States that there are no barriers in EU law that forbid changes in the technology specifications in the timeframe between permit application and construction of a renewable energy project. Member States should support renewable energy operators in deploying the most efficient technology available for a specific site.

The European renewable energy sector is entirely committed to cooperating and supporting the European Commission in how to address these points to Member States in further detail.

Kind regards,

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Secretary General
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