



## Position Paper

10 February 2016

### EUROCHAMBRES response to the public consultation on the preparation of a Renewable energy directive for the period after 2020

1. To what extent has the RED been successful in helping to achieve the EU energy and climate change objectives?

<i>Very successful</i>	<i>Successful</i>	<i>Not very successful</i>	<i>Not successful</i>	<i>No opinion</i>
	X			

In recent years, the uptake of renewable sources of energy can be regarded as quite successful. However, this success has mainly been achieved in the electricity sector. There are still high untapped potentials in the transport, as well as, in the heating and cooling sector. Due to inefficient support programmes and the lack of coordination on the European level, the uptake of RES is associated with high costs for industrial consumers that can lead to investment leakage.

To avoid interfering energy and climate targets, the expansion of renewable energy must not turn into a climate policy tool. The reduction of carbon emissions should mainly be driven by the ETS, which indirectly also provides incentives to save energy and reduce emissions through the use of renewables.

A major obstacle for a cost-effective integration of renewables remains the slow progress on electricity infrastructure development both within and across national borders. In order to accommodate the increasing share of renewables, it is crucial to synchronise the expansion of renewables with the expansion of Europe's grid infrastructures. More wind and solar electricity can only be used efficiently in integrated networks with sufficient interconnection capacity. Otherwise dispatch-costs and costs arising from the curtailment of RES-installations will inevitably increase.

2. How should stability, transparency and predictability for investors be ensured with a view to achieving the at least 27% renewable energy target at EU level? Please indicate the importance of the following elements:

	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>Forward looking strategic planning of RES development is required by EU legislation</i>	X				
<i>Best practice is derived from the implementation of the existing Renewable Energy Directive</i>		X			

<i>Regional consultations on renewable energy policy and measures are required</i>		X			
<i>Member States consult on and adopt renewable energy strategies that serve as the agreed reference for national renewable energy policies and projects</i>		X			
<i>The Commission provides guidance on national renewable energy strategies</i>					X
<p>As mentioned above, conflicting targets should be avoided. Incentives to save energy and to increase the uptake of RES should mainly derive from EU policies on reducing emissions. Moreover, the European patchwork of support mechanisms led to false incentives (such as costly support for RES deployment in regions with low potential) and should be harmonised as soon as possible.</p> <p>Due to the lack of national RES-targets, governance mechanisms must be reliable, comprehensive and transparent. This will be necessary to ensure a secure investment climate and to guarantee a fair effort sharing between Member States. With regard to the preparation and assessment of Member States' commitments, Chambers urge a systematic and compulsory consultation of the business community.</p> <p>3. Please rate the importance of the following elements being included in Member States' national energy and climate plans with respect to renewable energy in ensuring that the plans contribute to reaching the objectives of at least 27% in 2030.</p>					
	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>Long term priorities and visions for decarbonisation and renewable energy up to 2050</i>		X			
<i>In relation to national/regional natural resources, specific technology relevant trajectories for renewable energy up to 2030</i>			X		
<i>Overview of policies and measures in place and planned new ones</i>	X				
<i>Overview of renewable energy trajectories and policies to 2050 to ensure that 2030 policies lie on the path to 2050 objectives</i>			X		
<i>Qualitative analysis</i>	X				
<i>Trajectories for electricity demand including both installed capacity (GW) and produced energy (TWh)</i>					X
<i>Measures to be taken for increasing the flexibility of the energy system with regard to renewable energy production</i>	X				
<i>Plans for achieving electricity market coupling and integration, regional measures for balancing and reserves and how system adequacy is calculated in the context of renewable energy</i>	X				

Member States should assess the future development of electricity demand, production and installed capacity. However, to allow for technology-neutral approaches, specific technology relevant trajectories should be avoided.

Against the background of an increasing share of renewables, framework conditions for flexible demand and more effective use of RES will become more important than trajectories for reducing overall electricity savings.

The national energy and climate plans should emphasis providing planning certainty, lower investment risk, reduce cost of capital, and push forward technical developments and cost reductions. The focus should be on impacts and interactions of policy measures rather than on a simple description of activities. Furthermore, national plans should consider the whole picture and take into account the objectives of the 2030 Framework and the Energy Union strategy.

4. *What should be the geographical scope of support schemes, if and when needed, in order to drive the achievement of the 2030 target in a cost-effective way?*

*X Harmonised EU-wide level support schemes*

- Regional level support schemes (group of Member States with joint support scheme)*
- National support schemes fully or partially open to renewable energy producers in other Member States*
- Gradual alignment of national support schemes through common EU rules*
- National level support schemes that are only open to national renewable energy producers*

The 28 different national renewable energy support schemes have led to distortions of competition on the EU electricity market and had detrimental effects on the investment climate. Current schemes provide false incentives, as renewables are not always promoted in areas where climatic and topographic conditions are most favourable. In order to optimise cost-efficiency, national support schemes as well as the marketing of renewables have to be harmonised so that investments can be made where they have the greatest economic effects. The European Commission's Communication (2013) 7243 shows that a coordinated renewable investment scenario would lead to gains of 16 billion to 30 billion EUR in the period 2015-2030.

5. *If EU-level harmonised /regional support schemes or other types of financial support to renewable energy projects would be introduced:*

- *What hinders the introduction at the EU wide and/or regional scale?*
- *How could such mechanism be activated and implemented?*
- *What would be their scope (what type of projects/technologies/support mechanisms could be covered)?*
- *Who would finance them?*
- *How could the costs of such measures be shared in a fair and equitable way?*

Preservation of Member State competences on the national energy mix and efforts to secure energy supply on the national level can be identified as major obstacles to a "Europeanisation" of support schemes

The current RES Directive already provides for cooperation mechanisms for countries to work together in order to exploit renewable resources and meet their 2020 renewable energy targets. However, so far, only two European countries have made use of this possibility, as it has proven

difficult to equitably distribute benefits and costs among participating countries. Thus, it will be necessary to level-up this approach under the 2030 framework.

Moreover, the Commission must ensure a strict and timely implementation of the EU-wide state aid guidelines, adopted in 2014.

6. *The current Renewable Energy Directive gives Member States the possibility to enter into various cooperation mechanisms (statistical transfers, joint projects and/or joint support schemes). Please expand on the possible new legislative and non-legislative measures that could be introduced to foster the development of cooperation mechanisms in the period beyond 2020.*

Opening up national support systems to foreign installations would be a step in the right direction. Generally, tenders are a cost-efficient tool to determine the amount of support to RES-installations. However, tendering modalities need to be transparent and provide for planning certainty and equal opportunities for all actors. Besides, tenders should be technology-neutral in order to enhance competition between different renewable technologies and to make use of the best locations.

7. *The use of cooperation mechanisms has been limited to date. Which of the below factors do you consider important in explaining the limited recourse by Member States to cooperation mechanisms so far?*

	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>Unclear legal provisions</i>		X			
<i>Administrative complexities</i>	X				
<i>Lack of cost-effectiveness / uncertain benefit for individual Member States</i>		X			
<i>Government driven process, not market driven</i>		X			
<i>Member States reluctant to see their taxpayers/ consumers' money used for investments outside their country</i>	X				

8. *How could renewable electricity producers be fully or partially eligible for support in another Member State? Which elements would you include in a possible concrete framework for cross-border participation in support schemes? Any other consideration? Please explain.*

Cross-border participation schemes must guarantee a fair and non-discriminatory tender process. The main criteria should be the highest output per Euro of subsidies. Moreover, the schemes must be market-based and work with fixed market premiums rather than feed-in tariffs.

9. Please assess what kind of complementary EU measures <sup>1</sup> would be most important to ensure that the EU and its Member States collectively achieve the binding at least 27% EU renewable energy target by 2030:					
	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>EU-level incentives such as EU-level or regional auctioning of renewable energy capacities</i>	X				
<i>EU-level requirements on market players to include a certain share of renewables in production, supply or consumption</i>				X	
<i>EU-level financial support (e.g. a guarantee fund in support of renewable projects)</i>		X			
<i>EU-level support to research, innovation and industrialisation of novel renewable energy technologies</i>		X			
<i>Enhanced EU level regulatory measures</i>				X	
<p>Additional EU measures should only be discussed if national energy and climate plans turn out not to be sufficiently ambitious to achieve the 27%-target.</p> <p>However, it is imperative to apply existing EU legislation and facilitate the integration of RES into the market as stipulated in the Guidelines on State Aid for Environmental Protection and Energy 2014-2020 (EEAG) and as proposed by most stakeholders (including EUROCHAMBRES) in the context of the consultation on a new energy market design.</p>					

<sup>1</sup> Without prejudice of the actual funding mechanism, where required, of the complementary EU measures

The required feed-in premium should be defined through auctions or by applying similar market based tools to minimise costs.

10. *The Energy Union Framework Strategy sets the ambition of making the European Union the global "number one in renewables". What legislative and non-legislative measures could be introduced to make/strengthen the EU as the number one in renewables? Has the RED been effective and efficient in improving renewable energy industrial development and EU competitiveness in this sector?*

First and foremost, the EU should focus on creating the right framework conditions for a cost-effective expansion of renewable energy:

- Develop harmonised, un-bureaucratic EU-wide support schemes for renewable energy so that investments will be made where they have the greatest economic effects.
- new production capacities have to be embedded in the overall system and the necessary infrastructure must be extended accordingly.
- subsidies for renewables should be considered as temporary and degressive, rather than guaranteed over the long term. The focus should be on energy sources which have the potential to compete in the free market for the foreseeable future. Thus, disincentives have to be eliminated and support mechanisms should become technology-neutral.
- potential capacity mechanisms and subsidies for back-up systems must not fragment the internal market or further increase electricity prices.
- the new European energy market design needs to fully integrate renewable energy into the electricity market, including into balancing, intraday and future markets.

## 2. Empowering consumers

11. *How would you rate the importance of the following barriers for consumers to produce and self-consume their own renewable energy?*

	<i>Very important barrier</i>	<i>Important barrier</i>	<i>Not very important barrier</i>	<i>Not important barrier</i>	<i>No opinion</i>
<i>Self-consumption or storage of renewable electricity produced onsite is forbidden</i>	X				
<i>Surplus electricity that is not self-consumed onsite cannot be sold to the grid</i>	X				
<i>Surplus electricity that is not self-consumed onsite is not valued fairly</i>		X			
<i>Appliances or enabler for</i>	X				

<i>thermal and electrical storage onsite are too expensive</i>					
<i>Complex and/or lengthy administrative procedures, particularly penalising small self-consumption systems</i>		X			
<i>Lack of smart grids and smart metering systems at the consumer's premises</i>			X		
<i>The design of local network tariffs</i>		X			
<i>The design of electricity tariffs</i>		X			
<p>12. In general, do you think that renewable energy potential at local level is:</p> <p><input type="checkbox"/> <i>Highly under-exploited</i>  <input checked="" type="checkbox"/> <i>Under-exploited</i>  <input type="checkbox"/> <i>Efficiently / fully exploited</i>  <input type="checkbox"/> <i>Over-exploited (i.e. beyond cost-effectiveness)</i>  <input type="checkbox"/> <i>No opinion</i></p>					
<p>From a European perspective, the potential of renewable energy at local level is clearly under-exploited. However, the situation varies from country to country and region to region. Particularly, Mediterranean regions are still far from exploiting their solar energy potentials. But also hydro-, geothermal and wind power potentials are in many areas still significantly underexploited.</p>					
<p>13. How would you rate the importance of the following barriers that may be specifically hampering the further deployment of renewable energy projects at the local level (municipalities and energy cooperatives):</p>					
	<i>Very important barrier</i>	<i>Important barrier</i>	<i>Not very important barrier</i>	<i>Not important barrier</i>	<i>No opinion</i>
<i>Lack of support from Member State authorities</i>	X				
<i>Lack of administrative capacity and/or expertise/knowledge/information at the local level</i>		X			
<i>Lack of energy strategy and planning at local level</i>					X
<i>Lack of eligible land for projects and private</i>		X			

<i>property conflicts</i>					
<i>Difficulties in clustering projects to reach a critical mass at local level</i>		X			
<i>Lack of targeted financial resources (including support schemes)</i>	X				
<i>Negative public perception</i>	X				
<p>Wrong remuneration policy for certain types of RES: In some countries retail price caps (based on government interventions) led to inadequate tariffs, unable to cover renewable subsidies and the provision of adequate infrastructure.</p> <p>14. Please rate the appropriateness of stronger EU rules in the following areas to remove barriers that may be specifically hampering the further deployment of renewable energy projects at the local level :</p>					
	<i>Very appropriate</i>	<i>Appropriate</i>	<i>Not very appropriate</i>	<i>Not appropriate</i>	<i>No opinion</i>
<i>Promoting the integration of renewable energy in local infrastructure and public services</i>			X		
<i>Supporting local authorities in preparing strategies and plans for the promotion of renewable energy</i>			X		
<i>Facilitating cooperation between relevant actors at the local or municipal level</i>		X			
<i>Facilitating access to targeted financing</i>		X			
<i>EU-wide right to generate, self-consume and store renewable electricity</i>		X			
<i>Measures to ensure that surplus self-generated electricity is fairly valued</i>					X
<i>Harmonized principles for network tariffs that promote consumers'</i>	X				



<i>flexibility and minimise system costs</i>					
<p>The EU's RES policy should be based on the principle of subsidiarity and address Member States rather than regional or local authorities. The right to generate, self-consume and store renewable electricity will be of major importance in increasing energy consumers' acceptance of RES.</p> <p>15. <i>Should the current system for providing consumers with information on the sources of electricity that they consume be further developed and improved?</i></p> <p>While in some countries, it is already possible to consume 100% domestic renewable electricity, other Member States do not label green power but trade it altogether with conventionally produced electricity on the wholesale markets. In order to promote RES effectively, 100% green power consumption models should be introduced in all Member States.</p>					

### 3. Decarbonising the heating and cooling sector

16. <i>Please rate the importance of the following barriers in hampering the deployment of renewable heating and cooling in the EU:</i>					
	<i>Very important barrier</i>	<i>Important barrier</i>	<i>Not very important barrier</i>	<i>Not important barrier</i>	<i>No opinion</i>
<i>Real or perceived incoherence in existing EU policies (such as RED, EED and EPBD)</i>		X			
<i>Lack of administrative capacity and/or expertise/knowledge/information at the national and local level</i>		X			
<i>Lack of energy strategy and planning at the national and local level</i>		X			
<i>Lack of physical space to develop renewable heating and cooling solutions</i>					X
<i>Lack of requirements in building codes and other national or local legislation and regulation to increase the share of energy from renewable sources in the building sector</i>					X
<i>Heating and cooling equipment installers</i>			X		

<i>lack sufficient knowledge or information to offer renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment</i>					
<i>Lack of targeted financial resources and financing instruments</i>	X				
<i>Lack of definition and recognition of renewable cooling</i>		X			
<i>Lack of electricity market design supporting demand response, decentralised energy and self-consumption and thermal storage in buildings and district systems</i>		X			
<i>Lack of mapping tools to identify the resources potential at regional scale with local renewable energy</i>		X			
<i>Lack of tools and information to compare the lifecycle costs of the various alternative heating and cooling alternatives</i>		X			
<i>Negative public perception</i>			X		
<p>EUROCHAMBRES strongly believes that advisory services and incentive schemes are more appropriate to enhance renewable energy in heating and cooling than obligations. For this reason, Chambers call on the Commission to stick to its approach towards renewable energy, which is to propose concrete support measures without binding national targets.</p>					

<i>17. Please rate the most effective means of addressing these barriers and advancing the decarbonisation of EU heating and cooling supply:</i>					
	<i>Very effective</i>	<i>Effective</i>	<i>Not very effective</i>	<i>Not effective</i>	<i>No opinion</i>
<i>Renewable heating and cooling obligation<sup>2</sup></i>				X	
<i>Requirement for energy suppliers and/or distributors to inform consumers of the costs of heating and cooling and to offer renewable heating and cooling solutions</i>		X			
<i>Requirement that all urban and municipal infrastructure upgrades (energy infrastructures, and other relevant infrastructure, such as sewage water, water and waste chains) make it possible and promote the distribution and use of renewable energy for heating and cooling and hot water generation</i>					X
<i>Measures supporting best practices in urban planning, heat planning, energy master planning, and project development</i>		X			
<i>Criteria and benchmarks for promoting district heating and</i>					X

<sup>2</sup> 'Renewable energy obligation' means a national support scheme requiring energy producers to include a given proportion of energy from renewable sources in their production, requiring energy suppliers to include a given proportion of energy from renewable sources in their supply, or requiring energy consumers to include a given proportion of energy from renewable sources in their consumption.

<i>cooling taking into consideration the local and regional conditions</i>					
<i>Nearly zero-energy building (NZEB) standards to include a mandatory minimum use of renewable energy</i>				X	
<i>Including systematically renewable energy production in buildings' energy performance certificates</i>		X			
<i>The promotion of green public procurement requirements for renewable heating &amp; cooling in public buildings</i>			X		
<i>Heating and cooling equipment installers should present renewable energy alternatives when asked to replace fossil fuel heating and cooling equipment</i>		X			
<i>Develop best practices for enterprises, including SMEs, to integrate renewable heating and cooling into their supply chains and operations</i>	X				
<i>Requirement to consider renewable energy alternatives in subnational, national, regional or EU security of supply risk preparedness plans and emergency</i>				X	

<i>procedures</i>					
<i>Targeted financial measures</i>	X				

All strategies, rules and incentives for the heating and cooling supply must be technology-neutral and should allow for the combination of renewable energy and energy efficiency, in order to effectively decarbonise the sector.

If the public acceptance for RES is to be kept no RES obligations should be introduced. Such measures would not lead to any positive results and could even be counterproductive.

#### **4. Adapting the market design and removing barriers**

18. In your view, which specific evolutions of the market rules would facilitate the integration of renewables into the market and allow for the creation of a level playing field across generation technologies? Please indicate the importance of the following elements to facilitate renewable integration:

	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>A fully harmonised gate closure time for intraday throughout the EU</i>	X				
<i>Shorter trading intervals (e.g. 15 min)</i>		X			
<i>Lower thresholds for bid sizes</i>		X			
<i>Risk hedging products to hedge renewable energy volatility</i>	X				
<i>Cross border capacity allocation for short-term markets (i.e., some capacity being reserved for intraday and</i>	X				

<i>balancing)</i>					
<i>Introduction of longer-term transmission rights (&gt; 3 years)</i>					X
<i>Regulatory measures to enable thermal, electrical and chemical storage</i>		X			
<i>Introduction of time-of-use retail prices</i>		X			
<i>Enshrine the right of consumers to participate in the market through demand response</i>	X				

In order to attract investments in renewables, reliable framework conditions are most important. The patchwork of 28 different support schemes as well as retroactive changes to existing support schemes in some countries have led to investors' uncertainty.

In order to allow investments in renewables to be market driven, subsidies for renewables should be temporary and degressive rather than guaranteed over a long period of time. In the medium term, renewable sources of energy should be able to compete in the free market and must be provided with the opportunity to re-finance through the market rather than through public subsidies. To that end, long-term markets and balancing markets must be further opened to renewables.

A successful integration of renewables can only be achieved if green electricity is not only traded on the spot market but also marketed in the forward market and labelled as such. The marketing of green electricity on the forward market would incentivize RES producers to respond more accurately to the demand of electricity and offer forward products, e.g. by cooperating with other renewable plants, storage technologies or conventional producers. This, in turn, would lead to a positive effect on conventional producers on the spot market as the merit-order of renewables would be lowered or at least not further increased.

Against the growing share of renewable energies, intraday markets are gaining further importance. After progress has been made with respect to the coupling of the day-ahead markets, the establishment of a common European intra-day market is a logical next step towards a smoother electricity trading that makes sure that generation capacities, grids, transmission capacities and flexibility options are used more efficiently. In such a system price signals would clearly be strengthened. In order to make the cross border intraday market work effectively, scarce transmission capacities must be better reflected in intraday prices and available transmission capacities be allocated implicitly. The EU target model for cross border intraday trading and its legal transposition in form of the recently adopted network code on Capacity Allocation and Congestion Management (CACM) must be implemented by all Member States without delay.

A big obstacle for a cost-effective integration of renewables remains the slow progress on electricity infrastructure development both within and across national borders. In order to accommodate the

increasing share of renewables, it is crucial to synchronize the expansion of renewables with the expansion of Europe's grid infrastructures. More wind and solar electricity can only be used efficiently in integrated networks with sufficient interconnection capacity. Otherwise dispatch-costs and costs arising from the curtailment of RES-installations will inevitably increase.

Moreover, the market reform should also be the occasion to clarify and enhance the role of storage for electricity (under various forms).

19. *Currently, some exceptions from the standard balancing responsibilities of generators exist for energy from renewable sources. In view of increasingly mature renewable generation technologies and a growing role of short-term markets, is time ready to in principle make all generation technologies subject to full balancing responsibilities?*

*Yes, in principle everyone should have full balancing responsibilities*

*No, we still need exemptions*

Exceptions should apply to installations with very small capacities only.

20. *Please assess the importance of stronger EU rules in the following areas to remove grid regulation and infrastructure barriers for renewable electricity deployment:*

	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>Treatment of curtailment, including compensation for curtailment</i>	X				
<i>Transparent and foreseeable grid development, taking into account renewable development and integrating both TSO and DSO level and smart technologies</i>		X			
<i>Predictable transparent and non-discriminatory connection procedure</i>	X				
<i>Obligation/priority of connection for renewables</i>					X
<i>Cost of grid access, including cost structure</i>					X
<i>Legal position of renewable energy developers to challenge grid</i>					X

<i>access decisions by TSOs</i>					
<i>Transparency on local grid congestion and/or market-based incentives to invest in uncongested areas</i>		X			
<p>21. Which obstacles, if any, would you see for the dispatching of energy from all generation sources including renewables on the basis of merit order principles? Should there be any exemptions in some specific cases?</p> <p><input type="checkbox"/> Yes, exemptions are necessary  <input checked="" type="checkbox"/> No, merit order is sufficient</p>					
<p>Besides hydropower, PV and wind power are the most economic renewable energies and have little or no marginal costs. At the same time, marginal costs of fossil power plants are increasing due to climate policy measures and rising prices for emission allowances. Therefore, exceptions are not required.</p>					
<p>22. Please assess the importance of stronger EU rules in the following areas to remove administrative barriers to renewable energy deployment:</p>					
	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>Creation of a one stop shop at national level to allow for more streamlined permitting procedures</i>	X				
<i>Online application for permits</i>	X				
<i>A defined maximum time-limit for permitting procedures, and effective consequences if deadline is missed</i>		X			
<i>Harmonisation of national permitting procedures</i>		X			
<i>Special rules for facilitating</i>		X			



<i>small-scale project permitting, including simple notification</i>					
<i>Pre-identified geographical areas for renewable energy projects or other measures to integrate renewable energy in spatial and environmental planning</i>					X
<p>23. Please identify precise challenges with regard to grid regulation and infrastructure barriers in EU Member States that you are aware of.</p> <p>The implementation of key energy infrastructure projects is essential for completing the European internal energy market and to allow energy to flow freely in response to market needs and to eliminate energy islands and bottlenecks. The higher the share of RES in the market, the higher is the need for additional transition and distribution networks. The increased uptake of RES should, thus, be synchronised with the expansion of the infrastructure and the creation of energy storage facilities.</p> <p>On the cost side, administrative costs (permitting) represent a still untapped potential for reducing cost of renewables, and a low hanging fruit to be considered in the RED II.</p>					
<p>24. How would you rate the administrative burden and cost of compliance with the RED for national, regional and local authorities?</p>					
	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>Administrative burden</i>					X
<i>Cost of compliance</i>					X
<p>25. Please rate the importance of stronger EU rules in the following areas to remove barriers relating to renewable energy training and certification:</p>					
	<i>Very important</i>	<i>Important</i>	<i>Not very important</i>	<i>Not important</i>	<i>No opinion</i>
<i>Incentives for installers to participate in certification/qualification schemes</i>		X			
<i>Increased control and quality assurance from</i>			X		

<i>public authorities</i>					
<i>Understanding of the benefits and potential of renewable technologies by installers</i>		X			
<i>Mutual recognition of certificates between different Member States</i>		X			
<p>Basically, EUROCHAMBRES would welcome the mutual recognition of certificates between different Member States. However, as a precondition, it will be important to ensure that this must not lead to a general decline in qualification standards.</p> <p>26. <i>How can public acceptance towards renewable energy projects and related grid development be improved?</i></p> <p>The public acceptance towards renewable energy projects mainly depends on how they impact electricity prices, as well as, on the distribution of the costs. As mentioned above, the most appropriate way to reduce the costs of RES would be to support them more efficiently by setting up European support schemes.</p> <p>Apart from that, the acceptability could be increased through a better promotion (and labelling) of green electricity, flexibilisation of demand and better incentives for self-generation. Also, transparent and timely information must be considered a key enabler for public acceptance.</p>					

## 5. Increase the renewable energy use in the transport sector

### Questions:

28. *To what extent has the RED been successful in addressing the following EU transport policy objectives?*

	<i>Very successful</i>	<i>Successful</i>	<i>Not very successful</i>	<i>Not successful</i>	<i>No opinion</i>
<i>Contribute towards the EU's decarbonisation objectives</i>			X		
<i>Reduce dependency on oil imports</i>			X		
<i>Increase diversification of transport fuels</i>				X	
<i>Increase energy recovery from wastes</i>				X	
<i>Reduce air pollution,</i>					X

<i>particularly in urban areas</i>					
<i>Strengthen the EU industry and economy competitiveness</i>					X
<i>Stimulate development and growth of innovative technologies</i>					X
<i>Reduce production costs of renewable fuels by lowering the level of investment risk</i>		X			
<i>Facilitate fuel cost reduction by integration of the EU market for renewable fuels</i>				X	
<p>29. Please name the most important barriers hampering the development of sustainable renewable fuels and renewable electricity use in transport?  <i>[Please explain, and quantify your replies to the extent possible. Max. 500 words.]</i></p> <p>The lack of the required infrastructure (e.g. charging stations) as well as high costs and low capacities (i.e. accumulator battery) for new technologies hamper the development of sustainable renewable fuels and renewable electricity use in transport. Moreover, there are still many uncertainties about the framework conditions on tax reliefs for alternative fuels.</p> <p>30. Please rate the most effective means of promoting the consumption of sustainable renewable fuels in the EU transport sector and increasing the uptake of electric vehicles:</p>					

	<i>Very effective</i>	<i>Effective</i>	<i>Not very effective</i>	<i>Not effective</i>	<i>No opinion</i>
<i>Increased use of certain market players' obligations at Member State level</i>				X	
<i>More harmonised promotion measures at Member States level</i>		X			
<i>The introduction of certain market players'</i>				X	

<i>obligations at the EU level</i>					
<i>Targeted financial support for deployment of innovative low-carbon technologies (in particular to the heavy duty transport and aviation industry)</i>	X				
<i>Increased access to energy system services (such as balancing and voltage and frequency support when using electric vehicles)</i>		X			
<i>Increased access to alternative fuel infrastructure (such as electric vehicle charging points)</i>		X			

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