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'I/A' ITEM NOTE

From:	General Secretariat of the Council
To:	Permanent Representatives Committee/Council
Subject:	Draft DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652 (first reading) - Adoption of the legislative act = Statements

Statement by Belgium

Belgium recognizes the need to accelerate the energy transition and phase out fossil fuels in our efforts to achieve the objectives of the Paris Agreement. Belgium will support the adoption but would like to express its concerns regarding the challenges that come with the increased renewable energy targets contained in this 3rd Renewable Energy Directive. Serious demographical and geographical limitations, combined with the presence of large clusters of energy intensive industries, imply that the expected national contributions according to the formula referred to in Annex II to Regulation (EU) 2018/1999 are extremely difficult to achieve and seem unachievable, in particular in a time frame of just 7 years. The same goes for the binding sectoral subtargets (regarding RFNBO's in industry, transport and heating and cooling), which do not seem to be

coherent with a cost-effective achievement of our climate targets. Notwithstanding these challenges, Belgium will continue to deliver constructive contributions to the European goal.

Statement by Ireland

Ireland welcomes agreement on the update to the text of the Renewable Energy Directive and acknowledges the need to be ambitious in the renewable energy targets for 2030. The achievement of ambitious targets in a relatively short time frame will require an unprecedented effort from all in society, and it is crucial that we bring everyone with us on that journey.

It is Ireland's view that failure to consider all the implications of the significant increases to the renewable energy targets – such as the current operation of the interim targets under Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action - will be counterproductive.

The failure to consider the implications carries with it the risk of undermining the support required to promote renewable energy, when public funds are diverted away from the necessary investment in the energy systems of Member States, despite significant progress and investment having already been made and with much more committed.

The 2030 renewable energy target in the final text goes beyond what was originally proposed as part of the Fit for 55 Package. The impact of the increased renewable energy target, and any unintended consequences, may not become fully apparent until Member States have completed updates to their draft National Energy and Climate Plans.

The Governance Regulation provides for a review in response to a global stocktake of the 2015 Paris Agreement. Ireland believes that such a review of the Governance Regulation would be an opportune time to also review the operation of the interim targets and the compliance mechanisms available to Member States. Such a review may be informed by the analysis' contained in the updated draft National Energy and Climate Plans submitted by Member States.

Statement by Latvia

The Republic of Latvia emphasises the importance of developing renewable energy sources in order to strengthen energy security and independence, ensure price stability, reduce greenhouse gas emissions and achieve the European Union's climate objectives.

Latvia supports the proposal for a Directive as regards the promotion of energy from renewable sources and in particular the agreement reached on key elements of the proposal, such as sectoral targets, the heating sector and bioenergy.

Latvia will do its utmost to implement all necessary measures to increase the use of renewable energy in the transport sector, and it will work to increase the production of renewable electricity, in order to create the capacities required to produce renewable hydrogen in Latvia. However, Latvia considers that the agreement on the objectives and obligations set out in Article 25 regarding renewable energy, and in particular the use of hydrogen in transport, is beyond Latvia's capacity to implement and achieve, taking into account Latvia's national situation.

Latvia considers it important to take into account a country's economic and social conditions, national energy balances and starting points when setting requirements for renewable energy promotion measures.

Statement by Poland

Poland is one of the fastest-growing renewable energy markets in Europe.

In recent years, our renewable energy capacity has grown exponentially, especially in the solar sector, thanks to government support and public involvement. In order to scale up the development of clean energy, we have created a stable legal framework and set up appropriate support schemes. Simplifying and speeding up permitting procedures are elements of the proposal which are to be welcomed, but they are not enough to ensure that its objectives are met. The rapid introduction of renewable energy sources on the scale proposed in the amended Renewable Energy Directive (RED), and the growth in the share of weather-dependent energy sources in energy production jeopardise both the stability of the grid and overall energy security. Poland has constantly stressed the need to carry out the energy transition at a pace that is achievable for the energy system, accessible to society and favourable to European industry. The targets must be realistic and allow Member States flexibility in choosing the appropriate tools for implementing them.

Furthermore, given the impact of the draft Regulation on the energy mix of the Member States and the resulting negative social consequences, in Poland's view, the legal basis for the proposed act should be Article 192(2), point (c) TFEU.

Poland cannot, therefore, support the proposed revised Directive on energy from renewable sources.

Poland also maintains its negative position on the entire Fit for 55 package, which sets unrealistic targets and ambitions and significantly impacts Member States' energy mixes. Poland is of the opinion that most of the package is being realised on an incorrect legal basis, creating a dangerous precedent.

Statement by Slovak Republic

Slovakia considers the overall EU RES target for 2030 to be very ambitious and very difficult to achieve. With regard to the national energy mix and its development, the Slovak Republic does not see a real possibility for any significant increase in its ambition in this area and stresses that any additional contribution to the RES targets calculated on the basis of the non-binding formula set out in Annex II to Regulation (EU) 2018/1999 may not take into consideration all the relevant factors at national level and may therefore not reflect the real potential for the development of renewables in the country.

Although we consider the ambitious transport and heating targets to be difficult to achieve and there is a risk that they will not be met, the Slovak Republic will strive to achieve them by setting targets and measures in its NECP.

We also have a reservation with regard to support for the production of hydrogen from low-carbon sources, which is a key issue for Slovakia and which has not been satisfactorily addressed in the Directive.
