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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on Energy
Subject:	SK comments on the revision of the Renewable Energy Directive (ST 8705/22)

Delegations will find in the annex the SK comments on the revision of the Renewable Energy Directive (ST 8705/22).

SK comments on the revision of the Renewable Energy Directive (ST 8705/22)

Achieving carbon neutrality by 2050 should be the overarching goal. The use of all decarbonisation options, a thorough objective assessment of the economic and social impacts of the proposed solutions based on the principle of technological neutrality and taking into account the national specifics of individual MS is a prerequisite for success.

SK in general prefers indicative targets over binding ones, which will enable the flexible use of the most economically and technology-neutral ways of increasing the share of RES.

Recital 35

Recital 35 lists installations with a capacity of 5 MW or more, which is not in line with a capacity of 10 MW or more, as set out in Article 29. Recital 35 needs to be aligned with Article 29.

Article 3

SK welcomes the deletion of the text for the DA for the cascade principle. We welcome further administrative simplification in order to reduce the monitoring of use of forest biomass. The introduction of the cascade principle for biomass could be a potential obstacle to the energy use of biomass.

The security of supply situation has worsened as a result of RU aggression towards UA and the need to minimize the use of RU gas. Biomass is a key domestic energy source and additional restrictions could jeopardize meeting the RES target. We agree with SE's comments and the need to simplify administrative procedures, without the need for EC reporting.

Article 15a

The target in Article 15 (1) should remain indicative. The target value must be in line with the revision of the Energy Performance of Buildings Directive.

SK prefers to include waste heat without additional restrictions and increasing the overall target of 49% when using waste heat.

Article 22a

SK considers the setting of sub-targets in Article 22a to be counterproductive, as they reduce MS's flexibility to choose the most economically efficient decarbonisation measures according to the specific realities of the MS in accordance with the principle of technology neutrality.

In Article 22a, we propose to delete the period 2021-2025 in paragraph 1, as there will be no time for implementation.

Article 23

SK prefers a non-binding target for heating and cooling (H&C), which will allow the inclusion of waste heat in the target without additional restrictions and increasing the overall target.

This sector is one of the most difficult in terms of decarbonisation. SK has made great progress in this direction and has switched from solid fossil fuels to gas and biomass as renewable source. It continues with further decarbonisation, but due to the high share of district heating and the limited amount of biomass and biomethane, it cannot agree with a binding target in this sector. The use of waste heat in the H&C sector and in industry should not be further limited and linked to raising the target.

Article 25

The mere change of the target in transport sector from the share of renewables to the goal of emission savings is a logical step in achieving carbon neutrality, but its level of 13% is too high. It also contains limits for conventional biofuels of 7%, which are the most cost-effective way to increase RES in transport, and a disproportionately high target for RFNBOs of 2.2%.

SK cannot accept overly ambitious targets for this type of fuel due to its unavailability on the market and high production costs. If we plan to use RFNBO as quickly and widely as possible, it is not appropriate to restrict its origin. The only relevant criterion should be greenhouse gas savings. We therefore propose that all types of hydrogen that meet strict emission limits can be included in the industrial and transport target.

We also recommend adding multipliers for advanced biofuels. As this is still a new and costly technology with a shortage of usable residues for their production, an incentive will be needed in the form of multiple counting of this type of biofuels. Despite the changed architecture of the GHG savings target in the transport sector, it is necessary to find a way to make them more lucrative. We also support increases in the limit for biofuels produced from raw materials of Annex IX B under strict control so that counterfeiting and deliberate pollution of oils (UCOs) do not occur.

Article 28 and Article 31a

SK submits a comment on the databases. MS are not required to submit their national systems for EC approval / recognition. The EC has already confirmed that consignments verified by national systems, which are not officially recognized by the EC, may also be part of the EU databases. Therefore, we would like to reiterate our remark and ask the wording "voluntary or national schemes recognized by the Commission" to be reworded in all cases in order to avoid misunderstandings. We propose the following wording: "national schemes or voluntary schemes recognized by the Commission".