



Law

Feedback from: The Bioenergy Association of Finland

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Organisation

The Bioenergy Association of Finland

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Country of origin

Finland

Initiative

Renewable energy projects – permit-granting processes & power-purchase agreements (/info/law/better-regulation/have-your-say/initiatives/13334-Renewable-energy-projects-permit-granting-processes-&-power-purchase-agreements_en).

The Bioenergy Association of Finland is welcoming this initiative.

There is a need to focus on the permit-related and administrative barriers to the implementation of renewable energy projects and corresponding good practice solutions to tackle them. We would, however, note that deployment of renewable energy in Europe is also slowed down by the unnecessary regulatory uncertainty, micromanagement and increase in administrative costs proposed in the Fit-for-55 legislative package that is currently negotiated in EU institutions. We refer here in particular to the proposed revisions of implementation rules (note: not enhanced targets) of the Renewable Energy Directive, the Energy Efficiency Directive and the Energy Taxation Directive. In the current context of endangered European security and energy supply, EU legislation should consistently promote the use of sustainable renewable energy.

All the aspects of guidance to permit-granting processes should be considered as listed:

- Length of permit application and granting procedures
- Complexity of administrative authorisations
- Complexity of the processes and rules for site selection and planning of land/sea space use
- Constraints and good practice examples related to grid connection and repowering
- Staffing and skilling of permitting authorities

The main areas where permit-granting processes should be further developed

- 1) Sufficient staffing and skilling of permitting authorities and also administrative courts dealing with appeals to speed up decisions significantly
- 2) Closer cooperation and more concrete linkages between the regional land use planning, environmental impact assessment and permitting processes to avoid unnecessary delays and overlapping double work
- 3) The role and relevance of different interests and various stakeholders in permitting process should be continuously discussed, evaluated and clarified. There should be integral and transparent compensation models based on actual, measurable impacts and ways to compare and prioritise interests.

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