

Renewable energy projects – permit-granting processes & power-purchase agreements

The Bioenergy Association of Finland welcomes all initiatives to reduce the dependency on Russian fossil fuels and to boost development of self-reliance, resilience and renewable energy in the European Union. We work for these aims, but at the same time call for balance in the development with many other targets and ambitions of sustainability approved and agreed in the EU such as biodiversity and UN SDGs in general.

There is an obvious need to speed up permit-granting processes and to streamline power-purchase agreements connected to renewable energy projects. The recent energy crisis and the Russian invasion in Ukraine have put a new momentum on these efforts. We agree with the Commission proposal that lengthy and complex administrative procedures may pose one of the key obstacles for investments in renewables and related infrastructure. It is also apparent that as renewable technologies mature and the projects become less dependent on support schemes, administrative barriers become more prominent and may 'lead to different interpretations of existing legislation by the competent authorities' in some countries.

The proposal points out a very general and broad concept of 'conflicting public goods' as an inevitable obstacle. It is, however, very challenging to define from 'top down' what is regarded as a 'public good' regionally or locally, i.e. in the project-affected area. One should be very careful in overruling public and democratic processes that are initiated from 'bottom up' and considering multiple aspects and goals at the same time and securing acceptance and commitment to the projects. For the moment it is also unclear what will eventually be considered as 'not having significant effects on the environment' (application of the DNSH principles).

Even in the current situation in Europe, the proposal neglects to a great extent the fundamental and fast deployable role of bioenergy by concentrating on wind and solar energy as if they were the sole forms of renewable energy. This is particularly obvious when the proposal refers to buildings and heating (...buildings account for 40% of energy

consumed and 36% of energy-related direct and indirect greenhouse gas emissions ...). Solar installations, as proposed in the initiative provide a solution, but not the only one nor the fastest or most achievable way to deploy renewable energy at a larger scale in many Member States. The focus of the higher ambition at the EU level should not be limited to electricity only but to keep a comprehensive approach and to look at energy overall, addressing also transport and heating with dedicated support policies. Heat represents almost half of Europe's energy consumption and is a major sector in the energy transition.

In order to achieve the renewables and emission targets in the EU, an acceleration of the roll-out of renewable energy to complete the energy transition and to replace the use of fossil fuels in final uses is needed. This means building more renewable energy generation capacity, doing it quicker and ensuring wider integration of renewable sources into final energy uses. In this context, we find it discriminatory and unacceptable that the new concept "renewable go-to-areas" excludes plants using sustainable biomass for energy without further justifications. All the RES should be equally considered, and discrimination among sustainable renewable technologies is counterproductive for the EU energy ambitions. It is also important to remember that bioenergy technologies are to a high degree European, manufactured and developed in Europe, and utilization of bioenergy solutions will contribute to EU technological strategic autonomy and industrial competitiveness.

Accordingly, "renewable go-to-areas" should identify the potential and availability of sustainable biomass with a dedicated provision. This can be included as a new point B in article 15b (new) and be aligned with Art. 20 (b)(8) of directive (EU) 2018/1999 according to which Members States shall include in the NECPs information on measures promoting the use of energy from biomass, especially for new biomass mobilisation considering availability as well as measures for the sustainability of biomass produced and used. The same approach should also be extended to the evaluation of district heating networks as their potential expansions would be beneficial for a more integrated energy system.

In addition to focusing on industrial areas and urban waste-water plants the EC proposal should consider also rural areas, where the potential to mobilize residual biomass can be further addressed. Go-to-areas in rural context, where the potential of agricultural and forestry biomass side streams is still untapped, will require closer cooperation with local communities to ensure the mobilisation of solid biomass. This would benefit acceptance and commitment and avoid putting extra administrative burden on small farmers, forest owners and SMEs contributing eventually also to many other ambitions like biodiversity, food security, fair transition and overall stability, resilience, and equal human rights of the European societies.