

Dear Ebba Busch, Deputy Prime Minister and Energy Minister of Sweden
Dear Deputy Permanent Representatives

Dear Executive Vice-President Frans Timmermans
Dear Commissioner Kadri Simson

Dear Mr Markus Pieper MEP
Dear Mr Casares Gonzalez MEP
Dear Mr Christophe Grudler MEP
Dear Mr Ville Niinistö MEP
Dear Ms Sira Rego MEP

Brussels, 23 March 2023

Keep the Renewable Energy Directive for renewables – “low-carbon” energy is not the answer

The fight against climate change is a race against the clock. We must pave the way for Europe to scale up renewables at unprecedented speed. A rapid transition to a 100% renewables-based energy system will make it possible to achieve our targets under the Paris Agreement and enable the whole EU to reap the benefits of its own energy transition: local job creation in the renewable energy value chain, lowering energy bills, reducing dependence on expensive and insecure fossil fuel imports, and enabling citizens to actively participate in and directly benefit from the energy transition.

We are writing to express our serious concerns regarding ongoing efforts¹ to include so-called ‘low-carbon’ technologies into the centrepiece of the EU’s legal instruments to advance renewables. ‘Low-carbon’ energy sources are framed as a solution but in fact, they are part of the problem. They are expensive, rely on imports and infrastructure that is slow to build. As non-renewable energy sources, they should not be included in any provision under the Renewable Energy Directive (RED) nor should they count towards the EU’s binding 2030 renewable energy target.

Renewable energy and reduction of energy consumption are at the core of delivering the EU’s ambition from the Green Deal, Fit-for-55, and REPowerEU initiatives. The EU’s RED has proven effective in driving down the costs of renewable energy technologies and fostering investments in

¹ Proposals to allow Member States to take so-called ‘low-carbon’ energy sources to account towards the overall EU renewable energy target (article 3 of the RED) or to be part of measures contributing to national renewable energy contributions, proposals to allow so-called ‘low-carbon’ energy sources to account towards the EU’s sub-targets on Renewable Fuels of Non-Biological Origin (RFNBOs) (article 22a and 25 of the RED and under Article 8a of the Gas markets and hydrogen directive)

renewables assets across Europe. While a target of at least 45% renewables in the EU's final energy demand by 2030 must be defended at all costs in the current trilogue negotiations, the focus of the RED must also remain entirely on the transition towards renewable, cost-competitive, and domestic sources of energy that can be rapidly built.

Nuclear energy is expensive, unreliable and takes a very long time to build². Due to its centralised structure, it risks delaying the development of decentralised renewable energy systems, including by diverting subsidies meant to support renewables, hence distorting both competition and the power market(s).

Broadening the scope of the RED beyond renewables is counter-productive and risks promoting the very fossil fuels that renewables should be displacing in Europe's energy mix. Including 'low-carbon', non-renewable energy forms into the RED would not only undermine public trust in the EU's climate policies. It would also add uncertainty and delay much-needed investments in the manufacture, deployment, operation, maintenance, and recycling of renewable energy technologies in Europe. This would further damage European competitiveness in the crucial renewable energy sector vis-à-vis the US and China who are already stepping up their regulatory support of renewables, including for technology export purposes.

We are calling on you to seize the opportunity to adopt a clear policy framework in the RED by resisting the pressure to incorporate, either directly or indirectly, any reference to non-renewable, 'low-carbon' technologies in ongoing legislative revision. Keeping the RED focused on renewables only will give Europe a better chance of achieving cost-efficient and rapid decarbonisation, energy sovereignty, and economic regeneration.

We hope that you will be able to give due consideration to the concerns we have expressed and are available for discussion on the issues raised here.

² Nuclear energy (i) implies high costs in both construction, waste storage, and management (ii) has important proven risks and potential major health impacts (iii) has been an unreliable power source in times of drought in some countries and (iv) often takes many years longer than planned to be realised, hence delaying potential GHG emission reductions far into the future.

Signatories (alphabetical order)

Air Pollution & Climate Secretariat (AirClim) - Emilia Samuelsson, Energy Expert

Association négaWatt - Hélène Gassin, President

Climate Action Network (CAN) Europe - Chiara Martinelli, Director

CEE Bankwatch Network - Anelia Stefanova, Strategic Area Leader for Energy Transformation

Centre for Transport and Energy - Veronika Murzynová, Energy Transition Expert

E3G - Nick Maybe, CEO

EKOenergy ecolabel - Steven Vanholme, Programme Manager

Electra Energy Cooperative - Chris Vrettos, Communications Manager

Ember - Sarah Brown, Europe Programme Lead

EuroNatur - Gabriel Schwaderer, Executive Director

Europe Beyond Coal - Mahi Sideridou, Managing Director

European Environmental Bureau - Patrick ten Brink, Secretary General

European Renewable Energies Federation (EREF) - Dörte Fouquet, Director

Focus Association for Sustainable Development - Živa Kavka Gobbo, Chair

Food & Water Action Europe - Frida Kieninger, Director of EU Affairs

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Partnership for Policy Integrity - Mary S. Booth, Director

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Solar Heat Europe - Pedro Dias, Secretary General

Transport & Environment - William Todts, Executive Director

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