



EEB's response to the European Commission's call for evidence: Renewable energy – guidance on designating renewables acceleration areas

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The European Environmental Bureau (EEB) welcomes the opportunity to provide feedback to the European Commission on its forthcoming guidance to Member States on the designation of Renewables Acceleration Areas (RAAs) under the revised EU Renewable Energy Directive (RED). Our proposals are based on the principles of sustainability, environmental protection and social equity, and aim to promote [the accelerated deployment of renewable energy while safeguarding the integrity of ecosystems and benefiting local communities](#).

Targets and technologies

To meet the EU's 2030 renewable energy target of at least 42.5%, with a trajectory towards 45% by 2030, Member States must strategically map RAAs. These plans must also align with the broader goal of achieving climate neutrality by 2050 at the latest. To prioritize sustainability and scalability, **wind and solar technologies must be given priority** within RAAs. Wind energy, both onshore and offshore, offers significant potential for carbon-free electricity generation. Advancements in technology have enhanced efficiency and reduced costs. Solar energy, especially photovoltaic (PV) systems, offer valuable opportunities for decentralized energy production, contributing to energy security and resilience. Member States can accelerate progress towards meeting renewable energy targets while minimizing environmental impacts by prioritising these technologies.

The exclusion of technologies from RAAs eligible for fast permitting should be guided by the Polluter Pays, Precautionary, and 'Do No Significant Harm' Principles. **Hydropower and biomass technologies should be excluded** from those eligible for fast permitting within RAAs. The current sustainability criteria are insufficient because they do not restrict the amount of primary woody biomass and dedicated crops that can be considered renewable energy sources. Additionally, hydropower can harm freshwater ecosystems by disrupting natural river flows, impeding fish migration, and increasing flood risks.

Holistic approach to renewable energy expansion

We must approach the expansion of renewable energy with careful consideration of its environmental impact and societal implications. This involves integrating various elements such as energy modelling, environmental sensitivity assessments, socio-economic impact evaluations, and leveraging multi-use spaces to maximize benefits while minimizing harm.

Energy modelling is a critical tool for making strategic decisions. By assessing the availability of energy from renewable sources and evaluating the potential for generation, we can make informed decisions about suitable areas for deployment. Energy modelling must analyse projected energy demand, taking into account system efficiency, sufficiency, and the electrification of various end uses in buildings and



transportation. This will guarantee that the expansion of renewable energy is not only environmentally sustainable but also meets the evolving energy needs of society.

The availability and modernisation of **electricity infrastructure** are crucial to support the integration of renewable energy into the grid. Collaboration with distribution and transmission system operators (DSOs and TSOs) is crucial to ensure that current grids can handle the increasing solar and wind energy while identifying the need for infrastructure expansion or modernization. Forward-looking planning that considers areas with low environmental impact and resource availability is essential to optimize infrastructure development while minimizing environmental disruption.

Environmental sensitivity mapping is crucial in identifying suitable areas for renewable energy deployment while minimizing harm to biodiversity and ecosystems. By integrating biodiversity data, Geographic Information Systems (GIS), and advanced wildlife sensitivity assessment methods, it will be possible to confidently identify sensitive habitats and effectively mitigate potential environmental impacts. Collaborating with nature conservation NGOs and the scientific community will ensure compliance with environmental standards and regulations, making it easier for project developers to roll-out renewable energy assets in a nature-friendly and predictable way.

Understanding the **socio-economic impacts** of renewable energy projects is essential to ensure fair development and community engagement. Evaluating these impact helps identify areas of lower social impact and assess the potential benefits of renewable energy deployment for local communities. Adequate public consultation is crucial for involving local communities in decision-making processes, preventing delays and legal uncertainty, and ensuring that renewable energy projects provide social benefits to the populations they serve.

Multi-use spaces, such as agrivoltaics, offer opportunities to optimize land (and sea) use, maximizing environmental benefits while supporting renewable energy production. Integrating solar energy generation with agriculture or conservation improves biodiversity, soil health, and degraded land. Creating solar pollinator habitats on solar sites benefits local biodiversity and ecosystem services, such as crop pollination and pest control, ultimately enhancing agricultural productivity and ecological resilience.

Strategic spatial planning for both renewables and nature restoration targets:

The EU's Nature Restoration Law (NRL) introduces new restoration targets for our ecosystems: covering a minimum of 20% of EU land and sea areas by 2030 and achieving full restoration by 2050. Member States are required to submit National Restoration Plans outlining strategies to meet these targets.

Coordination of planning exercises under both the NRL and RED is necessary for maximum efficiency. To ensure that RAAs complement restoration efforts and minimize conflicts with protected areas, Member States must align the outcomes of restoration mapping with renewable energy planning. To prevent conflicts with nature, it is also crucial to identify sensitive areas outside of protected zones where endangered species reside. Careful mapping of these 'buffer zones' will positively inform decision-making and conservation strategies. Moreover, it is imperative to consider temporal sensitivity, such as seasonal habitat use, when conducting species sensitivity mapping.



RAAs must exclude environmentally sensitive areas, such as Natura 2000 sites, nature reserves, migratory corridors, areas designated for restoration under the NRL, agricultural areas of High Natural Value, wetland restoration sites, and potential ecological corridors. Marine protected areas should also be excluded from offshore wind RAAs to safeguard marine biodiversity.

Compliance with environmental standards

Defining clear thresholds for acceptable environmental impacts is a challenge. To tackle this issue, the Commission must establish precise **criteria for evaluating significant environmental impacts**. In addition, to avoid or mitigate any environmental impacts, mitigation measures must align with the strict protection standards mandated by the EU Nature Directives¹.

Both EU and national environmental standards and regulations must be adhered to by Member States to promote a nature-inclusive expansion of renewable energy. This is mandated by Article 6(3) of the Habitats Directive, which requires an evaluation of the likely significant effects on protected sites, including transboundary impacts. Member States must implement measures for developments both inside and outside protected areas, addressing **potential cumulative impacts** through comprehensive assessments.

Thorough screenings for individual projects must be conducted within RAAs to identify and mitigate unforeseen adverse effects. These screenings should assess potential impacts that were not recognized during spatial planning and cannot be adequately addressed by existing mitigation measures. Systematic assessments should be employed, particularly when data availability is limited. To proactively safeguard environmentally sensitive areas such as Natura 2000 sites and ecological corridors from the adverse effects of renewable energy development, it is essential to have clear guidelines for conducting screenings.

Effective mitigation measures are crucial to minimize the environmental impact of renewable energy projects within RAAs. The Commission's guidance should prioritize scientifically proven methods that can mitigate adverse impacts and provide clear definitions of what constitutes 'effective mitigation measures'. To comply with the directive's mandate of designating areas with no significant environmental impact, it is crucial to avoid designating RAAs without providing complementary indications regarding appropriate mitigation measures.

Coordination and stakeholder engagement

The length and non-uniform application of administrative procedures across Member States present significant barriers to the efficient deployment of renewable energy projects. To efficiently accelerate planning and permitting of renewables, it is crucial to promote the digitalisation of permitting procedures.

¹ Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora ([Habitats Directive](#)); Directive 2009/147/EC on the conservation of wild birds ([Birds Directive](#)); Directive 2000/60/EC establishing a framework for Community action in the field of water policy ([Water Framework Directive](#))



The introduction of **digital platforms and tools** can streamline both planning and permitting process, reduce bureaucratic delays, and increase transparency.

Collaborating and engaging with stakeholders is crucial for effective planning and decision-making. To ensure diverse perspectives are considered, structured mechanisms like dedicated task forces or roundtable discussions should be established. This is particularly important when identifying criteria and variables for site selection, such as renewable energy potential, biodiversity sensitivity, and social impacts. Involving NGOs, renewable energy developers, network operators, and other relevant stakeholders will undoubtedly help authorities foster transparency and build consensus around renewable energy initiatives.

Inclusive and transparent public participation

Public participation is essential to foster widespread support for the transition to renewable energy and to reduce the risk of mistakes, **malpractice**, and delays due to legal challenges. Meaningful engagement must go beyond mere formality and include early and comprehensive public consultations and real opportunities for input, in line with the requirements of the **EU Strategic Environmental Assessment (SEA) Directive²** and the Aarhus Convention³.

In addition, Member States should integrate community ownership considerations and work with local actors such as **municipal governments to foster the uptake of** renewable energy communities. Furthermore, public engagement in siting and project design is essential to build broad stakeholder support, identify conflicts, optimise designs and formulate nature-inclusive, circular and future-proof projects. Importantly, mechanisms for challenging RAA designations in national courts must be maintained to ensure access to justice, as emphasised by the Aarhus Convention. **This will ensure that potential implementation** flaws are addressed at the planning stage and do not result in lengthy project level litigation.

Transparency and accessibility of data are of paramount importance, requiring the public availability of information on renewable energy potential, land use, energy demand, environmental sensitivities and grid infrastructure in user-friendly, digitised formats. This data should be presented in interactive, **accessible** platforms that provide **all relevant information** on potential sites and project **design options** to facilitate informed decision-making and public scrutiny. By adhering to these principles, policymakers can cultivate robust support for renewable energy initiatives while promoting accountability and inclusiveness.

Harmonized legal frameworks for strategic spatial planning

One of the main focuses should be the **removal of unreasonable regulations** that hamper the progress of renewable energy deployment. In particular, the removal of restrictive setback rules is crucial. These rules often exacerbate rather than mitigate conflicts and create unnecessary barriers to project implementation.

² Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment ([SEA Directive](#)).

³ UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters ([Aarhus Convention](#)).



For example, in regions such as Hungary and Poland, strict minimum distance requirements have been identified as an obstacle to the widespread deployment of wind power. In addition, such rules can inadvertently exacerbate environmental impacts by forcing projects into more rural and natural landscapes.

There is also an urgent need to explore all opportunities to reuse **abandoned or degraded land**. The reuse of such land can not only facilitate renewable energy projects, but also provide environmental benefits through land restoration and revitalisation.

It is also essential to promote **cooperation and knowledge sharing between and within Member States**. By sharing best practices and lessons learned, countries can accelerate the transition to renewable energy while avoiding common pitfalls. This collaborative approach can also foster innovation and drive continuous improvement in renewable energy policies and practices.

Capacity building and resource allocation

To speed up the planning process and manage RAAs effectively, Member States need to prioritise investment in **staff training and administrative capacity**. This includes increasing the number of qualified personnel (in GIS, environmental law, conflict resolution, etc.). This will improve the smooth planning and permitting of renewable energy projects. Strengthening the human and administrative capacity of the relevant authorities and agencies is essential to meet the growing demand for planning and project applications. By investing in staff training, Member States can equip planning and permitting authorities with the necessary resources to engage stakeholders effectively and carry out thorough assessments.

Member States need to set up solid stakeholder consultations, carry out thorough assessments and monitor the development of renewable energy projects. Relevant authorities should be equipped the necessary expertise to navigate complex regulatory frameworks and facilitate streamlined decision-making processes. Adequate resources must also be allocated to enable competent authorities to undertake comprehensive data processing, facilitate conflict resolution and establish robust mechanisms for long-term monitoring of renewable energy projects.

Monitoring and update of plans:

Member States must prioritize the establishment of robust mechanisms for the **periodic review and update of spatial planning and mapping exercises**, incorporating the latest scientific knowledge and stakeholder feedback. This process should be dynamic, progressive, and forward-looking, ensuring the effective identification and implementation of areas suitable for renewable energy development. It is imperative that Member States utilize the most current available data and align their planning efforts with evolving scientific knowledge, technological advancements, environmental considerations, and local community needs.

The European Commission must closely monitor these developments to minimize adverse impacts on nature and ensure effective public participation. Member States must adhere to the requirements of the Strategic Environmental Assessment (SEA) Directive and the Nature Directives to mitigate the risk of inappropriate RAA designations and significant environmental impacts.



To ensure effective **monitoring and review of RAAs plans**, Member States should designate one national agency with a high-level mandate and clearly defined responsibilities. This agency should have full access to data and expertise in environmental science, administrative law, energy system planning, and conflict-resolution skills. Continuous monitoring of RAAs after their designation is essential. If harm to wildlife is detected, corrective measures must be promptly implemented.

Conclusion

The EEB urges the European Commission to adopt a proactive, nature-inclusive, and people-centred approach to the designation of Renewables Acceleration Areas under the revised RED. By implementing the recommendations outlined above, EU countries can effectively harness the potential of renewable energy while safeguarding biodiversity, promoting social justice, and achieving their climate and energy targets. The EEB stands ready to support the Commission in this endeavour and looks forward to seeing these principles reflected in the guidance document.