



**EEB**

European  
Environmental  
Bureau

# **CSOs political culture and democratic participation: the case for environmental sustainability**

12 July 2023

Cosimo Tansini  
Margherita Tolotto

Policy Officer for Renewable Energy  
Senior Policy Officer for Air Quality and Noise



# The EEB: A unifying actor



The EEB is **Europe's largest network of environmental citizens' organisations** – and the only one to work on such a broad range of issues.

Our **180 members from 38 countries** have more than 30 million individual supporters.

## **Our mission**

We advocate for progressive policies to create a better environment in the European Union and beyond.



# Our work areas



Climate



Circular  
Economy



Economic  
Transition



European  
Institutions and  
Governance



Global and  
Regional  
Policies



Health  
and  
Environment



Environmental  
Law and  
Justice



Nature



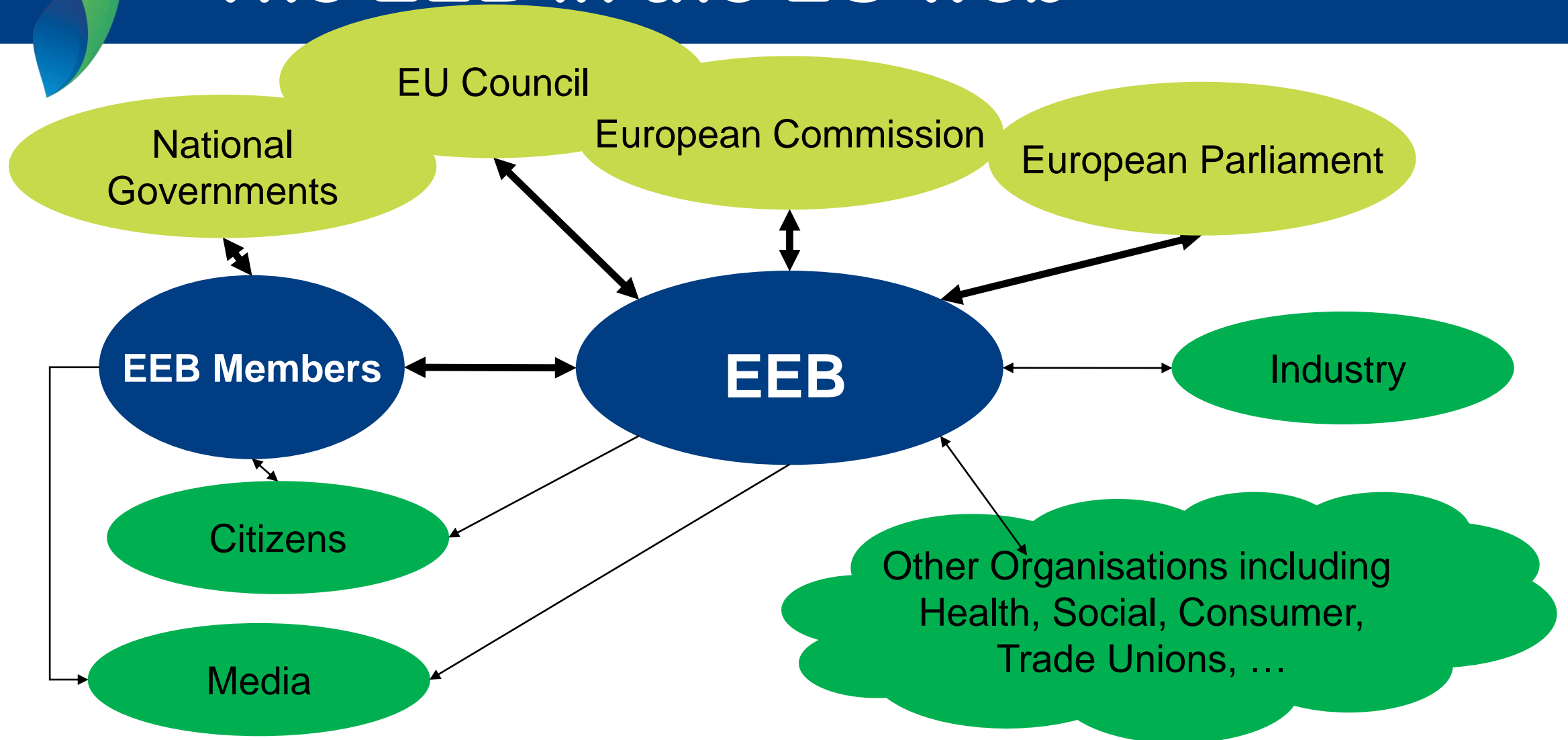
# Media and coalition-building

## THE GREEN 10



**We are a founding member of the Green 10**  
and work with many other stakeholder  
groups in and outside of Brussels

# The EEB in the EU web



# Advocating for policy change

## What do we want?



EEB's position  
incorporated into  
European  
Commission's  
**policy proposals**

EEB's position  
influences EU  
**political  
negotiations**  
(European  
Parliament,  
Council)

**Better EU  
environmental  
policies**



# Advocating for policy change



## What does it look like?

Article 3 – paragraph 1

European Commission proposal	Recommended amendment
Member States shall collectively ensure that the share of energy from renewable sources in the Union's gross final consumption of energy in 2030 is at least <b>45%</b> .	Member States shall collectively ensure that the share of energy from renewable sources in the Union's gross final consumption of energy in 2030 is at least <del>45</del> <b>50%</b> .

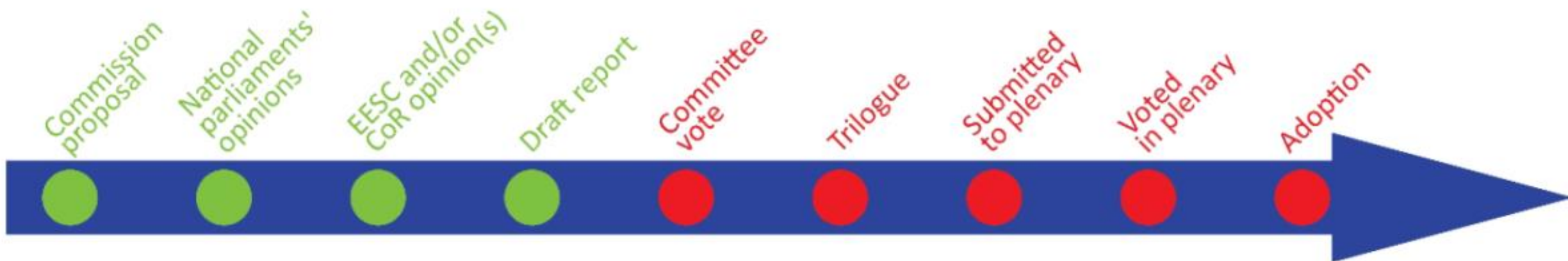


How?





# A time for everything



- **Room for manoeuvre varies** throughout the process
- Advocacy requires **different tools** at different stages
- Examples: policy briefs, Op-eds, social media posts, public consultation feedback, amendment proposals, press and media coverage...



# Air pollution/climate connections

- Many common sources generating AP and GHG
- Methane (GHG and AP precursor)
- Black carbon (climate and AQ impact)
- Many common/win-win solutions: clean renewables, no biomass burning, reduced meat production and consumption





## (Some) EU air quality pillars, ongoing/upcoming revision processes

- The implementation of the Zero-Pollution Action Plan, including the revision of the Ambient Air Quality Directives:
  - level of ambition
  - enabling framework

➔ EP ENVI Committee vote, EESC + CoR Opinions,  
Council General Approach December 2023
- The revision of the Industrial Emissions Directive (industry team): one key objective is the inclusion of cattle emissions in its scope
- The implementation of the National Emission Ceilings Directive: many MS in breach of 2020 targets and revised NAPCPs were due by 1 April 2023.



# International instruments

- WHO Global Air Quality Guidelines
- UNECE Long-Range Transboundary Air Pollution Convention
- Pollutant Release and Transfer Register
- UNFCCC

# REPowerEU context



Russia's invasion of Ukraine has massively disrupted European and global energy markets. Europe must end its dependence on such an unreliable supplier. **REPowerEU** is the European Commission's plan to end the dependency on Russian fossil fuel imports. REPowerEU is a plan for **saving energy, producing clean energy, and diversifying our energy supplies**. It is backed by financial and legal measures to build the new energy infrastructure and system that Europe needs.

MAY 2022



### SAVING

Every citizen, business, and organisation can save energy. Small behavioural changes, if we all commit to them, can make a significant difference. Contingency measures for supply interruptions will also be needed.



### DIVERSIFYING

The EU is working with international partners to find alternative energy supplies. In the short-term, we need alternative supplies of gas, oil and coal as quickly as possible, and looking to the future we will need renewable hydrogen too.



### ACCELERATING CLEAN ENERGY

Renewables are the cheapest and cleanest energy available, and can be produced domestically, reducing our need for energy imports. **REPowerEU** will speed up the green transition and spur massive investment in renewable energy. We also need to enable industry and transport to substitute fossil fuel use faster to bring down emissions and dependencies.



### INVESTMENT AND REFORM

Additional investments of €210 billion are needed between now and 2027 to achieve our independence from Russian fossil fuel imports, currently costing European taxpayers nearly €100 billion per year. The Commission proposes that Member States develop national **REPowerEU** plans to implement these new priorities.



Brussels, 18.5.2022  
COM(2022) 222 final

2022/0160 (COD)

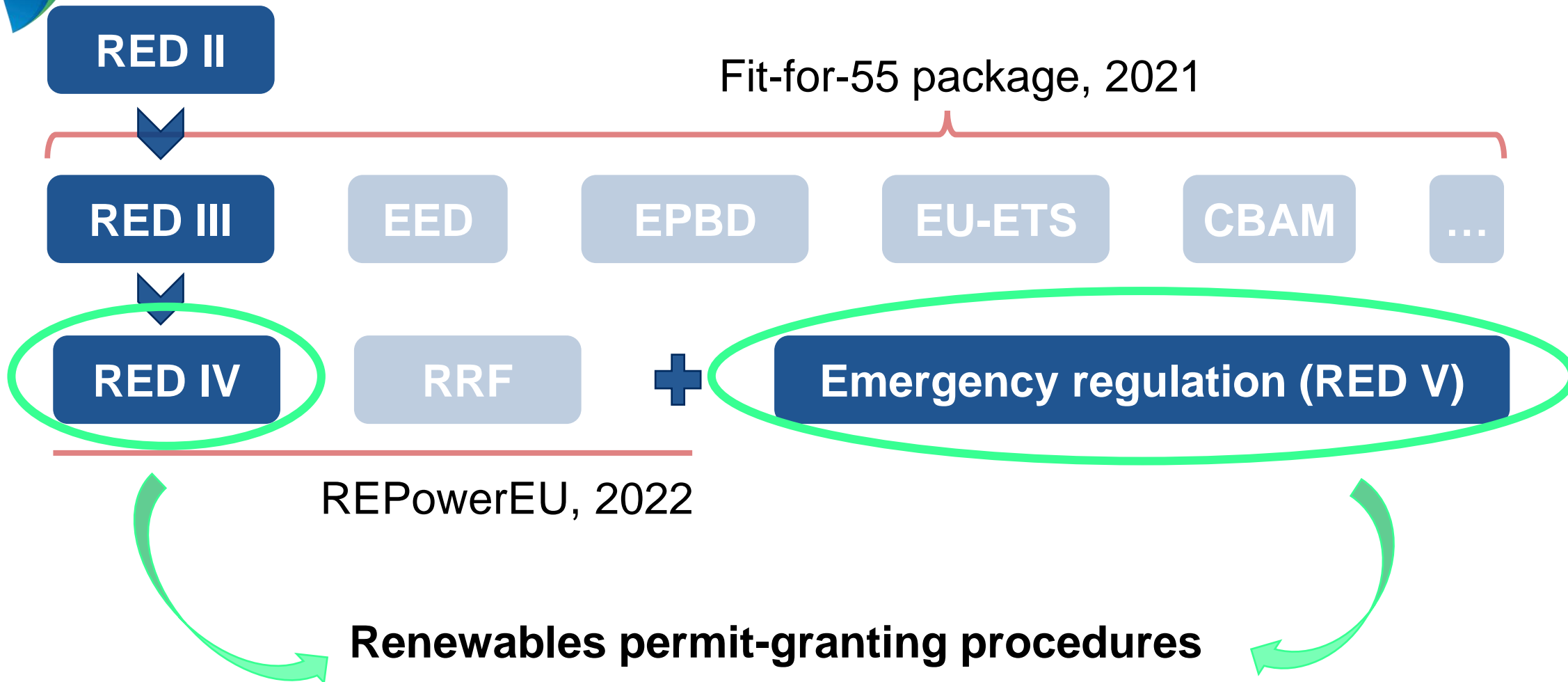
Proposal for a

**DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**  
**amending Directive (EU) 2018/2001 on the promotion of the use of energy from renewable sources, Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency**

(Text with EEA relevance)



# EU renewable energy policy





# Renewables go-to areas

## Two step approach

- 1) Identify the land and sea areas necessary for the installation of RES plants that are required to meet national 2030 targets
- 2) Designate within renewables go-to areas:
  - “where the deployment of a specific type or types of renewable energy is **not expected to have significant environmental impacts**” (Priority to artificial and built surfaces, **not**: Natura 2000 sites, nature parks)
  - Following a **Strategic environmental assessment (SEA)**



# Permit-granting procedures

## Permitting **inside** go-to areas\*

- Screening of projects
  - duration: (1 month, 15 days for <150 kW and repowering)
  - If “significant unforeseen” adverse effects → Environmental Impact Assessment (EIA) + Appropriate Assessment (AA)
  - If not and in case mitigation measures are adopted → Project is exempted from EIA and AA (excluding biomass)
- Duration of permitting
  - 1 year in general, with exceptions
  - 6 month for repowering and < 150 kW
  - 1 to 3 month for rooftop solar, small-scale solar, heat pumps
  - 2 years for offshore wind (?)
- Consent by silence (tacit approval)

EIA directive

Habitats directive

No public participation  
at project level

Legal issue

\* [Currently in trilogue negotiations](#)



# Permit-granting procedures

## Permitting **outside** go-to areas\*

- No screening of projects nor EIA exemptions
- Duration of permitting:
  - 2 years
  - 1 year for repowering and < 150 kW
  - 3 years for offshore wind (?)
- Where 'appropriate mitigation measures' adopted  
→ killing not deliberate for purposes of Birds Directive
- Novel mitigation measures can be piloted

\* [Currently in trilogue negotiations](#)





# Overriding public interest

## Inside and outside go-to areas:

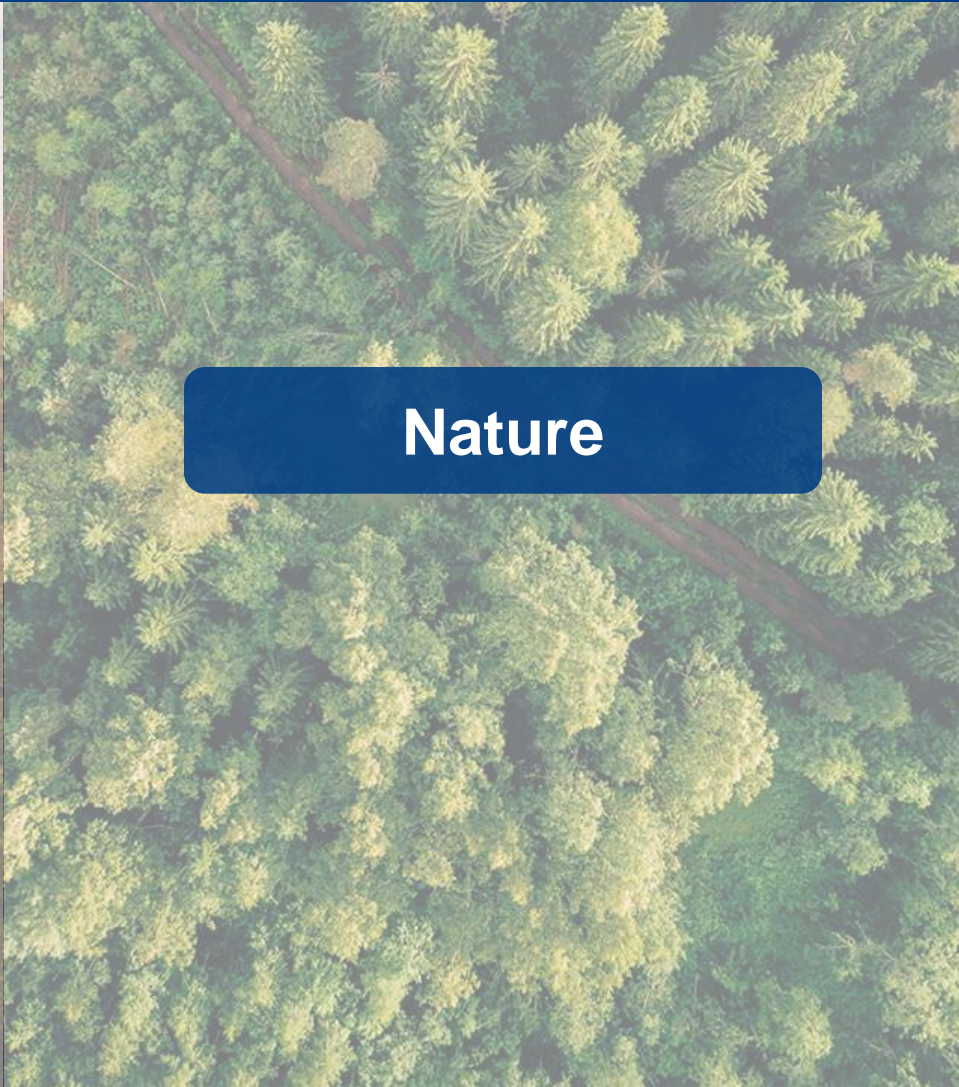
- Renewables are **presumed to be in the “overriding public interest”** (IROPI) within the scope of the Habitats, Birds, and Water Framework Directives
  - Renewable energy projects will be presumed to have relative priority over environmental concerns
  - But other criteria still need to be met on a case-by-case basis under the EU Nature Directives
- European Commission to issue **guidance** on interpretation and application of IROPI presumption



# A false trilemma?



**Renewables**



**Nature**



**Communities**



# ...quite often, yes!



## EEB factsheet:

- 12 examples across 4 categories of best practices for renewable energy deployment
- Planning processes, ownership models, administrative reforms...that can speed up **renewables deployment in harmony with people and nature!**

...check out and share our [video explainer](#) too!

# Best practices (1/4)



## Akuo's Bellegarde agrivoltaic project in France

- Combines solar power generation with farming of organic apricots and beekeeping. The PV structure was designed to fit the specificities of the land and farming needs.
- The crops are simultaneously protected from weather hazards, pests, and excessive sunlight; 70% water saved compared to traditional apricot farms.

**Nature-positive RES - agriPV**



# Best practices (2/4)



## Isera highway solar plant in Italy

- PV plant on the acoustic shelf of a local highway. The plant has a surface of 5.034 m<sup>2</sup> and an annual output of 760 MWh. The structure includes two sections with 60° degrees and 35° slopes that are 3.2 and 1.6 meters wide, respectively.
- This configuration allows for high PV efficiency while maintaining good acoustic protection. The cost of the barrier was EUR 5.8 million and was supported by the the “V Conto Energia” national support scheme, with investments returns expected in 17 years. This solution allows the construction of solar PV plants without the need to occupy land.

**Nature-positive RES - integration in transport infrastructure**

# Best practices (3/4)



## Edinburgh Community Solar Co-operative

- The cooperative (owned by residents through community shares offer) operates 30 solar panel installations throughout Edinburgh with a total generating capacity of 1.38MW.
- After providing a fixed return on our member's investments, excess profits are invested in further community projects that promote sustainability and renewable energy.

**Community-owned project**

# Best practices (4/4)



## Community wind farm in Zeewolde, Netherlands

- Composed of 83 wind turbines, owned by over 200 farmers and local residents. It has been estimated that around 300,000 households will benefit from the green energy produced on this site.
- The project was developed for, and also by, the local community, which can invest and participate by means of the cooperative New Millers (De Nieuwe Molenaars).

**Community-owned project**

# EEB's advocacy on REPowerEU

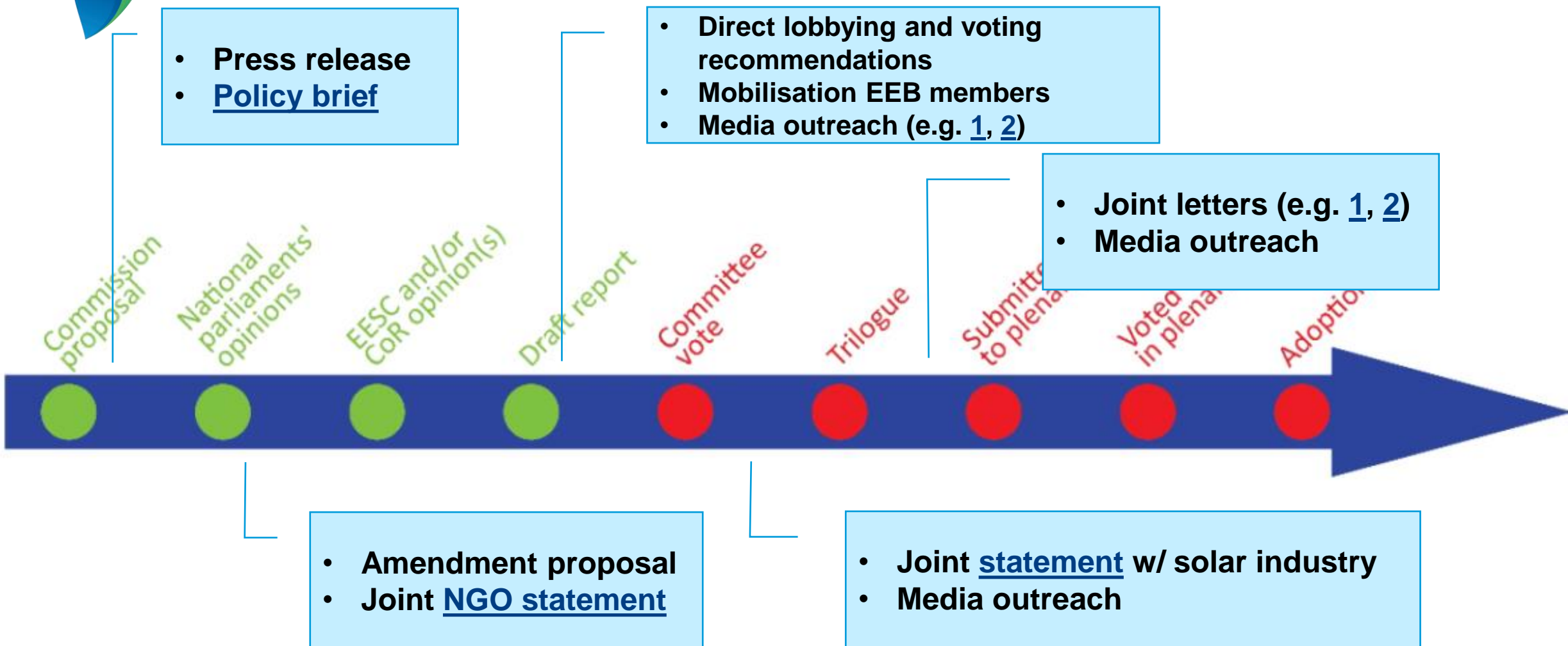
- **Press release**
- **Policy brief**

- **Direct lobbying and voting recommendations**
- **Mobilisation EEB members**
- **Media outreach (e.g. 1, 2)**

- **Joint letters (e.g. 1, 2)**
- **Media outreach**

- **Amendment proposal**
- **Joint NGO statement**

- **Joint statement w/ solar industry**
- **Media outreach**





# A Paris Agreement-compatible (PAC) scenario



## Guiding goals:

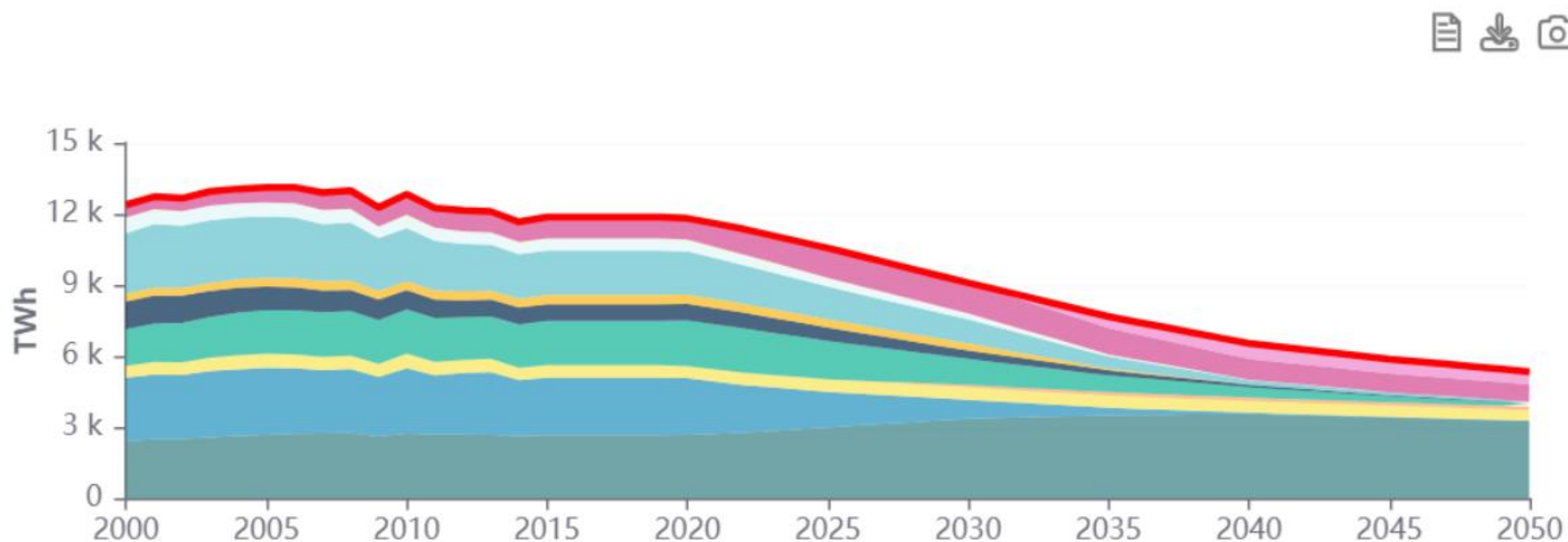
- 65% reduction GHG emissions by 2030
- net-zero GHG emissions by 2040
- 100% renewables in Europe by 2040 in all sectors

## Key elements:

- Swift electrification of industrial processes, heating and transport modes
- Quick phase-out of fossil fuels
- Swift mobilization of energy savings
- Strong focus on energy infrastructure and grids

# PAC: downscaling...

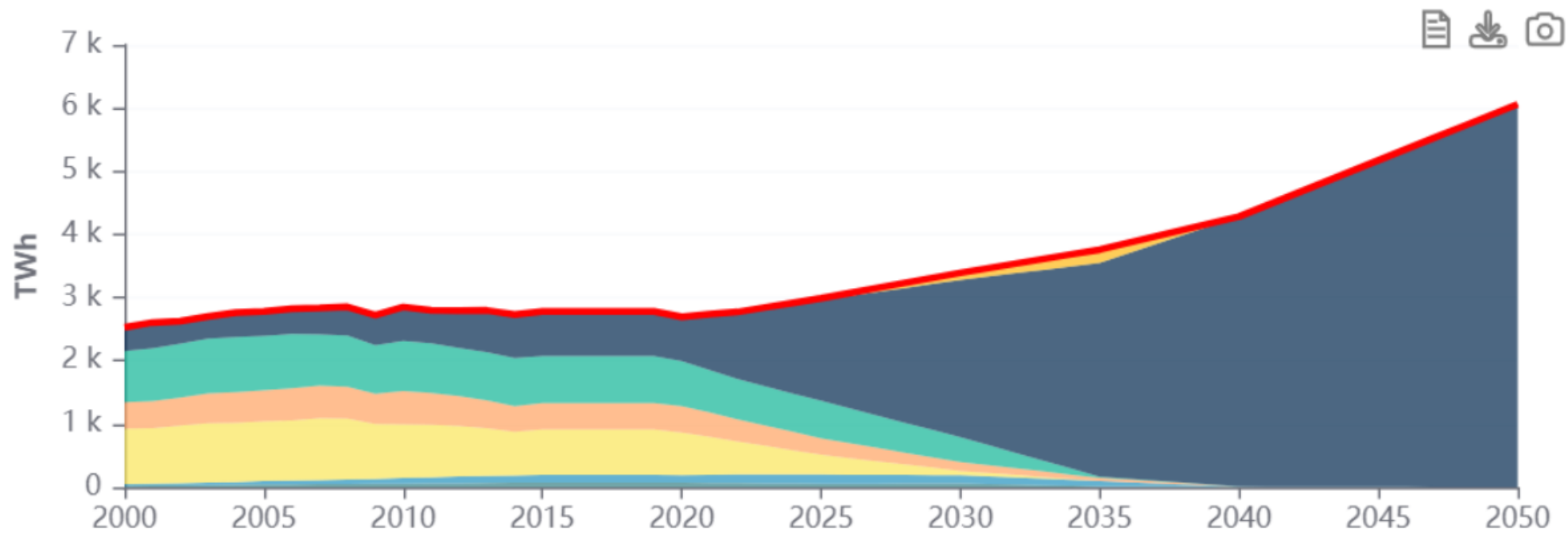
By vector, final energy consumption and exports





# ...and upscaling

Electricity production per source and net imports



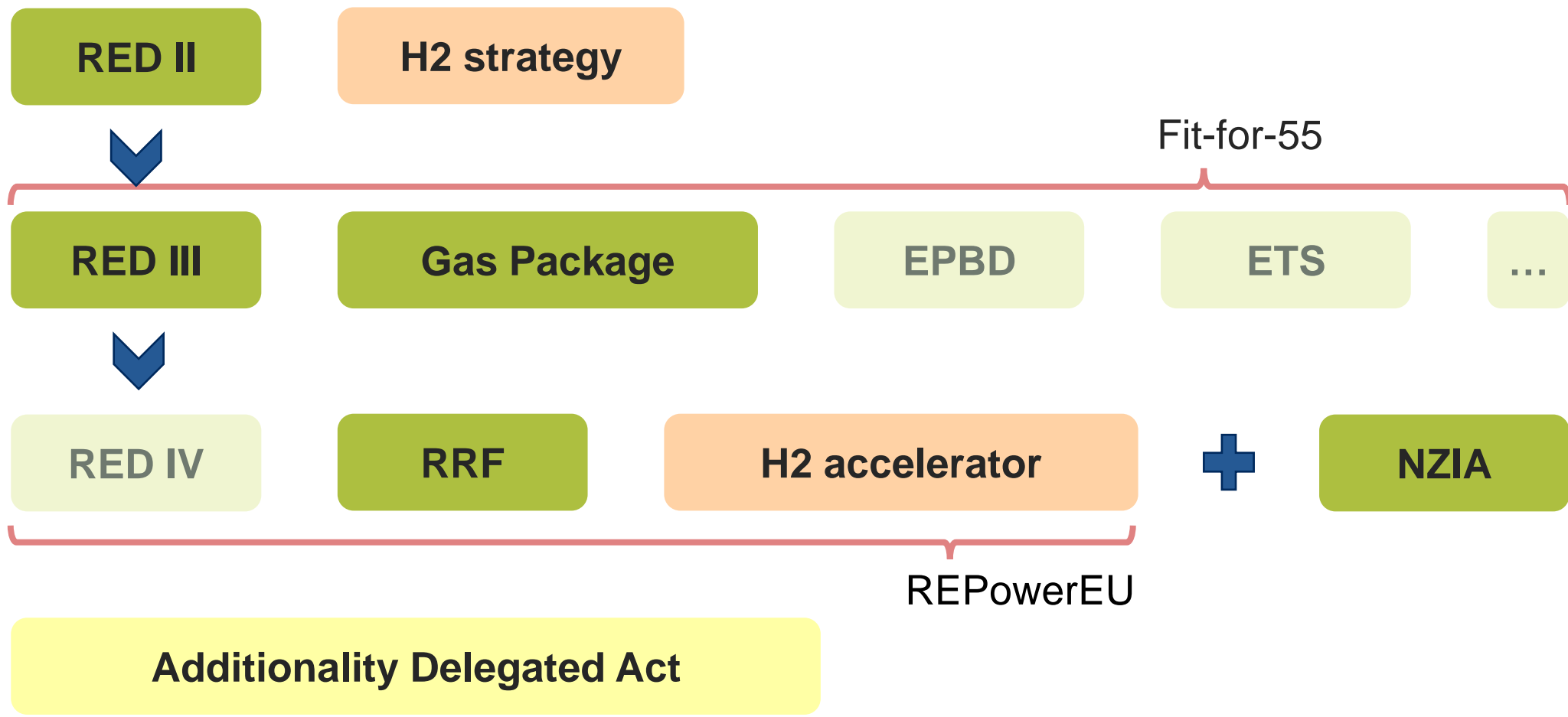
# Our demands

## Policy asks on climate & energy:

- More ambitious renewables targets
- Improved energy efficiency and sufficiency
- Foster electrification of buildings, transport, industry
- End incentives to fossil fuels
- Strategic renewables spatial planning
- Targeted support to limited hydrogen capacity
- Avoid dangerous lock-ins (nuclear, gas)

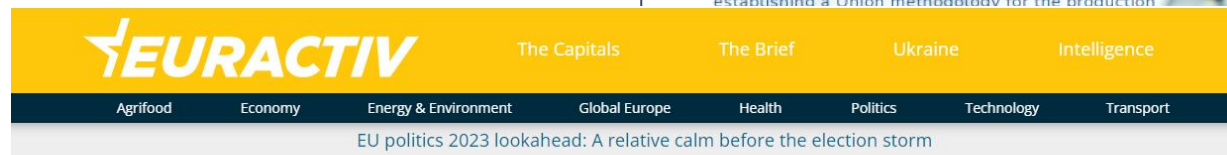


# The “puzzle” of EU hydrogen policy





# EEB's work on renewable hydrogen



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## It's not just about the colour: too much hydrogen is unsustainable

**DISCLAIMER:** All opinions in this column reflect the views of the author(s), not of EURACTIV Media network.

By Cosimo Tansini and Luke Haywood Est. 5min

21 Feb 2023



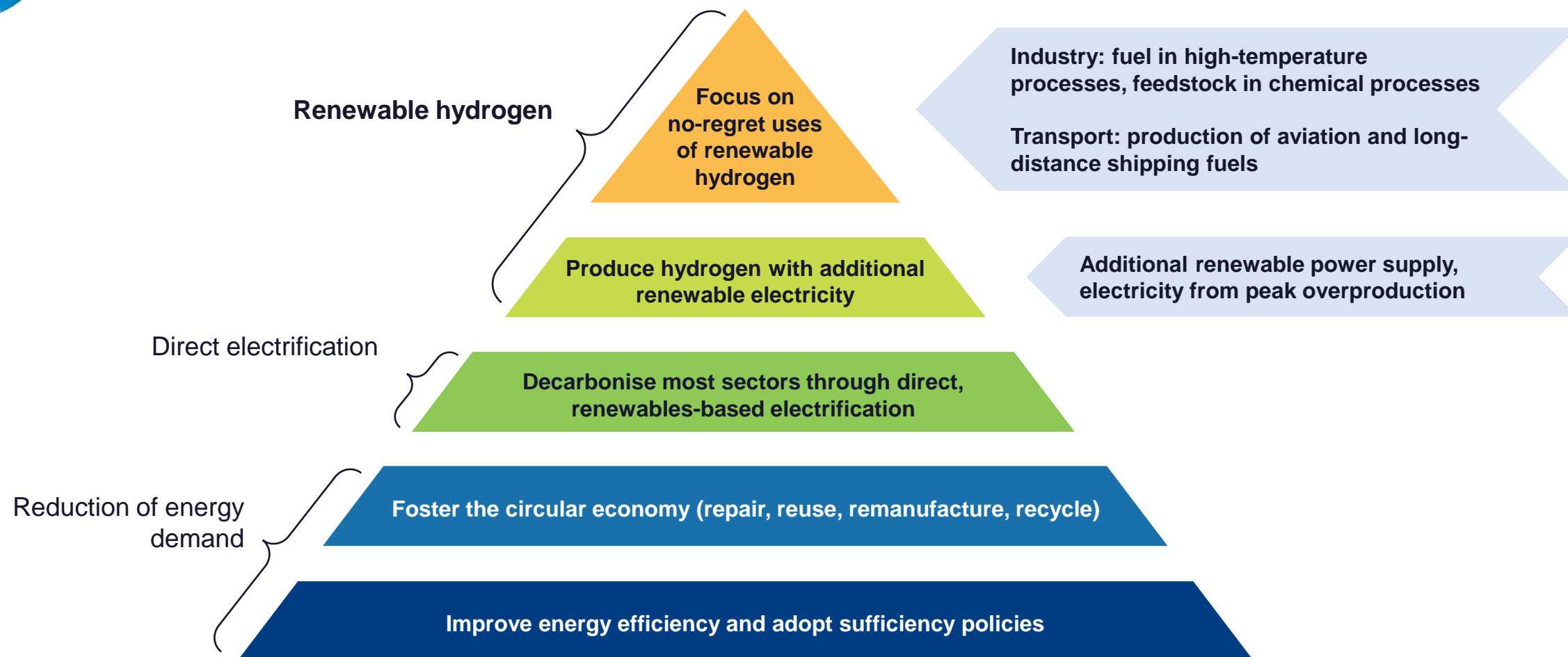
# EEB policy brief



## Key findings:

- The production, transport and use of H2 has environmental impacts, requires large public subsidies and carries the risk of fossil lock-in and competition for renewable generation.
- High production costs, uncertain technology uptake and inherent inefficiencies of H2 as an energy vector cast doubt on the future deployment of renewable H2.
- REPowerEU targets for renewable H2 by 2030 look very high and at risk of being unachievable.

# Hydrogen's place in the energy system







**EEB** European  
Environmental  
Bureau

[eeb.org](http://eeb.org)

**Thanks for listening!**

## Keep in touch



[eeb@eeb.org](mailto:eeb@eeb.org)



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