



Brussels, 13/16th May 2022

Frans Timmermans
Executive Vice-President for the European Green Deal, European Commission

Copy to:

Diederik Samsom
Head of Cabinet, Cabinet of Executive Vice-President Frans Timmermans, European Commission

By electronic mail

Re: REPowerEU package and environmental roll-back

Dear Executive Vice-President,

We are writing to you at this late hour of the week, in advance of the publication of the REPowerEU package on 18th May. We strongly support accelerating renewables as part of the EU's response to Russia's war in Ukraine, but also we want to share with you deep misgivings about some of the measures suggested.

Failure to push back on false arguments, failure to stick to the European Green Deal, and advancing the wrong measures in the REPowerEU that would allow a roll-back of environmental regulation, ignore citizen voices by side-stepping consultation, and focusing on renewables in protected areas when there are clearly so many better opportunities will together lead to a major public outcry and be fundamentally counter-productive. We call on you to take these points seriously and ensure that the REPowerEU does not undermine the EGD and the hope that citizens see in the EGD and the European Project.

We wish to share both our support for progress and our constructive and critically important recommendations in areas of major concern:

1. **We fully recognise and support the need for urgent acceleration of investments in renewable energy, in energy efficiency and the circular economy to support energy independence from Russia and to progress on the fossil fuels phase-out**, reduce prices and strengthen resilience to price fluctuations and scarcity of resources.
2. **The way forward has to be a positive agenda of speed and scale of deployment of solar and wind renewables**, with major opportunities around the improved spatial planning in go-to areas. This should be done through removing bureaucratic barriers, not weakening environmental protection legislation. The focus should be on the urban and industrial areas first and then on EU land and sea outside of protected areas. "Go to" areas are important but these must be very well defined in a democratic process.

Green 10 is chaired by Greenpeace European Unit
Rue Belliard 199
1040 Bruxelles, Belgium
Tel: +48 (0) 530 141 181
Email: secretariat@green10.org

3. **The biodiversity and climate crisis can and must be addressed together.** Biodiversity and nature protection and restoration are as important climate tools as renewable energies: the combination of RES and nature protection is the best chance we have to achieve climate neutrality.
4. **The rule of law and existing environmental legislation remains key and is not an obstacle to progress.** The EU has spent five decades creating a body of environmental and health protections, a reputation for being a region where the rule of law counts, and where citizen engagement is a key part of the process that also supports the legitimacy of EU institutions, decision-making and democracy. It is deeply surprising that weakening environmental protections are proposed in the REPowerEU even though the obstacles to renewables roll-out lie elsewhere.
5. **The existing environmental legislation must continue to apply – fully and in all areas. The assessments are important safeguards.** Planning is key and needs to be streamlined.
6. **We are deeply concerned that a blanket exemption of renewables from environmental impact assessments (EIAs) in go-to areas and the proposal to declare all renewables to be of overriding public interest risks undermining what the EU has achieved and will facilitate deregulation,** The speed-up in the deployment should not come at the cost of undermining the existing environmental acquis. Doing so on the grounds of renewables creates a precedent that in turn will risk being used tomorrow by interests on raw materials and other issues.
7. **Almost everyone across the EU recognises the need for more renewables and improved permitting –** accelerating permitting procedures for wind and solar and related infrastructure can be done through better spatial planning, through funding adequate staffing in competent authorities, and through the early and full involvement of independent experts, citizens and local authorities.
8. **We suggest the adoption of a “differentiated approach” to identifying areas for renewable energy development: go-to areas** (priority areas for development, the most suitable ones), **“second choice areas”** to be used after the space in the go-to areas is exhausted (the wider landscape where normally assessment, consultation and permitting procedures apply), along-side clear **no-go areas** strictly protected areas, Natura 2000 sites, other protected areas, reserves, restoration areas).
9. **Consultation of citizens and civil society cannot be waived – otherwise the EU will lose citizen support and undermine trust and key elements for democracy.** Besides, priority in both permitting and financing should be given to community-led projects, which have much higher support and prevent long and expensive court cases. There is very strong public support for the EU's nature laws, as witnessed during the fitness checks of the Birds and Habitats Directives and the Water Framework Directive - and there will be a real risk of losing public support for renewable energy deployment if it comes at the cost of natural areas.
10. **The European Green Deal is the solution to the current crisis and false arguments fed by fear, anti-EU interests, and vested interests should be rejected.** The EGD is the tool to safeguard the EU's future in light of energy and resource constraints and pricing and political dependency.

We ask for an emergency meeting on this matter with you in advance of the proposed launch of REPowerEU on the 18th. In addition, we rely on you to ensure that the REPowerEU is not an instrument that accidentally undermines the objectives it actually set out to advance and compounds the problems in Europe.

Yours sincerely,



Magda Stoczkiewicz, Programme Director, Greenpeace European Unit

On behalf of:

Patrick ten Brink, Deputy Secretary General, European Environmental Bureau, EEB

Ester Asin Martinez - Director, WWF European Policy Office (EPO)

Jagoda Munić, Director, Friends of the Earth Europe

William Todts, Executive Director, Transport & Environment

Mark Martin, Executive Director, CEE Bankwatch Network

Gabriel Schwaderer, Executive Director, EuroNatur

Ariel Brunner, Acting Director & Senior Head of Policy BirdLife Europe

Chiara Martinelli, Director Climate Action Network (CAN) Europe

Génon K. Jensen, Executive Director Health and Environment Alliance (HEAL)

Andrea Lichtenecker, Executive Director Naturefriends International

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and

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