



ACCELERATING THE DEPLOYMENT OF SUSTAINABLE SOLAR

A JOINT STATEMENT



WHO WE ARE



BirdLife Europe & Central Asia works to conserve birds and biodiversity by focusing on species, sites and habitats, ecological sustainability and engagement of people. Based in Brussels, we are supported by 45 Partners from 44 countries, including in all EU Member states.



The **CEE Bankwatch Network** is today the largest network of grassroots environmental groups in central and eastern Europe and a leading force in preventing dubious public investments that harm the planet and people's well-being in this region and beyond.



Climate Action Network (CAN) Europe is Europe's leading NGO coalition fighting dangerous climate change. With around 200 member organisations active in 38 European countries, representing over 1,500 NGOs and more than 47 million citizens, CAN Europe promotes sustainable climate, energy and development policies throughout Europe.



The **European Environmental Bureau (EEB)** is Europe's largest network of environmental citizens' organisations. It brings together 180 member organisations from 38 countries, standing for sustainable development, environmental justice & participatory democracy.

euRONATUR

EuroNatur is a Non-Governmental Organisation working to connect nature and people in a peaceful Europe. EuroNatur works to find solutions to change the ongoing degradation of nature and drastic climate change caused by the overexploitation of natural resources. EuroNatur's aim is a Europe that hosts free-flowing rivers, pristine forests and diverse cultural landscapes, offering sufficient space for wild animals to thrive while people live in harmony with nature.



SolarPower Europe is the award-winning link between policymakers and the solar PV value chain. Our mission is to ensure solar becomes Europe's leading energy source by 2030. As the member-led association for the European solar PV sector, we represent over 260 organisations across the entire solar sector. With solar sitting on the horizon of unprecedented expansion, we work together with our members to deploy affordable, secure and sustainable solar energy.

SUMMARY

As a consortium of associations promoting the accelerated deployment of sustainable solar, we believe the following elements should be priorities in the current EU discussions to ensure both speed and quality of future solar projects:

- 1. Safeguard a minimum 45% renewables target for 2030 and aim for higher to be in line with the Paris Agreement**
- 2. Swiftly designate priority areas of lower environmental impact for a quick roll-out of PV**
- 3. Allocate sufficient and trained staff for permit-granting at local and national levels**
- 4. Simplify procedures, especially for building-integrated PV**
- 5. Make the grid an essential element of planning and permit-granting**
- 6. Ensure the implementation of existing environmental legislation**
- 7. Involve citizens and local communities in the energy transition**

INTRODUCTION: THE FUTURE OF ENERGY MUST HAPPEN NOW

On 18 May 2022, the European Commission published its REPowerEU package in light of the Russian invasion of Ukraine. This package contains important provisions to foster the use of renewable energy in general and of solar power in particular. The [Communication](#) from the Commission underlines the importance of swift renewable energy deployment not only to fight the dangers of climate change, but also to reinforce energy security, build resilience against supply shocks, empower consumers and protect them against the volatility of energy prices. To that extent, the European Commission proposes to increase the headline target for renewable energy to at least 45% by 2030. The European Commission further acknowledges the importance of solar PV in the energy transition, and substantially increases the 2030 solar target to 750 GWdc by 2030, with an intermediary target of 400 GWdc by 2025.

We strongly support the increased ambition and higher renewable targets, and recognise that, in order for this accelerated transition to be sustainable in the long-term, maximising citizens and local participation, and ensuring the protection of nature is of crucial importance. We believe the following points should be the cornerstones for a nature-friendly transformation of the energy system.

ACCELERATED ENERGY TRANSITION USING SOUND AND FAST PLANNING

In its proposal, the Commission introduces the concept of designating areas of lower environmental impact where renewable deployment will be facilitated and accelerated. These “priority areas” should be designated first (one year after the entry into force of the directive), including areas such as:

- Parking lots, rooftops, transport infrastructure, industrial sites or publicly-owned land e.g. next to transport areas, built areas in military zones or in any other artificial structures.
- Carefully designated areas of lower biodiversity not intended for nature restoration measures (including agricultural land)
- Areas where agrivoltaic projects achieve positive impacts on the surrounding nature

In general, multiple use of space with solar PV should be favoured, as long as this allows positive impacts on surrounding nature. Further, these areas must include the necessary grid connection for the integration of renewables, where available, which shall fall under the same deadlines as the renewable projects. The process must result in the creation of zones that are economically viable for project developers while having a low risk profile for biodiversity and the surrounding ecosystems. This is why all stakeholders (developers, local residents, industrialists, NGOs, public authority representatives, etc.) must be consulted and considered in order to achieve fast, reasonable and non-conflictual planning. The definition of these areas shall not hinder the permitting procedure of existing projects and must not result in the automatic qualification of the remaining land as a “no-go-area”.

At the core of long-term good renewable energy infrastructure licensing, there must be a solid approach to spatial planning. The EU must push Member States to quickly proceed with spatially-explicit, integrated strategic planning, based on sound scientific advice and sensitivity analysis. This process should start straight away and incorporate the upcoming obligations from the new nature restoration regulation to ensure holistic spatial planning. Within two years after the entry into force of the directive and aligning with the Nature Restoration Plans, this spatial planning shall help define the favourable areas that are commensurate with long-term renewable energy targets by 2030 and 2050.

FASTER AND SMOOTHER ADMINISTRATIVE PROCEDURES

Barriers related to administrative processes are acknowledged among the major factors hindering renewables developments in Europe. The allocation of sufficient quantity and quality of human resources in local administration is therefore a key priority to ensure smooth and streamlined procedures. In its recommendations, the Commission has identified staffing and skilling as a priority for Member States to implement for permit-granting bodies and environmental assessment authorities. However, given the importance to staffing as a barrier for renewable development this should play a large role in the directive itself. Without this as a priority, accelerated renewable development will be unlikely. EU funding or a process fee could help finance better staffing.

On top of sufficient staffing, skilling of local administrative bodies is also of utmost importance to enhance the acceptance of renewables projects. The local administration and the competent judicial institutions, at the regional, landscape and local level, should be trained and skilled up to ensure that the energy transition can be delivered at a brisk pace and that the necessary adaptations of the energy system are well factored in.

Additionally, and as recommended by the European Commission, Member States should introduce fully digital permit-granting procedures and e-communication to substitute the use of paper and improve access to information. The information to applicants on permitting procedures should be made public and harmonised at national level. This digitalisation shall be supported by a GIS based information tool integrating all the informative layers necessary for the decision-making process.

Moreover, small projects such as solar rooftops should undergo simplified administrative procedures. For all solar PV projects, clear time limits should be defined and administrative procedures (excluding impact assessment) should benefit from tacit agreement.

GRIDS FIT FOR THE TRANSITION

A massive deployment of renewable energy will not be possible without an equal ambition in the expansion and optimisation of the current European electrical grid. The European grid must be ready at a faster pace to integrate this new capacity and stay aligned with the objectives of the European Green Deal, the REPowerEU Plan.

Front and centre is the required investment into our electrical grids. In the 18 May REPowerEU Communication, the European Commission estimated that an additional EUR 29 billion of investments are needed in the power grid, to make it fit for increased use and production of electricity.

In addition, there are other key areas of reform that will ensure that the electricity networks are tailored for the energy transition, such as:

- Ensure that the grid expansion is planned and aligned with the goals of carbon neutrality, nature restoration, and Member States' renewables targets, including through increased investment
- Promote a more harmonised, streamlined and transparent grid connection granting process, making also use of flexible arrangements and private investment
- Ensure grid priority access to hybrid projects as they optimise the use of available grid capacity (e.g. projects combining solar with storage)
- Introduce flexible connection arrangements which allow to maximise the capacity available on the grid,
- Revise and align with net zero objectives the grid upscale and expansion process
- Ensure that the incentives of TSO/DSOs are aligned with the grid innovation and flexibility that is required for the energy transition.

A FUTURE WHERE RENEWABLES AND NATURE CAN SHINE TOGETHER

The solar industry will need to double its installed capacities by 2025, and to quadruple by 2030, reaching 750 GW in the European Union. This radical transformation of our energy system will pass by a substantial increase of rooftop solar PV, but also a rapid acceleration of ground-mounted solar PV deployment, that needs to be tripled between now and 2025.

These capacities are necessary not only to ensure our energy security and reinforce our European independence of energy production, but also to fight climate change which is a major threat to our biodiversity. Future solar projects on the ground must also be held to the highest environmental quality standard by design, including compliance with the EU's Nature Directives and the proposed Nature Restoration Regulation. Where the impacts cannot be avoided, efficient mitigation or compensation measures must be provided. Member States must continue to implement EU environmental legislation such as the Strategic Environmental Assessment (SEA) and use the process laid out in the Environmental Impact Assessment (EIA) directive to determine when impact assessments are necessary. These procedures can help determine the necessary mitigation measures, and ensure compliance with public participation requirements, all of which are necessary for a just energy transition.

INVOLVING CITIZENS IN THE ENERGY REVOLUTION

Local populations should have their say in renewable energy projects so that they can reap the benefits of the energy transition. Early-stage, meaningful consultation and engagement of citizens and civil society must be guaranteed to gain citizen support, foster local communities' acceptance of RES projects of public relevance, and to avoid the risk of legal challenges against RES project development.

Local, community-owned renewable energy projects can be a great way to ensure energy independence and the active involvement of people in the energy transition. For this purpose, the involvement (e.g. via shares in the company or distribution of the benefits of the project) of local communities or collective self-consumption is key to foster the deployment and the acceptance of renewables.

The Commission, in its recommendations, requests Member States to stimulate the participation of citizens, including from low and middle-income backgrounds, in renewable energy projects also via simplified permitting procedures for energy communities. These recommendations need to be included in the Directive as well.