

## Open letter: Counting on new hydropower to accelerate Renewable Energy deployment in Europe is irresponsible.

Dear Ambassador Lars Danielsson, Permanent Representative of Sweden to the European Union,

Dear MEP Markus Pieper,

Dear MEP Christian-Silviu Buşoi,

Dear Commissioner Kadri Simson,

Dear EVP Frans Timmermans,

Dear Commissioner Virginijus Sinkevičius,

Cc: MEP Nils Torvalds, MEP Pascal Canfin, Shadow rapporteurs from the ITRE Committee for the revision of the Renewable Energy Directive.

We are reaching out to you as a broad coalition of civil society organisations active in the climate and biodiversity fields, to ask you to agree on a revised Renewable Energy Directive that truly catalyses renewable energy development in Europe and also works for the protection of our water resources and fragile freshwater ecosystems.

We ask you in the trilogue negotiations to:

1. **At least retain the new article 29b on sustainability criteria for hydropower proposed by the European Parliament (RED III)**, as it recognises that hydropower has direct impacts on freshwater ecosystems which must be mitigated.
2. **Ask Member States to exclude new hydropower plants from go-to areas (RED IV)**, as the Council's general approach from 21 December on REPowerEU, which only gives Member States the option to exclude new hydropower plants from go-to areas, does not go far enough.

**Hydropower has devastating impacts on freshwater ecosystems and strongly alters the ecosystem services provided by natural rivers.** It affects one of the most degraded ecosystems in Europe, as only 40% of surface water bodies are in good ecological status.<sup>1</sup>

By including hydropower in the category of renewable energy source without any particular restriction, the Renewable Energy Directive (RED) has incentivised hydropower development in Europe over the past ten years. We believe that greenfield hydropower capacity built after the adoption of the revised Renewable Energy Directive should not count towards the EU and Member States renewable energy targets, in line with the [manifesto](#) signed by 150+ NGOs in

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<sup>1</sup> <https://www.eea.europa.eu/ims/ecological-status-of-surface-waters>

2020. NGO-led scenarios show that it is possible to achieve climate neutrality at EU level in 2040 without further hydropower expansion across the EU.<sup>2</sup>

As regards REPowerEU, we think that new hydropower projects, or hydropower projects which had been introduced but were on hold because of environmental issues, should be excluded from the 'go-to areas' and streamlined permitting under the amended Renewable Energy Directive. With hydromorphological alterations the main cause of failure to achieve the good ecological status of rivers, hydropower plants must never be exempted from environmental assessments, or automatically declared of overriding public interest. In addition, the rising costs of new hydropower projects and rising number of litigation around them, are not in line with the intended purpose of "go-to" areas to facilitate and accelerate the deployment of renewables.

The European Commission's REPowerEU proposal has already led a number of Member States to announce new hydropower projects or reintroduce some controversial ones, including foreseeing public financing under Member States' recovery and resilience plans (RRPs). In December 2022, Romania adopted an emergency ordinance resurrecting nine hydropower projects in protected areas which had been put on hold, some of them even deemed illegal by national courts, because they would dry up rivers, cause deforestation, or lead to the extermination of fish species.<sup>3</sup>

Without a clearcut exclusion of hydropower from go-to areas, it is not nine cases, but potentially hundreds of them which will be greenlighted. This needs to be stopped urgently. Failing to take action would not only be oblivious of EU environmental law, but also send hydropower operators and Member States the very wrong signal that new hydropower development is part of the solution to the current climate and energy crisis.

Europe is struggling with rising energy prices and with a climate emergency. For those reasons, accelerating the deployment of renewables such as solar and wind is a necessity, but hydropower must be dealt with in a different way.

Hydropower represents about 10% of EU electricity generation and more than half of the electricity produced in Austria, Croatia or Luxembourg actually comes from hydropower.<sup>4</sup> This has come with a cost for freshwater ecosystems, as hydropower plants affect the hydrology and morphology of rivers, and all the ecosystem services they provide. Because the hydropower potential has been so exploited already, new hydropower would only make a small contribution

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<sup>2</sup> [Building a Paris Agreement Compatible \(PAC\) energy scenario](#), CAN Europe/EEB technical summary of key elements, June 2020, pages 33-34.

<sup>3</sup> <https://balkanriverdefence.org/news/basca-mare-dam-plans-resurrected/>

<sup>4</sup> European Environmental Agency, [Water resources across Europe - Confronting Water stress: an updated assessment](#), 2021, page 71.

to the energy transition.<sup>5</sup> In addition, hydropower reservoirs are also responsible for methane emissions because of decomposition of organic matters.<sup>6</sup>

The vast majority of hydropower production relies on steady flows. But can Europe count on steady flows anymore? Water stress affects 20% of the EU territory on average every year<sup>7</sup>, and six out of the top-10 global risks over the next ten years highlighted by the World Economic Forum are directly linked to water & freshwater ecosystems.<sup>8</sup> In Europe, precipitation patterns will become more unreliable in the future, making both water stress and floodings more frequent and more intense, and putting hydropower production at threat in many parts of Europe.<sup>9</sup> Croatia for instance, which is dependent on hydropower for over 50% of its electricity generation, is expected to see its hydropower production decrease by 10% in all seasons but winter because of reduced precipitation.<sup>10</sup>

Freshwater biodiversity is the most at risk globally among all species groups. Europe is the continent where populations of freshwater migratory fish are declining the fastest - we lost 93% of them since the 1970s.<sup>11</sup> Impoundments and river barriers are one of the main causes of this decline, and the EU Biodiversity Strategy has identified their removal as one of its flagship actions. Building new hydropower plants is completely at odds with the protection and restoration commitments of both the EU Biodiversity Strategy and the Kunming-Montreal Global biodiversity framework (targets 2,3 and 11).

**For all these reasons, new hydropower development is not part of the solution to the current climate and energy crisis.**

We thank you for your consideration and would appreciate meeting with you for further exchange on this issue.

Yours sincerely,



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<sup>5</sup> Even if all of the 5,500+ hydropower plants planned in the EU (in addition to the 19,000+ existing ones) were built, the share of the EU electricity generation provided by hydropower would go from 10% to 11.2-13.9%. (Source: EuroNatur, GEOTA, RiverWatch, WWF, [Hydropower pressure on European rivers: The story in numbers](#), 2019, and Eurostat, 2017).

<sup>6</sup> Soued, C., Harrison, J.A., Mercier-Blais, S. et al, [Reservoir CO2 and CH4 emissions and their climate impact over the period 1900–2060](#). Nat. Geosci. 15, 700–705, 2022.

<sup>7</sup> European Environmental Agency, [Water resources across Europe - Confronting Water stress: an updated assessment](#), 2021.

<sup>8</sup> World Economic Forum, [The Global Risks Report 2023](#), January 2023.

<sup>9</sup> Gøtske, E.K., Victoria, M., [Future operation of hydropower in Europe under high renewable penetration and climate change](#), 2021, iScience. 24, 102999.

<sup>10</sup> <https://climate-adapt.eea.europa.eu/en/countries-regions/countries/croatia>

<sup>11</sup> WWF, [Living Planet Report](#), 2022.



Comitato per lo sviluppo sostenibile dell'Alta Val Brembana **AVB**



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A Rocha International  
 AEPIRA-Asociación en defensa del piragüismo y de los usos recreativos del agua  
 Agent Green  
 Allier Sauvage  
 Aqua Transilvae Club  
 Arnika, Centre for Citizens' Support  
 Asociația Bankwatch Romania  
 Asociația Club Sportiv Fly Reghin

Asociația Clubul Sportiv Fly Fishing Extreme  
Asociația Declic  
Asociația Fly Fishing Bucovina  
Asociația Fly Fishing Club Sibiu  
Asociația Fly Fishing Rarau  
Asociația Grupul Pescarilor Sportivi Orădeni  
Asociația Pescari Amărășteni  
Asociația Pescarilor Sportivi Aqua Crisius  
Asociația Pescarilor Sportivi Bega Poieni  
Asociația Sportiva Fly Fishing Bistrita  
Association Nationale pour la Protection des Eaux et Rivières-Truite Ombre Saumon  
Association of Environmental Journalists and Ecological Tourism from Republic of Moldova  
Association of Tourism Development in Moldova  
Association of Women for Environmental Protection and Sustainable Development (AFPMDD)  
Association Protectrice du Saumon pour le bassin Loire-Allier  
Balkan River Defence  
Balkanka Association  
Bankwatch  
BirdLife Europe and Central Asia  
Buglife – The Invertebrate Conservation Trust  
Bund für Umwelt und Naturschutz Deutschland e.V. (BUND) – Friends of the Earth Germany  
Canoa Club Trento  
Carpatica Fly Fishing  
CEEweb for Biodiversity  
Center for Protection and Research of Birds of Montenegro  
CIRF - Italian Centre for River Restoration  
Clubul Muscaricilor Timișoara  
Coalition Clean Baltic  
Comitato per lo sviluppo sostenibile dell'Alta Val Brembana  
Commission Internationale pour la Protection des Alpes (CIPRA)  
COORDINAMENTO NAZIONALE TUTELA FIUMI - FREE RIVERS ITALIA  
CUTEZATORUL Falesti, Republic of Moldova  
DÉFENSE DES MILIEUX AQUATIQUES  
Deutscher Angelfischerverband e.V.  
Deutscher Naturschutzring e.V.  
Eco-Razeni Association, Republic of Moldova  
EcoContact /Aarhus Centre for Environmental Information and Consultation  
Ecological Association Rzav  
EEB  
Environmental Protection Public Association  
EuroNatur  
European Anglers Alliance  
European Cave Protection Commission  
European Herpetological Society - Societas Europaea Herpetologica

European Rivers Network  
Federația Coaliția Natura 2000 România  
Fédération Auvergne Nature Environnement  
Fédération SEPANSO Aquitaine  
Fédération Spéléologique Européenne asbl.  
Federazione Nazionale Pro Natura  
Foundation for Biebrza  
Foundation for Education and Development - Moldova  
Free Rivers Fund  
Fundacja EkoRozwoju  
Fundatia Eco-Civica  
Generation Earth  
GEOTA  
Global Youth Biodiversity Network European Chapter  
GRÜNE LIGA e.V.  
Habitat  
International Rivers  
Jägala kalateed MTÜ  
Leeway Collective  
Legambiente FVG APS  
Let's Do It Peja  
Lithuanian Fund for Nature  
Living Rivers Foundation  
Mammal Conservation Europe  
MedINA (Mediterranean Institute for Nature and Anthropos)  
Natagora  
Natuurpunt  
Naturskyddsforeningen – Swedish Society for Nature Conservation  
ÖKOBÜRO  
Olive Growers Association Boka - Boka of Kotor  
Open Rivers Programme  
Organizatia Salvati Prutul din Iasi  
Österreichischer Alpenverein  
Podkarpackie Towarzystwo Przyrodników Wolne Rzeki  
Polish Society for the Protection of Birds, BirdLife Poland  
proTEJO - Movement for the Tagus river  
REVIVO, Institute for ichthyological and ecological research  
Rewilding Europe  
RiverWatch  
Rural Renaissance  
Societatea Carpatina Ardeleana  
Stowarzyszenie Ekologiczne EKO-UNIA, Poland  
Suomen luonnonsuojeluliitto (The Finnish Association for Nature Conservation)  
Synchronicity Earth

Tartu Sportfishing Club

Terra-1530

The Public Association of the Society of Ecotoxicologists from Republic of Moldova ECOTOX

Tiroler Fischereiverband - Tyrolean Fishing Association

Uja Centre, Albania

Umweltdachverband

Umweltorganisation VIRUS

WET - Wildwasser erhalten Tirol

Wetlands International Europe

WildFish

World Fish Migration Foundation

World Sturgeon Conservation Society

WWF European Policy Office

Youth Ecological and Security Zone- EcoZ