Dear Mr. Turmes,

We understand that you are negotiating with representatives of the Member States compromises on the directive on the promotion of the use of energy from renewable sources in order to achieve a first reading agreement by the end of December 2008.

We believe that the renewable energy directive can greatly contribute to climate protection and reduction of import and dependence to fossil fuels. Thus, it is an essential input to ambitious energy and climate policies at European, national, regional and local level. Local and regional authorities are key players to achieve the objectives of the directive. Their competences enable them to influence energy infrastructures and policies.

In June 2008, the Council of European Municipalities and Regions (CEMR) adopted the attached Position paper on the renewable energy directive. This response of Municipalities and Regions over Europe emphasizes the significant role of local and regional authorities in the production and use of renewable energy.

The Council of European Municipalities and Regions would therefore like to present its key points to the national governments and the European Parliament:

- Include provisions requiring the involvement at an early stage of local and regional authorities in the drawing up and implementation of renewable energy national action plans (article 4)
  Given their competences and the decentralised nature of renewable energy, local and regional authorities have a key role to play in delivering the EU’s 20% goals.
The provisions agreed by European Parliament’s ITRE committee adequately reflect the involvement of local and regional authorities in the formulation of national action plans.

- **Reject restrictive administrative and planning procedures (article 12)**
  The directive should find the right balance between promotion of renewable energy, adaptation of administrative procedures and the financial challenge that this could represent. A certain level of flexibility should also be ensured at local level, in accordance with the principles of proportionality and subsidiarity.

  In this sense, proposals made by the French Presidency to the Coreper on 24 October 2008 are a balanced proposal.

- **Specify that grid suppliers themselves should meet the costs of reasonable adjustments of the grid system (article 14)**
  It is right that priority access has to be given to electricity produced from renewable energy sources, but these costs for opening up the grid should not be spread across all energy consumers.

We therefore would ask you to take the views of local and regional government into consideration during the last round of negotiations leading to the adoption of the renewable energy directive. For further questions please do not hesitate to contact me or Marie Bullet, CEMR’s policy officer on sustainable development (Tel: 02 500 05 35; email: marie.bullet@ccre-cemr.org).

Yours sincerely,

Angelika Poth-Mögele
Director of Policy