Dear Member of the ITRE Committee,

I am writing to you regarding the vote on the report on the directive on renewable energy (rapporteur Claude Turmes) in the ITRE Committee on 11 September 2008.

The Council of European Municipalities and Regions (CEMR) expressed its view on the proposal for a directive on the promotion of renewable energy and sent you its position paper and proposals for amendments in June. In the view of the vote of the ITRE report, we would like to submit our vote recommendations on points of the draft directive that are relevant for local and regional government.

Due to the large quantity of amendments we understand that there will be a number of compromise amendments which will be tabled. Similarly, CEMR would be supportive of compromise amendments which correspond to the principles set out below.

1. Recognising the role of regions and municipalities in achieving the targets for the use of renewable energy

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. CEMR considers that this active role could be further strengthened in the directive. In particular, local and regional government should be considered as partners of Member States and be involved in the development of national strategies promoting renewable energy.

In order to realise a strong partnership between the different levels of government, CEMR suggests adopting the amendments promoting the active involvement of local and regional authorities in the drawing up and implementation of national action plans.

⇒ CEMR strongly supports the adoption of amendments 185 (role and involvement of local and regional authorities), 423 (cooperation with national, regional, local authorities), REGI 1 and REGI 7 (involvement of national authorities in national action plans).

2. Ensuring sufficient flexibility for local and regional choices regarding planning, investments and energy policies

The directive will have a major impact on further policies, regulations, laws and administrative procedures. Buildings and cooling, heating and electricity equipments and
systems will have to be adapted as well. However, this should not result in a disproportionate financial overload and a reduction of the room for manoeuvre of local and regional government.

CEMR believes that the administrative and financial impacts of the directive on the promotion of energy from renewable sources should be taken into account. Therefore, CEMR supports amendments simplifying administrative procedures and recognising the financial challenge that the promotion of renewable energy could represent.

| CEMR suggests to: |
| ⇒ Adopt amendments 90 (improvement of the access to public and private financing), 650 and 651 (lightening obligations for requirements on buildings); |
| ⇒ Reject amendments 84, 85, 86, 645, 646, 648 and 675 (new and/or strong obligations for buildings and installation of equipments and systems). |

3. Dissemination of information and awareness rising at local and regional level

Good information is crucial to create greater awareness and active support from local communities. To overcome resistances of citizens to the planning of new renewable energy facilities like wind farms and biomass plants, public authorities at all levels should cooperate in an inclusive decision making and information process.

Since they are the political level closest to the citizens, local and regional authorities have a relevant role to play to inform them on the benefits and practical implications of developing and using renewable energy.

| ⇒ CEMR strongly supports the adoption of amendments 92 (development of guidance for local decision makers), 185 and 730 (role of local and regional authorities to inform citizens), 701 (information for local decision makers on support measures) and REGI 15 (co-operation between Member States and local authorities). |
| ⇒ CEMR suggests the rejection of amendment 633 (potentially too prescriptive on planning procedures). |

4. Encouraging and facilitating the development of decentralised renewable energy

Given its efficiency, green potential and adaptation to the local environmental conditions and local demand, decentralised renewable energy production has to be supported by the EU and national governments, as well as its access to the general grid. The grid suppliers should be obliged to make, and bear the costs, of adjustments to give priority access to electricity from renewable sources. However, one should make sure that the costs would not be shifted to the consumers. Furthermore, CEMR would like to stress the possible high economic burden for small transmission system operators.

| ⇒ CEMR supports amendments 200 (promotion and benefits of decentralised energy production) 95, 743 and 750 (priority grid access for renewables), 97 (transmission and distribution system operators to publish rules related to bearing cost of improved operation of and access to the grid), and 609 (grid system operator to bear costs of grid access). |
| ⇒ CEMR proposes to reject amendments 746, 747, 749 and 755 (weakens right to grid access). |
We would be grateful if you could take our view into consideration during your vote. 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