

RGI Statement on Renewables Acceleration Areas

February 2024

The Renewables Grid Initiative (RGI) welcomes the opportunity to provide feedback to the call for evidence with regard to the upcoming guidance on designating renewables acceleration areas.

We, at RGI, acknowledge that, if well designed, the renewables acceleration areas, envisaged in Art. 15c of Directive (EU) 2023/2413¹ (RED), can be valuable tools towards the swift development of variable renewable energy sources (RES) in the European Union (EU). Through a balanced approach, they can indeed increase predictability and certainty for new investments. However, **rather than offering a blank check, renewables acceleration areas represent a make-or-break opportunity.** They demand careful consideration and adherence to the precautionary and proportionality principles. They should also not become tools to fuel public opposition. Instead, Member States should adopt a holistic approach, encompassing technical, environmental and societal aspects, towards processes and solutions that are fit for purpose.

Moreover, alongside the process of designating renewables acceleration areas, Member States and the EU at large, should identify and further tackle the root causes of delays in electricity infrastructure development within and beyond the framework of acceleration areas.

Identify synergies between RES generation and electricity grids, while minimising drawbacks

RGI strongly believes that the process of designating **renewables acceleration areas should follow an optimised and forward-looking energy system planning.** System-level and demand side efficiency, including energy demand reduction, should be prioritised to optimise resources and reduce spatial needs.

Moreover, RGI notes (and complements) the European Commission's approach to focus the current call for evidence, and upcoming guidance, on RES generation assets, notably wind and solar projects. Indeed, inherent differences in developing RES generation assets and electricity grids suggest caution in broadly interpreting rules for renewables acceleration areas. Approaches that apply to the former will not necessarily apply to the latter, and thus, the upcoming guidance should take due consideration of that fact and clearly distinguish the two. Otherwise, the guidance would risk unintended drawbacks for the development of electricity grids.

¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023L2413&qid=1699364355105>

To ensure the effectiveness of renewables acceleration areas though, synergies with electricity grid infrastructure should be carefully explored. Existing and anticipatory electricity grid capacities, including parts of electricity grid infrastructure located within renewables acceleration areas, i.e. assets necessary for the connection of RES generation plants to the electricity grid, should be duly considered, also in line with the EU Action Plan for Grids, to integrate renewables into the energy system and avoid further delays.

Accelerate RES development hand in hand with nature protection and restoration

Space is a finite resource, subject to conflicting interests, and necessitates robust and holistic spatial planning, coupled with sensitivity mapping, in order for the impacts of RES infrastructure on ecosystems and biodiversity to be avoided and minimised. This implies prioritisation of built and artificial environments for renewables acceleration areas to avoid high-value areas for nature and biodiversity. Towards this, the collection of comprehensive data on the presence of species should be strengthened and support further clarification on valuable biodiversity areas.

As stated above, the mapping of areas necessary for national contributions towards the European Union's overall renewable energy target for 2030, and the designation of renewables acceleration areas should follow a holistic approach. This should encompass existing and future spatial planning tools and instruments in a coordinated and coherent manner. Therefore, renewables acceleration areas should align with the identification of protected areas for nature² and the upcoming nature restoration plans as well as consider the spatial requirements of RES generation needs, envisaged in the updated National Energy and Climate Plans.

Moreover, clarity should be provided on the envisaged mitigation, nature enhancement and restoration measures, which in turn should be tailored to the affected species and habitats. Synergies between RES generation assets and other economic activities, as well as nature protection and enhancement, can be a win-win opportunity for space optimisation and biodiversity. Robust sustainability and ecological criteria, for example through their inclusion in the pre-qualification and competitive phases of relevant RES auctioning schemes, can not only increase the environmental standards of wind and solar projects, by encouraging the implementation of measures that minimise environmental impacts and contribute to the enhancement and restoration of ecosystems, but can also support the competitiveness of EU industry. Reporting frameworks and benchmarks should, therefore, further assess, recognise and incentivise the contribution of renewable energy and electricity grid infrastructure towards nature positive goals³.

² See [European Environment Agency's monitoring report on progress towards the 8th EAP objectives 2023 edition](#)

³ See European Central Bank's report No 333, entitled '[Living in a world of disappearing nature: physical risk and the implications for financial stability](#)'

Accelerate the energy transition through enhanced public acceptance

RGI is concerned that the introduction of renewables acceleration provisions could lead to significant reduction in stakeholder engagement processes. In the worst case, this could further exacerbate social unrest, undermine democratic values, lead to further delays and conflicts, and essentially stop RES expansion.

However, RGI also sees the process of designation of renewables acceleration areas as an opportunity for Member States to strengthen public participation and increase awareness, beyond what is envisaged in Art. 15d of the revised RED. Indeed, Member States have a chance to launch new or complement existing communication campaigns on the renewables-based energy transition prior to the process of Art. 15c.

Creating convincing narratives is a first step in preventing societal backlashes, but not the only one. National governments should engage early, regularly and in a meaningful manner with relevant stakeholders, including TSOs, NGOs and the general public. Only this has the potential to ensure a holistic approach and improve the final outcome. Lastly, negative impacts on local communities should be foreseen and alleviated. Careful identification of affected communities and granular engagement with them can increase acceptance for the project at hand and redistribute benefits. All in all, the designation of renewables acceleration areas should be fully in line with the Aarhus Convention.

About RGI

RGI is a unique collaboration of NGOs and TSOs (Transmission System Operators) from across Europe engaging in an 'energy transition ecosystem-of-actors'. We promote fair, transparent, sustainable grid development to enable the growth of renewables to achieve full decarbonisation in line with the Paris Agreement.

RGI Members originate from a variety of European countries, consisting of TSOs from Belgium (Elia), Croatia (HOPS), France (RTE), Germany (50Hertz, Amprion, TenneT and TransnetBW), Ireland (EirGrid), Italy (Terna), the Netherlands (TenneT), Norway (Statnett), Portugal (REN), Spain (Red Eléctrica) and Switzerland (Swissgrid); and the NGOs Bellona Europa, BIOM, BirdLife Europe, Climate Action Network (CAN) Europe, Ember, France Nature Environnement (FNE), Friends of the Earth Ireland, Fundación Renovables, Germanwatch, Legambiente, NABU, Natuur&Milieu, the Royal Society for the Protection of Birds (RSPB), WWF International and ZERO. Europacable and IUCN are Supporting Members.