

Energy Traders Europe's response to the European Commission's Public consultation on the Renewable Energy Framework for the Decade Ahead

Brussels, June 2026

Key Messages

1. The architecture is right - the priority is enforcement, not new legislation.

Europe's energy market framework - marginal pricing, the EU ETS, and the internal energy market - already provides the investment signals and cross-border efficiency needed to drive renewables deployment at least cost. The barriers holding back further progress are not structural. What is missing is follow-through: fragmented national frameworks, unmet cross-zonal capacity obligations, divergent certification rules, and incomplete balancing market integration are suppressing deployment that existing rules should already be enabling. The post-2030 framework should prioritise consistent enforcement of what has been agreed over the addition of new regulatory layers.

2. A robust, stable EU ETS should be the primary driver of decarbonisation.

The ETS is the most powerful technology-neutral instrument available. It delivers investment signals simultaneously across electricity, gas, heat, transport, and industry without prescribing which technologies or pathways must be used. Renewable energy targets can complement the carbon price signal, but must not distort or substitute it. The post-2030 target architecture should resist the proliferation of sector-specific sub-targets that add compliance complexity, risk market fragmentation, and raise transition costs without delivering additional emissions reductions.

3. Technology neutrality and market integrity must be preserved across the single market.

Flexibility for Member States in meeting their contributions must not come at the cost of market fragmentation. Diverging national implementation of EU legislation on grid access, support schemes, guarantees of origin, and certification creates unequal conditions, suppresses cross-border investment, and undermines the integrated energy market Europe is building. A level playing field, with demand-side support coordinated at the EU level where necessary, is the foundation for private capital to flow efficiently to where renewable deployment delivers the greatest value.

CONSULTATION RESPONSE



Questions

Part I: General Questions

Q1: How important are the following factors in hindering or slowing down progress towards a higher share of renewables in the EU?

Q1: Importance of factors hindering or slowing down progress towards a higher share of renewables in the EU					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Regulatory					
Lack of implementation of the EU legislation in Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Complexity of the EU legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity in the national implementation of EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Gaps in the EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Administrative and regulatory barriers at national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Insufficient or uncertain business case (economic viability)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Answer

Energy Traders Europe supports a green transition built on clear political goals and market-based solutions. Europe already has the architecture it needs: marginal pricing that guides investment to where it matters most, an emissions trading system that provides long-term investment visibility, and an internal energy market that moves energy efficiently across borders. Together, these deliver renewables integration across power and gas at least cost to consumers.

The barriers holding back further progress are not structural. What is missing is follow-through: fragmented national frameworks, divergent guarantees of origin rules, inconsistent biomethane certification, incomplete balancing platform integration, and unmet cross-zonal capacity requirements. These implementation failures affect electricity and gas markets alike.

Completing the internal energy market requires enforcing what has been agreed, harmonising rules across all energy vectors, and maintaining the regulatory stability that long-term investment requires.

Q2: In the context of the revision of the Governance Regulation, the Commission has asked for evidence on the preferred target architecture for the energy post-2030 framework. In case you have not participated in the consultation on the Governance Regulation by the 19 March 2026 deadline, the following question is replicated here:

CONSULTATION RESPONSE



Answer

For the post-2030 framework, the most efficient transition is one where renewable deployment and electrification advance in parallel. Supply paced with demand strengthens price signals, sustains investment viability, and ensures the transition delivers for consumers.

A robust, predictable and stable EU ETS should be the primary driver of decarbonisation across the energy system, providing technology-neutral incentives for investment at least cost. Any targets should complement rather than distort the carbon price signal.

Clear policy targets set the direction; markets ensure they are met efficiently. The architecture should respect technology neutrality and, where possible, avoid the distortions and compliance complexity of sector-specific sub-targets. Flexibility for Member States must not fragment the single market or raise transition costs for consumers.

Part II: Enabling Framework

Regional & cross-border cooperation

Regional and cross-border cooperation within the EU and with non-EU countries can reduce overall costs and ensure cost-efficient deployment of renewables. Under the RED, Member States have the possibility to enter into various regional and cross-border cooperation mechanisms, but so far their use has been very limited.

Q5: How important are the following measures in maximising the potential of regional and cross-border cooperation in the deployment of renewables?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Remove national administrative/regulatory barriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Provide EU guidance, exchange of best practice and/or technical support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Strengthen EU support to regional investment planning/coordination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improve dedicated EU financing solutions/instruments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set/strengthen obligations for Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
No EU-level provisions are needed	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Maintain the current framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

CONSULTATION RESPONSE

Answer

Simplification and consistent enforcement of existing legislation should be the priority ahead of new regulatory layers. Diverging national rules on grid access and network charges continue to create unequal conditions and suppress cross-border investment.

The minimum 70% cross-zonal capacity requirement has been mandatory since 2019, but is still not consistently met. Full compliance, enforced by national regulatory authorities with appropriate financial incentives and penalties, would significantly increase the capacity available for renewable integration.

Six TSOs remain outside PICASSO. Completing the integration of both balancing platforms is essential to enabling flexible resources to operate where they deliver the greatest value.

For biomethane, consistent implementation of existing EU rules is equally important. Unharmonised certification requirements and support schemes create barriers to cross-border trade, to the detriment of market integration and, in some cases, in breach of fundamental internal market rules.

Financing & support schemes

Approximately €130 billion of investments in clean energy generation are estimated to be needed annually from 2031–2040, with renewables representing 80%. In addition, €90 billion of investments are needed annually in the power grid. While the bulk of renewable energy is deployed today with state support, the energy transition should be increasingly based on private, market-driven investments.

[2] COM SWD Impact Assessment Report — Securing our future: Europe’s 2040 climate target and path to climate neutrality by 2050.

Q6: How important are the following measures for increasing market-driven investments in renewable energy projects in the EU?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Reinforce rules on the opening of support schemes and joint support schemes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Strengthen the guarantees of origin framework with additional information and rights for consumers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify the guarantees of origin system and enable more flexibility for Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Remove barriers to energy purchase agreements including Power Purchase Agreements (PPAs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Remove barriers to revenue stacking and the combination of multiple	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

CONSULTATION RESPONSE



revenue streams at EU and/or national level					
Reinforce support for demand-side measures (e.g. electrification of end-uses)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
No EU-level provisions are needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maintain the current framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Answer

PPA uptake remains constrained by financial regulation that limits virtual PPAs, the absence of multi-year long-term transmission rights, fragmented guarantees of origin processes across Member States, and insufficient recognition of the role of intermediaries in facilitating transactions.

PPAs are contractual structures that operate within and rely on existing market rules. Their adoption reflects free choices made by market participants within the established framework. Regulatory treatment of PPAs must therefore be consistent and non-discriminatory: constraints that do not apply to comparable instruments distort market choice without delivering additional policy outcomes.

On guarantees of origin, both the electricity and gas sectors face the same underlying challenge: diverging national frameworks undermine market integrity, liquidity, and cross-border trade. Harmonising GO frameworks across all energy vectors will build a common European market infrastructure that supports renewable deployment at scale.

For biomethane, full implementation of the Union Database and convergence towards a common certificate as the sole compliance tool will lay the foundations for a liquid European renewable gas market. This could be achieved by removing validity limits, adding carbon intensity and sustainability data, and introducing more granular feedstock categories aligned with proof of sustainability requirements, creating a single standardised EU certificate for compliance use.

Part III: Integration of Renewables into the Electricity System

Renewable energy capacity is growing at a record pace in Europe. System limitations that hamper the integration of new capacities into the electricity system need to be addressed, including grid constraints, low electricity demand, and limited non-fossil energy system flexibility. Addressing current system limitations is important for improving the market conditions for renewable electricity, which are increasingly impacted by the reduction of market revenues due to the rise in hours of low/negative electricity prices correlated with renewable production.

Q7: How important are the following measures for accelerating the integration of renewable energy generation into the electricity system?

Measure	Locational signals for renewable energy	Energy storage	Demand response
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CONSULTATION RESPONSE

	generation and flexibility solutions														
<i>Scale: 1 = not important → 5 = very important</i>	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Remove national administrative/regulatory barriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Provide EU guidance, exchange of best practice and/or technical support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improve EU financing solutions/instruments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set indicators to track progress and reinforce monitoring	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen digitalisation and data exchange	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Set/strengthen obligations for Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set/strengthen obligations for energy system operators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set/strengthen obligations for project developers and generators	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set/strengthen obligations for large electricity consumers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Create/strengthen rights for project developers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Create/strengthen rights for energy consumers (citizens, SMEs, industries)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Create/strengthen rights for aggregators	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Target(s) at EU or national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
No EU-level provisions are needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify EU legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Maintain the current framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Answer

A well-functioning European energy system requires consistent locational signals across all Member States. Harmonising market-based redispatch and coordinated EU-level grid planning with transparent congestion projections are the immediate priorities. Redispatch is defined in existing regulation, but is inconsistently applied; uniform implementation should be actively promoted.

CONSULTATION RESPONSE



Imbalanced pricing harmonised towards a value-of-lost-load basis would strengthen flexibility investment signals and support deeper integration of the internal wholesale market.

Local flexibility markets are a welcome development, but divergent platform designs risk fragmenting the integrated market. Their rules must be consistent with the internal wholesale market, enabling flexible assets to be optimised across borders rather than isolated within national boundaries.

For storage and demand response, removing participation barriers is welcome, but measures must remain proportionate and complement rather than substitute grid expansion.

Part IV: Energy System Integration

Energy system integration means creating stronger links between different types of energy carriers (electricity, liquid, gas and solid fuels, heat and cold), energy infrastructure and consumption/demand sectors. It includes a strong focus on electrification of final energy consumption, and for demand sectors that are difficult to electrify, focus on indirect electrification through the conversion of electricity into fuels such as hydrogen.

Electrification of final energy consumption

Answer (applicable to Q8, Q9, Q10 and Q11):

Europe has the potential to fully decarbonise its industry, buildings, and transport. Realising this requires a stable, technology-neutral European framework with credible long-term signals that give investors the confidence to commit capital across sectors and technologies.

Regulatory consistency is the foundation. When policy direction is clear and implementation is uniform across Member States, markets find the most efficient solutions. This is how Europe unlocks demand-side investment in renewable electricity and renewable gases at the scale the transition requires.

Consistent implementation of EU legislation across all Member States is therefore essential. A level playing field encourages cross-border investment and deepens the single market. Market-based instruments such as PPAs are contractual structures that operate within and rely on existing market rules - their adoption reflects free choices made by market participants within the established framework. Regulatory treatment of such instruments must be consistent and non-discriminatory: constraints that do not apply to comparable instruments distort market choice without delivering additional policy outcomes. Where demand-side support schemes are necessary, coordination at the EU level ensures they complement rather than fragment the integrated European energy market Europe is building.

Part V: Innovative and Emerging Technologies

CONSULTATION RESPONSE

Innovative and emerging renewable energy technologies and forms of deployment (e.g. floating offshore wind, ocean energy, agrisolar, floating solar, renewable fuels, RFNBOs) can contribute to reaching the EU's energy objectives but are currently underexploited.

Q12: How important are the following measures for accelerating progress on bringing to market and scaling up innovative renewable energy technologies and forms of renewable energy deployment?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Remove national administrative/regulatory barriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Provide EU guidance, exchange of best practice and/or technical support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improve EU financing solutions/instruments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set indicators to track progress and reinforce monitoring	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Create/strengthen rights for project developers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Target(s) at EU or national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
No EU-level provisions are needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Maintain the current framework	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Answer

Innovative technologies are best brought to market through stable, predictable regulatory frameworks rather than technology-specific targets or public financing instruments, which risk distorting investment signals and crowding out private capital.

The European hydrogen market has yet to develop at scale. Part of the delay stems from existing RFNBO rules that limit the sector's ability to scale efficiently. Revisiting these requirements to reduce production costs and compliance complexity, including maintaining the refinery route beyond 2030, would deliver greater impact than additional public financing, while preserving the integrity of investments already made under the current framework.

In both cases, removing regulatory barriers and ensuring technology-neutral market access is the enabling condition.

CONSULTATION RESPONSE

Part VI: Bioenergy Sustainability

Biomass sourcing sustainability

Bioenergy represents half of the EU's renewable energy mix and serves as an important dispatchable, storable, and mainly EU-sourced energy solution. However, specific criteria are required to ensure that the biomass used to produce energy is sustainably sourced. The RED sets standards for sustainability and greenhouse gas emissions savings for biomass for bioenergy purposes and introduces the cascading principles.

[4] The cascading principle refers to the efficient use of biomass, by maximising its economic and environmental value in its application.

Q13: How important are the following measures for improving the sustainability of biomass sourcing?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Simplification of current sustainability criteria in the EU legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforcing the sustainability criteria in the EU legislation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide EU guidance, exchange of best practice and/or technical support to further harmonise sustainability criteria across Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Set indicators to track progress in compliance with sustainability criteria and reinforce monitoring	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Incentivise production and consumption of locally available biomass in line with local bioeconomy and environmental objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reinforce certification and traceability of biomass and bioenergy products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen EU-level sustainability criteria for bioenergy and further harmonise the rules	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen obligations for economic operators across the biomass value chain	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

CONSULTATION RESPONSE



No EU-level provisions are needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Answer

Our responses are relevant for gaseous bioenergy sources. The primary concern is how to demonstrate compliance, relating to the debate surrounding guarantees of origin versus proof of sustainability. It is important to ensure the integrity of the chain of custody via the implementation of the Union Database, and to ensure consistent implementation of sustainability criteria and certification. Universal acceptance of all national and international voluntary schemes recognised by the Commission for all compliance markets is key to ensuring integrity.

Bioenergy use optimisation

Bioenergy is a versatile energy source that can be used to produce energy across multiple end uses as well as to provide storage and enhance energy security. However, due to its limited availability, it should be used efficiently, focusing on sectors where it has the highest economic and environmental added value, and primarily in applications that cannot be electrified.

Q15: How important are the following measures for optimising the use of bioenergy?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Promote the role of bioenergy to provide energy storage and resilience	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Incentivise co-production of bio-based products and bioenergy within the same facilities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Require new facilities to increase output efficiency	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Require new facilities to operate more flexibly, together with other renewable technologies, as needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Retrofit existing facilities to increase output efficiency and operate more flexibly	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prioritise bioenergy use in hard-to-decarbonise sectors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

CONSULTATION RESPONSE



Answer

The market is best positioned to determine where the use of bioenergy is most optimal for welfare maximisation. Biomethane is an existing, deployable solution delivering emissions reductions to sectors that are hard to electrify, where alternatives are not yet scalable: aviation, maritime, heavy-duty transport, buildings, and industry.

Part VII: Union Renewable Energy Financing Mechanism

The Renewable Energy Financing Mechanism (RENEWFM) allows a cost-effective deployment of renewables by bringing together EU Member States with low availability of domestic resources and others that have more favourable conditions. A primary objective is to contribute to renewables target achievement (gap-filling function). A second objective is to support renewable energy deployment across the Union by contributing to the enabling framework (enabling function). The mechanism kicked off in September 2023.

Q16: How important are the following factors in hindering the participation of Member States in the RENEWFM?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Administrative barriers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of legal or economic incentives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Existence of better alternatives (e.g. statistical transfers)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of the procedure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited familiarity with the mechanism/early stage of mechanism implementation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Q17: How important are the following factors in hindering the participation of project developers in the RENEWFM?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Eligibility conditions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Structure of the grant	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Complexity of the procedure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of long-term visibility on auctions schedule and budget	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Limited familiarity with the mechanism/early stage of mechanism implementation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

CONSULTATION RESPONSE

Q18: How important are the following measures for optimising the use of the RENEWFM?					
	1 not important	2 somewhat important	3 neutral	4 important	5 very important
Strengthened and explicit mandate for Union-funded auctions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
EU guidance, exchange of best practice and/or technical support	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Use of financial instruments (Contracts for Difference or repayable forms of support)P	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Set/strengthen obligations for Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Review the rules for statistical allocation of renewable consumption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Expand the technology scope (e.g. flexibility)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allow other tender designs (e.g. demand-focused)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Develop synergies with other EU programmes (e.g. Innovation Fund)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
No EU-level provisions are needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify EU legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Maintain the current framework	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Answer

To develop a genuinely integrated biomethane market, where demand is met continuously and securely by the most cost-efficient sources across the continent, Europe needs a harmonised framework for support mechanisms, simple to implement across Member States and aligned with a common approach to certification.

Today, national support schemes often restrict exports or require obligations to be met with domestic production, resulting in complex rules, barriers to trade, and higher costs. Member States

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should be required to ensure their national schemes and related targets do not constitute barriers to cross-border trade.

Regional support mechanisms, designed around cross-border trade principles rather than domestic supply priorities, can play an important role in this regard. A well-designed, harmonised framework would unlock the scale and investment needed for biomethane to make a substantial contribution to Europe's decarbonisation goals at competitive cost.

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