



The aim of the Cérémé association (Cercle d'Etudes Réalités Ecologiques et Mix Energétique) is to promote – in France and the European Union more broadly – a debate based on the ecological and economic consequences of the various types of energy.

The official objective of the revision of the 2018-2001 directive is to increase the reduction in CO₂ emissions from 40% to at least 50% compared with 1990, mainly by raising the current renewable energy target of 32% by 2030.

To achieve the final CO₂ emissions reduction target, Cérémé considers that the draft directive must explicitly and exhaustively take into account all types of energy which effectively contribute to the target, rather than limiting its scope to the renewables listed in the draft directive and the 2018-2001 directive.

In other words, since it fails to mention nuclear among the types of energy that make a significant contribution to this target, the proposed revision does not meet its own official stated objective. The Commission should therefore extend the draft revision, including its title, by explicitly referring to energies with low CO₂ emissions, and at least those with lower CO₂ emissions than those referred to in the 2018-2001 reference directive.

Furthermore, Cérémé notes that indent 2, subparagraph 4 of B. *Objectives and Policy options*, refers to energies “and other low-carbon fuels including advanced biofuels, synthetic liquid and gaseous fuels and hydrogen” which do not appear to have any of the specific characteristics required to be included in a list of renewable energies. Since this exception has been accepted, all types of energy contributing to the official target should – by appropriate rewording of the title of the draft directive as well as its content – be accepted for inclusion in Member States’ balance sheet, for example as “renewable energies and similar with regard to CO₂ emissions.”

Similarly, the draft revision should emphasize from the outset that the energy efficiency objective prevails over the renewable energy production objectives, which are only secondary among the energy transition objectives. Energy efficiency is at the heart of the draft roadmap released in parallel by the commission for public consultation, although there is no reason why this draft revision should not make explicit reference to it – quite the contrary given the pressing issue of reducing CO₂ emissions.

The actual characteristics of the complete energy balance specific to each Member State with regard to CO₂ emissions – see Annex 1 of the 2018-2001 directive, as updated – must be taken into account by applying the principle of subsidiarity referred to by the draft revision in paragraph A, in other words without it being necessary to resort to the expedient of statistical transfers between Member States as specified in Article 8 subparagraph 2 (and Recital 39) of that directive. The Commission uses this completely unjustified expedient in a recent “new financing mechanism for renewable energies” initiative and Cérémé respectfully asks for it to be abandoned.

Finally, it would be useful if the future directive could specify the performance indicators used to assess the quality of the energies contained in the list of “renewable energies and similar with regard to CO₂ emissions” following the aforementioned revision; for example, effective availability and controllability, comparative competitiveness, control over prices for the consumer, respect for the environment and biodiversity, contribution to regional employment, etc.

In conclusion, Céréme considers option 3 to be appropriate, on the express condition of explicitly considering a new list of “renewable energies and similar with regard to CO2 emissions”, rather than simply the energies mentioned in the draft.