Manifesto for Nature-inclusive, People-centred Renewable Energy in Europe

The path to avoiding catastrophic climate change is narrow. To limit global warming, Europe must drastically reduce energy and resource consumption, abandon its reliance on fossil fuels, and massively expand renewable energy production[1]. At the same time, developing renewables and electricity grids must not come at the expense of preserving biodiversity, but should seek to maximise synergies with nature conservation.

Too often, we are given the impression that developing renewable energy automatically means sacrificing other environmental priorities or social rights. But there is ample evidence from across Europe to suggest that with careful planning, public participation and benefit sharing, renewable energy and its supporting infrastructure can be developed in harmony with natural ecosystems, local populations, and workers' rights.

We now have an opportunity to get it right: the revised EU Renewable Energy Directive (RED) requires governments across the EU to map their territories and identify suitable areas where permits for renewable energy installations and infrastructure can be issued in a simplified and expedited manner. Will EU governments now have the courage and will to move their countries quickly and decisively towards a sustainable expansion of renewable energy?

With this Manifesto, we as civil society organisations and networks propose five key courses of actions that can ensure a successful acceleration of renewable energy development in harmony with our ecosystems and communities. We urge decision-makers across Europe to commit to these priorities and draw inspiration from the underlying good practices:

1. Make renewable energy an ally of biodiversity

Biodiversity loss and the degradation of natural ecosystems are closely linked[2] to climate change. We need to deploy renewable energy while preserving and restoring nature. This requires careful environmental sensitivity mapping to underpin the siting of new renewable energy installations and infrastructure across the continent. Integrated, multi-level mapping with robust data collection will enable renewables to be sited in a way that minimises negative ecological impacts and creates ecologically valuable habitats.

Based on the results of these mapping exercises, countries and regions must develop careful zoning plans[3] to designate renewables 'acceleration areas'. These plans need to be developed in a transparent and participatory way - i.e. allowing municipalities and local communities to assess the proposals and propose alternatives at an early stage - and with the strategic aim of prioritising renewable energy deployment in areas that are best suited to it, such as urban, artificial, and industrial areas, transport infrastructure corridors, already degraded land and land with low yield and low natural value. This approach is also key to complying

[1] According to the updated Paris-Agreement compatible scenario, Europe must meet at least 50% of its final energy consumption from renewable sources by 2030 and 100% by 2040. Assuming a constant rate, the figures in the PAC scenario result in 105 GW of renewable generation capacity being added on an annual basis from 2023 onwards, mainly from wind and solar technologies. See www.pac-scenarios.eu.

[2] According to a joint IPBES-IPCC report, the mutually reinforcing nature of climate change and biodiversity loss means that a satisfactory solution to either problem cannot be achieved without addressing the other. Increased atmospheric concentrations of greenhouse gases lead to higher average temperatures, changes in precipitation patterns, increased frequency of extreme weather events, oxygen depletion and acidification of aquatic environments. Most of these have negative impacts on biodiversity. Changes in biodiversity in turn affect the climate system by altering the nitrogen, carbon and water cycles.

[3] In the revised RED, Article 15c (2) requires these plans to be subject to a Strategic Environmental Assessment (SEA) in accordance with Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive).

with the RED requirement that 'acceleration areas' should not be located in protected natural areas[4]. When assessing both marine and terrestrial areas, authorities must ensure that each activity has its place in synergy with others. It is therefore essential that the spatial planning process is comprehensive and includes other activities such as agriculture, mining, fisheries, and nature preservation or restoration.

There are also opportunities to combine renewable energy projects with nature restoration activities[5], which should be encouraged. For example, by combining solar power generation with environmental stewardship and agro-ecological practices on brownfields, old mining sites, or intensively used agricultural land, it is possible to restore the functionality of deteriorated soils, thereby combining renewables roll-out with important biodiversity benefits.

Further EU-wide guidance on best practice in the siting of renewable energy projects could provide additional certainty to developers, investors, local communities, and civil society that clear, consistent and credible criteria are being used to identify suitable acceleration areas. This could also improve public accountability and the European Commission's ability to monitor developments and prevent administrative malpractice[6].

However, even when constructing renewables in these 'acceleration areas' we call for proper environmental assessments to be carried out where this is required under the Environmental Impact Assessment (EIA)[7] and Nature[8] Directives. As well as contributing to the assessment of risks to habitats and species, EIAs can play a valuable role in gathering data for regions and ecosystems where gaps and uncertainties remain (particularly in some Central and Eastern European regions and marine ecosystems) and in identifying effective mitigation and compensation measures.

Depending on countries' renewable energy needs however, these most suitable areas may not be sufficient to accommodate the volume of renewable energy installations required to meet the EU's renewable energy targets. The transposition of the RED by EU countries must therefore include clear and binding provisions on mitigation measures and nature-inclusive design– for both new and repowered renewable energy assets – as well as robust criteria to regulate changes of use and allow for multiple uses of land and sea land and sea areas.

Appropriate criteria in tenders for renewables, particularly utility-scale projects, can help to ensure that environmental considerations are effectively integrated into the specific characteristics of projects. Therefore, to reward projects with the best environmental performance in their design, construction, operation and

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[4] Under the revised RED, Article 15c (1) (a) (ii) requires that, in their plans to designate renewables 'acceleration areas', "Member States shall [...] exclude Natura 2000 sites and areas designated under national protection schemes for nature and biodiversity conservation, major bird and marine mammal migratory routes as well as other areas identified based on sensitivity maps [...]".

[5] The impact of renewable energy and electricity grid projects on the surrounding biodiversity and ecosystem services is highly dependent on scale and context. Habitat loss and fragmentation, which are major threats to biodiversity, can be prevented, minimised, and/or mitigated through appropriate nature-compatible planning and design solutions. However, the combination of renewable energy and electricity grids with complementary restoration activities can even have positive effects in terms of habitat and biodiversity enhancement - nature-positive, i.e. no net loss but net gain in biodiversity. Examples of "Proactive Conservation Actions" can be found in Bennun et al. (2021) "Mitigating biodiversity impacts associated with solar and wind energy development. Guidelines for project developers" (available here). Similarly, Solar Power Europe in its "Solar, Biodiversity and Land Use" Best Practice Guidelines (available here) provides several recommendations for combining solar photovoltaic (PV) projects with nature restoration objectives. For electricity grid infrastructure, the Renewables Grid Initiative (RGI) has provided a comprehensive database of examples of how grid development can better support existing nature conservation objectives.

[6] For example, the misapplication of legal requirements under the EIA and Nature Directives has allowed nine highly damaging projects to be approved in several of Romania's protected natural areas.

[7] Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (EIA Directive).

[8] Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (Habitats Directive); Directive 2009/147/EC on the conservation of wild birds (Birds Directive); Directive 2000/60/EC establishing a framework for Community action in the field of water policy (Water Framework Directive).

decommissioning, specific non-price tendering criteria – covering nature-inclusive design and circularity – should be established in the relevant legislation and regulations. In large countries, support mechanisms should be differentiated by region to encourage a balanced development of renewables across territories, and should be adapted to specific locations, e.g. by providing higher support for solar installations on rooftops or in built-up areas.

The wellbeing of marine ecosystems must be central in offshore renewable energy expansion. Ecosystem-based maritime spatial planning[9], supported by robust Strategic Environmental Assessments (SEAs), can ensure that the right sites are identified – where environmental risks are lowest – and that cumulative impacts are understood and minimised. In all relevant planning and project permitting processes, science-based dialogue and coordination between all stakeholders can help find solutions that address both the need for rapid development of offshore energy technologies and the need for effective protection and restoration of marine biodiversity, for instance by coupling offshore wind assets with practices such as low-impact aquaculture.

Maritime spatial plans (MSPs) should respect the designation of 30% of Europe's seas as a contiguous and representative network of Marine Protected Areas (MPAs) and Areas of Ecological Importance, and ensure connectivity through appropriate provisions outside MPAs. Plans should avoid siting offshore renewable energy installations in Natura 2000 sites or other nationally and internationally designated MPAs.

2. Put civil society at the centre of decision-making on plans and projects

Public participation requirements are not just a legal obligation under the Aarhus Convention[10]. They are a strategic and fundamentally democratic tool to ensure sound and transparent planning and permitting of new renewable energy assets.

Under the revised RED, Strategic Environmental Assessments (SEAs) of plans to designate renewables 'acceleration areas' must be initiated by the competent authorities of EU member states. In carrying out the SEAs, it is vital that the public are given an early and meaningful opportunity to express their views and influence the outcome of land use and maritime spatial planning processes. Full, clear and transparent information on proposed spatial plans should be proactively made available to the public from early in the planning process, when all options are still open. This will enable local communities and the wider civil society (including environmental NGOs, universities, local residents and businesses, representatives of indigenous communities) to engage constructively and improve these plans. Transboundary SEAs[11] are also key, as they can ensure cross-border coordination, which is particularly important for offshore renewable energy development.

Properly conducted SEAs will provide an initial assessment of the environmental and social sensitivity of additional renewable energy installations in different areas. This requires an ongoing exchange of best

[9] Maritime spatial plans are required by EU countries under Directive 2014/89/EU establishing a framework for maritime spatial planning (MSP Directive). Directive 2008/56/EC establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive) aims to achieve a "good environmental status" of the EU's marine waters and sustainably protect marine-related economic and social activities.

[10] Both the EU and each individual EU country are parties to the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention).

[11] Transboundary SEAs are required under the UNECE Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention).

practices, which can help to reduce the uncertainties normally associated with SEAs due to their broad scope. Ensuring a strong and diverse representation of the scientific community can help improve the reliability of the modelling used in a SEA, resulting in more reliable information about the likely environmental impacts of particular projects or the effectiveness of particular mitigation measures. Similarly, public participation through appropriate communication, consultation and negotiation can help to identify the right assessment criteria for the SEA and to select options where alternatives are available. Importantly, this will increase certainty at the permitting level by facilitating screening decisions, enabling more rapid EIAs and Appropriate Assessments (AAs)[12], and guiding project developers on what mitigation measures need to be taken.

Proper and transparent public participation can help to speed up project implementation too. By ensuring that potential environmental and social concerns, including possible related legal issues, are addressed early in the process, public consultations that inform the design and siting of utility-scale projects can dramatically reduce the likelihood of later administrative or judicial appeals. There is also a need for closer cooperation between competent authorities (and in particular the "single contact points") and project developers to facilitate the availability of timely and easily accessible information to all interested parties, both at the plan and project level. Real-time, digital publication of decisions and full disclosure of relevant project information to the public during the permitting process are key to ensuring that civil society participates in the renewable energy transition.

Steps should be taken to involve local authorities, encourage the creation of citizens' assemblies, and channel the debate through open, science-based stakeholder dialogue platforms. Such institutions can play a fundamental mediating role between public authorities, project developers and nature conservation organisations. They can find solutions that make the development of renewable energy assets more environmentally friendly and increase support by residents - such as tendering criteria that award points for citizen participation - thereby increasing the legitimacy of projects, shortening development times, and reducing the risk of lengthy legal challenges.

3. Prepare public administrations for an accelerated transition to renewables

EU legislation requires renewable energy projects to be approved by competent authorities within short timeframes, which vary depending on the size and location of the proposed projects. Accelerating the permitting procedures – and ensuring streamlined processing of project applications while maintaining thorough environmental assessments and public participation – is critical to developing the many additional gigawatts of renewable energy that Europe needs within a reasonable timeframe.

The success of this acceleration depends largely on the quality and efficiency of administrative processes and environmental assessments, at all levels of government. Efficient allocation of financial resources, ranging from revenues generated by permit application fees to funds in the REPowerEU chapters of National Recovery and Resilience Plans (NRRPs) is key. Resources should be dedicated to improving the staffing and expertise of those public bodies (especially local authorities) involved in the various stages of permit-granting processes – e.g. reviewing project applications, checking the completeness of documentation, organising public consultations from technical review to documentation completeness checks – and to developing digital and

[12] Although it shares many similarities with EIA, the Appropriate Assessment (AA) is a distinct legal tool. Based on Article 6 of the EU's Habitats Directive, AAs involve a case-by-case examination of the effects of a development or activity on a Natura 2000 site and its conservation objectives, to verify the likelihood of significant effects on specific natural sites and species.

accessible permitting tools to help streamline administrative procedures. The responsibilities of different ministries and regional and local authorities should also be clearly defined in the relevant legislation to avoid overlapping competences.

Equally important is the development of digital permitting tools to streamline the permitting process. These should provide a single online environment to help permitting authorities and developers synchronise their workflows, facilitate access to environmental data and provide transparency for all stakeholders, including authorities, project developers and community members.

There is also a need to ensure that the workforce is ready along the entire renewable energy value chain. From manufacturing to installation and recycling, EU countries should make best use of EU funding instruments to ensure that there are enough skilled workers to cope with the expected increase in the volume of renewable energy projects. Financing tools should include investment in higher education programmes to promote renewable energy professions, and mechanisms to promote gender balance to make the transition more equitable. This could also provide an opportunity to redeploy or retrain workers from other energy sectors, such as coal mining or gas network development and maintenance, which will be drastically reduced as a result of the energy transition, thus avoiding unemployment.

4. Use renewables to empower communities and foster social innovation

Citizens and local communities should be empowered to actively benefit from the direct economic returns of renewable energy, both individually and collectively[13]. Administrative and financial support for the uptake of energy communities is essential to enable citizens, small businesses, and local authorities to collectively produce, manage and consume their own energy. Community members will have access to low-cost, locally sourced renewable energy and be directly involved in collective ownership and decision-making, thereby strengthening democratic processes. To ensure fairness and equity, energy communities should have access to specific support for obtaining permits and grid connection, including through custom workflows and application templates available on the digital permitting platforms of the relevant “single contact point”.

Engaged citizens make community life more resilient. In addition to the efficiency value to the grid of bringing consumption closer to production and increasing local acceptance and support to renewable energy projects, , community-owned projects can also add value at the local level. This can happen, for example, when project revenues are reinvested in local social services, public transport, and energy efficiency. Energy communities also often promote energy literacy among community members, leading to more virtuous energy and material consumption models.

The relevant updated EU legislation[14] on energy communities should be implemented in full and as soon as possible. In their updated National Energy and Climate Plans (NECPs), governments should outline national and sub-national targets and trajectories for the production and ownership of renewable energy by citizens and local communities. In addition, potential technical and regulatory barriers should be removed and, based

[13] Article 2 of the RED provides definitions of “renewables self-consumer”, “jointly acting renewables self-consumers” and “renewable energy community”. The latter, Renewable Energy Communities (RECs), must meet certain criteria regarding their legal entity and ownership models, with cooperative structures being a typical example, in which case the acronym CEC may be used. For the sake of clarity, only the term "energy community" will be used in this document.

[14] Importantly, the Renewable Energy Directive (RED) and the Internal Electricity Market Directive (IEMD) need to be adequately transposed in order to create an appropriate “enabling framework to promote and facilitate the development of renewable energy communities” as stated in Article 22 of the RED.

on a system optimisation approach Transmission and Distribution System Operators (TSOs and DSOs) should be incentivised to provide rapid grid access (and, where necessary, grid expansion) to renewable energy projects, especially those serving energy communities.

Regional and local authorities must be provided with adequate resources and expertise to design and implement support schemes and tenders aimed at including or promoting citizen- and community-led projects using public space. Importantly, public procurement rules should be clarified at national level to enable municipalities to optimise their procurement processes, including by facilitating open competition and fair treatment[15] of energy communities.

Special attention should also be paid to providing access to renewable energy for vulnerable, energy-poor, and low-income households to ensure a just transition. Energy communities can enable solidarity-based energy financing, allowing the most disadvantaged households to benefit from lower bills and repay the investment over time with the money saved. Revolving loan funds and other relevant financing mechanisms should also be prioritised to finance the installation of solar panels in social housing and to support the insulation of low-income households' buildings.

5. Make the transition to renewables resource-wise

In parallel with the need to increase renewable energy supply across the continent, EU countries should take the appropriate steps to significantly reduce their energy demand[16] through ambitious efficiency and sufficiency[17] policies and measures in all relevant sectors (buildings, transport, agriculture, etc.). Incorporating a strong circular economy approach into the criteria for both new and repowered renewable energy projects will also provide an opportunity to reduce both the material and energy intensity of the technologies and components required. Permitting processes should promote the use of repairable systems and products, reusable components, recyclable materials and recycled content in wind and solar installations in a meaningful way, and should include strong environmental conditions for decommissioning. In addition, appropriate requirements should be put in place to account for the embodied carbon of materials and reward the use of green steel and cement in the construction of renewables installations and infrastructure. This will not only help Europe reduce the material, resource, land and energy footprint associated with the transition to renewables. Reducing dependence on imported resources would also increase security and boost the EU's internal market in the critical areas of recycling and zero-emission manufacturing.

Integrating and combining different renewable energy resources at system level is key to realising their full generation potential and reducing the need for expensive or polluting balancing options. To this end, it is important to unlock investment in critical electricity grid projects and ensure their rapid approval and implementation, as well as unlocking demand-side flexibility. Expanding and upgrading electricity transmission infrastructure, both within and between countries, will efficiently and cost-effectively

[15] Several examples of municipal procurement processes that directly support energy communities are reported in the REScoop.eu Municipal Guide (available here), developed as part of the Life COMPILE project.

[16] According to the updated Paris-Agreement compatible scenario, Europe must reduce its final energy consumption by at least 24% by 2030, 48% by 2040, and 57% by 2050, compared to 2020. See www.pac-scenarios.eu. Similarly, the CLEVER scenario shows that Europe's final energy consumption could and should be reduced by 55% by 2050 compared to 2019 in order to stay on a 1.5°C compatible pathway, with -45% as a key milestone for 2040. See www.clever-energy-scenario.eu.

[17] Some European countries have already implemented sufficiency measures. See e.g. climate ticket in Austria; 2000 watt target in Zurich; creation of local agencies for collective housing in Germany; reduction of the speed limit on motorways to 100 km/h in the Netherlands; ban on flights if there is a 2.5 hour train or bus alternative in France.

accommodate the increasing output of solar and wind power - enabling higher electrification rates, in more end-use sectors, and promoting solidarity between EU countries. In parallel, implementing these grid upgrades in line with the 'energy efficiency first' principle is essential to ensure their success. It is therefore important to rapidly enable or improve demand-side response[18] in both the residential and industrial sectors. This will unlock the full potential of distributed generation while minimising the network upgrades required at the distribution level, thereby reducing material requirements.

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The climate, energy and biodiversity crises will only get worse if governments do not systematically and rapidly phase out fossil energy from our economies. We therefore call on decision-makers at all levels of government across Europe to work together now for a rapid, democratic and decisive transition to 100% renewable energy, while reducing energy demand and avoiding new investments in false solutions and new fossil fuels infrastructure. Proper implementation of the EU's RED, consistent with existing EU environmental safeguards and commitments, is crucial. It will pave the way for an energy transition that is both environmentally friendly and that maximises the involvement of citizens and local communities, thus ensuring that it is also socially just. Now is the time for policymakers to seize their chance.

[18] The EU Strategy for Energy System Integration emphasises the importance of giving priority to demand-side solutions whenever they are more cost-effective than investments in energy supply infrastructure in meeting policy objectives.


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