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**Contribution to the EU Consultation on Green Paper:
“A 2030 framework for climate and energy policies”**

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As an individual citizen, I would like to send my personal input to build a more stable and faire 2020-2030 energy framework. I personally believe that this consultation is of high importance for the future of Europe and that citizens should lead the energy transition in a sustainable way.

Questions and answers of the consultation:

4. 1 General

Which lessons from the 2020 framework and the present state of the EU energy system are most important when designing policies for 2030?

The absence of binding targets to reach the 20-20-20 targets was the Achilles' heel for boosting renewable energies. Member State's credibility has dropped sharply when Governments decided to stop their national remuneration schemes initiatives, which has seriously deteriorated renewable energies (RE) social acceptance. These Member States' individual actions ensued on a devastating effect for the RE national markets and in consequence public acceptance was gravely affected. Consequently, remuneration schemes should be consistent and focused on the long-term to provide stability and to develop renewable energy solutions. Policies for 2030 need to lead national actions in a more coherent and consistent way. Binding targets will be needed to prevent these kinds of counter-effects on the promotion of RES. Binding targets have enabled Member States to engage in political GHG reduction and promotion of Renewable Energy, which was no necessarily the case for energy efficiency despite of some wishful thinking.

Regarding to carbon trade, it was shown that the current system could also negatively affect the renewable energy sector because of the lack of controlled flexibility. Efforts should be made to ensure that the emissions price would remain stable and that the institutions could have effective mechanisms to react fast to challenges presented in this respects. Carbon prices are not the only solution to fully introduce renewables in the energy market. Other solutions such as strong and ambitious objectives should be summited.

More ambitious targets should be taking in consideration excluding the promotion of new polluting energy initiatives (such as Shale Gas).

The 2020 strategy presented a lack of recognition of community-owned and local citizen initiatives; small producers and cooperatives play an increasing role on the energy market and their role needs to be recognized not only to boost social acceptance but also as actors who can organize the energy demand. Cooperatives have shown to be more crises resilient than traditional companies. This applied to the energy sector will positively affect not only on the security of supply but also to the current problem of distribution infrastructure since energy is produced and consumed at the local level. Supporting community owned production and microgeneration implants will enforce and stabilize the internal energy market, reinforcing indigenous supply sources, thus becoming more independent.

4. 2 Targets

- Are targets for sub-sectors such as transport, agriculture, industry appropriate and, if so, which ones? For example, is a renewables target necessary for transport, given the targets for CO₂ reductions for passenger cars and light commercial vehicles?

Regarding the transport sector, emphasis should be placed on technology neutral measures to promote CO₂ reductions.

- How should progress be assessed for other aspects of EU energy policy, such as security of supply, which may not be captured by the headline targets?

An efficient instrument to assess progress should be based in relative terms, focusing on local and regional measurements since absolute terms are usually on the side of large companies. To assess progress, decentralized indicators should be better coordinated. An efficient way of assessment should be linked to environmental impacts and competitiveness in the long term.

4. 3 Instruments

- Are changes necessary to other policy instruments and how they interact with one another, including between the EU and national levels?

Yes, streamlining policies is fundamental. Overlapping targets and a variety of implementation measures water down the effectiveness of each other. For example, the waste legislation has to keep into better consideration energy and climate targets.

- How can fragmentation of the internal energy market best be avoided particularly in relation to the need to encourage and mobilise investment?

An efficient way to avoid fragmentation could be done by organizing the demand of energy. It is to note that the energy cooperative model plays with this advantage, which can be seen as a step forward on the governance of the energy market. Organized demand aloud a better planning of the energy consumption and thus better manage the energy market. In order to foster so, financial mechanisms (such as feed-in-tariffs) for community-owned energy producers will be needed.

In this perspective, to avoid fragmentation and to promote investments, decentralized energy production and microgeneration are to be promoted (mainly through community-owned energy and REScoops). Decentralization will lead to un-burden national and European heavy investments. The RES cooperative model is a working alternative, which counts with a large

capacity of mobilizing private investments and funds by citizen initiatives. Initial investments can be done and lead by citizen initiatives. Capital for this investment is already available through promoting citizen initiatives via Cooperatives and community-owned companies. In order to further mobilize these investments, remuneration schemes should be putted in place to give enough confidence to the citizens to tackle the initial investments. This will empower business ventures from a bottom-up perspective keeping the monetary sources active in the region of origin.

- Which measures could be envisaged to make further energy savings most cost-effectively?

Smart cities have been seen as those working in close cooperation with their inhabitants. Therefore, there is a need to encourage smart consumers and “prosumers” involving them in the production chain. It was shown that community-owned initiatives have putted down energy consumption and generated active consumers and prosumers. Administrative charges and procedures should be lightened to ease citizen’s participation in all the energy chain (as producers, suppliers, retailers and consumers).

Energy savings should be targeted focusing on citizens, allowing them to produce their own energy. This will build consciousness on energy consumption and as a consequence, energy savings.

4. 4 Competitiveness and security of supply

- Which elements of the framework for climate and energy policies could be strengthened to better promote job creation, growth and competitiveness?

The role of co-operative enterprises should be further highlighted in its mission on job creation, growth and competitiveness in a sustainable and participative manner. The promotion of RES cooperatives and community-owned models will diversify the supply, as well as boost local growth and promote long term savings. Regarding job creation, through this decentralized models focus on the creation sustainable jobs (since they aim to create self employment) and social awareness on renewable energy.

Also the integration of small local players will provide more stability to the internal market, diversifying the supply sources. National barriers and administrative burdens are currently playing against small companies and individuals, which produce energy.

- How can the EU best exploit the development of indigenous conventional and unconventional energy sources within the EU to contribute to reduced energy prices and import dependency?

Competitiveness targets must be focused on renewable energies and energy efficiency leaving aside non-renewable options, which will only delay the current transformative process towards a clean market. Also, “Green choices” regarding the choice of energy suppliers should become more affordable.

Complete liberalization was shown not to lead to fair competition between energy actors. It is a fact that liberalizing the market helped many industries to foster competitiveness and to reduce prices but, in order to reach so, equality on competition terms should be granted. This is to say,

that transparency on the distribution of aids and taxes should be shown and supporting mechanisms should help the development of renewables as the real solution to a clean economy.

- How can the EU best improve security of energy supply internally by ensuring the full and effective functioning of the internal energy market (e.g. through the development of necessary interconnections), and externally by diversifying energy supply routes?

To tackle security of supply, assessments and capacity analysis at the national and regional level should be implemented. Decentralized production schemes not only tackle energy losses -since the energy produced remains consumed locally- but also helps in generating a more independent energy market backed on indigenous sources and enforcing security of supply because of the diversification of suppliers. Even if the energy potential produced locally may be lower than the one produced in a centralized way, the energy received by end-users consuming centralized-produced energy is lower than the amount that they would get if the energy was produced locally.

Energy extracted from non-renewable energy sources, should not be taken as an option to tackle security of supply. Shale gas represents an obstacle and a threat for the development of the RES market and clean energy production. Also investing in Shale gas (not speaking about the gravity of the environmental footprint that will left behind) is a dead-end investment. Supply should be focused on RES following the current European trend to lead innovation technologies worldwide.

Energy poverty (energy isolation) is a reality that needs to be treated through decentralized production. Local and regional producers and suppliers could make a difference at the time of providing energy independence to the regions. Grids interconnection should be tackled in a smart way, starting from regional initiatives and connecting with neighbor's regions following a centripetal methodology.

4. 5 Capacity and distributional aspects

- Are new financing instruments or arrangements required to support the new 2030 framework?

New support schemes should reinforce local initiatives putting citizens at the vanguard of the energy transition. These support schemes should become a reality to give a first incentive to RES. In any case, support schemes must be a long-time commitment, penalizing governments that cut down this aids.

Simplifying the regulatory framework for the creation of renewable energy cooperatives and community-owned initiatives. Also there is a need to facilitate the interaction between decentralized public authorities and citizens (Germany has proven the potential of citizen initiatives, where 51% of renewable energy have been developed by individuals).