

**Explanatory statement on the National Renewable Energy Action Plan ‘The Republic of Latvia’s Renewable Energy Action Plan for implementing Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC by 2020’.**

**Table 1 in the action plan**

In the action plan’s ‘additional energy efficiency’ scenario, which includes additional measures, it is forecast that in 2020 an increase in energy efficiency and energy saving will produce a saving of approximately 638 ktoe, compared with the reference scenario, which takes into account only the energy-efficiency and energy-saving measures adopted up to 2009 and measures laid down in policy planning documents in force.

This assessment forecasts that part of the energy saving will be produced by end users of energy, and according to the *First energy efficiency plan for the Republic of Latvia 2008 – 2010* this could amount to **554 ktoe**. Part of the energy saving will, on the other hand, come from the transformation sector, giving an additional energy saving of **84 ktoe** from reducing energy losses in transmission and distribution systems in the centralised supply of heat energy and electricity.

**2. Authorisation procedures (Q4.2.1).**

The information included in section 4.2.1 of the action plan, ‘*Administrative procedures and spatial planning (Article 13(1) of Directive 2009/28/EC)*’, was prepared taking into account the European Commission’s template prepared and adopted on 30 June 2009 pursuant to Decision No L 182/33, *Commission Decision establishing a template for National Renewable Energy Action Plans under Directive 2009/28/EC*.

We would like to draw your attention to the fact that the action plan contains information about all the possible permits, licences and agreements that a renewable energy producer might have to obtain. However, we would point out that in each case (for example, depending on the capacity of installations) the number of permits to be obtained and the volume of applications varies.

The institutions regularly evaluate the administrative procedures in force to see how far they are proportionate and necessary, pursuant to the Law on Administrative Procedure, and this includes introducing the requirements laid down in Directive 2009/28/EC.

### **3. Technical specifications.**

In order to remove obstacles to the operation of the internal market, all European standards have been fully transposed into the Latvian standards system and there are no standards in force within it that exceed the demands of European standards in this sphere. Latvia's aid schemes do not include specific technical specifications in relation to renewable energy facilities or systems, but experience has shown that business owners choose those technologies whose specifications meet the applicable European standards.

### **4. Buildings (Q4.2.2).**

The date set out in paragraph (c) of section 4.2.3, Buildings, (Article 13(3) of Directive 2009/28/EC) was initially '1 January 2012', but it has been amended and should now read '9 July 2012'.

The Ministry of the Economy would like to make it clear that conditions to foster the use of renewable energy in buildings are to be set out in local authorities' building planning documents. There is a plan to include a duty on the part of local authorities to draft these documents in the Law on the Energy Efficiency of Buildings, which must be drafted and adopted by 9 July 2012.

### **5. Information provisions (Q4.2.4).**

In reply to the Commission's letter, the Ministry of the Economy would like to draw the European Commission's attention to the following:

In relation to all the documented information (information or compilations of information, in any technically possible form of recording, storage or transfer) that is circulated by institutions, a uniform procedure has been laid down pursuant to Article 2 of the Freedom of Information Law, under which private individuals are entitled to obtain information from an institution and use it. Additionally, information is accessible to the public in all cases where not otherwise provided by the Freedom of Information Law.

Pursuant to Articles 15(4), 22(4), 27(4), 28(6) and 29(2) of the Law on the Cabinet System, and Article 11 of the Development Planning System Law, Cabinet Regulation No 300 of 7 April 2009 'Cabinet Rules of Procedure' is in force (hereafter referred to as 'Cabinet Regulation No 300'). This regulation lays down, among other matters, the types of document to be examined within the Cabinet, including development planning documents, foreign and domestic legislation, and the procedures for their submission, harmonisation, forwarding and examination. Paragraph 3 of Cabinet Regulation No 300 stipulates that when a bill is submitted for consideration by the Cabinet, a report assessing the possible initial impact of the planned legal provisions must be attached to it, consisting of separate thematic sections (hereafter referred to as an 'annotation'), including sections assessing the impact of the draft legislation on

the public. At the same time, Cabinet Regulation No 300 lays down a detailed procedure for harmonising draft legislation, including a procedure, under subparagraph 89(1) of Cabinet Regulation No 330, by which parties with an interest in draft legislation that has been announced, and is therefore available on the government's public internet site ([www.mk.gov.lv](http://www.mk.gov.lv)), can put forward reasoned recommendations and submit proposals. In addition, pursuant to paragraph 17 of Cabinet Regulation No 300 the ministry is responsible for providing information to the public concerning the content of draft legislation to be considered by the Cabinet, and significant changes. A procedure under which the ministry prepares, draws up and disseminates to the public information on draft legislation to be considered at meetings of Secretaries of State, Cabinet committee meetings and Cabinet meetings, and decisions taken, is laid down by Cabinet Order No 2 of 23 March 2010, entitled 'Procedure under which the ministry prepares, draws up and disseminates to the public information on draft legislation to be considered at meetings of Secretaries of State, Cabinet committee meetings and Cabinet meetings, and decisions taken'.

#### **6. Certification of installers (Q4.2.5).**

- In relation to question (a) in section 4.2.5, we would like to point out that, in construction, the regulation of services (engineering research, design, expert examination of construction, construction works management, construction supervision) is laid down in Article 8 of the Construction Law and in Cabinet Regulation No 383 of 8 July 2003 'Regulation on the granting, registration and cancellation of building practice and architect's practice certificates'.

- In Latvia, in the construction sphere, the professions are not regulated in the regulatory enactments at the level of operatives. In view of the fact that, with the transposition of Directive 2009/28/EC, amendments have been made to the regulatory enactments in force, in relation to question (c) in section 4.2.5 the sentence 'Currently, there is neither a qualification system nor certification schemes for the operatives referred to in Article 14(3) of Directive 2009/28/EC' should be deleted.

We would also like to inform you that, pursuant to Article 8(a) of the Construction Law, natural persons must have a building practice or architect's practice certificate in order to operate independently in these construction spheres: engineering research, design, expert examination of construction, construction works management and construction supervision. Indications regarding the works, documents or sections of documents which the appropriately certified specialist may perform (manage) or certify are laid down in the regulatory enactments governing construction procedures.

The training requirements in order to obtain a building practice and architect's practice certificate are laid down in the annex to Cabinet Regulation No 383 of 8 July 2003, entitled 'Regulation on the granting, registration and

cancellation of building practice and architect's practice certificates', according to which, in order to obtain a building practice or architect's practice certificate at least middle-level vocational education is required, including in the fields of heat supply and air conditioning systems construction.

Accredited staff certification institutions shall carry out building practice and architect's practice certification.

- In relation to question (d) in section 4.2.5, we would like to clarify the information provided in the action plan:

The register of building practice and architect's practice certificates is publicly accessible on the Ministry of the Economy's internet site at:

[www.em.gov.lv/em/2nd/?cat=30244](http://www.em.gov.lv/em/2nd/?cat=30244) and [buvkomersanti.bema.gov.lv](http://buvkomersanti.bema.gov.lv)

- In relation to question (e) in section 4.2.5, we would like to inform you that Cabinet Regulation No 383 of 8 July 2003, entitled 'Regulation on the granting, registration and cancellation of building practice and architect's practice certificates', has been amended. Clarification has been provided in the building practice area of heat supply and air conditioning systems, laying down the responsibility of relevant specialists for biomass heating systems, sun collector systems, geothermal systems and heat pump construction.

## **7. Grid development (Q4.2.6).**

See answer to question 8.

## **8. Grid operation (Q4.2.7).**

### **1) Planned measures**

Directive 2009/72/EC of the European Parliament and of the Council concerning common rules for the internal market in electricity is binding upon Latvia, as an EU Member State:

Annex 1, point 2

- Member States shall ensure the implementation of intelligent metering systems that shall assist the active participation of consumers in the electricity supply market. The implementation of those metering systems may be subject to an economic assessment of all the long-term costs and benefits to the market and the individual consumer or which form of intelligent metering is economically reasonable and cost-effective and which timeframe is feasible for their distribution.
- Such assessment shall take place by 3 September 2012.
- Subject to that assessment, Member States or any competent authority they designate shall prepare a timetable with a target of up to 10 years for the implementation of smart metering systems.

- Where roll-out of smart meters is assessed positively, at least 80% of consumers shall be equipped with smart metering systems by 2020.

In 2011 the Latvenergo AS intelligent systems paper was approved. This provides for the effective operation of systems and the promotion of the entry of renewable energy sources onto the electricity market, including through installing smart meters, with at least 80% of consumers being supplied with them by 2020 and all consumers by 2030.

Intelligent systems will be structured in order to promote decentralised production and energy efficiency. The intelligent system will be a self-diagnosing and self-healing system, which will constantly send, receive and process data on the status of the system and its individual elements, parameters and capacity flows, and will also exchange information with intelligent electronic devices, producers, system operators, traders and customers. The intelligent system will not only guarantee customers' needs and improve the quality and safety of electricity supply, but will also be able to achieve two-way communication with the customer, accurate metering, load management and real-time pricing, and will also be accessible to all system users, especially renewable energy sources and local generating sources, which do not produce any CO<sub>2</sub> emissions, or very few.

Potential benefits anticipated by Latvenergo AS in connection with the introduction of intelligent systems are as follows:

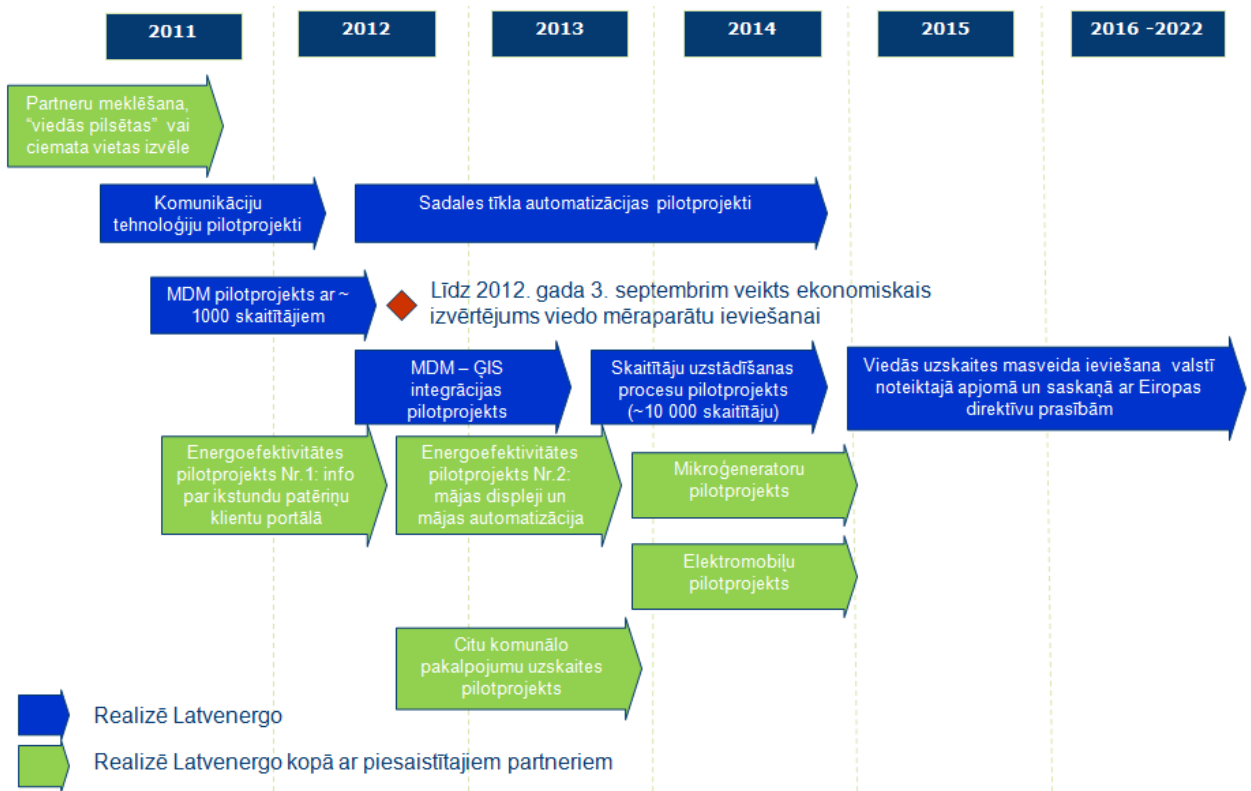
- reductions in CO<sub>2</sub> emissions as a result of energy generation and increase in consumption efficiency in Latvia, particularly in towns;
- in maximum peak load reductions, in electricity generation, in transmission and distributions systems: investments and losses will fall;
- wider use of Latvia's renewable energy sources;
- alternative energy supplies to motor vehicles, cleaner air, particularly in towns;
- ever wider use of electricity in transport;
- growth in various additional energy businesses (trading in energy and electrical facilities, consultancies);
- growth in the alternative electricity market and resulting regional growth
  - new jobs are created, and agriculture, forestry, the processing industry and research connected with renewable energy technologies are developed;
- the quality electricity supply and the level of customer service will improve: opportunities for the application of real-time tariffs, load restriction, management of customers' electrical devices, information on planned outages in the network;

- interactive customer cooperation with the distribution operator and the electricity trader;
- consumers' opportunities to choose various electricity suppliers will increase, as will the level of information they receive about the amount and time of their electricity consumption;
- better understanding of electricity use, and the opportunity to control consumption and reduce energy bills;
- the opportunity to store and sell excess electricity, and to operationally order the necessary capacity.

In order to introduce the concept of intelligent systems, various new technologies and new business processes will be tested, and assumptions will be checked regarding the impact of intelligent systems on energy efficiency and consumption reduction. The following might be potential pilot projects:

1. Communication technologies pilot projects.
2. MDM pilot project.
3. MDM-GIS DMS integration pilot project.
4. Meter installation processes pilot project.
5. Distribution system automation pilot projects.
6. Energy efficiency pilot projects.
7. Metering of other shared services pilot project.
8. Micro-generators pilot project.
9. Micro-generators pilot project.

Figure 1 illustrates the sequence of intelligent systems pilot projects.



[Search for partners, selection of ‘intelligent town’ or village location  
 Communication technologies pilot projects  
 Distribution system automation pilot projects  
 MDM pilot projects with approx 1000 meters  
 The economic evaluation for the introduction of smart meters will be carried out by 3 September 2012  
 MDM-GIS integration pilot project   Meter installation processes pilot project (approx. 10 000 meters)  
 General introduction in the country of smart meters to the amount laid down and in accordance with the requirements of European directives  
 Energy efficiency pilot project No 1: info on clients’ hourly consumption on a portal  
 Energy efficiency pilot project No 2: home displays and home automation  
 Micro-generators pilot project  
 Electric vehicles pilot project  
 Metering of other shared services pilot project  
 [blue arrow]: Carried out by Latvenergo  
 [green arrow]: Carried out by Latvenergo together with associated partners

Figure 1. Sequence of intelligent systems pilot projects

Similarly, in the ENTSO-E Ten-Year Network Development Plan 2010-2020 there are two systems development projects which will provide the integration of renewable energy sources into the electricity supply system.

Table 1

**European Network of Transmission System Operators for Electricity ENTSO-E 10 year network development plan**

REF on map	RGs	Substation 1	Substation 2	Project characteristics	Investment need alleviated	Expected benefits	Progress status	Expected time of commissioning	TENE
385	Baltic Sea	Grobina (LV)	Imanta (LV)	"Kurzeme Ring" is a Latvian grid reinforcement project with new 330kV OHL construction and connection to the Riga node. New 330kV OHL construction mainly instead of the existing 110kV double circuit line route, 110kV line will be renovated at the same time and both will be assembled on the same towers. Upgrade of double circuit 330kV double circuit OHL new 380 330. (Capacity 800MW)	New interconnection lines between Western and Central part of Latvia. New transmission line will increase Security of Supply in Western and Central part of Latvia. <b><u>Platform for integration of new renewable power generation.</u></b>	Improved security of supply; <b>RES integration</b> ; Increase of NTC. Mentioned line reinforcement is part of the NordBalt project and planned connection point to Estonian-Latvian third interconnection.	planned	2016	X
386	Baltic Sea	EE (Lihula-Sindi)	LT (Ventspils-Dundaga-TEC2)	Latvian-Estonian third interconnection will consist of OHL	Need to increase the current	Increase of NTC, improved	under consideration	2020	X



				<p>Harku-Sindi-Lihula in Estonian part, OHL Imanta-Tume-Dundaga-Ventspils in Latvian part, and sea cable between cross-border DC or AC cable. Final interconnection type and final interconnection and transmission line route will be selected in middle of 2010. At present three alternative route variants researched. Final interconnection length, DC voltage and transmission capacity will be selected in feasibility and technical study in the middle of 2010. The connection would be as a new single circuit line mixed (OHL+subsea cable) up to 500kV</p>	<p>transfer capacity between Estonia and Latvia. Need to increase Security of Supply in Latvia, Estonia and all Baltic countries.</p> <p><b><u>Platform for integration of new renewable power generation in both countries</u></b></p>	<p>security of supply and <b><u>RES integration</u></b>.</p> <p>Increasing security of supply in Baltic. Capacity congestion and number of hours with market division will be reduced. Risk of shortage of energy will be reduced in the Nordic and Baltic power system. Expected NTC 600-1200MW.</p>			
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Source: Ten Year Network Development Plan, [https://www.entsoe.eu/fileadmin/user\\_upload/\\_library/SDC/TYNDP/TYNDP-final\\_document.pdf](https://www.entsoe.eu/fileadmin/user_upload/_library/SDC/TYNDP/TYNDP-final_document.pdf)

## 2) Regulation measures

A permit from the Ministry of the Economy is required for increasing generation capacities and introducing new generation equipment, and from the legal viewpoint it is not complex to obtain one. (Cabinet Regulation No 883 of 11 August 2009, entitled 'Regulation on permits for increasing electricity generation capacities or the introduction of new generation equipment').

All participants in the system have the same rights to access the network. The legal regulation in force is Article 9(1) of the Electricity Market Law, which stipulates that *a system operator shall be responsible, within the area and the term of the licence activity thereof, for the operation, maintenance and safety of the system, the management and the development of the system, as well as for the sustainable ability of the system to ensure the transportation of electricity in line with the expected demand*, which also includes the transmission and distribution of this energy, and therefore also electricity produced using renewable energy sources.

Article 9(2) of the Electricity Market Law stipulates that *a system operator* (both transmission and distribution operators) *shall have permanent obligations within the area and the term of the licence activity thereof to provide system participants with the required connection to the relevant system in accordance with the uniform regulations for a system connection specified by the Regulator, if the system participant fulfils the technical requirements for the installation of a connection determined by the system operator*. The legal provision does not stipulate priority access to the system by other participants, i.e. renewable energy producers. All system participants have the same rights to access the network (non-discriminatory factor). Therefore access to the network is guaranteed for producers using renewable energy sources to generate energy in the same way as any other system participant.

Uniform electricity system connection regulations and the method for calculating the connection cost for all electricity producers, including producers using renewable energy sources to generate energy, were laid down under Decision No 280 of 3 September 2008 by the Public Utilities Commission and approved in the connection system regulations for electricity producers.

Since access to the network by producers which use renewable energy sources to produce energy is neither restricted nor obstructed, no additional regulation measures are planned to ensure their access to the network.

## 9. Biogas integration (Q4.2.8).

Under paragraph 1 of Cabinet decision in minutes No 10 38 of the meeting held on 15 February 2011, the Cabinet supported the submission of the bill for the 'Renewable Energy Law' to the Saeima. The bill for the 'Renewable Energy Law' makes provision for the Cabinet to lay down quality requirements in order to enrich biogas to the quality of natural gas, as well as a procedure for feeding biogas into the natural gas network. This bill stipulates that a biogas

producer may acquire rights to feed biogas that has been enriched up to natural gas quality into the natural gas networks and to transmit it, and a biogas producer which does not make use of the other support instruments laid down in the bill is entitled under the procedure laid down by the Cabinet to receive a proof of origin certificate for each unit of biogas produced which is enriched up to natural gas quality. The planned date for these measures to enter into force is 3 December 2014.

In addition to the information provided by Latvia in relation to question 4.2.8 in the action plan, we would like to make it clear that Article 15(5) of the Energy Law will enter into force on 4 December 2014. This stipulates that a system operator which has received a request from system users or applicants to provide information regarding access to the system and use thereof shall provide such information in writing within 30 days. The system operator has the right to request from the system users or applicants the necessary information for the development of use regulations. On 4 December 2014 Article 15(6) of the Energy Law will enter into force. This stipulates that a system operator is liable for the operation, service and safety of the energy transmission or distribution systems or the natural gas storage site, the management and development of the system in the area of operation of the licence, connection with other systems, and as well as for the long-term capability of the system to provide energy transmission or distribution or natural gas storage in accordance with demand.

#### **10. Electricity support scheme (Q4.3).**

In addition to the information already provided, we would like to make it clear that under the Latvian Government/Cabinet of the Republic of Latvia decision in minutes No 10 38 of the meeting held on 15 February 2011, the Cabinet supported the submission of the bill for the 'Renewable Energy Law' (hereafter referred to as the 'bill') to the Saeima. On 22 February 2011, the Cabinet, when submitting the said bill to the Saeima, asked the Saeima to acknowledge it as urgent. The bill for the 'Renewable Energy Law' was adopted by the Saeima at first reading, and a deadline of 15 September 2011 was laid down for the submission of amendments.

We would like to emphasise that in the exposition of the support scheme account will be taken of the memorandum signed on 17 June 2009 by heads of Baltic region governments, including the heads of government of the three Baltic states, entitled 'Memorandum of Understanding on the Baltic Energy Market Interconnection Plan' (*BEMIP*), which was also approved by the European Commission. *BEMIP* makes provision for ensuring uniform market conditions on the electricity market of the three Baltic states for all market participants, and free trading in electricity, in order to attain the *BEMIP* goal: the integration of the Baltic energy market into the common European Union energy market.

The aid mechanism for renewable energy laid down in the 'Renewable

Energy Law' bill stipulates that a producer which sells electricity on the free market in electricity may, in addition to the market price, receive a premium of a fixed amount, irrespective of the station's operating system. Taking into account the provisions of point 25 in the preamble of Directive 2009/28/EC, in particular, in relation to the need to maintain investor confidence, the planned aid mechanism does not affect those producers which up to now have obtained the right to sell electricity within the compulsory purchase framework, and also there is no restriction on their right to withdraw from entitlements already obtained and to obtain premiums in accordance with the new scheme.

Taking into account the fact that up to 2016 the changes required in the investments in production unit expenditure are not forecast, renewable energy sources that will be used for the production of energy, the 'Renewable Energy Law' bill plans to lay down a transitional period, and therefore the amounts of the premiums will be constant until 2016.

The amount of aid in the new mechanism is based on CO<sub>2</sub> emissions avoided, in comparison with production of energy using fossil resources, and the need for an electricity base for capacity in coming years. Therefore, the 'Renewable Energy Law' bill provides that from 2016 one of the three components constituting a premium will be tied to the market price of emissions on the exchange. However, the bill includes criteria for production units, in order to receive a premium, based on eliminating the need for investment in the construction of basic capacity power stations using fossil resources, and therefore currently it is planned that a production unit must use the installed electrical capacity for at least 3,500 hours per annum. At the same time, the 'Renewable Energy Law' bill stipulates that in 2015 there will be a review of the premium in relation to new production units, retaining investor confidence.

The 'Renewable Energy Law' bill lays down changes concerning the coverage of costs for connection to the electricity network for a renewable energy production unit whose installed electrical capacity does not exceed 5 MW, if the production unit meets criteria laid down. Currently the producer covers all the connection costs in full.

In order to foster generation of renewable electricity and consumption in households, the said bill lays down specific support for the domestic sector, providing that an independent producer who owns or has the use of one or more renewable electricity production devices, the nominal capacity of which does not exceed 50kW, is entitled to use net electricity accounting, which is the mutual account between the public trader and the independent producer, using an amount of electricity of 1kWh equivalent to 1kWh. It is planned to set the accounting period within the framework of one month.

The Ministry of the Economy asks you to note that the adoption of the 'Renewable Energy Law' bill at final reading in the Saeima is expected no earlier than 1 November 2011. Therefore, it will only be useful to provide any

more detailed information, including information about amounts of premiums, after the legislation has entered into force. At the same time, we would like to point out that the current wording does not envisage laying down targets for individual types of renewable energy, allowing producers to choose those energy resources and technologies which bring about the attainment of the compulsory target for Latvia laid down in Directive 2009/28/EC in the most economically profitable manner.

## **11. Heating support schemes (Q4.4).**

In Latvia programmes are always structured so as to make effective and focused use of European Union financial instruments, and also other financial instruments for achieving their goals, included in energy policy planning documents in force. In the action plan Latvia submitted exhaustive information on existing support for investment targeted mainly at the alignment of the heat supply system and the appropriate use of useful heat energy, producing electricity through cogeneration.

The largest financial instruments within the framework of which Latvia receives financial assistance are the European Union funds (EU funds): the European Regional Development Fund (ERDF), the European Social Fund (ESF) and the Cohesion Fund (CF). In Latvia, the Ministry of Finance is responsible for managing them.

In the 2007- 2013 planning period support from EU funds has been primarily targeted at education of residents, the technological distinction and flexibility of businesses, and also the development of science and research, to promote the formation of a knowledge-intensive economy in the country and strengthen other necessary preconditions for sustainable economic development and people's lives in Latvia as a whole.

1. Under the supervision of the Ministry of the Economy are the '*Energy*' activities under additional measure 3.5.2, '*Environmental infrastructure and environmentally-friendly energy promotion*', within priority 3.5, within the '*Infrastructure and services*' operational programme, including:

- activity 3.5.2.1, '*Measures to increase the efficiency of centralised heat supply systems*', the aim of which is to significantly increase the efficiency of heat energy production, to reduce losses of heat energy in transmission and distribution systems and to promote the replacement of fossil fuels with renewable fuels. In this activity support is provided for the renovation and construction of heat sources and transmission and distribution systems.

Pursuant to Cabinet Regulation No 824 of 31 August 2010, entitled 'Regulation on the submission of projects for selection on a second or subsequent occasion within additional activity 3.5.2.1, 'Measures to increase the efficiency of centralised heat supply systems' in the 'Infrastructure and services' operational programme', on 25 October 2010 the Investment and Development Agency of Latvia announced an open competition for project applications within

the framework of Cohesion Fund activity 3.5.2.1, '*Measures to increase the efficiency of centralised heat supply systems*'. The aim of the activity is to significantly increase the efficiency of heat energy production, to reduce losses of heat energy in transmission and distribution systems and to promote the replacement of fossil fuels with renewable fuels or fuels of other types.

Within the context of the said activity, between 14 April 2009 and 26 May 2009, in adopting applications in the first selection round, 11 projects were approved for Cohesion Fund financing of LVL 6,680,242.

- activity 3.5.2.2 '*Development of cogeneration power plants using renewable energy sources*', the aim of which, by supporting the construction of cogeneration power plants using renewable energy sources, is to significantly increase the volumes of electricity and heat generated from renewable energy sources, thus reducing Latvia's dependence on imports of primary energy sources. As part of this activity, support has been provided for the development of cogeneration power plants. As mentioned in the action plan, in additional activity 3.5.2.2, '*Development of cogeneration power plants using renewable energy sources*', within the '*Infrastructure and services*' operational programme, support is provided for the construction of cogeneration power plants using renewable energy sources.

On 17 February 2009 Regulation No 165 was adopted by the Cabinet. This regulation, entitled 'Regulation on additional activity 3.5.2.2, '*Development of cogeneration power plants using renewable energy sources*', within the '*Infrastructure and Services*' operational programme' (hereafter referred to as 'Regulation No 165') entered into force on 12 March 2009. The aim of Regulation No 165 is to significantly increase the volumes of electricity and heat generated from renewable energy sources, thus reducing Latvia's dependence on imports of primary energy sources. Within the context of this activity, support has been provided for the construction of new cogeneration power plants using renewable energy sources, and also for the conversion of existing boilers for cogeneration power plants using renewable energy sources.

The first round of selection of project applications was from 14 April 2009 to 31 August 2009, and 10 projects were approved for Cohesion Fund financing, in the amount of LVL 21,365,499.

The second round of selection of project applications is scheduled for the second half of 2011, with an allocation of financing from the Cohesion Fund of LVL 13,007,742.

In order for aid to be provided not only to heat supply businesses, but also to independent producers, within the framework of activity 3.5.2.1 two sub-activities were created. The range of funding recipients under sub-activity 3.5.2.1.1, '*Measures to increase the efficiency of centralised heat supply systems*' is public service providers: commercial companies which have a heat licence for heat energy production, transmission or distribution, if the regulatory enactments in the energy sphere so provide, and this range of aid recipients is

the same as in activity 3.5.2.1, as implemented to date. Therefore, finance may be applied for by those who were not ready to submit project applications in the previous round of selection of project applications under activity 3.5.2.1 due to limited financial resources or because their heat supply system or certain parts of it were not yet efficient.

According to a survey carried out by the Ministry of the Economy, it can be concluded that there are still businesses which are ready to submit a project application in the next round of selection of project applications, in order to increase the efficiency of centralised heat supply systems. Aid is planned for investment in transmission and distribution systems, and also for increasing the efficiency of heat sources using renewable energy sources.

In sub-activity 3.5.2.1.2, '*Measures to increase the efficiency of heat supply systems businesses*' support will be given to companies which produce heat energy for the purpose of consuming it for their own or local heat supply needs. Financing will be allocated to heat energy generation facilities with an installed capacity greater than 3 MW. As a result of the implementation of projects, modernising or changing production and products, the competitiveness and industrial capacity of independent producers will be increased.

The selection of project applications under these activities is scheduled for autumn this year or at the latest by the end of this year.

Additional information on the activities mentioned above is available on the website of state agency 'Investment and Development Agency of Latvia' [www.liaa.gov.lv](http://www.liaa.gov.lv), in the 'EU funds' section.

2. On 12 May 2010 Regulation No 441 was adopted by the Cabinet, entitled 'Rules of procedure for the open competition '*Technology transfer from fossil to renewable energy sources*' for projects financed by the climate change financial instrument'. This entered into force on 28 May 2010 and was aimed at technology transfer.

The competition's aim is the reduction of carbon dioxide emissions, shifting from technologies using fossil energy sources to those using renewable energy sources.

Within the framework of the competition, project activities were deemed eligible if they planned to rebuild or convert heat energy or electricity generation facilities so that fossil energy sources could be replaced by renewable energy sources, and also to supply, construct and install new electricity generation facilities for electricity generation from renewable energy sources.

Within the framework of the competition, the maximum permitted aid intensity of the financial instrument from the project's total eligible expenditure is not to exceed:

- 75%: for Latvian city or regional local governments and educational institutions, if the project provides for migration from heat energy



generation technologies using fossil fuels to technologies which generate heat energy for own needs from renewable energy sources;

- 65%: for micro and small businesses and scientific institutions registered in the register of scientific institutions;
- 55%: for medium-sized businesses and scientific institutions registered in the register of scientific institutions.

According to the information published by the Ministry of Environmental Protection and Regional Development, 48 projects have been approved, with total funding of LVL 8,082,346. Total funding for projects approved from Latvian city or regional local governments and educational institutions is LVL 2,108,412, as against total funding of LVL 5,973,934 for projects from micro, small and medium-sized businesses registered in Latvia, and scientific institutions registered in the register of scientific institutions.

3. In 2009 - 2010, within the '*Construction or rebuilding of renewable energy sources energy supply systems*' activity, part of the rural development 2007-2013 programme measure '*Basic services for the economy and residents*', implemented by the Rural Support Service, 14 projects were approved, with total eligible expenditure of LVL 889,990.95, of which the public funding was LVL 777,234.27.

Under the rural development programme 2007-2013, the measures '*Support for the creation and development of micro businesses*' (312(311)/1) and '*Diversification of activities not connected with agriculture*' (312(311)/2) provide for support to existing renewable fuel production units in existing agricultural businesses (except for the production of biogas and converting it into heat energy).

Production of fuel from agricultural and forestry products is included in sub-measures 312(311)/1 and 312(311)/2, and 64 projects have been approved. The total funding applied for in fuel production within these sub-measures is EUR 13,250,645, of which public financing accounts for EUR 5,300,258, i.e. 40%.

## **12. Biofuels support schemes (Q4.5).**

Since the 'Biofuel production and use in Latvia (2003-2010)' programme is no longer current, and the state support programme 'Aid for biofuel production' (N 540/2005; with amendments N 254/2007 and amendments N 26/a/2010), as part of which direct state aid was provided for biofuel production, has also ended, at the meeting of the Advisory Council for Biofuel Development (hereafter referred to as the 'Council') held on 2 June this year there was an examination of the measures needed to promote biofuel use and future state aid to the biofuel production sector, in order to achieve the target laid down in Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources



and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC, that must be achieved by 2020, that the share of energy from renewable sources in all forms of transport in 2020 is at least 10% of the final consumption of energy in transport.

The Council is a coordinating and advisory inter-sectoral institution whose aim is to coordinate the work of institutions involved in implementing the Biofuel Law. The Energy Department within the Ministry of the Economy is responsible for the Council's activities.

At the Council meeting members of the Council were made aware of the Ministry of the Economy's proposals to ensure that the share of energy from renewable sources in all forms of transport in 2020 will be at least 10% of the final energy consumption in transport.

One of the proposals for promoting biofuel use envisages increasing the mandatory admixture of biofuel to fossil fuel, i.e. for petrol from 5% to 10%, and for diesel from 5% to 7%, and also laying down a mandatory addition of biofuel to Arctic diesel (class 0 and 1) in the period from 1 November to 31 March. Similarly, the proposals envisage promoting the availability of biofuel to users, for example, by stipulating that from 2016, clean biodiesel (B100) must be available at fuel filling stations, and also biofuel and fossil fuel mixtures, if the biofuel content is at least 30% (E85, B30).

The Ministry of the Economy's proposals also envisage direct state aid for biofuel production, allocating resources for the modernisation or rebuilding of biofuel production units, the development of new production units and second-generation biofuel production units, and also the provision of state guarantees and state indemnities. The proposals also envisage state aid for biofuel producers for biofuel which meets sustainability criteria. Therefore, it is to be expected that, by using land which is currently not being used in agriculture, these incentives will also promote the development of second-generation biofuel.

Similarly, the proposals also provide in the future for indirect support for promoting biofuel use, for example by reducing the excise duty rate only for biofuel and mixtures of biofuel and fossil fuel where the biofuel content is at least 30%, and reviewing the consumption tax rate for fossil fuel and mixtures of fossil fuels and biofuels, including the creation of an incentive for the use of biofuel by farmers.

At the Council meeting it was decided to draw up a draft paper on ensuring that by 2020 at least 10% of the final consumption of energy in transport is energy generated from renewable sources (hereafter referred to as the 'draft paper') and to submit it to the Cabinet for consideration.

In view of the above, Latvia will be able to send more extensive information, following the approval of the draft paper by the Cabinet, to provide more details on the action plan, if necessary, in relation to support in the biofuel sphere, including support for second-generation biofuels.

### 13. Biomass supply (Q4.6.1).

Biomass is the most important local fuel in Latvia, where the forested area takes up approximately 50% of national territory. Therefore, the use of wood, wood residue and biomass of other kinds to achieve the obligations imposed upon Latvia will increase, particularly in heat supply, with new heat loads being developed. Taking into account existing heat loads and operating fossil fuel boilers, it is to be expected that the replacement of technologies in a shift to biomass will happen gradually, through the implementation of highly efficient cogeneration projects.

- *Table 7 does not provide complete information: it omits biomass from agriculture and fisheries and gives incomplete information regarding biomass from waste (no primary energy production reported).*

Again, we would like to point out that, taking into account the information provided by the Central Statistical Bureau, separate data on wood from agricultural and forestry land is not available.

*Corrected Table 7 from the action plan*

**Biomass supply in 2006**

Sector of origin		Amount of domestic resource	Imported		Exported		Net amount	Primary energy production (ktoe)
			EU	Non-EU	EU	Non-EU		
A. Biomass from forestry (m <sup>3</sup> )								
<b>Of which:</b>	1. direct supply of wood biomass from forests and other wooded land for energy generation	<b>1,380</b>	<b>90</b>		<b>2,568.6</b>		<b>4,038.6</b>	<b>2,827.02</b>
	2. wood biomass for energy generation from wood processing by-products (timber waste and woodchips)	<b>678</b>	<b>26.4</b>		<b>756.8</b>		<b>1,461.2</b>	<b>1,022.84</b>
B. Biomass from agriculture and fisheries (ktoe)								
<b>Of which:</b>	1. agricultural crops and fishery products directly provided for energy generation	48. 222		0.824			49. 046	<b>17,164,968 (thousand litres)</b>
	2. agricultural by-products / processed residues and fishery by-products for energy generation							

	2.1. liquid manure	1,619.9						
	2.2. manure	3,503.2						
	2.3. crop production waste	418.9						
C. Biomass from waste (ktoe)								
	1. Biodegradable fraction of municipal solid waste including biowaste (biodegradable garden and park waste, food and kitchen waste from households, restaurants, caterers and retail premises, and comparable waste from food processing plants)	79.6	17.64			1,420.4		
	2. Biodegradable fraction of industrial waste (including paper, cardboard, pallets)	14.6	6.3	5.94				
	3. Sewage sludge	23.9						

It is problematic to assess how much biodegradable waste is in unsorted municipal waste. If biodegradable waste makes up approximately 57% of household and comparable waste, then, applying that percentage, from the unsorted municipal waste collected in 2006 theoretically an amount of 504.3 thousand tonnes of organic waste could be usable for the production of biogas. However, the actual usable amount could be significantly smaller.

- *Table 7a is missing. This should be provided according to the template. When filling in this table, if agricultural biomass domestic supply is to be used for biofuels production, please indicate whether the data provided in the 'primary energy production' column includes the final energy contained in biofuels or the primary energy from raw feedstock used to produce such biofuels.*

*Corrected table 7a from action plan*

### **Estimated biomass domestic supply in 2015 and 2020**

	2015		2020	
	Expected amount of domestic resource	Primary energy production (ktoe)	Expected amount of domestic resource	Primary energy production (ktoe)

a) biomass from forestry	1. direct supply of wood biomass from forests and other wooded land for energy generation				
	2. indirect supply of wood biomass for energy generation				
b) biomass from agriculture and fisheries	1. agricultural crops and fishery products directly provided for energy generation	87,247		90,737	
	2. agricultural by-products / processed residues and fishery by-products for energy generation				
c) biomass from waste	1. biodegradable fraction of municipal solid waste including biowaste (biodegradable garden and park waste, food and kitchen waste from households, restaurants, caterers and retail premises, and comparable waste from food processing plants) and landfill gas				
	2. biodegradable fraction of industrial waste (including paper, cardboard, pallets)				
	3. sewage sludge				

- *The answer to the following question should be provided: ‘Please explain the conversion factor / calculation methodology used for the conversion of the amount of available resources to primary energy’*

The amount was forecast by taking into account the amount of domestic biomass resources used for the production of biofuel in 2010, which was calculated using an 8% increase by 2020, and correspondingly a 4% increase in resources for energy production by 2015, as forecast by the European Commission’s Agriculture and Rural Development Directorate-General in its report *‘Prospects for agricultural markets and income in the EU 2010-2020’* **Table A 1**

- *The answer to the following question should be provided: ‘Please specify on what basis the biodegradable fraction of municipal solid waste.’*

There is no information.

- *According to tables 10 and 11, final energy consumption in the heating and cooling sector and in the electricity sector would amount to around 1500 ktoe in 2020. In 2006, the primary energy from biomass from forestry amounted to 158.66 ktoe according to table 7. The plan indicates that there are no plans to increase the amount of logging to ensure biofuels supply. It should be explained how final energy consumption from biomass in tables 10 and 11 will be achieved.*

We would like to make it clear that the data provided in Table 7 in the action plan relate to the existing situation. However, in future years, as the demand for biomass resources increases on the local market, it is expected that there will be an increase in consumption of energy from biomass resources. Therefore the use of biomass resources will be dependent on energy efficiency measures carried out.

- *The answer to the following question should be provided: ‘What is the estimated role of imported biomass up to 2020? Please specify the quantities expected (ktoe) and indicate possible import countries.’*

The action plan states that Latvia will attain the target for 2020 by using local renewable energy sources, and therefore currently it is not possible to forecast specific countries supplying raw materials or the amount of biomass imported.

- *The missing table 8 should be provided.*

*Table 8 from the action plan*

**Agricultural land use for production of crops dedicated to energy in 2006**

Agricultural land use for production of dedicated energy crops	Surface (ha)
1. Land used for short rotation trees (willows, poplars)	200
2. Land used for other energy crops such as grasses (reed canary grass, switch grass, Miscanthus), sorghum	> 200*

\* The Ministry of Agriculture does not have precise information available

In relation to the use of agricultural land for the production of energy crops, the Ministry of Agriculture has indicated that in 2006 direct payments were not paid in Latvia for individual energy crops, if any farmer grew such crops, then he declared them as ‘other crops on arable land’, and therefore there are no specific figures for 2006.

**Aid for crops with a high energy value** was introduced in Latvia in 2007 and was implemented for 3 years (2007- 2009). This aid could be received for areas in which crops with a high energy value were sown or planted (hereafter

referred to as 'energy crops'), in order for use in the production of energy products pursuant to Article 88 of Regulation No [1782/2003](#). In 2007 aid for energy crops could not be received for meadows, pasture or long-term grassland which were earmarked for the production of hay as an energy product feedstock, or for areas in which trees and bushes were grown in order to obtain energy.

#### 14. Measures to increase biomass availability (Q4.6.2).

In addition to the information mentioned in the action plan in 2010 the Rural Support Service has surveyed units of usable agricultural land which are larger than 1 hectare of land in one unit, in total 2,352,159 hectares, and has ascertained the following:

- 1) cultivated land usable in agriculture (worked or at least maintained in a good agricultural and environmental condition): 1,983,260 ha;
- 2) unworked or uncultivated land: 368,900 ha, of which:
  - a) overgrown land: 49 710 ha;
  - b) uncultivated land: 316 341 ha;
  - c) built on land: 2 849 ha.

In order to add detail to the information provided in the action plan, we are supplying data for recent years for known areas sown with cereals and rape (Table 2), and also indicate the production of rape (see Table 3).

*Table 2*

#### Agricultural crops: sown areas

Crop	2009, thousand ha	2010*, thousand ha	2010 compared with 2009, %
<b>Cereals</b>	<b>540.8</b>	<b>535.7</b>	<b>99.1</b>
Winter crops	294.5	282.3	95.9
including:			
wheat	212.4	221.3	104.2
rye	59.0	34.2	58.0
triticale	13.1	11.4	87.4
Spring crops	246.3	253.4	102.9
including:			
wheat	73.3	81.7	111.4
barley	94.6	91.1	96.2
oats	60.6	63.3	104.4
buckwheat	10.1	8.2	81.1
<b>Rape</b>	<b>93.3</b>	<b>109.5</b>	<b>117.3</b>

Source: CSB website ([www.csb.gov.lv](http://www.csb.gov.lv))

\*Provisional data

*Table 3*

### Production of agricultural crops and average yield

Crop	Production, thousand tonnes			Average yield from 1 hectare, quintals per hectare	
	2009	2010*	2010 compared with 2009, %	2009	2010*
<b>Cereals</b>	<b>1 663.7</b>	<b>1 416.5</b>	<b>85.2</b>	<b>30.8</b>	<b>26.4</b>
Winter crops	1 042.7	913.4	87.6	35.4	32.3
including:					
wheat	819.9	774.5	94.5	38.6	35.0
rye	162.2	69.4	42.8	27.5	20.3
triticale	33.3	25.0	75.1	25.5	21.9
Spring crops	620.6	503.4	81.1	25.2	19.9
including:					
wheat	216.5	198.5	91.7	29.5	24.3
barley	238.3	184.0	77.2	25.2	20.2
oats	141.4	100.6	71.2	23.3	15.9
buckwheat	4.8	5.5	113.4	4.8	6.7
<b>Rape</b>	<b>204.7</b>	<b>223.6</b>	<b>109.3</b>	<b>21.9</b>	<b>20.4</b>

Source: CSB website ([www.csb.gov.lv](http://www.csb.gov.lv))

\* Provisional data

The area sown with rape in 2010 grew by 16.2 thousand hectares, i.e. 17.3%. In 2010, the total harvest of rape increased by 18.9 thousand tonnes, i.e. 9.3%, regardless of the reduction in average output from 21.9 quintals per hectare in 2009 to 20.4 quintals per hectare in 2010. The increase in the sown area of both spring and winter rape affected the increase in the rape harvest.

In adding to the information on rape and cereals areas which are used for the production of raw materials for biofuels, the Ministry of the Economy has obtained information from the Latvian biofuel and bioenergy association, which provided information about quantities of raw materials purchased in Latvia and outside Latvia. (See Table 4)

Table 4

### Quantity of raw materials purchased by Latvian biofuel producers for the production of biofuel

Raw material	Purchased in Latvia, t		Purchased outside Latvia, t	
	2009	2010	2009	2010
Rape	32,118	48,413	33,258	17,629
Rape oil	4,945	5,590	83,534	12,640
Cereals:	29,532	29,889	14,354	27,725
of which wheat	21,890	14,770	2,841	20,674
of which rye	3,592	12,603	2,760	1,142
of which triticale	4,050	2,516	8,753	5,909

*Source: Latvian biofuel and bioenergy association*

Taking into account the growth in fuel production projects in Latvia (currently 64 projects have been approved with a total amount of financing required in the production of fuel of EUR 13,250,645, of which public funding forms 40%), there are plans to commence production of various types of fuel: woodchips, firewood, briquettes and pellets. The majority of plans involve producing woodchips: 60.9 % of the projects submitted. Briquettes and pellets production account for, respectively, 6.4% and 15.6% in the projects. For 10.9% of projects the type of fuel is not specified. In the production of woodchips, the plan is to use wood processing waste, and also wood from roadsides and firebreaks, and bushes. In the production of briquettes and pellets the plan is to use residues from both forestry (sawdust), and agriculture (straw and chaff).

The amounts of fuel production are planned to be 1.5 million tonnes per year. By using assumptions for the thermal capacity of each fuel type, volumes of fuel production have been calculated in energy units (thousands of toe). Using the results obtained, it can be presumed that the production of renewable fuel will increase by 111.3 ktoe (see Table 5).

*Table 5*

**Planned amounts of fuel production in projects under sub-measures 312(311)/1 and 312(311)/2**

<b>Fuel type</b>	<b>Number of projects approved</b>	<b>Percentage of projects approved</b>	<b>Production volume, tonnes per year</b>	<b>Production volume, thousands of toe/year</b>	<b>Proportion of production volume accounted for by fuel type, %</b>
Woodchips	39	60.9%	1,295,166	85.4	76.7%
Firewood	2	3.1%	300	0.1	0.1%
Briquettes	4	6.3%	22,377	9.6	8.6%
Pellets	10	15.6%	6,474	2.8	2.5%
Mixed (firewood, woodchips etc.)	2	3.1%	5,032	2.2	2.0%
Not indicated	7	10.9%	170,616	11.2	10.1%
<b>Total</b>	<b>64</b>	<b>100.0%</b>	<b>1,499,965</b>	<b>111.3</b>	<b>100.0%</b>

Projects submitted which are connected with the production of renewable energy from inputs of agricultural and forestry origin, and also projects which relate to the renovation of energy supply systems using renewable energy sources, cover the whole of Latvian territory: they are planned in 38 districts out



of 109 and in 1 city. The largest proportion of projects is planned for implementation in the Latgale and Vidzeme planning regions, and the smallest proportion in the Kurzeme planning region. Energy production projects are distributed comparatively equally among all planning regions, but there are significantly larger numbers of fuel production projects in Latgale (21 projects, i.e. 33%) and Vidzeme (16 projects, i.e. 25 %).

In addition to the data given in the action plan in 2010, taking into account information supplied by the Ministry of Agriculture, in 2010 10,927 tonnes of non-edible fish products were produced in Latvia, which were not usable as food, including fish waste. However, Latvia imported 1,797 additional tonnes of fish waste from EU states in 2010 and, in comparison with 2009, the amount of this production has halved.

In view of the fact that fish processing businesses in Latvia are not concentrated in a specific locality, which would significantly reduce the costs of transporting the raw materials required to obtain biogas, but are in fact located throughout along the coast, and because it is more profitable in economic terms to convert fisheries by-products into fish meal, for which there is a large demand on export markets under current circumstances, the potential for the use of products of this type for obtaining biogas and producing electricity from biomass in Latvia is not forecast.

Unfortunately, it is not possible to forecast the quantity of fisheries by-products that will be available in Latvia in 2015 and 2020, because this depends on the catch quotas allocated to Latvia's fishermen, the size of which is laid down every year, and also to a large extent it depends on changes in demand for Latvian fish products, including fish meal, on export markets.

#### **15. Table 11 in the action plan.**

The action plan mentions that the attainment of the target in accordance with Directive 2009/28/EC has been planned taking into account the potential for renewable energy sources that are accessible and usable in Latvia, which are mainly concentrated in the agriculture and forestry sectors, and Table 5 in the action plan summarises measures known to be accessible at the moment. We would like to draw your attention to the fact that currently biomass is widely used for heat supply in housing, but it is expected that the use of biomass resources in centralised heat supply could also increase, through the creation of financial instruments to foster its use also in the next financial planning period, after 2013.

#### **16. Table 12 in the action plan**

In reply to the Commission's additional questions relating to Tables 4b and 12 in the action plan, we attach a corrected Table 4b, in which changes have been made in row J, and we also attach a corrected Table 12.



*Corrected Table 4b from the action plan*

**Calculation table for the share of renewable energy in transport ('000 tonnes oil equivalent)**

		2005	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
C.	Expected RE consumption in transport	7	42	44	46	48	51	53	64	73	80	82	83
H.	Expected consumption of electricity generated from RES in transport	1	1	1	1	1	2	2	2	2	2	2	2
I.	Expected consumption of biofuels from waste, residues, non-food cellulosic and ligno-cellulosic material in transport	0	0	0	0	0	0	0	0	2	7	21	44
J.	Expected RE contribution to transport for RE target $C + (2.5 - 1) * H + (2 - 1) * I$	9	44	46	48	50	54	56	67	78	90	105	130

Source: Ministry of the Economy

*Corrected Table 12 from the action plan*

**Forecast of total contribution expected from each renewable energy technology in [Member State] to meet the binding 2020 targets and the indicative interim trajectory for the shares of energy from renewable resources in the transport sector 2010-2020 ('000 tonnes oil equivalent)**

	2005	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Bioethanol and bio-ETBE	<b>0</b>	<b>14</b>	<b>16</b>	<b>17</b>	<b>18</b>	<b>19</b>	<b>19</b>	<b>20</b>	<b>21</b>	<b>22</b>	<b>22</b>	<b>18</b>
<i>Of which biofuel <sup>(1)</sup> in accordance with Article 21(2)</i>	0	0	0	0	0	0	0	0	0	1	3	18
<i>Of which imports <sup>(2)</sup></i>	0	0	0	0	0	0	0	0	0	1	3	9
Biodiesel	<b>3</b>	<b>25</b>	<b>25</b>	<b>25</b>	<b>23</b>	<b>22</b>	<b>20</b>	<b>20</b>	<b>20</b>	<b>22</b>	<b>24</b>	<b>28</b>
<i>Of which biofuel <sup>(1)</sup> in accordance with Article 21(2)</i>	0	0	0	0	0	0	0	0	0	1	10	15
<i>Of which imports <sup>(3)</sup></i>	0	0	0	0	0	0	0	0	0	1	5	8
Hydrogen from renewable resources	0	0	0	0	0	0	0	0	0	0	0	0
Renewable electrical energy	<b>4</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>6</b>
<i>Of which vehicular transport</i>	1	1	1	1	1	2	2	2	2	2	2	2
<i>Of which other transport</i>	3	2	2	2	2	2	3	3	3	3	3	4
Others (for example, biogas, vegetable oil etc.)	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>4</b>	<b>6</b>	<b>9</b>	<b>19</b>	<b>27</b>	<b>31</b>	<b>31</b>	<b>31</b>
<i>Of which biofuel <sup>(1)</sup> in accordance with Article 21(2)</i>	0	0	0	0	0	0	0	0	2	5	8	11
Total	7	42	44	46	48	51	53	64	73	80	82	83

<sup>(1)</sup> Biofuel as defined in Article 21(2) of Directive 2009/28/EC

<sup>(2)</sup> Of the total amount of bioethanol/bio-ETBE

<sup>(3)</sup> Of the total amount of biodiesel

The Ministry of the Economy is grateful for the assessment of the action plan provided by the European Commission and the proposal submitted for making it clearer, but at the same time we would like to draw your attention to the fact that because Latvia's statistical bureau does not provide all the data demanded by the European Commission, the submission to the Commission of the information requested has been more difficult.

Where applicable, the relevant Latvian institutions will submit additional information on the questions asked by the European Commission by 1 September 2011.

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