

GREEK ASSOCIATION OF RES ELECTRICITY PRODUCERS

GAREP's contribution to the European Commission's consultation on the formulation of a new Climate and Energy Framework (Green Paper) for 2030

The Greek Association of RES Electricity Producers shares the view expressed by many Professional European Associations involved with Renewables, most notably the European Renewable Energy Council (EREC) and the European Renewable Energies Federation (EREF), that to achieve the multiple objectives of the European Climate and Energy policy, the European Union should adopt an integrated climate and energy framework with ambitious and legally binding targets for Renewable Energy Sources (RES), Energy Efficiency (EE) and reduction of Greenhouse Gas emission (GHG).

Those new binding minimum targets should be established at European level and broken down at national level for an efficient and legally enforceable implementation. Such a framework would bring more benefits for European citizens and industries than a one-legged policy based on a supposedly "technology-neutral" "GHG-only" approach.

Moreover, the new framework should:

- ✓ Guarantee the continuation of the priority access for RES
- ✓ Encourage EU Member States to adopt flexible and evolving support frameworks for RES to avoid retrospective changes
- ✓ Resolve some of the malfunctioning of the EU ETS on the short term (through the EU ETS allowances back-loading) and the medium-term (through a structural reform of the system)
- ✓ Ensure a level playing field by making a thorough analysis of subsidies given to the energy sector and call on the EU Member States to phase out subsidies to fossil fuels and nuclear energy
- ✓ Develop in parallel to the 2030 climate and energy framework an industrial policy, a better financing framework for RES and a comprehensive and ambitious R&D policy
- ✓ Give the possibility for the Commission to impose direct penalties on the Member States which do not fully and timely implement the post-2020 framework
- ✓ Not allow any new subsidies to nuclear energy.

Athens, 1 July 2013

The Greek Association of RES Electricity Producers (GAREP) is an association of independent power producers active in the development, installation and operation of RES-electricity projects in Greece. GAREP represents the vast majority and the full technological spectrum of installed renewable capacity in Greece and strives to facilitate the implementation of RES projects nationwide.