

CLUB ARC ALPIN (CAA)



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Your letter of

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PUBLIC CONSULTATION – GREEN PAPER ON ENERGY

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Dear Sir or Madam,

The Club Arc Alpin e.V. (CAA) is the umbrella organisation for the large mountaineering associations in the alpine area and, as such, represents around two million members. It has three expert commissions in the areas of mountaineering, huts and trails as well as nature protection and alpine spatial planning, whose work focuses on an exchange of information and the coordination of joint positions. As an official observer of the Alpine Convention, the CAA promotes in its committees the rapid implementation of this international agreement and a sustainable development of the alpine region. Consequently, the CAA is represented by an expert in the Alpine Convention's newly formed Energy Platform. In 2012, the CAA adopted a basic position on the energy policy in the Alps (enclosed).

We were interested to read the Green Paper on Energy, which provides the framework for the EU climate and energy policy until 2030. The Green Paper mainly covers economic and technological aspects as well as aspects relating to competition and security of supply within the scope of EU targets for reducing GHG emissions, increasing the share of renewable energies and saved energy as well as the internal energy market.

We deliberately do not go into the details of the Green Paper and the questions it raises; instead we want to concentrate on a few fundamental observations:

From the CAA's perspective, ambitious EU targets for saving energy, developing renewable energies and reducing greenhouse gas emissions are a major requirement for sustainable development in Europe and consequently also for a sustainable economy. The term "sustainability" encompasses economic, ecological and social aspects at the same time. The development of renewable energies – which we welcome in principle – has a considerable impact on the landscape in many areas.

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The changeover to renewable energies is exerting extreme pressure on nature and the landscape, particularly in the Alps. The term "Europe's battery" is often used to describe the Alps.

The alpine region is, however, a unique and largely still intact major ecosystem with extraordinary significance as a habitat, a cultural and economic area for the local population and a holiday destination for the whole of Europe.

A sustainable energy policy – and this should be the aim in the EU as well as in the Alps – is only possible if compatibility with nature and landscape and the necessary public approval regarding the development of renewable energies and distribution networks play a major role in a pan-European energy concept. To achieve this, transparent planning processes and sites chosen on the basis of criteria for sustainable development are vital.

However, the EU Green Paper on Energy makes no mention of these aspects, which is presumably partially due to differing responsibilities in the EU Commission, but also gives the impression that compatibility with nature and landscape plays a rather subordinate role in the plans and targets of EU energy policy.

In this respect, we would like to point out that, in 2006, by ratifying the Alpine Convention's Energy Protocol, the EU had already committed itself to meeting the ecological requirements for sustainable development, including within the framework of the energy policy, and recognised the need for planning across sectors and borders. Naturally, our concerns are focussed on the Alps; we are, however, of the opinion that these aspects also affect many other regions of the EU.

We therefore consider it vital to include these concerns in the Green Paper on Energy. Please take these concerns into consideration.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'KJ Gran', with a stylized, cursive script.

Klaus-Jürgen Gran
President

Attachment: Position paper on energy policy