



THE EUROPEAN WIND ENERGY ASSOCIATION

EC Public consultation on permit granting procedures

Response from the European Wind Energy Association,

Interest Representative Register ID: 710687598-46

Q1:

Long and complicated permitting and planning procedures are a main bottleneck for building new transmission lines. There is inadequate coordination between Member States on cross-border infrastructure both on the planning and licensing levels. The upcoming TEN-E revision should in this respect not only alleviate investments in bilateral interconnectors but also put forward an appropriate planning and regulatory framework when multiple projects are clustered into regional schemes.

EWEA agrees with the view that the set-up of one central authorising body within each Member State in charge of cross-border projects is worth exploring. This would avoid delays during the authorisation procedure and speed up implementation in general. EWEA believes that by this means planning procedures would be streamlined to ensure a faster and more reliable permitting scheme including binding deadlines for all involved authorities. In addition to the prioritisation of projects on a European level, necessary support must be ensured at a national level. All TEN-E projects should therefore be labelled as national priority projects to provide for consistency between national and European energy infrastructure projects.

Q2:

EWEA believes that the measures outlined in the answer to Q1 would also help increase the transparency and predictability of the permit granting process. In general, the whole process should be made more rigorous with binding deadlines for all authorities involved. The central authorising body within each Member State should be responsible for ensuring transparency and coordinating related measures with the affected stakeholders and citizens during the entire process.

Q3:

Increased awareness-raising must be carried out among the public to explain why grid upgrades are needed in Europe. It is often difficult for citizens to recognise the need for needed grid upgrades in their communities, as these are currently perceived more with profit increases of vertically-integrated power companies and overcoming the present congestions on some of the main transmission lines rather than being perceived in the context of security of supply, market integration and connection of renewable energy



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technologies. In general, a more proactive approach of national and regional governments, local politicians, and regulators, would be needed to engage with the broader public in order to facilitate the political decisions to build new transmission infrastructure.

Crucially, grid infrastructure should not only be seen as part of the EU's efforts to meet the 20% renewable energy target, or to improve energy security, or to reduce GHG emissions, but also to increase the level of interconnectivity thereby helping to develop the emerging EU internal electricity market and increase competition and thereby provide consumers with affordable electricity in the long-term. Citizens (and also national regulators) need to be made aware that enhanced cross-border grid infrastructure would also provide for enabling a functioning internal market as well as savings in balancing and system operation costs which in the long term will be beneficial rather than costly.

The EU should furthermore consider increased project support for contributing non-commercial, public goals, such as cable under-grounding due to environmental and public acceptance reasons.

Q4:

No opinion

Q5:

As best practise on a European level, EWEA would like to highlight the positive experience of "EU coordinators" for interconnectors to facilitate progress during the entire permitting and planning process, particularly where the coordinator has a clearly defined (and limited) objective - such as is the case with the French-Spanish connection (Mr. Monti). Where the mandate of a coordinator is broader, such as is the case with Baltic and North Sea off-shore wind connections (Mr. Adamowitsch), the Commission should consider providing additional support, or better still defining a more precise mandate.

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The European Wind Energy Association (EWEA) is the voice of the wind industry, actively promoting the utilisation of wind power in Europe and worldwide. Over 650 members from nearly 60 countries, including manufacturers, developers, research institutes, associations, electricity providers, finance organisations and consultants, make EWEA the world's largest wind energy network.