



Danish Government response to the public consultation by the European Commission on the EU Strategy for solar energy

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Danish key priorities for the EU strategy for solar energy

The Danish government

- Expresses overall support for the Commission's approach to scaling up renewable energy and fully agrees that solar energy plays a key role in contributing to cost-efficiently achieving the EU-level target for renewable energy by 2030 and climate neutrality by 2050.
- Encourages the Commission to work for an ambitious level of renewable energy in the EU and strengthen the European renewable ecosystem.
- Emphasizes that the individual Member States must maintain flexibility to determine its own renewable energy mix and the general structure of its energy supply based on a technology-neutral design of the national energy market.
- Encourages the Commission to involve the respective Member States in the identification of barriers for a market-driven deployment of solar energy and ways to promote it as much as possible.
- Emphasizes that renewable energy, including solar energy, should be considered as being in the public interest and serving public safety.

The Danish Government welcomes the opportunity to comment on the European Commission's public consultation on the EU strategy for solar energy.

The Danish Government supports an EU strategy for solar energy and the current proposal for a strategy framework. The Commission's priorities are consistent with the Danish Government's agenda on prioritising and supporting a cost-efficient accelerated development of renewable energy - including solar energy production.

Increase ambitions for renewable energy in 2030

Denmark fully agrees with the Commission's assessment that achieving the EU emissions reduction target of at least 55 pct. by 2030 necessitates an accelerated clean energy transition with renewable energy at its core.

The energy sector will be the main contributor to reaching the 2030 climate target, and it must be at the centre of an ambitious effort to realize the enhanced climate target of at least 55 pct. cost-effectively by 2030 and to become climate neutral by



2050. To achieve this, Europe needs to transform its energy system fundamentally. *The Strategy on Energy System Integration* provides a viable pathway for achieving this with its focus on high shares of renewable energy and integration of different energy systems through electrification.

The Danish Government believes that the European energy sector should deliver a larger share of the EU's reduction target and is working towards increasing the binding EU-level target for renewable energy in 2030 to 45 pct. Here, solar power has the potential to deliver a substantial share of the needed renewable energy production, especially towards 2030.

The falling price of renewable energy technology and the current rise in fossil fuel prices means that an even greater share of renewable energy is indeed possible. In addition, this will drive an increased demand for all types of renewable energy technologies e.g. solar energy, thereby stimulating the supply of affordable and sustainable solar energy products.

Flexibility for Member States to determine own energy mix

The Danish Government fully acknowledges the need for an identification of policy measures with the aim of accelerating the deployment of solar energy and ensuring a secure supply of affordable and sustainable solar energy products. Still, Member States must maintain its right to determine its own energy mix and the placement and ownership of solar power.

It is important to maintain the discretion for Member States to choose the best-suited measures with the aim of accelerating the deployment of solar energy on a national level. For the Danish Government such elements are e.g. the right to structure the national energy system on basis of technology-neutrality and the right to set national targets for solar power production. The strategy should not lead to policy measures that promote self-consumption or RES communities over alternatives, with the risk of a displacement of socio-economically more efficient production from the grid.

Member States involvement in the identification of local barriers is key

Member States differ greatly in terms of both energy mix, solar potential (energy input), national legislation and governance structure. The Danish Government encourages the Commission to continuously involve the respective Member States in the identifications of local barriers that hinders a market-driven expansion of the solar energy sector, and in the development of the necessary policy measures with the aim of overcoming these barriers. Therefore, the Danish Government supports an ambitious transition pathway for Renewable Energy as the Industrial Forum will publish in 2022.

We are undergoing a climate crisis as well as a biodiversity crisis. An accelerated development of renewable energy and the preservation of nature and natural habi-



tats are not opposing objectives, but considerations that has to coexist. It is of utmost importance that we find balanced solutions to accelerate the development of renewable energy all over Europe without jeopardizing the protected nature. Co-existence is the key going forward. In this regard, renewable energy, including solar energy, should be considered as being in the public interest and serving public safety, in accordance with relevant Union law. To that end, there is a need for further flexibility to facilitate the use of existing derogations in various areas of public law, particularly under environmental law, in order to avoid inappropriate delays and lengthy planning and permitting procedures, e.g. in relation to permitting.