

**Non-paper on Renewable Energy Directive**  
**by Germany, Austria, Denmark, Ireland, Luxemburg, Netherlands, Spain**  
**for COREPER 13 April 2022**

The war in Ukraine has shown Europe's vulnerability due to its **dependency on energy imports**. We agree that the **acceleration of RES deployment** in all sectors is key to reduce this dependency and contribute to achieving **climate neutrality**.

For this reason, **we need to strengthen our efforts** to accelerate RES deployment in the context of the revised **Renewable Energy Directive (RED)**. A lowering of ambition by removing sectoral targets or making them all indicative **cannot be the right answer** to the current geopolitical crisis and to challenges of the Green Deal. Instead, weakening the structure of sectoral targets would put the achievement of the more ambitious **EU 2030 target at risk**.

Consequently, we call for **maintaining the mandatory nature of the sectoral targets** (while keeping indicative targets indicative) and stick as much possible to the respective **levels of ambition**.

At the same time, we are aware that an appropriate **balance between reliability and flexibility** must be found for a Council agreement on the revised RED. Therefore, some **targeted adjustments** might be needed **on the newly proposed binding sectoral targets** to provide more flexibility to agree on a general approach in the Council.

Furthermore, **we oppose that low-carbon fuels are accounted as renewable energy** either in the context of the sectoral targets or the overall EU target. This would not only undermine the structure and **credibility of the revised RED**, but also dilute the achievement of EU 2030 target. The revised RED must continue to exclusively focus on renewable energy.

In general, we call for **constructively working together on compromises** that incentivise RES deployment in the relevant sectors and ensure sufficient flexibility, while preserving the ambition and fundamental structure of the RED revision.