VIK-Position

Verband der Industriellen Energie- & Kraftwirtschaft
Energie für die Industrie

Inception impact assessment on the revision of Directive (EU) 2018/2001 (RED II)

21.09.2020

Competitiveness is a driver for sustainability

VIK welcomes the consultation of the roadmap on the revision of RED II. Industry is ready to support the transition of a carbon neutral energy supply system with innovative processes and products. However, such innovations are largely not yet competitive and partly not even on an operational readiness level. Implementation requires increased investment and operating expenditures. Nevertheless, in the course of the desired transformation, the European industry must not lose competitiveness. The transition costs facing industrial consumers have to be efficient and on a competitive level. A further key to competitiveness is cost efficient roll-out and market integration of renewable energy sources, as outlined in the roadmap. Incentives for a cost efficient roll-out are particularly required in non-electricity sectors.

Technology neutrality

RED II focuses on renewable based fuels and gases as a priority. However, in the transition phase other low carbon pathways such as blue hydrogen should be considered as well to satisfy the demand for low carbon hydrogen. VIK stresses a technology neutral approach, since in the end, only the carbon-footprint of hydrogen production technologies matter Technology competition favours a market launch at economically optimised costs. Furthermore, the large amounts of hydrogen and other low carbon gases and fuels required in the future prohibit the exclusion of suitable technologies. Therefore, all technologies revealing a marginal carbon footprint should be considered as equal options for the future technology mix. Therefore, all low carbon options should be considered also in the long term in order to prevent hampering development of efficient technological pathways in the future.

Theodor Wolf

VIK Verband der Industriellen Energie- und Kraftwirtschaft e.V.
VIK-Büro Berlin: Friedrichstraße 187 • 10117 Berlin
Tel.: +49 (0)2 01/ 8 10 84-0 • Fax. +49 (0)2 01 / 8 10 84-30
Vorsitzender des Vorstands: Dr. Günter Hilken
Geschäftsführung: Dr. Hans-Jürgen Witschke, Christian Seyfert
Amtsgericht Essen: Registernummer 1813 VR
info@vik.de • www.vik.de

Guarantees of origin

Guarantees of origin (GO) are able to support the further establishment of a functioning hydrogen market by decoupling market transactions from physical flows, which allows e.g. for green hydrogen trade already when there is no sufficient transport infrastructure available yet.

GOs are necessary for hydrogen as well as electrical energy. While GO for green electricity can already be traded in the electricity sector, an analogous development for gases with a low carbon footprint is still required. However, both systems have to allow for virtual delivery across grid bottlenecks.
A GO-system needs to be harmonized across the internal market while being open for extension to an international / global scale. It has to be applicable to all climate neutral gases, thus supporting technology neutrality.

Effective sector integration

Hurdles to sector coupling have to be removed. Large amounts of the energy consumption in industry are used to generate process heat and cold. Industrial heat supply can be realised via several different technological pathways (e.g. power-to-heat, fuel-based by using climate neutral gases or waste biomass). They are to be treated in a technology neutral manner, while considering limited availability. Support regimes for CHP and heat/cold networks should be further expanded.

Use of renewable electricity for renewable fuel production

To develop an efficient and fully integrated energy supply system, access to renewable electricity via the electricity grid infrastructure has to be ensured. Art. 27 III RED II enables such an access route only if the criteria outlined in recital 90 are fulfilled. These criteria are very restrictive (e.g. the principles of temporal and geographical correlation), restrict the use of renewable electricity for the production of green hydrogen and thus hamper an effective market launch and investments. This conflicts with the aims expressed in the European Hydrogen Strategy launched in July 2020. Therefore, the criteria should be removed, softened or implemented in a pragmatic manner, e.g. by a dynamic approach enabling a less restrictive environment during the initial market launch

Der VIK ist seit über 70 Jahren die Interessenvertretung industrieller und gewerblicher Energienutzer in Deutschland. Er ist ein branchenübergreifender Wirtschaftsverband mit Mitgliedsunternehmen aus den unterschiedlichsten Branchen, wie etwa Aluminium, Chemie, Glas, Papier, Stahl oder Zement. Der VIK berät seine Mitglieder in allen Energie- und energierelevanten Umweltfragen. Im Verband haben sich 80 Prozent des industriellen Energieeinsatzes und rund 90 Prozent der versorgerunabhängigen Stromerzeugung in Deutschland zusammengeschlossen.