

Dear European Commission,

As representatives of the Dutch Sustainable Energy Association (Nederlandse Vereniging Duurzame Energie (NVDE)), we would like to provide our input on the consultation for the Grid Package.

Importance of the energy grid

The energy grid is a cornerstone of the clean energy transition, enabling the integration of renewable energy and supporting rapid electrification across Europe. A modernised, resilient, and interconnected grid is essential not only for decarbonisation goals but also for ensuring energy security, competitiveness, and affordability. To achieve this, Europe must **accelerate grid expansion and upgrades, speed up permitting, strengthen long-term planning at the EU level, and rapidly deploy more flexibility and storage options.**

Accelerate grid expansion and upgrades and speed up permitting

It is essential to prioritise the shortening of lead times in order to establish a robust energy infrastructure. Delays in project execution hinder the development of reliable networks that are necessary to support the growing demand for renewable energy and ensure long-term energy security. All too often, projects involve seven years of discussion and two years of construction: this timeline must be shortened, especially in the planning phase. Therefore we urge the European Commission to take a step forward and propose the following recommendations:

- Ensure that energy grid projects are systematically prioritised in permitting procedures. And systematically consider them projects of overriding public interest. Although EU legislation already assigns this qualification to the projects, member states (for example the Netherlands) are still hesitant in fully adopting the recommendation to systematically recognise grid infrastructure projects as projects of overriding public interest.
- Harmonise and accelerate permitting procedures for energy grid projects by consolidating and modernising existing environmental legislation. This includes a REFIT of EU permitting legislation, particularly the Strategic Environmental Assessment Directive. Key environmental assessments still differ significantly between countries, leading to legal and regulatory fragmentation. This results in unequal treatment of comparable projects within the EU, creating legal uncertainty and competitive disadvantages.
- Introduce time limits for permitting decisions by authorities, improve and intensify communication between businesses and authorities, allow early project/construction starts, streamline judicial/administrative procedures for handling claims, and implement tacit approval in the absence of timely decisions. Digitalise permitting procedures and strengthen the administrative capacities of the relevant permitting authorities. This package should also address energy legislation, with the aim of simplifying multiple laws simultaneously in order to enable faster permitting and implementation.



- Introduce a categorical exemption for temporary construction emissions in energy grid projects. At present, these projects may face delays because construction machinery temporarily causes emissions. Temporary construction emissions rarely cause significant long-term environmental effects. Therefore, European legislation should clarify that such emissions generally do not trigger the requirement for an Environmental Impact Assessment (EIA) (Milieu Effect Rapportage / MER, in Dutch), unless specific circumstances indicate the potential for significant effects.

There are additional ways to improve the efficiency of the Environmental Impact Assessment (EIA):

- One possible improvement is to set a maximum number of alternatives to be examined in the assessment, for example, five. This could help streamline the process in practice. Moreover, a strategic EIA (plan-EIA) is only meaningful when it includes several substantially different alternatives. If the difference between alternatives are minimal, the assessment provides little basis for distinguishing between them, thereby reducing its added value for decision-making.
- Another potential improvement is to introduce an exemption from conducting a project-level EIA if a prior strategic EIA has already demonstrated that the project, including any mitigating measures, will not result in significant negative environmental impacts.

Strengthen long-term and EU-wide planning

The future energy system of Europe will largely rely on renewable electricity. To make this possible, an EU-wide and interconnected energy and electricity infrastructure is essential. It is therefore necessary to begin planning now for what this system should look like and where the interconnection needs to be strengthened. The better EU member states coordinate with one another, the stronger and more reliable our energy supply will become.

Moreover, investments in the grid will need to be supported through European funding, particularly when it comes to cross-border infrastructure: such as the cooperation between North Sea countries on offshore grid development. This can significantly reduce costs for individual member states. The allocation of costs for transporting electricity from offshore sources across countries should also reflect the distribution of the benefits it brings.

A long term horizon, would also provide the certainty needed for member states to build up the necessary permitting capacity at local and national levels. Competent authorities across the EU are increasingly overstretched, leading to significant delays in permitting procedures due to limited staffing and resources.

Rapidly deploy more flexibility and storage options

Long-duration energy storage, demand response, and other flexibility tools are crucial to ensure a stable, reliable system based on renewable energy. In addition, flexibility solutions reduce the costs for grid expansion by smoothing out daily, weekly and seasonal imbalances. For example, using demand-side response and storage to adapt to fluctuations can ease pressure on the network and defer the need for new grid lines and strengthening interconnections between countries is another proven tool to increase flexibility and share reserves across borders.

By deploying modern storage solutions and more dynamic grid management tools, Europe can integrate renewables at scale while maintaining grid stability, reducing price spikes, and minimizing reliance on fossil-fuel peaking plants. This will ultimately bring down costs for consumers and ensure the grid is future-proof.

Conclusion

The NVDE urges the European Commission to accelerate grid expansion and streamline permitting procedures as key enablers of the energy transition. A modern, resilient, and interconnected energy grid is vital for Europe's decarbonisation, energy security, and competitiveness.

We thank you for the opportunity to provide our input and look forward to further collaboration to advance the energy transition.

Yours sincerely,
NVDE