



Ministry of Economy
The Republic of Poland

Possible alternatives to the Commission's proposal for GO trade mechanism

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Key issues to be addressed

- It is the Member State's responsibility to achieve the target
- Some of the Member States will not achieve their targets on their own
- There are Member States which could be able to work out a surplus of RES energy
- Unnecessary administrative and financial burden must be avoided
- A mechanism for cooperation on RES energy generation between Member States is required



National support scheme as a basis

- **The national support scheme should remain the basis for the development of renewable energy generation**
- **The decision on which instruments need to be chosen to promote the RES generation is an internal competence of the Member States Authorities**
- **The RES Directive only needs to propose some flexible and voluntary instruments that could be used by the MS in their cooperation in RES energy**



Flexible cooperation between Member States

- The GO trade between MS is one of the instruments that could be used to efficiently realize the EU RES target, however it is not the only one that could be used.
- The GO trade between legal persons in the EU is a flexible, but in the mean time a very risky instrument. It is very likely that in some MS its implementation would undermine their effort to realize their national targets.
- It is also probable that the COM-proposal although in line with the Treaties, puts these MS which do not wish to accept this level of trade in a situation when they are acting against the Treaties.
- Therefore, as the GO trade between legal persons may not be accepted, it is necessary to have some new, flexible solutions worked out.



Flexibility as a rule

- Any new instruments of cooperation between the MS introduced to the directive should be based on few principle rules:
 - The implementation of the instrument must be voluntary
 - Any used instrument must give equal advantages to both/all involved sides
 - None of the instruments may have negative effect on the national targets realization
 - The information on the instrument used by legal persons should be known to the responsible MS Authorities
 - Any kind of instrument that would be used by legal persons must be subject to the approval of the responsible MS Authorities



Possible new instruments

- Well known and already used instruments could be implemented to the COM proposal which would allow the MS to jointly cooperate on the EU target achievement
 - Joint implementation – Joint projects
 - Cross – border cooperation between MS
 - Cross – border cooperation between local authorities
 - Technology transfer (CDM - similar mechanism?)
 - Shared targets, shared support schemes
- Old fashioned, simple energy trade between MS



Ammendments to the directive

- **Ockham's razor – The simplest solutions are most commonly the BEST.**
- **Would GOs trully be neccessery if the RES energy virtual transfer on the statistical basis was introduced?**
- **Would it be neccessery to have such a detailed wording in article 8 & 9 if we had no GO trade between companies?**
- **The wording of Articles from 6 to 11 in the directive should be carefully reconsidered if there was lack of support for the Commission's „GO trade idea”.**

Thank you for your attention

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