BirdLife INTERNATIONAL
EUROPE AND CENTRAL ASIA

RENEWABLE ENERGY THAT RENEWS NATURE:

BirdLife Europe's recommendations on how to align the EU's renewable energy expansion with biodiversity goals

MAY 2025

Windfarm. © Shutterstock

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1. Introduction

Accelerating the energy transition is essential to achieve climate goals, as part of building a thriving, sustainable society for the future.

However, the EU is already falling behind its 2030 targets for emissions reductions and percentage of energy from renewable sources in the energy mix. Furthermore, these targets are regarded as insufficient by civil society organisations and independent scientific opinion[1], and the EU's independent scientific advisers have encouraged the EU to move as far as possible towards 'net zero' by 2040[2].

At the same time, BirdLife Europe has highlighted a worrying lack of progress towards the goals of the EU's Biodiversity Strategy[3]. Very significant changes are required in policies and funding streams, and attitudes in political institutions, businesses and wider society, in order to meet EU biodiversity targets for 2030. The principal sectors involved in the use of land, water and sea must all play their part, and the rapid expansion of renewable energy must be done in a way which supports the achievement of environmental and nature protection targets.

Within the EU it is especially important to reinforce the action required at a time when national, European and global political contexts make progress difficult. As part of ongoing EU efforts to meet its targets for climate neutrality and biodiversity, new legislation such as the revised Renewable Energy Directive ('REDIII') and the Nature Restoration Regulation (NRR), must be implemented by Member States in a coherent way and in compliance with existing environmental legislation. For example, Member States must align the duties under REDIII to (i) map the areas where they will develop the renewable energy capacity required to meet 2030 targets[4] and (ii) approve plans which will designate Renewable Acceleration Areas[5], with (iii) the preparation of National Restoration Plans[6] (NRPs). REDIII also requires Member States to reduce permitting times for renewable energy projects and increase the efficiency of the permitting process.

[1] Climate Action Tracker report (December 2024) & CAN Europe (2024) Paris Agreement Compatible Scenarios (PAC) 2.0.
[2] European Scientific Advisory Board on Climate Change (2023) Setting climate targets based on scientific evidence and EU values. Initial advice to the European Commission on an EU-wide 2040 climate target and a greenhouse gas budget for the 2030–2050 period.
[3] BirdLife Europe (2024) Time to restore: Progress and pitfalls in implementing the EU Biodiversity Strategy. Assessment report.
[4] In line with Article 15(b) of the Renewable Energy Directive, Directive (EU) 2023/2413.
[5] In line with Article 15(c) of the Renewable Energy Directive, Directive (EU) 2023/2413.
[6] In line with Article 16 of the Nature Restoration Regulation, Regulation (EU) 2024/1991.

Solarfarm. © Shutterstock

Turbines in Poland. © Shutterstock

The key tasks and deadlines set by REDIII and the NRR include:

By 1 July 2024, transpose into national law various REDIII requirements to streamline and speed up permitting processes for renewable energy projects, and the remaining provisions by 21 May 2025;

By 21 February 2026, publish a plan with maps to designate 'Renewable Acceleration Areas ('RAAs'), areas of land or sea of low environmental sensitivity for renewable energy installations, where projects can be approved through a rapid permitting process under area-specific rules;*

Within six months of receiving draft NRPs, the Commission shall assess and may issue observations. Member States must publish their final NRPs within six months of receiving those observations.

2024 — 2025 — 2026 — 2027 — 2028

By 21 May 2025, publish maps of the areas required for the renewable energy capacity (and associated grid infrastructure) to be installed to achieve their stated 2030 renewables target;*

By 1 September 2026, publish draft NRPs with objectives, actions and timelines for the restoration of biodiversity within their national territory;

KEY:

- **Renewable Energy Directive**
- **Nature Restoration Regulation**

*Ensure that synergies with nature restoration are considered in accordance with the NRR[7]

The European Commission has initiated infringement proceedings against most Member States for failing to transpose REDIII on time. Progress with REDIII implementation is already under way in some Member States, with some attempting to comply quite early. However, BirdLife Europe is concerned that in seeking to move ahead quickly, these countries are neglecting some key REDIII obligations and failing to implement mandatory NRR requirements, such as those highlighted in the timeline above. Work on both fronts should move forward in an integrated way so that Member States maximise synergies, avoid the risks associated with poor planning for renewables and restoration, and avoid unnecessary waste of resources in the public and private sectors.

In this briefing, BirdLife Europe presents its main recommendations on these issues to Member States, the European Commission and the renewables and electricity sector, focusing especially on the issues most relevant for wind and solar power. Many points are also relevant for hydropower and other renewable technologies. The aim is to ensure that this legislation is implemented in a coherent and holistic way, so that the rapid expansion of renewable capacity for EU energy decarbonisation and electrification proceeds whilst conserving and restoring biodiversity. These recommendations draw on existing BirdLife Europe positions[8], civil society guidance on application of REDIII[9], the European Commission's general recommendations and guidance to Member States on accelerated permitting[10], more specific guidance and tools for designating RAAs[11], and civil society and European Commission guidance and recommendations for ambitious nature restoration plans[12].

[7] In line with Article 14(13) of the Nature Restoration Regulation, Regulation (EU) 2024/1991.
[8] BirdLife Europe (2023) Position Paper: Winds of change: powering healthy seas through a nature positive energy transition & BirdLife International (2025) A nature-positive renewable energy transition: Birdlife International position.
[9] Client Earth (2025) Renewable Energy for Nature and People. A practical guide to the revised Renewable Energy Directive.
[10] European Commission (2024) Recommendation and guidance on speeding up permit-granting for renewable energy and related infrastructure projects.
[11] European Commission Directorate-General for Energy *et al.* (2024) Study on the designation of renewables acceleration areas (RAAs) for onshore and offshore wind and solar photovoltaic energy – Final report & Joint Research Centre Acceleration areas for renewables - technical tool to support sensitivity mapping.
[12] BirdLife Europe *et al.* (2024) Guidance and Recommendations for Ambitious Nature Restoration Plans - #RESTORENATURE & European Commission (2025) The Nature Restoration Regulation.

2. STRATEGIC ENERGY AND SPATIAL PLANNING ON LAND AND AT SEA, INCLUDING SENSITIVITY MAPPING

Turbine. © Esteban Sanchez

BirdLife Europe firmly supports a strong, plan-led approach to decarbonisation and renewable energy development, as a basis for making good locational decisions on new installations and grid infrastructure. To set out a clear path for accelerated energy decarbonisation, a structured approach to energy and spatial planning is required, which guarantees strong public involvement and maximises opportunities for biodiversity conservation and restoration. This starts with full and prompt updating of National Energy & Climate Plans (NECP) and Long-Term Strategies (LTS) to set out overall objectives and mechanisms for reaching renewable energy targets, that must be in line with biodiversity objectives. Then REDIII sets out requirements to use environmental sensitivity mapping in helping to provide regulatory certainty for faster permitting.

Member States should set out in National Biodiversity Strategies and Action Plans ('NBSAPs)' and NRPs how biodiversity will be conserved and restored. Coastal Member States also have legal obligations to improve the marine environment and publish Marine Spatial Plans, which should take into account protected area targets, NRR targets and ecological connectivity. In all of these areas, Member States must ensure that tasks are clearly assigned to, and delivered by, public authorities at all levels and in all relevant sectors.

In particular, BirdLife Europe recommends:

- Updated NECPs and LTSs should set and justify the speed of the renewable energy transition (including energy saving, efficiency and demand reduction) in relation to other climate emissions reductions, explain the chosen mix of renewable energy technologies, on land and at sea, and include all measures necessary to achieve the identified goals, with regular public reports on progress, impacts and any further measures required. Such updates and reports should also explain national approaches to the identification of areas for renewable energy development and use of RAAs, and how this is expected to speed up energy decarbonisation whilst complying with EU nature legislation;
- In establishing targets and measures for biodiversity conservation and restoration through NBSAPs and NRPs, Member States must set out clearly the guarantees and benefits that will be provided for nature in energy sectoral planning, decision-making and regulation;
- Energy and any associated spatial plans must set out clear timelines, actions and expected results for meeting energy decarbonisation goals;
- To guide locational decisions for new installations and infrastructure, sensitivity maps should classify land and sea territory according to the suitability of different areas in terms of their environmental vulnerability to different types of renewable energy installations and electricity infrastructure. Zoning policies should then ensure that projects are directed towards the least sensitive areas for nature, as the first essential 'avoidance' step in the 'mitigation hierarchy'[13];
- Wildlife sensitivity maps and related materials produced by national governments, BirdLife Europe's national Partners, and other organisations in individual Member States[14] and more widely in the EU[15], must be used as essential tools under REDIII, when identifying the areas required for renewable energy development by 2030, as well as in the subsequent designation of RAAs and any associated 'dedicated infrastructure areas'[16] for electricity grid needs;
- In relation to birds and other sensitive species and their habitats, exclusion zones for renewable energy installations should be declared early in the application of REDIII, ideally in the first resource mapping exercise (see timeline in the Introduction) where they are necessary to protect sensitive or endangered biodiversity features and reduce the risks of adverse impacts from individual projects or cumulative effects. Very small installations (e.g. for visitor centres in protected areas), may be excepted from this exclusion;
- Member States must integrate better the planning and permitting of renewable energy installations with that of grid infrastructure and wider decarbonisation efforts, to: ensure that projects are proposed where there is available grid connection capacity and potential consumers; avoid unnecessary projects, costs and environmental impacts; and provide greater certainty for developers, investors, regulators, consumers, local communities and wider interests;
- Member States must ensure that, in mapping the areas required to meet 2030 renewable energy targets, and in planning for designation of RAAs and any associated 'dedicated infrastructure areas', opportunities for nature restoration are fully considered (see Section 10);

[13] See BirdLife International (2025) A Nature Positive Renewable Energy Transition: BirdLife International Position for BirdLife's views on the mitigation hierarchy in relation to renewable energy development and nature conservation.
[14] E.g. in AT, BE, CZ, DE, DK, ES, GR, HR, IE, IT, MT, NL, PL, PT, SK.
[15] See European Commission Directorate General for Energy *et al.* (2024) Study on the designation of renewables acceleration areas (RAAs) for onshore and offshore wind and solar photovoltaic energy – Final report & Joint Research Centre Acceleration areas for renewables - technical tool to support sensitivity mapping; European Environmental Bureau (2024) Land for Renewables. Briefing on spatial requirements for a sustainable energy transition in Europe; Siecker *et al.* (2024) Land use and Europe's renewable energy transition: identifying low-conflict areas for wind and solar development. *Front. Environ. Sci.* 12:1355508; Wingenbach *et al.* (2024) Overview of Renewable Energy Spatial Planning and Designation of Acceleration Areas in Selected EU Member States; & SEO/BirdLife (2025) Principios rectores en la designación de las Zonas de Aceleración para el desarrollo Renovable (ZAR) (in Spanish).
[16] In line with Article 15(e) of REDIII, Directive (EU) 2023/2413.

- These processes should begin early, involve and inform affected local communities and other interested parties throughout, and should include clear efforts to collect the best information available and use it in a transparent way (see Figure below);
- RAAs should include as much urban, industrial and otherwise heavily modified or degraded territory as possible, including transport corridors where renewable energy can be generated without compromising safety or other issues, and intensive agricultural areas where renewable energy generation is compatible with cultivation or grazing (see studies cited earlier). Where Member States do not designate significant parts of such areas, clear justifications should be provided;
- The seas of the EU have suffered severe degradation, so action to recover marine ecosystems is required on many fronts. Full application of EU environmental evaluation, marine protection and nature law is required, and Marine Spatial Plans, supported by more detailed sensitivity mapping and analysis and a strong ecosystem approach, should determine where renewable energy should be favoured or avoided. For these reasons, RAAs are not considered to be appropriate for the marine environment;
- Given the high likelihood of cross-border environmental impacts from energy and electricity plans, Member States must take special care to consult neighbouring countries. Where such impacts may be even wider, e.g. in shared marine basins or along bird migratory corridors, international collaboration should take place under the Convention on Migratory Species, OSPAR, and other various international initiatives in marine basins around the EU. The European Commission should ensure that Member States collaborate effectively with each other and with neighbouring countries to ensure that energy planning and decision-making in such shared spaces respects the needs of biodiversity, e.g. with cross-border legal frameworks.

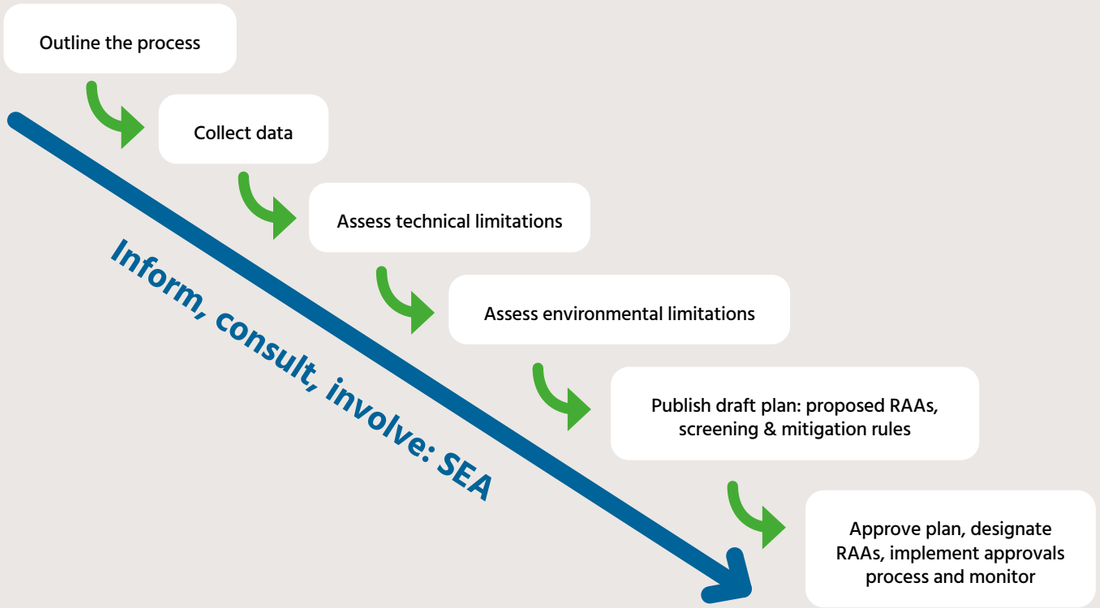


Figure: Schematic representation of a suggested stepwise process for the designation of RAAs (source: BirdLife Europe)

Eurasian Skylark. © Colum Clarke

Stork and turbines. © Vova Shevchuk

3. AUCTIONS OF NEW RENEWABLE ENERGY CAPACITY

Where Member States choose to use competitive auctions of rights to install future renewable capacity, there are some basic EU legal requirements[17] and further 'Delegated Act' legislation is expected[18]. Several organizations have made recommendations on how such auctions should operate, particularly regarding the use of 'non-price criteria'[19], which encourage bidders to propose additional positive social or environmental measures, beyond basic legal requirements.

Power lines. © Shutterstock

BirdLife Europe makes the following recommendations:

- Updated NECPs (due in mid-2024) and subsequent progress reports should identify clearly how Member States will use competitive auctions to assign new renewable generation or storage capacity for installation, including in relation to delivering the objectives of spatial planning for energy to avoid sensitive areas;
- Auctions to assign such capacity should follow a two-stage process, with basic environmental standards established as criteria in the first stage. Such standards should ensure that projects with impacts that cannot realistically be mitigated or compensated should not pass to the second competitive stage;
- Member States, with the support of the European Commission, should consider with neighbouring countries how auctions can be used to minimize the risk of cross-border negative impacts for biodiversity, and maximize possible cross-border benefits;
- Auctions in areas of low to medium sensitivity should, in most cases, include a strong weighting for non-price environmental criteria in determining the final auction decision, so that the auction design attracts and favours projects and measures with the best chance of maintaining or improving the conservation status of species and habitats, including innovative measures where appropriate. This includes going beyond project-specific mitigation actions, to include additional restoration measures in accordance with identified restoration priorities (see also Section 10).

[17] In line with Article 26 of the Net Zero Industry Act, Regulation (EU) 2024/1735.
[18] A Delegated Act is awaited following a European Commission consultation on draft legislation in January 2025.
[19] See Wind Europe (2024) Wind Europe views on pre-qualification and non-price award criteria in renewable auctions; Offshore Coalition on Energy and Nature (2023) OCEaN statement on ecological criteria in offshore wind farm auctions & WWF Norway (2024) Non price criteria as sustainability and social measures in offshore wind prequalification and auction design.

4. ENVIRONMENTAL IMPACT ASSESSMENT AT STRATEGIC PLANNING AND SPECIFIC PROJECT LEVEL

Across the EU, there is a very high rate of renewable infrastructure projects being presented for approval, and this will continue well into the next decade, transforming energy systems and our rural, urban and marine territory. The expectation that in most cases EIA will not be carried for projects within RAAs places added importance on the quality of SEA and the new RAA-specific rules for mitigation measures (see Section 5). Whatever the eventual extent of RAAs, the environmental impact assessment (EIA) of renewable energy projects and strategic environmental assessment (SEA) of projects and programmes, equivalent assessments under nature legislation, and enforcement of regulatory requirements (see Section 5) must continue to be crucial elements of the renewable energy transition. This is necessary to ensure that negative environmental impacts are avoided, or minimised and corrected/compensated, and this must be guaranteed for the duration of the plan or project.

BirdLife Europe makes the following recommendations in this area:

- The SEA of renewable energy plans and spatial plans (including those to designate RAAs) should make special efforts to assess territorial carrying capacity for renewables and associated infrastructure while considering other human pressures on the environment, in order to avoid where possible and in all cases minimise cumulative effects with negative impacts on biodiversity[20]. The SEA process should seek to maximize synergies and other positive opportunities, such as nature restoration (see Section 10), in line with identified conservation priorities;
- The EIA of individual projects should include the need to avoid habitat fragmentation and negative cumulative impacts, in line with requirements already established by prior SEA;
- Where they are required, environmental mitigation measures must be clearly designed to achieve tangible, positive results for affected species populations and habitats, within a wider framework of biodiversity conservation priorities for species and sites protection and restoration. This applies both to measures taken to mitigate identified negative impacts, and also to compensation measures where such negative impacts are unavoidable;
- Greater efforts must be made by Member States to ensure that the conditions established by SEA and EIA are fully complied with, through transparent monitoring of plan/project impacts and measures, and regular reporting of results, via public online data platforms (see Section 7).

[20] See e.g. the IUCN recommendations in Bennun *et al.* (2024) Guidance on biodiversity cumulative impact assessment for wind and solar developments and associated infrastructure.

Griffon Vulture. © Lars Soerink

Kittiwake. © Shutterstock

5. REGULATORY AND PERMITTING REGIMES

Successive legal reforms have introduced new regulatory and permitting requirements for EU renewable energy installations and electricity grid infrastructure, most recently through emergency regulations and through REDIII. These reforms have focused on improving the efficiency of the permitting process and reducing the time needed to approve projects. This has included a potential weakening of environmental protection, and not all new provisions have been transposed or applied fully or in a timely manner by Member States. It is essential that these new regulatory requirements designed to support the necessary acceleration of energy decarbonisation are applied in ways that contribute to biodiversity conservation and recovery, and do not cause further biodiversity decline.

BirdLife Europe's recommendations in this area are as follows:

- Minimum environmental operating standards and conditions, including requirements for monitoring project impacts, must be applied to all new renewable energy installations and grid infrastructure projects. Measures to mitigate negative environmental impacts[21] must be legally enforceable rules, not simply 'guidance';
- Projects proposed within RAAs, when submitted for 'accelerated screening' under REDIII, should include an opportunity for public participation, and the final project permission should establish any further conditions, in additional to the basic rules on mitigation measures, where these may be required to avoid or reduce environmental impacts[22];
- The energy and electricity sectors and regulatory authorities must work harder to monitor, ensure and report compliance with the conditions imposed on projects through the EIA, auction and licensing processes (see above). The results of such monitoring and any enforcement action should be publicly available, given the value of this information for wider biodiversity action and future projects;
- For projects where significant unforeseen negative environmental impacts are detected, whether through inadequate siting, evaluation or permitting, or for other reasons, corrective action should be taken to modify, relocate or in the worst cases, remove the cause of the problem, using mechanisms for revising permissions where necessary;
- Smaller installations (especially for solar 'prosumers') in RAAs and other low-medium sensitivity areas should be promoted and incentivised (e.g. with rapid permitting and grants or tax advantages), so that the renewable installations with the least environmental impact are more affordable and attractive for more EU citizens, businesses and institutions, and their benefits are widely understood, appreciated and shared;
- Member States, with the support and oversight of the European Commission, should endeavour to establish a 'level playing field' for the environmental regulation, permitting and monitoring of renewables and grids projects, so that similar levels of mitigation effort are in operation throughout the EU distribution of sensitive species and habitats, whilst retaining the sovereignty of Member States in their internal decision-making processes.

[21] See for example Renewables Grid Initiative (2024) Avoidance and Minimisation of Environmental Impacts from Offshore Wind and Grid Infrastructure, BirdLife Europe (2024) Bird curtailment in offshore wind farms. Towards a coherent sea-basin approach to mitigate collision risk for birds, European Commission Directorate-General for Energy *et al.* (2024) Study on the designation of renewables acceleration areas (RAAs) for onshore and offshore wind and solar photovoltaic energy – Final report & Bennun *et al.* (2021) Mitigating biodiversity impacts associated with solar and wind energy development.
[22] Articles 15(e)(3),(4),(5); Article 16(a)(4); and Article 16(c)(2) of Directive (EU) 2023/2413 (REDIII)

6. OVERRIDING PUBLIC INTEREST IN PERMITTING PROCESSES

REDIII creates a presumption that renewable energy projects and their related infrastructure may be approved in permitting processes for 'imperative reasons of overriding public interest' ('IROPI') or via specific justified exemptions, when evaluating their potential impacts under EU Nature, Water and Marine Directives, allowing for simplified permitting procedures[23].

Powerline with bird flight diverter. © Richard P Long

However, this presumption does not automatically exempt projects from environmental safeguards; if clear evidence shows significant adverse effects that cannot be avoided, reduced or compensated, the presumption is overturned. The assessment of whether a project can be approved under these exemptions must follow the strict conditions set under the relevant EU directive to ensure that environmental protection requirements are met. For biodiversity, before applying any derogations, authorities must conduct an 'appropriate assessment' under the Habitats Directive to evaluate the potential environmental impact and determine necessary mitigation or compensation measures.

BirdLife Europe recommends:

- Member States should ensure that good spatial planning, SEA and EIA mean that there is little need to apply exemption provisions, which in any case should be used with caution and avoided where there is clear evidence of significant adverse environmental impacts that cannot be mitigated or compensated;
- These exemptions should only be applied on a case-by-case basis following a strict assessment, in full compliance with the relevant environmental directives.

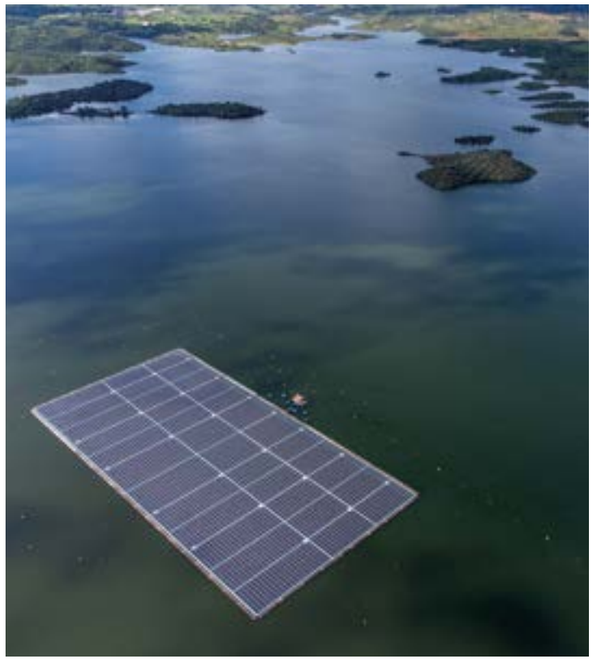
[23] Article 16(f) of Directive (EU) 2023/2413 & Article 6 of Regulation (EU) 2024/1991.

Juvenile Bonelli's eagle. © Svitlana Tkach

7. ESTABLISHING PUBLIC DATA PLATFORMS

Balearic Shearwater. © Arnau Soler

The absence of centralised, open-access biodiversity data hampers efficient environmental assessment and permitting, adding to project risks for developers. Establishing an EU-wide public data platform to monitor the evolution of the renewable energy sector and disseminate results from environmental studies, biodiversity databases, citizen science, and project monitoring is crucial for transparency and informed decision-making. It would also enable cumulative and cross-border impacts to be assessed, supporting the development of NRPs and good application of the EU Nature Directives, through more and better cross-border nature protection. European Commission recommendations[24] on permitting for renewable energy projects highlight the value of such platforms, which already exist in some Member States, but there are important gaps in coverage.



Floating solar panels. © Joao Manita

BirdLife Europe supports the Commission's recommendations, and further recommends:

- Member States should actively explore the feasibility and the potential barriers of setting up a transparent process to establish a data platform, including possible collaboration with neighbouring countries in this process, to ensure that international energy projects and their impacts are well documented;
- Ensure that data related to environmental studies and project monitoring are presented in standardised, machine-readable formats to facilitate interoperability and ease of analysis with intuitive interfaces that cater to a broad audience, including policymakers, researchers, and the general public, to encourage widespread use and engagement;
- Disclose failed permit applications, to discourage developers from presenting projects in the same, probably unsuitable, area several times, resulting in speeding up permitting procedures and saving expenses;
- Implement systems that allow for real-time or frequent updates of environmental data, and on existing or proposed new renewable energy installations, with open access, including monitoring data on the effectiveness of measures at individual sites, enabling all interested parties to access the most current information available;
- Integrate new data platforms with existing national and regional environmental information systems, working towards a harmonised EU database to create a cohesive, comprehensive and cumulative data ecosystem and produce regular reports on overall trends and specific priority topics.

[24] Commission Recommendation (EU) 2024/1343 of 13 May 2024 on speeding up permit-granting procedures for renewable energy and related infrastructure projects

8. IMPROVEMENTS IN THE PERFORMANCE OF PUBLIC AUTHORITIES

Efficient and effective public authorities are essential for accelerating permitting and renewable energy entry into the electricity 'mix' while ensuring environmental safeguards and maximizing synergies with restoration requirements. The scale, complexity and urgency of the renewable energy transition and biodiversity crisis require unprecedented efforts to improve public sector performance. The Commission's Recommendation (EU) 2024/1343 highlights the need for improved coordination between government levels, including clear frameworks for cooperation. It also emphasises the establishment of "single contact points" for granting permits to simplify procedures and the necessity of adequate staffing and digital tools to handle applications effectively. Additionally, cross-border collaboration on planning, SEA/EIA and permitting, especially within shared marine basins and along migratory flyways, is critical for addressing transnational challenges.

BirdLife Europe recommends:

- Member States should establish transparent, structured cooperation between national, regional, and local authorities to improve planning for renewables, grids and nature conservation and restoration, and streamline decision-making, while ensuring that cross-border cooperation with neighbouring countries addresses transnational challenges. National institutional coordination is especially important in strongly decentralized or federal Member States;
- Member States should establish independent expert committees, as national equivalents of the European Scientific Advisory Committee on Climate Change, to guide national action for the renewable energy transition and wider climate action;
- Well-resourced 'one-stop shops' to provide a single administrative contact point for project developers should include provision of environmental advice and information, based on the best data available (see Section 7);
- Many renewable energy installations are large-scale industrial projects and careful siting, design and operation is needed to avoid conflict with biodiversity and other objectives. Member States must work harder to prevent and resolve such conflicts, including using easily accessible dispute resolution procedures[25];
- Member States should inform interested stakeholders at regular intervals of progress in these and other areas, whether through formal structures (advisory councils, consultative panels, citizens' assemblies) or more informal channels;
- NGOs should be granted access as observers to the Commission-Member State Expert working group on accelerating permitting for renewable energy projects, and similar groups at national level, to enhance transparency and environmental oversight, and provide input from civil society expertise and experience.

[25] As required under Article 16(5) of Directive (EU) 2023/2413.

Stork nesting on grid. © Ayse Deniz Firtina

Solar Panels. © Leonid Sorokin

9. INFORMING AND INVOLVING AFFECTED COMMUNITIES AND WIDER CIVIL SOCIETY

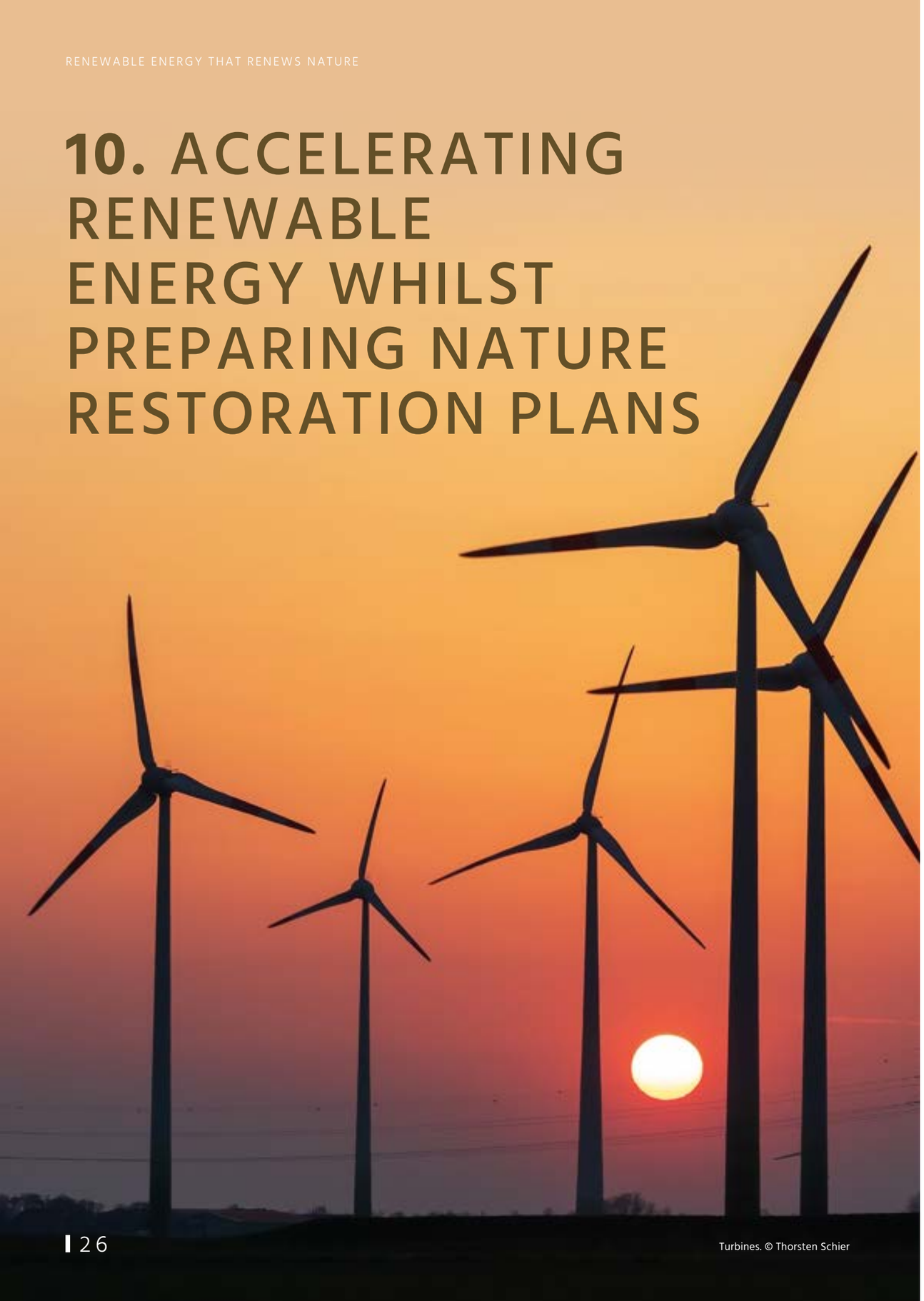
The REDIII's exemption of projects within RAAs from EIA weakens participation options in Member States, potentially diminishing citizens' role in decision-making. However, transparent public participation is a fundamental aspect of a just transition to renewable energy, essential for democratic legitimacy, legal certainty and better environmental outcomes. International agreements like the Aarhus and Espoo Conventions, alongside EU directives, require early and effective involvement of the public in decision-making. Transparent consultation processes at all stages - strategic planning, environmental assessments, and project approval and operation - help to mitigate conflicts and improve project acceptance, a benefit also recognised by the REDIII[26]. When communities are engaged from the outset, it fosters public trust, improves the quality of environmental assessments through the inclusion of local knowledge, and helps avoid legal and social conflicts. Early involvement also aids in identifying conflicts and issues proactively, preventing delays and promoting a sense of ownership among citizens. This is particularly crucial for onshore renewable energy projects, where public support can significantly influence project timelines and chances of success.

BirdLife Europe's recommendations are as follows:

- Authorities should provide accessible, early, and effective information and consultation opportunities, including transboundary engagement when relevant, ensuring public participation beyond the REDIII and the NRR requirements;
- In particular, additional efforts must be made by public authorities at all levels to explain to the public the need for an urgent renewable energy transition as part of global climate action, the process that is expected in each Member State, and how decisions on renewable energy plans and individual projects are taken, including how they can be planned and installed in ways which minimise damaging impacts and maximise opportunities for nature restoration;
- Renewable energy auctions should include non-price criteria on community involvement and local benefit-sharing mechanisms, as well as those related to the environmental impact of installations, nature-inclusive design, circularity, public participation, and responsible business conduct, due in the upcoming implementing act under the Net-Zero Industry Act (see Section 3 on non-price criteria);
- Regional and municipal authorities should ensure that they are equipped with the necessary skills, tools and staff for engaging with the public in a transparent way on general and project-specific issues relating to the renewable energy transition and nature. Member States should ensure that funding (including EU funding) is available where needed to support subnational authority work in this area.

[26] Recital 14 of Directive (EU) 2023/2413.

10. ACCELERATING RENEWABLE ENERGY WHILST PREPARING NATURE RESTORATION PLANS



Turbines. © Thorsten Schier

As BirdLife Europe and others have highlighted[27], EU nature legislation is very successful when applied properly, but overall, the EU's nature is in crisis through weak application of this legislation and poor integration in other sectoral policies, such as agriculture[28]. For example, whilst protected areas are fundamental instruments to conserve biodiversity and a standard feature of wildlife sensitivity maps, in many cases, such areas are not in good conservation status and are in urgent need of restoration[29]. Member States failed to reach the objective of Good Environmental Status (GES) for European marine waters by 2020, and overexploitation is a reality in most European seas[30]. Application of the Marine Spatial Planning Directive has so far made little progress in the integration of an ecosystem-based approach, resulting in inadequate marine biodiversity protection and failure to address cumulative environmental impacts effectively[31].

Against this background, the NRR requires Member States to publish draft NRPs by September 2026. Preparatory work includes prior identification of restoration opportunities in completing REDIII mapping tasks by May 2025 and February 2026 (see Section 1 above). The renewables sector is also well-placed to make a significant contribution to the funding and political impetus required for ambitious nature restoration.

BirdLife Europe makes the following recommendations:

- Member States must align mapping exercises for renewable energy purposes with NRPs and biodiversity targets, ensuring consistency across planning instruments. In particular, the REDIII deadlines in May 2025 and February 2026 should be used to present initial commitments from the renewable energy development sector to future nature restoration targets on land and at sea;
- Protected areas, together with suitable buffer zones, are not suitable for most types of renewable development, especially in the light of the poor record of Member States in guaranteeing the effective conservation of such areas. Therefore, for precautionary avoidance and legal certainty, renewables and associated infrastructure in these areas should be as far as possible avoided, with the designation of exclusion zones where necessary in areas of strict protection and clear sensitivity. The EU and national authorities must ensure that derogations for renewable energy under the NRR and REDIII do not undermine biodiversity protection[32];
- Coordination between the competent authorities should highlight and deliver nature restoration opportunities wherever possible in renewable energy planning and deployment, including in RAAs, where the recovery of degraded ecosystems can be combined with renewable energy and other uses;
- Member States should engage in meaningful consultation with neighbouring countries to identify cross-border opportunities and risks for nature restoration, both on land and at sea, in the context of REDIII implementation and NRPs;
- Member States and renewable energy businesses should grasp the opportunities provided by renewable capacity auctions and SEA/EIA (see Sections 3 and 4 above) to promote and deliver restoration actions to bring further benefits for biodiversity, in addition to the actions required to mitigate or compensate individual project impacts;
- Member States should implement the Marine Strategy Framework Directive to guarantee that offshore renewable energy deployment respects EU policy targets, such as Good Ecological Status and marine targets under the NRR and the EU Biodiversity Strategy 2030 and NBSAPs.

[27] BirdLife Europe (2024) Time to restore: Progress and pitfalls in implementing the EU Biodiversity Strategy. Assessment report.
[28] Pe'er *et al.* (2021). The Common Agricultural Policy post-2020: Views and recommendations from scientists to improve performance for biodiversity. Volume 1 – Synthesis Report.
[29] European Environment Agency (2023) State of nature in the EU. Results from reporting under the nature directives 2013-2018.
[30] European Commission (2025) Marine Strategy Framework Directive Evaluation 2025.
[31] BirdLife Europe (2022) – Are EU Member State's Maritime Spatial Plans Fit for Nature and Climate? - Technical Report – Approach and Main Findings; WWF (2022-2024) The EU is not on track for a sustainable blue future.
[32] Article 16(f) of Directive (EU) 2023/2413; Article 6 of Regulation (EU) 2024/1991.

11. PROGRESS ON BROADER DECARBONISATION PRIORITIES BEYOND RENEWABLE ENERGY

Achieving climate neutrality requires more than just scaling up renewable energy - it demands urgent action across all sectors. According to the OECD and UNDP, *'Accelerated climate action does not hinder economic growth, it provides economic gains'* and *'investing in clean energy and energy efficiency increases productivity and innovation'*[33]. Reducing the EU's emissions by reducing its reliance on imported fossil fuels will strengthen energy security, and make energy more affordable for its citizens. Combining this climate action in a holistic manner with efforts to halt and reverse biodiversity loss, will generate many other social benefits[34].

As well as the tasks necessary for a nature-friendly energy transition described previously in sections 2-10, BirdLife Europe makes the following recommendations:

- Member States must accelerate climate action in all of the following areas: energy saving, efficiency and demand reduction; conservation and restoration of carbon-rich ecosystems; sustainable agriculture, to reduce nitrogen and methane emissions, as well as urgent action to reduce methane emissions in other sectors[35]; industry decarbonisation; zero-emissions buildings and transport and public transport improvements; and progress towards a 'zero-waste' economy;
- In driving forward these actions, Member States must apply the "do no significant harm" principle across all sectors;
- The EU and Member States must ensure that all renewable energy projects displace fossil fuel use and that there is a clear timeline for energy demand in the future to be met exclusively from renewable sources, for all sectors;
- Particular efforts must be made to maximize the use of renewable electricity generation capacity, through improvements to grids, rapid expansion of electricity storage, reforms to electricity markets and tariff structures to adjust demand to supply, and guaranteeing grid stability;
- More generally, to meet REDIII renewable energy and biodiversity targets, the EU must focus on the full implementation of measures agreed in the adopted European Green Deal and not further roll back targets or regulatory guarantees for the sake of simplification. The EU must counter anti-Green Deal narratives by highlighting the economic and environmental benefits of leading the global transition.

[33] OECD & UNDP (2025) Investing in Climate for Growth and Development – The case for enforced NDCs.
[34] See Report (2021) of the IPBES-IPCC Co-Sponsored Workshop on Biodiversity and Climate Change (2020).
[35] See e.g. the proposals of the 'Methane Matters' coalition, https://methanematters.eu/

Gannet. © SarahLou Photography

12. Conclusions

The EU and the world are at a crucial moment for nature and the climate.

Transformational progress must be made during the rest of this decade if humanity is to have a chance of avoiding the worst consequences of climate chaos and biodiversity collapse during the rest of the century. A rapid increase in energy efficiency, renewable energy transition, the reduction of emissions in other sectors, the protection of natural carbon sinks, better conservation and restoration of nature, and more effective, participatory and science-based governance and regulatory measures are all essential if this progress is to be achieved.

Within the EU it is especially important to reinforce the action required at a time when national, European and global political contexts make progress even more difficult. As noted in the Introduction, the EU already needs to move faster if it is to meet its renewable energy, climate and biodiversity targets. Delaying progress will simply postpone the action required, increasing its eventual disruptiveness and likely eventual cost.

Involving and informing EU citizens about the nature and speed of the main actions required is an essential ingredient of success. With improved planning, regulation and monitoring, a more transparent and inclusive approach, and a clear commitment to nature across the renewables sector, protests against renewable installations (with their associated delays and costs) can be significantly reduced, adverse environmental impacts can be avoided, and positive benefits for nature can be achieved.

The implementation of the NRR and REDIII provides a significant opportunity for the EU to lead the world in the nature-sensitive energy transition, if Member States increase their individual and collective commitments. This document presents BirdLife Europe's initial recommendations for how these commitments might be delivered. BirdLife Europe will present a further publication later in 2025 which will assess progress, identify best practice examples, and highlight areas for further improvement.

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Egyptian Vulture on powerline.
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