European Commission

Clean energy for EU islands:

Position Paper: Supporting Denmark's island communities in the green transition - Creating a proportionate framework for Natura 2000 in small-scale renewable projects

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1. Background and context

1.1. Denmark's Green Transition and the roles of the Islands

Denmark is recognised as one of the European leaders in the green transition, with a long-standing political and societal consensus on the need for climate action. The country has committed to reducing its greenhouse gas emissions by 70% by 2030 compared to 1990 levels and aims to become climate-neutral by 2050. The 2022 government advanced climate neutrality to 2045, aiming for 110% GHG reductions by 2050. These overall targets are grounded in the Danish Climate Act (Klimaloven)[1] adopted in 2020. The Act in general balances green transition with maintaining welfare.
Under the Climate Act, Denmark set up the Danish Council on Climate Change, an independent expert body, to assess the government's climate efforts. In addition, the Act also establishes a system of annual progress reporting.

One of the main pillars of Denmark's green transition is the expansion of renewable energy production. In 2017 Denmark achieved a wind energy world record: 43,4 % of the Danish power was produced solely by wind energy[2]. In 2022, more than 60% of Denmark's electricity came from wind and solar energy, with ambitions to further increase both offshore and onshore capacity. The government's Energy Agreement and Climate Action Plans support this trajectory, emphasising not only technological deployment but also decentralisation, public participation, and community ownership of energy systems[3].

Within this national context, Denmark's islands play an important role. Their geographic isolation and reliance on local infrastructure make them ideal sites for showing self-sufficiency in energy production. Moreover, island communities have shown leadership in adopting renewable technologies, often ahead of the national curve. The most well-known example is Samsø, which became Denmark's first "renewable energy island" by transitioning to 100% renewable electricity and heating within a decade largely through locally owned wind turbines and biomass plants[4].

Besides Samsø, other islands such as Fejø, Ærø, Bornholm, and Venø are also pursuing ambitious sustainability agendas. These include community wind and solar projects, district heating systems based on biomass or electric heat pumps, and energy storage pilots[5].

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[1] Ministry of Climate, Energy and Utilities. The Danish Climate Act (Klimaloven). Available at: https://www.en.kefm.dk/Media/1/B/Climate%20Act_Denmark%20-%20WEBTILG%C3%86NGELIG-A.pdf; and https://climate-laws.org/document/the-climate-act_dae7

[2] Denmark: energy and climate pioneer

[3] Danish Energy Agency. Energy Statistics and Renewables Data, 2022

[4] Samsø Energy Academy: A Renewable Energy Island

[5] See inter alia examples: Case study on district heating based on solar with seasonal pit storage in Marstal, Denmark; District heating in Bornholm and Bornholms Forsyning; https://reempowered-h2020.com/pilots/bornholm/

In addition, many islands are active participants in EU and national initiatives, such as the Clean Energy for EU Islands Secretariat[6] or the DK2020 climate planning framework[7] which provide technical support to local governments developing climate-neutral action plans.

The experience of Denmark's islands shows the viability and scalability of decentralised energy transitions. These communities serve as examples of citizen engagement and cross-sector collaboration. Their efforts contribute to achieving Denmark's national climate goals but also enhance energy security, economic resilience as well as local empowerment.

To pursue success of the island initiatives it is necessary to ensure coherent policy support, streamlined permitting procedures as well as investment in infrastructure and capacity building.

1.2. Natura 2000: objectives and current application

Natura 2000 is the cornerstone of the European Union's biodiversity policy. It is an EU-wide ecological network of protected areas established under the Birds Directive (2009/147/EC)[8] and the Habitats Directive (92/43/EEC)[9]**.** The primary aim of this framework is to ensure the long-term survival of Europe's most valuable and threatened species and habitats, both on land and at sea.

In Denmark, Natura 2000 sites comprise habitat areas (habitatområder), bird protection areas (fuglebeskyttelsesområder), and Ramsar-designated wetlands. The legal framework for Natura 2000 in Denmark includes:

- **Naturbeskyttelsesloven**[10] (The Nature Protection Act, LBK nr. 240 of 13/03/2019) which is the primary legislative act ensuring the protection of nature and biodiversity in Denmark;
- **Habitatbekendtgørelsen**[11] (Executive Order on Habitat Areas, BEK nr. 2091 of 12/11/2021) implementing Articles 6 and 16 of the Habitats Directive, laying out procedures for site designation, assessment, and dispensation (derogation);
- **Planhabitatbekendtgørelsen**[12] (Executive Order on Planning in Relation to International Nature Protection Areas, BEK nr. 1383 of 26/11/2016) which ensures Natura 2000 considerations are integrated into land-use and spatial planning;
- **Miljøvurderingsloven**[13] (Executive Order on Environmental Assessments of Plans, Programmes and Specific Projects, LBK nr 1976 of 27/10/2021) which governs Environmental impact assessments and strategic environmental assessments, especially for plans and projects with potential cross-boundary or Natura 2000-related impacts.

Projects or plans that could significantly affect a Natura 2000 site either directly or indirectly must undergo an appropriate assessment under Article 6(3) of the Habitats Directive. This is a preventive tool based on the precautionary principle: the project proponent must prove that the activity will not

[6] Clean Energy for EU Islands Secretariat. "Denmark's Island Communities"
[7] DK2020 project
[8] Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds
[9] Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora
[10] Naturbeskyttelsesloven (LBK nr. 240 of 29/03/2019).
[11] Habitatbekendtgørelse (BEK nr. 2091 of 12.11.2021).
[12] Planhabitatbekendtgørelse (BEK nr. 1383 af 26.11.2016).
[13] Miljøvurderingsloven (LBK nr 1976 af 27.10.2021).

have adverse effects on the site's integrity. If such effects cannot be ruled out, the project can only proceed under strict conditions set out in Article 6(4), including proof of overriding public interest and provision of compensatory measures[14].

As clarified in the Danish national guidance issued by the Ministry of the Interior and Housing new wind turbine installations or major expansions are generally prohibited within Natura 2000 sites unless an exemption (dispensation) is granted under exceptional circumstances[15]. The guidance underlines that while societal interests such as the deployment of renewable energy are recognised, they do not automatically outweigh nature conservation objectives. Any proposed development must clearly demonstrate that it will not adversely affect protected habitats or species, or it must include adequate compensatory or mitigation measures.

Nevertheless, the guidance allows for context-sensitive planning. For instance, if a wind turbine is proposed on farmland with no significant presence of protected species or habitats, and where cumulative impacts are minimal, authorities may assess the potential for derogation on a case-by-case basis. Under Section 2(5) of the Planning Habitats Executive Order, the Minister of the Interior and Housing may, in special cases, grant a derogation from the prohibition on planning in a Natura 2000 area. Furthermore, Section 2(3) clarifies that the planning prohibition does not apply to line transfers of overhead power lines through areas designated solely as habitat sites.

This approach is also consistent with the planning principles set out in the Danish Environment Agency's official guidance on wind turbine deployment (Vejledning om planlægning og opstilling af vindmøller, 2015[16]). The guidance emphasises that local and municipal authorities must ensure early stakeholder engagement, clear zoning for wind energy as well as proportionate environmental assessments that fit the nature and the scale of the project. It confirms that while the expansion of renewable energy alone does not justify exemption from nature protection laws, societal interests may be weighed particularly where projects are sited on previously used land and accompanied by impact-reducing design or mitigation commitments (such as turbine replacement).

Consequently, Natura 2000 rules do not automatically ban new projects. Instead, Natura 2000 follows the precautionary principle, meaning project developers must show that their plans will not harm protected nature or take steps to reduce any harm. This makes sense in sensitive areas, but applying the same strict rules everywhere even in low-risk places can create unnecessary obstacles for small community projects.

This issue has become particularly important on Denmark's islands, where small-scale wind turbine projects are often delayed or blocked despite being located on previously developed or agriculturally used land. For example, in current planning cases on Lolland and other islands, Natura 2000 areas often include large coastal or farmland zones that have little value for protected species or habitats. Because these areas are still subject to strict rules, it becomes harder to approve small renewable energy projects causing conflict between Denmark's climate goals and its nature protection policies.

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[14] Assessment of plans and projects in relation to Natura 2000 sites – Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC

[15] VEJ nr. 9317 af 26/01/2022, Vejledning om planlægning for og tilladelse til opstilling af vindmøller i Natura 2000-områder, By-, Land- og Kirkeministeriet.

[16] Miljøstyrelsen. (2015). Vejledning om planlægning og opstilling af vindmøller. Danish Ministry of Environment.

In practice, the implementation of Natura 2000 objectives and procedures in Lolland Municipality is shaped by several recent strategic planning documents.

The **Natura 2000 Action Plan 2022–2027 for Maribosøerne** (Area N177)[17] outlines conservation measures to be implemented by 2027 (and by 2033 for protected forest areas). It shows how Natura 2000 rules are applied in practice at the local level. The document developed by the Danish Environmental Protection Agency together with Lolland and Guldborgsund Municipalities, sets out actions to protect habitats and species. These include agreements with landowners, restoring natural areas and maintaining important sites for biodiversity. While these efforts are important, they also show how complex and time-consuming it can be to manage Natura 2000 areas even in places that are mainly farmland or already used for other purposes.

The **White Paper for Smålandsfarvandet, Guldborg Sund, Bøtø Nor and Hyllekrog-Rødsand** (Area N173)[18] covers a large coastal and marine area north of Lolland. The document summarises public feedback and the authorities' responses, including from Lolland Municipality, the Danish Nature Agency, and environmental NGOs. It highlights the technical complexity of Natura 2000 planning and the importance of data consistency and clear responsibilities between actors. Sometimes tasks like updating habitat area tables or defining responsibilities for controlling invasive species required adjustments after public consultation. This example shows that Natura 2000 planning can become a detailed and resource-intensive process for municipalities.

[17] Natura 2000 Action Plan 2022–2027 for Maribosøerne (Area N177).
[18] White Paper for Smålandsfarvandet and Surrounding Areas (Area N173)

2. Case Studies: Fejø & Venø

2.1. Fejø – Skålo Windmill Proposal

Fejø is a small island in Lolland Municipality that shows both the strong local ambition and the challenges Denmark's islands face when trying to develop renewable energy.

The Fejø Island Transition Team wishes to install two modern wind turbines to replace older ones and help the island produce its own clean energy. But strict rules related to land use, the environment, and planning make this difficult.

Parts of Fejø are covered by Natura 2000, and the island is also affected by Danish laws protecting the coast and environment. The Fejø Transition Team has looked at up to nine possible turbine layouts, with total capacities between 2 and 3 MW. These include one or two large turbines (like the Vestas V80 or Enercon E82) or several smaller ones (like the Vestas V52), with possible locations in on the nearby island of Skalø, Østerby or Vesterby.

Because the proposed sites are close to Natura 2000 areas, salt marshes, and bird migration paths, a full Environmental Impact Assessment is required. Skalø, for example, is completely within a Natura 2000 site and also falls under the coastal protection line, which generally prohibits new construction within 300 metres of the coastline unless a dispensation is granted under the Nature Protection Act. This means that replacing an existing turbine here would require multiple exemptions from both Natura 2000 and coastal protection rules, adding complexity to the permitting process. The Østerby sites are close to the coastline and residential areas, so they must meet strict rules like staying at least 300 metres from the shore and at least four times the turbine's height away from homes.

To move the project forward, the Fejø community has looked for suitable sites on farmland with little environmental risk. They have also started early discussions with the local authorities. Bird studies suggest that the project would have very little impact on migratory species, which could allow for a case-specific exemption under the Natura 2000 rules. The community has also proposed removing the old turbines as part of the project to improve the island's landscape and reduce the overall environmental impact.

The project is supported by the Clean Energy for EU Islands Secretariat, which selected Fejø for technical assistance. The Secretariat confirmed that the project is technically possible, provided that planning and nature protection requirements are met. To address legal and social aspects and barriers, several measures are considered, such as habitat replacement, benefit-sharing schemes under the Danish Renewable Energy Act (including neighbour compensation and municipal green funds), as well as community engagement activities to strengthen local support.

2.2. Venø - local planning barriers and opportunities for renewable energy

Venø is a small island in Struer Municipality, located in the Limfjord, with fewer than 200 residents and an area of 6.42 km². Despite its size, Venø has a strong ambition to become carbon-neutral,

supported by the island's Transition Team and its Clean Energy Transition Agenda (CETA) developed in 2022.

A key part of this plan is to install a new, community-owned wind turbine to replace older, less efficient ones and help the island become more self-sufficient in energy.

However, the island faces several barriers. One of the main challenges is that Struer Municipality has not designated Venø as a wind energy development area in its current spatial plan. This means that even replacing an existing turbine is not possible without a change to the municipal plan or a formal exemption. Any new wind turbine project would require a full permitting process, including an Environmental Impact Assessment and a new municipal planning procedure.

Two possible areas for wind development have been identified through initial screening. Most of the island is restricted due to coastal protection zones, Natura 2000 designations, Section 3 protected habitats, mandatory buffer zones around dwellings, and water protection areas. The most promising area is in the south of the island, where there are fewer conflicts, but environmental screening and further assessments would still be needed especially because of nearby salt marshes and bird migration routes.

National regulations require that turbines are placed at least 300 metres from the coastline and at least four times the turbine height from the nearest dwellings[19], which significantly limits the available space on a small island like Venø. However, a recent national agreement on rural development (October 2024) may offer new opportunities: small islands like Venø may now apply for exemptions from some planning restrictions such as those related to coastal zone protection if the project is part of an approved island development plan. These exemptions, however, do not override nature protection obligations, including those under the Natura 2000 framework and the Danish Nature Protection Act.

The benefits of the turbine would stay local, and community support is expected to be strong. The Venø Transition Team is also prepared to integrate mitigation and compensation measures into the project, such as habitat enhancement and voluntary removal of outdated infrastructure, to reduce environmental impact. In addition, the project could make use of existing benefit-sharing mechanisms under the Danish Renewable Energy Act, including neighbour compensation and municipal green funds, to increase local acceptance.

3. The problem: a systemic misalignment

Although it is understood that the goals of Natura 2000 are environmentally necessary, the way the rules are currently applied shows a mismatch between nature protection laws and climate policy especially for small island communities in Denmark. Small, citizen-led wind projects, even when placed on farmland with little or no environmental value, are subject to the same level of regulation as large commercial wind farms. This creates procedures that are far too demanding for the scale and impact of these projects.

[19] Naturbeskyttelsesloven (2019) for coastal protection
VEJ nr. 9317 af 26/01/2022 for wind turbine planning guidance

At present, these small projects often have to go through long and expensive Environmental Impact Assessments and face unclear, case-by-case rules. This can delay or even stop their development. This approach goes against both the EU's Better Regulation principles[20], which call for simpler and fairer processes, and the European Commission's REPowerEU plan[21], which supports faster approval for renewable projects in low-risk areas like farmland or developed land.

Local and national planning rules are also not designed with small islands in mind. Many existing turbines on islands like Venø, Fejø, and Anholt were built decades ago, but cannot be easily replaced under current regulations because the sites are not included in official wind energy zones and Denmark's planning system requires a full municipal plan change and EIA even for repowering existing turbines. This blocks upgrades and goes against Denmark's national climate goals, as outlined in the Klimaloven, which aims to establish legally binding targets of reducing GHG emissions by 2030 and achieving climate neutrality by 2050.

The problem is also practical. Natura 2000 rules are often applied in the same way to areas with high biodiversity and to places like intensively farmland or developed land with low ecological sensitivity. In many cases, local landowners and communities have useful knowledge that could help shape a smarter, more focused impact assessment but this input rarely fits into the current national system. As a result, island municipalities are left without clear guidance or flexibility to move forward with sustainable energy projects.

This creates a real contradiction as Denmark's islands, which have led the way in community-owned renewable energy, are now limited in how they can support national climate goals. Instead of being supported, they face rules that do not fully reflect their potential and may overlook their consistent efforts toward sustainability.

This problem is not caused by the original intent of Natura 2000 but by the way the rules are currently applied. The European Commission's own guidance explains that protecting a site does not automatically mean refusing new projects, it means making a well-reasoned judgement based on actual risk. Unfortunately, as it is the case now, the current system does not put that flexibility into practice especially not for small, local renewable projects on islands.

[20] COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS Better regulation: Joining forces to make better laws

[21] COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS REPowerEU Plan

4. Why a proportionate approach is needed

The experiences of Fejø and Venø demonstrate why a more proportionate and flexible approach is urgently needed for small-scale renewable energy projects in Denmark's island communities.

On Fejø, the local community plans to install two modern wind turbines to replace older ones, with the preferred location being Skålo. The site is farmland, not forest or wetland, and no bat colonies or other protected species of concern have been identified. Although Skålo lies within a Natura 2000 area, the actual ecological risk is low. The community has also proposed to remove outdated turbines as part of the project, helping reduce visual and environmental impact across the island. The project is small in scale (2–3 MW) and designed to support local energy needs, yet it still faces full Environmental Impact Assessments and a complex dispensation process discouraging progress despite strong local support.

Similarly, on Venø, a single community-owned turbine is planned to support local energy needs. Most of the island is covered by planning and environmental constraints, including Natura 2000, beach protection zones, and strict dwelling setbacks. The only viable site, located in the island's south, still borders protected habitats, requiring extensive assessments. Like Fejø, Venø's project is modest in scale and impact but must navigate the full weight of national permitting procedures. Adding to this, Venø is not designated as a wind energy area in the municipal plan, blocking even the replacement of older infrastructure without a new planning process.

These examples reflect a one-size-fits-all interpretation of Natura 2000 rules, which is not required under EU law and is not environmentally justified in low-risk settings. The European Commission's own Article 6 guidance clarifies that development is not automatically forbidden within Natura 2000 areas but must be assessed based on actual impacts on conservation goals not just proximity.[22]

Moreover, both Fejø and Venø have shown a strong commitment to sustainability. They propose clear mitigation measures such as turbine replacement and early local engagement. However, these good practices receive no procedural benefit under current frameworks. Without changes, the risk is that such community-led projects will be delayed or abandoned not due to environmental risk, but due to disproportionate administrative barriers.

A proportionate approach would allow authorities to distinguish between high-impact commercial projects on one side and low-risk, high-benefit community initiatives on the other side.

[22] Managing Natura 2000 Sites – The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC; p.35-36

5. Recommendation

To enable Denmark's small island communities to fully contribute to the national green transition while maintaining high standards of biodiversity protection, we recommend that national and municipal authorities together with the Danish Environmental Protection Agency and Planning Authority introduce a more permanent, proportionate, and supportive approval framework for Natura 2000 related to small-scale renewable energy projects.

This framework should be guided by the following principles:

1. **Introduce proportionate procedures for low-risk projects**

To reduce unnecessary regulatory burdens on small-scale, citizen-led renewable energy projects, a proportionate permitting system should be established for initiatives located in low-risk areas, such as intensively cultivated farmland or previously developed land, where no protected habitats or species are present.

These projects typically involve a limited number of wind turbines intended for local use, and should not be subject to the same procedural and documentation requirements as large-scale commercial wind farms. A proportionate permitting system, in line with e.g. EU Better Regulation Agenda and the European Commission's REPower EU plan, which explicitly calls for accelerated permitting in low-conflict areas, is necessary.

The procedure should include the following key elements:

- A formalised screening mechanism to quickly assess whether a full Environmental Impact Assessment is required, based on the site's land use, ecological sensitivity and project scale;
- Clearly defined timelines for processing dispensations in low-risk cases, with clear and predictable deadlines at each stage to ensure transparency for applicants;
- Objective eligibility criteria to determine which projects qualify, based on parameters such as land type (e.g. agricultural land), turbine number and capacity, proximity to Natura 2000 core areas, and proposed mitigation actions (such as removing old turbines or applying buffer distances).

2. **Recognise mitigation through replacement**

Projects that include the voluntary removal of old wind turbines or related infrastructure as part of a modernisation effort should be formally recognised as contributing to mitigation or compensation requirements under the Natura 2000 dispensation process. This is in line with Article 6(4) of the

Habitats Directive, which allows for exceptions to be granted when compensatory measures ensure the overall coherence of the Natura 2000 network is maintained.

A clear environmental and landscape benefit can arise from replacing old, inefficient, and often visually intrusive turbines, with fewer, modern ones. Such upgrades are also more likely to gain public support, especially when driven by local communities.

However, under the current procedures, these projects do not receive any special consideration. They are treated the same as completely new wind farm developments, even when the proposed changes would reduce the number of turbines, improve design and limit environmental impact.

The approval framework should therefore:

- Formally recognise the decommissioning of old turbines and infrastructure as a valid mitigation or compensation measure;
- Allow faster and less complex procedures for modernisation projects that clearly reduce environmental, noise, and visual impact;
- Treat the overall improvement in environmental performance as a positive factor in the Natura 2000 assessment and decision process.

3. Publish island-specific guidance

To help small island municipalities and community groups participate effectively in the Natura 2000 dispensation process, there is a need for clear, practical guidance that is tailored to their specific context. At present, the complexity and lack of clarity in Natura 2000 procedures create real barriers for small, citizen-led renewable energy projects, particularly in places with limited technical or administrative capacity.

This guidance should speak directly to the realities of island communities, where space is limited, older infrastructure is often still in place, and local involvement in energy planning is rather strong.

The goal should be to make the rules more understandable and predictable by clearly explaining:

- What documentation and procedural steps are required for small-scale renewable energy projects, including examples of how to prepare project descriptions, baseline environmental studies, and screening justifications;
- What types of mitigation and compensation measures are commonly accepted, such as removing old turbines, enhancing local habitats, or introducing buffer zones;
- What has worked in similar cases, by sharing good practices from other island or rural Natura 2000 projects in Denmark and elsewhere in the EU, where dispensations were granted based on proportionate and well-supported applications.

Alongside the written guidance, supporting materials such as visual tools (for example, flowcharts or checklists) and ready-to-use templates should also be provided. These can help local actors prepare strong and complete applications and reduce uncertainties in the approval process.

4. **Strengthen support and coordination at national level**

To ensure a fair and effective implementation of Natura 2000 in the context of small-scale renewable energy development, the Danish government should establish dedicated technical assistance and advisory capacity to support small municipalities and island communities. These actors are often deeply committed to advancing the green transition but lack the specialised expertise or administrative resources required to navigate the complex permitting and environmental compliance processes.

We recommend that the Danish Planning Authority or a designated national body be mandated to provide targeted support, including:

- Clarification of legal and procedural requirements under Natura 2000 for small-scale wind energy projects;
- Tailored advisory services to help local actors interpret ecological impact levels and identify proportionate mitigation options;
- Support in preparing technically sound and policy-aligned applications, including guidance on assessments, justifications of low-risk status, and compensatory measures.

This support could be delivered through a combination of written guidance, digital tools (e.g. online advisory platforms) and/or direct consultation with municipal planning departments or citizen energy groups.

5. **Monitor and review implementation impacts**

To make sure the Natura 2000 approval framework works well, while ensuring nature protection, a clear system for monitoring and feedback should be set up. This system should track how the current rules affect small renewable energy projects in island and rural areas, including how long approvals take, how many projects move forward, and how communities are involved.

It should also help identify common obstacles, overly complex requirements, or unclear rules that create problems for small, low-risk projects.

This monitoring system should include:

- Regular reviews of how applications are handled for island-based renewable projects, including data on applications submitted, approved, delayed, or withdrawn;

- Feedback from local stakeholders such as municipalities, project developers, citizen energy groups, and NGOs, focusing on how understandable and workable the current procedures are;

- Updates to national guidance and procedures based on what the monitoring shows, so that Natura 2000 rules stay effective and up to date.

6. Conclusion

The Natura 2000 framework plays an important role in protecting Europe's biodiversity, and its goal of safeguarding vulnerable habitats and species is widely supported. However, it has been noticed that it sometimes applies too rigidly. The experiences of Fejø, Venø, and other small Danish islands show a growing tension between two national priorities, that is protecting nature on one side and advancing the green transition on the other side.

Denmark's islands are not just passive recipients of national policy; they are practical examples of innovation, self-sufficiency, and community-driven climate action. However, under the current approval system, their plans to replace outdated wind turbines and contribute to national climate goals are often slowed or blocked by complex procedures, even when the projects pose minimal environmental risk. A more predictable and proportionate framework is needed to ensure that these low-risk initiatives can move forward without unnecessary administrative barriers.

This position paper shows that a more proportionate approach is necessary and fully allowed under the existing EU rules. A small, citizen-led project on farmland with no sensitive species should not face the same requirements as a large commercial wind development. If this distinction is not made, the system risks becoming stuck and ineffective.

We call on the Danish government, the Danish Environmental Protection Agency, and municipal planning authorities to adopt the recommendations set out in this paper. With the right reforms, Denmark can continue to protect nature while giving its island communities the tools they need to support the green transition.