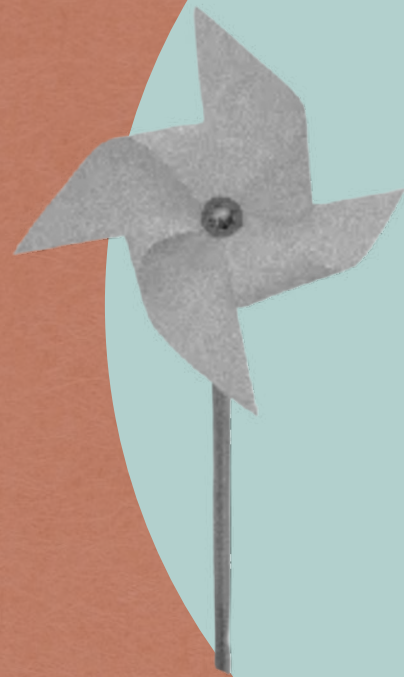


# PEOPLE POWER UP

*A report on Renewable  
Energy Communities  
in Malta*



# COLOPHON

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**Printed by** Printed by Progress Press Ltd. on FSC certified paper

**With thanks to representatives of the entities interviewed as part of this research:**

Menorca Energy community - Menorca Foundation and COURE, the Regulator for Energy and Water Services (REWS), the Institute for Sustainable Energy - University of Malta, the Western Regional Council, AQS Med (Renewable Energy Company), the Energy and Water Agency (EWA), the Malta Intelligent Energy Management Agency (MIEMA) and the Malta Cooperative Federation (MCF).

February 2025



For more information about Malta's energy system, its climate impacts and our vision for the future, download our report 'Towards a Fossil Free Malta' (2023) from our website.

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This publication is an output of the People Power Up project of Friends of the Earth Malta, funded by the Malta Environment Foundation.

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# 1. INTRODUCTION

## 1.1 ENERGY IN MALTA

Malta is highly dependent on fossil fuels for its energy needs. In 2022, 87% of Malta's electricity was produced from fossil fuels (Eurostat, 2024a). Malta has an electricity supply which is largely dependent on the burning of Liquefied Natural Gas (LNG). All of it is imported (Eurostat, 2024a), which is a drain on the economy and puts Malta at risk in case of rising energy prices or geo-political tensions.

Climate change is an imminent existential threat, the effects of which are already being felt around the world. In the Maltese context, the country is facing drought with record low rainfall (Galdies, 2022) and record high temperatures (Michelle, 2024). The Government of Malta itself stated this is an emergency situation when they officially declared a Climate Emergency in 2019 (Times of Malta, 2019). Despite the declaration, the government is not doing nearly enough. We urgently need to act to limit the impacts of climate change and adapt to the changes that are happening (Maas, 2023). A principal way to do this is to shift energy sources away from fossil fuels. Adopting ambitious climate policies is not just a threat response, but also a great opportunity: a 1.5°C energy transition by 2030 would save the EU 1 trillion euros in avoided climate damages, health impacts, and fossil fuel imports (CAN Europe, 2024).

Malta is one of the few nations with increasing greenhouse gas (GHG) emissions in the EU and has the highest rate of GHG emissions increase from 2023 to 2024 (Eurostat, 2024b). Overall, GHG emissions have gone down since 2005, mostly due to a shift from using heavy fuel oil to gas at the Delimara power station and the commissioning of the interconnector to Sicily (EWA, 2019). However, emissions under the EU's Effort Sharing Regulations have had a high increase of 30% since 2005 (EC, 2024). Malta also has one of the lowest share of renewable energy production in the EU, with only 15.1% of its energy coming from renewable sources in 2023 (Eurostat, 2024c).

While action to promote the green transition is lacking, Malta also has some policy measures in place that exacerbate

emissions. Electricity and fuel prices are heavily subsidized in Malta - essentially a direct subsidy for fossil fuels - giving them an unfair advantage over renewable energy (Sansone, 2022). While it is important to protect people from energy poverty, the blanket subsidy doesn't make distinctions and essentially supports high energy users. Furthermore, the government has proposed a fossil gas pipeline between Sicily and Malta (Sansone, 2019), which would lock Malta further into decades of fossil fuel use. The government also gives heavy tax breaks to extremely polluting and luxury industries such as private jets and superyachts (Gonzi & Associates Advocates, 2020; Ministry for Transport; 2023).

Almost all of the renewable electrical energy that Malta uses originates from solar photovoltaic (PV) systems. The vast majority of these are small arrays on residential properties: 93.4% in 2023. In terms of generation capacity, it is mostly in the commercial sector with 52.7%, while the residential sector accounts for 44.7% (NSO, 2024a). Malta has already surpassed the very low target included in the first National Energy and Climate Action Plan (NECP): 11.5% renewable energy share by 2030 (EWA, 2019), although the updated NECP published in January 2025 increases the target for 2030 to 25% (EWA, 2025). Reaching the original target ahead of schedule has been achieved despite a lack of action from the government and hindrances such as heavy fossil fuel subsidies, showing that there is potential for rapid decarbonization. There is a huge potential for renewable energy generation in Malta, the islands being one of the sunniest places in Europe with 300 days of sunshine per year.

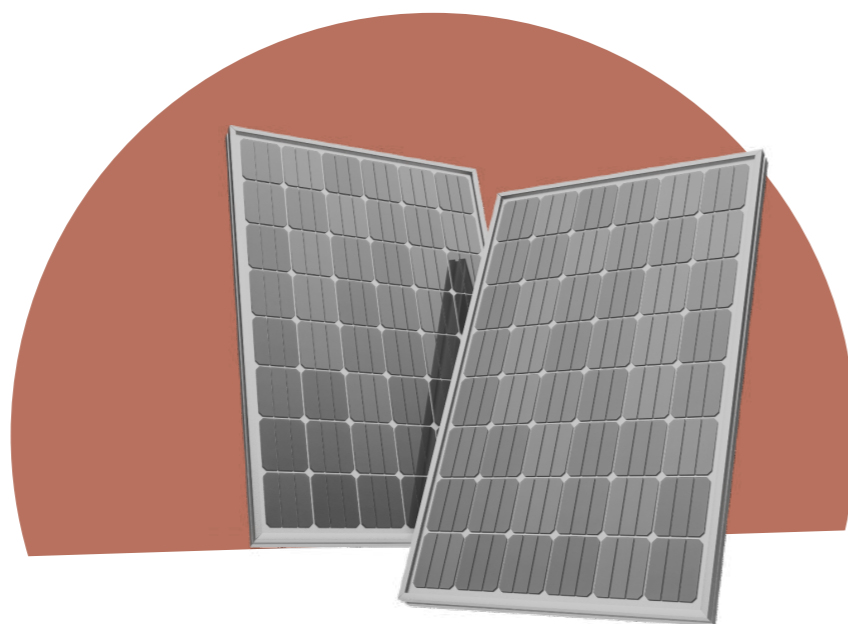
One of the main measures that the government has implemented to shift to renewable energy sources was to offer grants for residential photovoltaic (PV) installations and feed-in tariffs (FiT) for sold renewable energy. While this has been a good measure with a large amount of solar panels being installed since 2014, installation rates have now declined due to a lack of available space or economic difficulties.

There are many people who would want to have solar PV panels. A 2024 survey with 692 respondents showed that 78% of people surveyed were willing to have PV panels in their community and 74% in their own residence (Berendsen et al., 2024). However, many households do not own roof space or cannot install solar PV for other reasons, such as planning restrictions or their roof space being shaded. The lack of any legislation that provides solar rights results in people being hesitant to invest in solar PV, especially with planning policy increasing building heights and rampant construction (Camilleri, 2018). The majority of residences, about 65% of dwellings in Malta, are apartments or maisonettes, which often lack (access to) roof space (NSO, 2023). This proportion is expected to increase with time. There is also a large upfront cost to installing solar PV, which not every household is able to afford, although there are grants in place which help overcome this barrier (REWS, 2024).

Centralization of energy production concentrates an enormous amount of power in the hands of a few, allowing those who control that power to influence policy. The economy is dependent on energy so those that control energy have a disproportionate amount of influence. This can undermine democracy and lead to corruption and injustice, which is evident in the Maltese energy system. Investigations into the energy systems of Malta by journalist Daphne Caruana Galizia exposed widespread corruption (Brincat and Borg, 2021; Rubino, Anesi, and Bagnoli, 2018) which is possibly linked to her assassination. The company that was directed by the alleged murderer is one of the companies making up the Electrogas consortium, which operates the power station that generates the vast majority of the electricity in Malta (Electrogas, 2018). The company itself is also implicated in corruption (Borg, 2021).

Renewable energy communities (REC), i.e. legal entities that ensure citizens, SMEs, and local authorities can co-own renewable energy projects, are part of the solution for a just transition to a cleaner energy system, opening up new opportunities for increasing the share of renewable energy generation. Renewable energy communities are democratically controlled and transparent organisations whose main aim is to benefit the community rather than generate profit for shareholders.

If the government will not take the necessary measures, then people can and should take the energy transition into their own hands. Renewable energy communities play an important role in the just transition away from fossil fuels. Apart from environmental benefits, RECs also offer economic benefits and help the local community.



## 1.2 RENEWABLE ENERGY COMMUNITIES AND THEIR BENEFITS

Renewable energy communities are open and transparent, and democratically owned legal entities. The primary aim is to meet the local community's energy needs, and to prioritise social and environmental benefits over profit. Renewable energy community projects can involve different endeavours related to renewable energy. In most cases this is energy production, like through solar and wind farms, but it could also be distribution, energy efficiency measures, sustainable transport, energy storage, education on energy and addressing energy poverty. They can involve the individuals of the community, local small businesses and local authorities.

There is a large degree of overlap between RECs and the cooperative structure, and RECs often take the form of a cooperative. In fact, the Renewable Energy Directive's (RED) definition of a REC states that a REC is based on open and voluntary participation, is autonomous, and is effectively controlled by shareholders or members. These are three of the seven internationally recognised cooperative principles (REScoop.eu, 2022). However, this is not prescriptive and RECs can take other forms as well. RECs can also be considered social enterprises, since they trade for a social objective with surpluses reinvested in the REC and its objectives. Malta's Social Enterprise Act would cater for RECs to be accepted as social enterprises (Article 3(b)(i)).

Renewable Energy Communities offer many benefits (REScoop.eu, 2023):

### Environmental benefits

- RECs speed up the renewable energy transition as they are an additional tool in the fight against the climate crisis, shifting energy systems away from fossil fuels.
- People forming part of the energy community are more likely to be aware of how to use their energy more efficiently and the community can help and educate in this regard, since there's no profit motive to increase consumption (Coenen and Hoppe, 2017).
- They allow for more efficient use of the limited space available for renewable energy generation, as people in the community can offer whatever space is available.

## Economic benefits

- RECs allow the local economy to flourish as funds aren't constantly being bled to an entity outside the community to fund energy imports.
- RECs support the local economy, mobilizing funds of the people in the community, and can potentially create local jobs.
- The mobilization of community funds effectively means that the government has attracted a new investor to the renewable energy field: the community. Rather than relying solely on government funds and private for-profit corporations, Malta would benefit from a third investor (the community).
- Since RECs reinvest their surpluses back in the community, primarily in more clean energy projects, any surpluses generated will be directed towards Malta's own renewable energy targets, rather than taken out as dividends by private individuals.
- RECs can help protect against price fluctuations. Although with current fixed energy prices this is not a concern in Malta right now, this could be a benefit in the future if energy prices would be more volatile.
- RECs can fight energy poverty as they can offer lower prices than would otherwise be provided by a for-profit energy company. Many energy communities implement actions to help vulnerable households, such as by providing them free shares in an energy sharing project. The CEES Energy Solidarity Toolkit outlines concrete examples of energy communities tackling energy poverty from across Europe (CEES 2025). As energy consumption tends to be lower in energy communities, this also leads to financial savings for their members.



## Social benefits

- Energy communities enable greater acceptance of renewable energy projects by people in their locality as they are involved, own and directly benefit from them. REC projects are more likely to include and respect the local community and environment whereas projects from a large entity outside the community might not take all the needs of the local community into account.
- RECs are a tool for people to act, empowering them to have control of the energy systems they use in their daily lives. They allow people who want to do something about the climate crisis to participate directly in the energy transition. Allowing them to invest in the energy transition, gives people a tool to fight the climate crisis rather than feeling hopeless.
- Community owned energy systems lead to a healthier democracy. They take power away from large corporations and take it back to the community. Through economic participation and voting community energy members exercise their democratic rights.
- RECs allow for people to have their own renewable energy production which may not otherwise be possible on an individual level.
- RECs contribute to the strengthening of the social bonds in the local community. Community participation in RECs can foster greater community participation in other fields and strengthen the sense of belonging to a community in general.

This report highlights the current situation in Malta regarding renewable energy communities, as well as recommendations to promote them in our context. In chapter 2, relevant policy and legislation on energy communities will be explained, whereas chapter 3 discusses different renewable energy technologies. Chapter 4 looks at the opportunities and barriers for renewable energy communities in Malta. In chapter 5, recommendations for policy makers to promote community energy are provided, whereas chapter 6 presents guidelines for people who are interested in starting or becoming involved in a renewable energy community.

## 2. POLICY AND LEGISLATION ON ENERGY COMMUNITIES IN THE EU AND IN MALTA

### 2.1 EU POLICY ON RENEWABLE ENERGY COMMUNITIES AND ITS RELEVANCE TO MALTA

The EU has recognized the importance of energy communities in its legislation. Two legal definitions exist from different directives. Article 2(11) of the Electricity Directive (2019/944/EU) defines Citizen Energy Communities (CEC), and Article 2(16) of the Renewable Energy Directive (RED) (2018/2001/EU) defines Renewable Energy Communities (REC). The Directive should have been transposed by all Member States by 30 June 2021.

The definitions of REC and CEC are mostly similar in their definitions although CEC has a broader definition. Key differences between the two are:

- The type of energy: CEC can be any energy generation while for RECs it is only renewable energy generation.
- The geographic area: There are no geographic restrictions for CEC while there is an emphasis on being local for RECs
- RECs are more restrictive in the eligibility of members, including natural persons, local authorities and local SMEs while CECs can involve any entity.

EU member states were required to transpose the legal framework for RECs from article 22 of the Renewable Energy Directive (RED) (2018/2001) to their national legislation. Malta has only partially transposed some of these requirements, having only defined RECs and CECs in Subsidiary Legislation S.L. 545.35. However, Malta hasn't carried out the other obligations for transposition such as: creating an enabling framework, carrying out an assessment of the barriers and potentials for RECs in Malta, and taking into account the specific conditions of RECs in designing support schemes for renewable energy (REScoop.eu, 2024a).

Article 22(4) of the RED calls on Member States to create an enabling framework for energy communities as one of the legal obligations for transposing the law on RECs. Some of the aspects which are required of such a framework are that

unjustified legal barriers for RECs are removed, RECs are given provisions to carry out their activities, and participation of all citizens in RECs including those in low-income households is allowed. As of February 2025, little progress in creating this framework has been made by the Maltese government.

The enabling framework also includes creating dedicated financing tools. Malta currently doesn't offer any financial incentives to energy communities. The country has also so far failed to leverage any EU funds (e.g. the Recovery and Resilience Facility or the European Regional Development Fund) to support such entities (REScoop.eu, 2024b).

The EU Solar Energy Strategy envisions at least one renewable energy community per municipality of more than 10,000 residents by 2025 (EC, 2022). Many local councils in Malta fit this criterion, as is outlined in Table 1 (NSO, 2024a). However, this target is not legally binding and it seems very unlikely that it will be implemented in time in Malta, where currently no renewable energy communities exist yet. However, this is still an important target, as it can be used persuasively to push and encourage the national government, and regional and local councils, to support or participate in local energy communities.

*Table 1: Localities in Malta with a population over 10,000 (NSO, 2024a)*

Locality	Population
San Pawl Il-Baħar	38,615
Birkirkara	28,841
Il-Mosta	25,152
Tas-Sliema	22,037
Hal Qormi	19,567
Marsaskala	18,253
In-Naxxar	17,836
Haż-Żabbar	17,754
L-Imsida	15,815
San Ġwann	15,697
Is-Swieqi	14,794
Haż-Żebbuġ	14,752
San Ġiljan	14,524
Il-Mellieħa	14,004
Il-Fgura	13,861
Ħ' Attard	12,952
Iż-Żejtun	12,719
Iż-Żurrieq	12,668
Birżebbuġa	12,404
Ir-Rabat	12,284
Il-Gżira	12,158
Il-Ħamrun	11,751

Malta didn't mention RECs in the first version of the 2030 National Energy and Climate Plan (NECP) (EWA, 2019), unlike other Member States such as Spain and Portugal that have set ambitious goals for community energy (Community Power Coalition, 2024). This was flagged as an issue by the European Commission and it was recommended that RECs are included in Malta's plans. This was initially dismissed by the Maltese authorities, who responded saying that RECs are unlikely to develop given the characteristics of Malta's electricity system. The updated version of the plan, published in 2025 (EWA, 2025), mentions a communal energy project set up and controlled by a government agency in 2016 on a water reservoir (Fiddien) as an example, with the government encouraging "private enterprises and investors" to develop the model further. Unfortunately there wasn't much improvement in terms of support for RECs in the updated plan. It still mentions the monopoly of distribution of energy by Enemalta as a barrier to their implementation. The RED obliges Member States to add the main elements of the enabling framework and of its implementation as part of the updates of the national energy and climate plans and progress reports. As Malta has not designed an enabling framework, it also did not comply with this obligation in the NECP although the updated NECP states that there is a study currently in progress to assess the barriers to RECs in Malta (EWA, 2025).

## 2.2 MALTA'S ENERGY POLICY

Maltese law regarding electricity production and distribution has several parts which are important for RECs. There is only one Distribution System Operator (DSO) in Malta, Enemalta plc, an enterprise with a majority shareholding by the Maltese Government, alongside Shanghai Electric Power. Only Enemalta is allowed to carry out this task by law [Subsidiary Legislation S.L. 545.13]. By extension, energy sharing is currently not possible. The legislation is likely to change in the near future to allow for energy sharing, as EU Member States will have to transpose the new right to share energy into national law by 17 July 2026 according to the updated Electricity Market Design [EU directive 2024/1711].

A guaranteed feed-in tariff (FiT) for energy sold to the DSO (Enemalta) should be given for energy generated from renewable energy sources at a representative market rate [Subsidiary Legislation S.L. 545.27]. The DSO is also obliged to buy renewable energy [Subsidiary Legislation S.L. 545.34]. There is a bidding process by the Regulator for Energy and Water Services (REWS) for the FiT for renewable energy plants larger than 40KW. Unlike countries such as Ireland (REScoop.eu, 2021) and Germany that have created auctions just for energy communities, auctions in Malta are not reserved for such actors. This

leads to an uneven playing field, pitting smaller actors such as RECs against private companies.

Planning Authority (PA) approval is needed for a solar project. The guidelines for rooftop solar can be found in the 2015 Development Control Design Policy, Guidance and Standards. Some important information within these guidelines is that inclined PV panels on a roof can be up to a maximum of 1m above the roof level and cannot exceed parapet wall height. PV panels should be installed so that they are flush with inclined roofs. In car parks they can be installed up to a height of 3.4m (Planning Authority and Zammit, 2015).

One major issue in Malta preventing widespread adoption of renewable energy is the lack of available and suitable space. Renewable energy projects should not be detrimental by taking up precious land, such as for agriculture. The government has published a Solar Farm Policy as a guideline for the placement of solar farms, which states that new solar farms should be sited in the vicinity of urban areas, or areas with high electrical consumption, and should not take up virgin or agricultural land (Planning Authority, 2017). Prospective renewable energy communities should follow these guidelines and ideally make use of unutilized roof space in urban areas, close to where electricity is consumed. Across the EU, many municipalities are joining forces with energy communities to install community solar and wind projects in public spaces, such as on rooftops, on public buildings or vacant lots.

Administrative power is very centralized in Malta with most important decisions being made by the central government and very little agency given to local administration. This would make it more challenging for local administration to participate in or support RECs in their area. On the other hand Malta is a very small nation and so the central government can be seen as the equivalent to the local administration of cities in other nations. People in Malta tend to be closer to politicians in the central government than in other nations.



## 2.3 MALTA'S OFFSHORE RENEWABLE ENERGY POLICY

An alternative option is for renewable energy production to be taken offshore. This has generally been a challenge as there are not many possible areas for bottom mounted wind turbines given the bathymetry of the deep Maltese waters. There were plans for a wind farm at an area off the north coast of Malta known as Sikka l-Bajda in 2011 (Debono, 2015). However, the project was scrapped because of the impact it would have had on shearwater bird colonies. The Maltese government has now been looking again at investing in offshore renewable energy, given the advancement in floating technology. In 2024 Malta published the National Policy for the Deployment of Offshore Renewables (EWA, 2024a). Unfortunately there is no mention of renewable energy communities in this plan, despite Friends of the Earth Malta (FoEM) repeatedly suggesting this option in their public consultation feedback on the draft policy (FoEM, 2023). The recently revised Renewable Energy Directive (2023/2413) includes a new paragraph (7a) to Article 9, which states that "to enhance public acceptance, Member States may include renewable energy communities in joint offshore renewable energy projects".

The recently published policy for offshore renewables increased Malta's renewable energy target for 2030 to 25% (Malta Independent, 2024; EWA, 2024a) and the NECP has been updated to align with this target (EWA, 2025).

## 3. POSSIBLE ENERGY TECHNOLOGIES

While there are several energy technologies that communities can make use of, the focus of this report will be on solar PV as they are the most practical and likely to be utilized in the Maltese context in the short term.

### 3.1 SOLAR

The most obvious and straightforward choice for RECs in Malta would be solar. The renewable share of electricity generation is already almost exclusively from solar energy. Unlike other renewable energy sources, it is established, cheap and mature and many people are familiar with the technology.

It is also seen as a safe investment as energy generation is very predictable throughout the year, the feed-in tariff offers a guaranteed income and the technology is robust, with failure being uncommon. There is also a very low maintenance cost. The primary challenge is finding space.

### 3.2 WIND

Given the very limited land space available in Malta and high population density, large utility scale wind turbines on land have been assessed as unfeasible. However, microwind remains a good possibility. They have rarely been implemented due to unfavorable economics, especially when compared to solar.

However, due to technological advances, smaller scale wind power is becoming more attractive. Additionally, small wind turbines, while being a challenge for an individual due to structural and maintenance requirements, could be more easily implemented on a community scale. Malta has published a Microwind policy in the past (Malta Environment and Planning Authority, 2010).

As stated earlier, Malta recently developed a strategy for offshore renewables, mostly focused on wind. This offers an opportunity to include citizen participation in offshore renewable energy installations, by including conditions in guidelines and tender procedures. The renewable energy cooperative SeaCoop, a citizen cooperative in Belgium participating in offshore renewable projects, is an inspiring example. The federal government of Belgium decided they want to see significant citizen participation in offshore wind energy and announced that the tendering procedure for awarding of concessions for future wind farms will include specific conditions that award extra points to consortia including citizen participation. SeaCoop responded to that by aiming for 20% ownership of a wind farm project, to supply 20% of the produced electricity directly to citizens (SeaCoop, 2023). This model provides an excellent example for Malta to follow, to ensure that direct citizen participation and energy democracy can be part of the offshore renewable energy revolution.

Malta could achieve its ambition of promoting more socially responsible public procurement (SRPP) by including RECs and community participation as a social criterion in any government tender related to energy. The Department of Contracts is currently promoting SRPP and should consider community participation in renewable energy as a way of achieving this.

Investing in wind can help to diversify the renewable energy mix.





### 3.3 BATTERIES/STORAGE

While not an energy production technology, energy storage is an important part of the renewable energy transition, and communities can have an active part in their use.

In the current situation with fixed pricing it doesn't make economic sense to invest in energy storage. However if there is a differential pricing on electricity throughout the day based on demand, then investment in batteries could make sense. The REC could buy and store electricity at low demand and sell at high demand, generating revenue. An advantage of this is that it requires very little space. It would help ease pressure on the electricity distribution network. Battery prices are rapidly falling (Bloomberg, 2024).

RECs can also organise their members to shift their electricity consumption during times of day where there is an abundance of renewable energy sources (e.g. midday). This so-called 'demand response' alleviates grid congestion, helps to increase the share of renewables in final electricity consumption, and empowers citizens to be more aware of their consumption profiles (DR-Rise, 2023).

### 3.4 TRANSPORT

There are several examples of RECs in Europe that have invested in transport, for instance Som Mobilitat in Catalonia, Spain (Som Mobilitat, 2025) which is a cooperatively owned e-car sharing platform. More than 50% of total energy use in Malta is for transport; a much larger amount than in the rest of Europe. There are several transport cooperatives in Malta, but they are driver/worker owned cooperatives. None of these cooperatives are community initiatives or aimed at using renewable energy sources for transport.

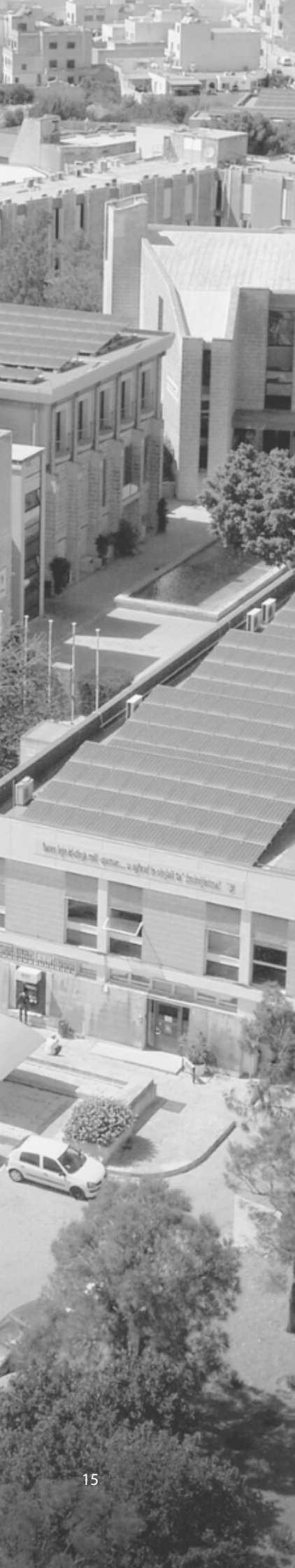
This could be a complex and potentially risky avenue. In recent years, Malta has witnessed the arrival, but also departure, of mobility sharing services such as bikesharing operator Nextbike Malta, carsharing service GoTo, and scooter sharing company Bolt. However, as a community project, profit is not the primary aim and transport sharing can be more feasible for a community. Supportive policies would be required to enable successful transport sharing models to operate in Malta.

### 3.5 ENERGY EFFICIENCY

An energy community can focus on addressing energy usage and energy poverty in the community. Some actions it can be involved in are fighting energy poverty through education on how to save energy and reduce consumption, through energy saving measures. It can also act through collectively funding building renovations such as adding insulation to improve energy efficiency and quality of life.

Education programs on energy saving and financial incentives from government entities already exist that align with this goal, such as household energy audits and support for vulnerable households (EWA, 2024b; EWA, 2024c). A renewable energy community can work with the local government and these entities can be involved in the energy community. It can also work with other agencies supporting vulnerable communities such as the Foundation for Social Welfare Services or the Malta Housing Authority, thus bridging the gap between them and the community to address energy poverty.





## 4. RENEWABLE ENERGY COMMUNITIES IN MALTA

Renewable energy communities do not exist in Malta yet. Malta does have a communal solar plant on top of a water reservoir in Fiddien managed by the Water Services Corporation (WSC) and the Energy and Water Agency (EWA) (The Malta Government Gazette, 2016). The Fiddien project has some aspects of a renewable energy community, however it cannot be defined as such as it is not democratically governed by the members of the community. There was great interest in the project and the available panels were taken up in a short period of time, showing that there is a demand for community energy (Interview with EWA, 6 December 2024).

### 4.1 CASE STUDY - COURE SOLAR ENERGY COOP, MENORCA

It is important to learn from and work together with other communities, especially those that are working in a similar scenario. FoEM spoke with the Coure energy community in Menorca to learn more about them and for inspiration (Interview with Coure Energy Community, 3 October 2024). It is an example of a new renewable energy community that has many of the same conditions that exist in Malta. Menorca is a small sunny Mediterranean island much like Malta with the same climate and amount of sunshine.

Their goal is to lead the way in decarbonization of the economy of the island and ultimately bring the energy transition to the island as a community. The current electricity production is mostly dependent on fossil oil, similar to the situation in Malta before it transitioned to fossil gas in 2015.

The Coure energy community has worked closely with the local municipalities to make use of their resources which are important to enable the formation and construction of the energy project. There is already a great deal of interest from the public to be part of the community, even before the first project is finished. There is a lot of optimism that many more would be willing to be part of the energy transition, especially after the first project is finished, seeing the benefits it produces and gaining confidence from its success.

A major challenge in implementing projects was the delay from the DSO to connect the project to the grid, taking up to a year to do so. Another challenge is to find an appropriate roof for the PV installation (around 30 kWp) of the community. The difficulties include a lack of interest from private owners, who refuse to have a collective installation on their property, or more technical issues, such as roofs with poor structural conditions or electrical installations that are not appropriate to connect the solar PV to. The Coure energy community is now in conversations with the municipality to put the PV installation on the roof of the school of Sant Climent.

The project would have ideally been funded through shares from the community members. However, funding from other sources such as from a bank loan lowers the upfront capital cost which would allow more members to join who might not have the initial capital to buy shares for funding the capital cost of the project. This can make a project more inclusive and more effective at tackling energy poverty.

Other examples of successful renewable energy communities and plenty of resources can be found at REScoop.eu (REScoop.eu, 2025).



*Coure energy community meetings with Sant Climent residents (photo by Coure Comunitats en Transició cooperativa)*

## 4.2 OPPORTUNITIES TO ADOPTING RENEWABLE ENERGY COMMUNITIES IN MALTA

Malta is very sunny so there is a high yield of energy per solar panel compared to other European countries, leading to a better return on investment.

In 2024, a group of students from Wageningen University (the Netherlands) conducted research and evaluated the opportunities and barriers to renewable energy communities in Malta through surveys with 692 respondents (Berendsen et al., 2024). Highlights of some of their results are shown below:

- People are generally dissatisfied with power outages.
- People generally would rather be engaged with the community than with Enemalta; people inherently like the concept of energy democracy.
- Almost all participants in the survey were willing to have solar panels on their property, however the majority of people live in apartments.
- The amount spent on electricity is roughly 8-10% of income, representing a significant amount.
- A high proportion of respondents had graduate degrees, unlikely to represent the general population. They would also likely have a higher income than the average.

Those who live in townhouses generally have a higher income and are willing to spend more on a renewable energy community than those living in apartments. However, it is the people who live in apartments who are more in need of being part of a renewable energy community since they do not have their own roof space for solar panels. This further stresses the need for financial support for RECs, to enable all households to participate in community energy and reap the benefits.

## 4.3 BARRIERS TO ADOPTING RENEWABLE ENERGY COMMUNITIES IN MALTA

Although Renewable Energy Communities (RECs) could offer many benefits and opportunities in Malta, none have been established yet. Several significant barriers need to be addressed, particularly for the first REC.

### Legal Challenges

Malta has defined RECs in its legislation but has not completely fulfilled its obligation to transpose law from the RED (see section 2.1 for details). There is

no framework or support for RECs or their creation. This makes it difficult for individuals or communities interested in starting a REC to know where to begin or what steps to take. It also makes it risky and difficult for them to succeed as they are pitted against larger, established private actors. The legal forms a REC can take isn't specified in the law, making things ambiguous for citizens who want to be part of a REC.

Malta lacks legislation defining and protecting solar rights. Over-development is a significant issue, leading to environmental and urban challenges such as dust, noise, and limited light in many communities. This lack of guaranteed sunlight creates anxiety and uncertainty for those who might want to install solar panels, as there is always the risk that a new development could block access to sunlight. This problem also applies for RECs, as the risk of shading could impact their energy generation potential.

The legal framework does not allow for the sharing of electricity between members of a REC. Currently, producers can only sell energy to Enemalta. This can limit the possible activities a REC can engage in. However, this is expected to change in the next two years due to obligations from the revised Electricity Market Design [EU directive 2024/1711].

### Financial Challenges

While grants are available for domestic solar PV installations, there is no dedicated funding specifically for RECs (REScoop.eu, 2024b).

Citizens may struggle to financially compete with large, established commercial entities in energy production.

Cooperatives are tax exempt on income they would generate from a feed-in tariff, However, paying dividends to the members of the cooperative is subject to a withholding tax of 15% (Income Tax Act, 2024).

### Technical Challenges

The concept of RECs is still relatively new, leading to significant uncertainty and challenges. Many citizens who wish to establish a REC may lack the technical expertise needed to navigate the process.

There are multiple government entities involved, which can be overwhelming for a group attempting to establish an REC. It can be difficult to know where to start or which authorities to approach.

Slow response times from authorities, coupled with fragmentation and poor communication between various government entities, further complicate the process of establishing a REC.

## 5. RECOMMENDED ACTION FOR AN ENABLING FRAMEWORK

There is a huge potential in Malta to involve the community to meet its renewable targets. Friends of the Earth Malta, with the support of entities such as the Malta Cooperative Federation and REScoop.eu, is willing to assist all those involved, from government to residents, in making this happen in Malta.

### **FoEM puts forward the following recommendations for policymakers for creating an Enabling Framework for RECs:**

1. Establish political commitment to empower the community in being part of Malta's green transition, specifically through RECs. Following best practice examples from other Member States, Malta could set a legally-binding quantitative target for community-owned renewable energy by 2030 (e.g. 75 MW).
2. Put in place a comprehensive enabling framework for energy communities, in full compliance with EU Directives and best practices from other Member States (EC, n.d.). This should include secondary legislation that regulates viable business models, including energy sharing and selling.
3. Facilitate access to funding to support energy communities and have dedicated funding specifically for this purpose. There can be grants similar to those available for domestic PV installations. EU Funds, such as the Just Transition Fund and the European Regional Development Fund, can be leveraged for this purpose. Policy makers should also include energy communities as eligible beneficiaries in the National Social Climate Plan (REScoop.eu, 2023). Additionally, national funds should be made available, and RECs need to be included in the yearly budget measures by the government.
4. Create a framework or tool to enable setting up virtual net-metering for renewable energy generation sources for RECs, especially given that the NECP encourages its adoption (EWA, 2019).
5. Create a One Stop Shop for RECs so that setting up a community energy project is not such a daunting task for a group of citizens that do not have so much expertise in the field. The One Stop Shop can be run collaboratively between the Government and civil society actors and cooperative sector representatives.
6. Update Malta's NECP to include commitments to RECs and remove the misconception that Enemalta's monopoly is related to RECs in any way or shape.
7. Prioritise RECs in competitive bidding processes for renewable energy projects, including by creating dedicated auctions only for energy communities (EC, 2024), as is the case in Germany and Ireland. Dedicate a share of certain large renewable energy projects (such as the proposed offshore renewables projects), which are ultimately for the benefit of the community, to be owned by the community. This will assist Malta with its ambition to increase its SRPP targets.
8. Offer fiscal incentives for RECs, similar to or the same as will be made available for social enterprises.
9. Exempt payments of income from the feed-in tariff from the cooperative to its members from tax, instead of the current 15% withholding tax charged, as a financial incentive so this income is treated equally to the feed-in tariff for households, which is income-tax and VAT exempt.
10. Include energy democracy in the National Policy for the Deployment of Offshore Renewable Energy. Malta can follow the example of the Belgian government that supports renewable energy communities to be part of offshore renewable energy. The REC SeaCoop is participating in offshore wind in Belgium (SeaCoop, 2023).
11. Reserve public spaces such as public building rooftops for RECs to generate energy. There are a large number of public buildings that would be suitable sites for communal PV installations and they could involve the local authorities and community in communal energy projects. Community ownership of energy generation on public buildings can serve for the common good of the locality. Collaboration between municipalities and energy communities should be encouraged by including RECs and community participation as a social criterion in any government tender related to energy. Malta Budget 2025 (Ministry of Finance, 2024) has allocated 25 million euros for 50 public social partnerships - the use of public buildings for RECs could be one such partnership.
12. Incentivize rooftop owners to allow others to install PV panels on them, both to RECs and individuals.

## 6. GUIDELINES ON SETTING UP A RENEWABLE ENERGY COMMUNITY

RECs are not yet established in Malta. It can be challenging to navigate the situation, especially due to the lack of a legal framework or support. The information provided here can be a starting point to getting involved with or forming a REC in Malta. FoEM is available to discuss with any interested citizens or groups and support them with obtaining more detailed or up-to-date information.

### 6.1 GOVERNANCE AND COMMUNITY

RECs should be democratically controlled, transparent and have social and community goals rather than operate for profit. Thus, it is important to involve the community in the project. There should be effective communication with the community; members should always be involved in the process. Two important and challenging tasks to start your own REC are setting up the legal entity for it and securing a location for the energy generation plant.

The REC that you form should be a recognized legal entity. If you are forming a cooperative you should contact one of the cooperative organizations in Malta, the Malta Cooperative Federation or Koperattivi Malta for further guidance:

<https://maltacooperativefederation.coop/>

<https://cooperatives-malta.coop/brands/>

This is a recommended course of action for making your REC a reality:

1. Set up a core team
2. Involve community and stakeholders
3. Discuss and decide on the governance model
4. Plan the business model and financials
5. Create a legal entity
6. Acquire site
7. Create a project plan
8. Get quotes for the project
9. Secure funds

Friends of the Earth Europe, REScoop.eu, and Energy Cities have created the Community Energy Handbook, a practical guide with instructions, practical tips, powerful success stories and invaluable resources to build a local, community-led renewable energy revolution (REScoop.eu, 2024b).

### 6.2 FINANCING THE PROJECT

Since there isn't an open electricity market and electricity is sold at a fixed FiT, the financial models available are limited. However, this can be in the community's favour as it simplifies the process, given that the DSO is required to buy renewable energy.

Two financial models can be implemented: a shares and dividends model and virtual net-metering.

1. In a shares and dividends model, REC receives income from the FiT and then distributes the income to its members.
2. Virtual net-metering can be done through an agreement with Automated Revenue Management Service (ARMS) where an amount of the energy generated is deducted from the energy bill of the REC members' household.

The latter can be more complicated and challenging to set up. Upon communicating with them, ARMS have stated that there should be no issues with setting up such a system. This is how the Fiddien solar farm operates. As mentioned earlier, the government stated that it encourages further development of such a model in its NECP.

As part of the installation process a grid connection study needs to be carried out by Enemalta. This is one of the biggest risks associated with the installation as the cost is unknown and it can be very expensive.

There are several possible ways to fund your project which can be broadly put in three categories; equity financing, debt financing and grants.

#### A. Equity financing

This would involve allowing the members to directly buy shares of the project. Thus the project would be directly funded by the community. An advantage of this is that there is no dependence on an external entity and there are no debts or interests involved.

It might be a challenge for the members to obtain the funds however, especially if some of the potential members are struggling financially.

Equity from shares can also be obtained from small local SMEs or local or regional authorities.

## B. Debt financing

This involves obtaining a loan, generally from a bank. This can be an option if obtaining the necessary equity poses a challenge.

Look for possible green loans from banks which can offer favourable interest rates. It is advised to look for banks that are part of the European Federation of Ethical and Alternative Banks (FEBEA, 2024) meaning they are more likely to give favourable conditions for your loan.

## C. Grants

Grants would be payments for a project with no expectation of a return.

Unfortunately there aren't any local grants specifically for community energy projects, however there can be grants available for renewable energy projects.

Grants are also available by Malta Enterprise for starting businesses such as Start-up Finance and Business Star so it is recommended to get in touch with them to see the possibility of gaining access to these funds. Information and contact can be found here: <https://maltaenterprise.com/support>

EU funds in Malta are centralized and disbursed via fondi.eu. There are funds available for renewable energy projects under the Just Transition fund and Cohesion Fund. Check their website for what funds are currently available: <https://fondi.eu/>

Local councils generally have limited funding however it is advisable to reach out to the local or regional council to enquire whether any support or funds are available if they are a partner in the REC (Interview with Western Regional Council, 13 November 2024).

## 6.3 FINDING THE RIGHT LOCATION

Space is a very precious commodity in Malta and so it might be challenging to find an appropriate location for your community energy project.

The government is one of the largest landowners in Malta, so it makes sense to try to partner with a government entity for an agreement on land for your project. Local councils make a lot of sense in this regard. The Ministry of Education is another possibility for the school roof space.

Another very big landowner is the Church. Generally they are open to social initiatives so they can be great partners for setting up an REC. Reach out to your local parish, band clubs, the Curia, or Catholic Action.

If there is a site that you think would be great but you don't know who owns it, you can obtain ownership information by requesting it from the Lands Registry online through their website: <https://landsregistry.mt/>

Given the lack of space on land it would be great to take advantage of the large amount of open sea that is available around the Maltese Islands. Large areas of open water have been earmarked as potential sites for renewable energy in the recently published National policy for the Deployment of Offshore Renewable Energy (EWA, 2024a). It would be a great avenue for renewable energy communities to take and it is important for RECs to get involved when offshore floating renewable projects, both wind and solar are being planned.

### Useful data to know when starting a Renewable Energy Community:

- The area needed for a solar array is roughly 10m<sup>2</sup> for every kWp of PV panels (Rebé, Mule Stagno and Yousif, 2013)
- The annual generation is about 1600 kWh per year per kWp
- The capital cost of a 100 kW array would be about €60,000 (interview with AQS Med, 20 November 2024)
- The insurance cost for a solar array is roughly 0.2% of the capital cost
- The average annual consumption of a Maltese household is about 5000 kWh, which is provided for by 3 kW of solar panels (9 panels)
- The rating of one solar panel is assumed to be 330W.

Example: Your energy community has made an agreement with a local council to use the roof of a public building in your locality with a roof area of 500 m<sup>2</sup>. You want to know how many solar panels you can install, the cost and to how many people it can provide power. A 500 m<sup>2</sup> building can provide space for about 50 kWp system which would cost about €40,000 and provide energy equivalent to the consumption of 17 households.

### Useful resources for further reading:

<https://energycommunityplatform.eu/>

<https://www.rescoop.eu/>

## ABBREVIATIONS

ARMS - Automated Revenue Management Services  
CEC - Citizen Energy Community  
DSO - Distribution System Operator  
EU - European Union  
EC - European Commission  
EWA - Energy and Water Agency  
FiT - Feed-in Tariff  
FoEM - Friends of the Earth Malta  
GHG - Greenhouse Gases  
KWh - Kilowatt-hours  
KWp - Kilowatt-peak  
LNG - Liquefied Natural Gas  
NECP - National Energy and Climate Plan  
PA - Planning Authority  
PV - Photovoltaic  
REC - Renewable Energy Community  
RED - Renewable Energy Directive  
REWS - Regulator for Energy and Water Services  
SL - Subsidiary Legislation  
SRPP - Socially Responsible Public Procurement  
WSC - Water Services Corporation



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