



Time to step up national climate action

An assessment of the draft National Energy and Climate Plans updates

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Introduction

The narrow window to stay within the critical 1.5°C global warming threshold to avoid the worst consequences of the climate crisis, and fulfil the Paris Agreement commitment is rapidly closing. Postponing decarbonization is no longer a viable option; and this crucial “decade”, spanning from now until 2030, offers only seven years to intensify our efforts.

National Energy and Climate Plans, or NECPs, can be a powerful tool to accelerate and put European countries on the right track, while ensuring the well-being of our environment and citizens. **Member states are required by law to collectively achieve the European climate and energy targets but they have the chance to do much more.** Governments now have a historic duty and opportunity to plan and implement true change and unlock the social, economic and environmental benefits of the transformation.

This report scrutinises draft NECPs updates through a critical lens: do these plans effectively serve their purpose, or do they fall short in guiding the much-needed climate action?

NECPs IN A NUTSHELL

What are these plans? In their NECPs, EU Member States are required to describe, in an integrated manner, their climate and energy objectives and targets – as well as the policies and measures to achieve them until 2030 (with an outlook to 2040 and the longer term). Specifically, they need to show how they will deliver on **national binding emission reductions targets** for sectors covered by the Effort Sharing Regulation (agriculture, road transport, buildings, waste and small industry) and for LULUCF (Land Use, Land Use Change and Forestry) sector, as well as **how they will contribute to the EU’s 2030 renewables and energy efficiency targets**. The national targets and contributions are based on the ambition levels set in the Effort-Sharing Regulation (ESR), the LULUCF Regulation, the Renewable Energy Directive (RED) and the Energy Efficiency Directive (EED) respectively. The Governance Regulation¹ sets the framework for the NECPs: they must be developed based on a common template and along common rules of planning, reporting and monitoring.

NECPs were first adopted in 2019 and – as required by the Governance Regulation – they **are being updated between 2023 and 2024**. The deadline for Member States to submit the draft updated plans was in June 2023. The draft NECPs are being analysed by the European Commission, an overall assessment and country-specific recommendations are to be published by the end of 2023. The final NECPs should take into account the European Commission’s recommendations and shall be delivered in June 2024.

The ongoing update is of the utmost importance, as EU climate and energy policies have evolved substantially since the NECPs were first drafted in 2019. After the launch of the European Green Deal, the EU has increased its climate target for 2030 from (gross) 40% to (net) 55% emission reductions and, to back it up, it revised its entire climate and energy framework under the ‘Fit for 55’ Package, which brought new legislative files and revised already existing ones. The ESR, LULUCF, RED and EED have all been revised as part of the package. Moreover, as a result of the COVID-19 pandemic and the war in Ukraine, the EU has also adopted the ‘Next Generation EU’ and the ‘REPowerEU’ policy packages, which have further increased ambition and provided substantial additional funding for climate action and the energy transition at the national level.

¹ Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action.

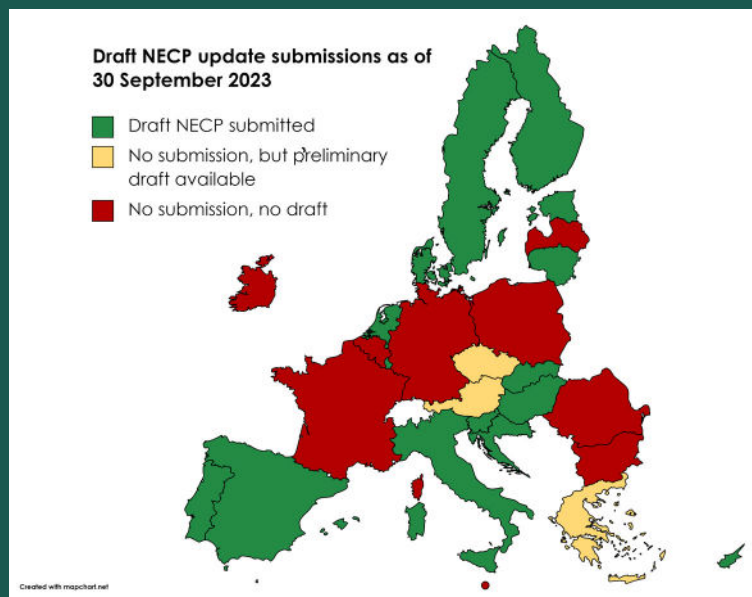
As a result of these developments, the 2019 NECPs have become obsolete. **Updating them is a crucial opportunity for Member States to at least align with the EU's updated 2030 requirements, but also go beyond them. Countries can design plans more ambitious than EU requirements,** and the ambition of NECP updates will be fundamental in determining whether the new EU 2035 Nationally Determined Contribution (NDC) will truly comply with the Paris Agreement's requirements to represent progression that reflects the highest possible ambition (Article 4.3 of the Paris Agreement).

The [latest IPCC synthesis report](#) has once more confirmed what science has been showing for years: every increment of warming results in rapidly escalating hazards. We have to stay within the 1.5°C limit to avoid the worst consequences of the climate crisis, and we have a small window to make it happen. To do its fair and science-based share under the Paris Agreement, the EU must [reduce](#) its gross greenhouse gas emissions by at least 65% (-76% net emissions) by 2030 and achieve net-zero emissions by 2040 at the latest. This requires an unprecedented level of climate action to be undertaken mainly in this decade.

ABOUT THIS REPORT

This report presents an initial assessment of NGOs regarding the NECPs update process and, where possible, regarding submitted draft NECP updates. It is not meant to be a comprehensive analysis of all aspects of the plans, but **provides a first overview of some of the main issues that will need to be addressed in the European Commission's recommendations in December 2023.** It is divided in two parts: an overview that includes general recommendations and provides a bird's-eye assessment of the main issues analysed; and country factsheets highlighting key issues to improve each plan, so that these NECP updates really pivot climate action and the energy transition at the national level. At the end of the report, an Annex is provided with the methodology behind our assessment.

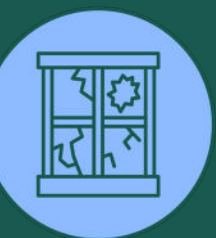
Our assessment was severely hindered by the fact that only a handful of countries delivered their draft updates by the deadline. As of 30 September 2023, only 15 draft NECP updates have been submitted to the European Commission (Croatia, Cyprus, Denmark, Estonia, Finland, Hungary, Italy, Lithuania, Luxembourg, the Netherlands, Portugal, Slovakia, Slovenia, Spain and Sweden)². For countries that have not submitted their draft NECP updates – three of the five major EU emitters (Germany, France and Poland) are worryingly among them – our assessment is based either on preliminary drafts (this is notably the case for Austria, Czechia and Greece, as well as for Belgium, where only sub-national plans are available) or it includes some recommendations on the basis of previous experience and any available information. Our report incorporates inputs from over 30 environmental organisations across the EU, and covers 25 EU countries: Austria, Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, the Netherlands, Poland, Portugal, Slovakia, Slovenia, Spain, Sweden.



² Malta submitted its draft in October 2023, which was too late to include it in our assessment.



While details will be provided in the following sections, we must anticipate that **the results of our analysis are concerning**. A large number of Member States are failing to comply with their obligations – as shown by late submissions and poor public participation standards. But in addition to that, the submitted draft **NECP updates are inadequate not only to align with a 1.5°C compatible trajectory, but also to comply with minimum EU climate and energy requirements for 2030**. If NECPs are to be the key instrument to implement the European Green Deal and for the EU to comply with its Paris Agreement obligation, the final updates must be drastically improved. **Luckily, Member States still have a 8-month window of opportunity to make their NECP updates fit for purpose. But there can be no more delay: the time for action is now.**



Overall Assessment

MAIN FINDINGS AND RECOMMENDATIONS



The draft NECP updates could be the opportunity for Member States not only to meet and contribute to the new 2030 EU climate and energy targets – which they must do – but also to ensure that national climate and energy targets, policies and measures go beyond those targets and bring the EU's emission reductions closer to a 1.5°C compatible trajectory. Both objectives are severely threatened by the fact that 12 out of 27 Member States (Austria, Belgium, Bulgaria, Czechia, France, Germany, Greece, Ireland, Latvia, Malta, Romania, Poland) have not submitted their draft NECP updates as of 30 September 2023. This late submission is not only in breach of EU legislation (Art. 14. Of the Governance Regulation), but implies that Member States lack a comprehensive plan to accelerate decarbonisation across all sectors in the next six years.

The draft NECP updates that have been submitted, on the other hand, still have large room for improvement, notably on the ambition levels and planning details. Luckily, Member States still have the opportunity to make them better until the final NECP submission deadline in June 2024, an opportunity which they must take. The European Commission must hold them accountable for the quality of the plans, and make recommendations that will ensure that the EU gears towards higher climate ambition. Based on the assessment of the available plans, we have developed a set of recommendations to ensure that the NECP updates are fit for purpose:

- 1. Increase the level of climate ambition**
- 2. Increase the ambition on energy savings**
- 3. Increase the ambition on renewables**
- 4. Develop more robust policies and measures**
- 5. Phase out fossil fuels as soon as possible**
- 6. Stay away from false solutions**
- 7. Plan to phase out fossil fuels subsidies**
- 8. Significantly improve public participation**



These recommendations are further detailed below. The assessment criteria are based, among others, on [the set of criteria CAN Europe and WWF developed earlier for strong NECPs](#).



1. INCREASE THE LEVEL OF CLIMATE AMBITION



In their plans, Member States are required to include national **2030 climate targets** for both the non-ETS (altogether the buildings, road transport, agriculture, waste and small industry) and the LULUCF (land use, land use change and forestry) sectors. In this overview, we notably look into the Member State's **level of climate ambition** for non-ETS sectors. We have also assessed whether projections with existing measures (WEM scenarios) and additional measures (WAM scenarios), as well as the policies and measures (PAMs) in the plans, are in line with the 2030 non-ETS targets. Details on the methodology are provided in Annex I of this report.

The minimum EU requirements for 2030 in non-ETS sectors are set in the Effort-Sharing Regulation (ESR). The ESR mandates each Member State to meet a specific level of emission reductions in non-ETS sectors, with the aim of achieving an overall EU target of -40% emission reduction in those sectors by 2030 (compared to 2005 levels). The current ESR target is however still unambitious and insufficient: to be in line with the Paris Agreement goal, at least 50% reductions would be needed in the ESR sectors.

Several of the countries that have submitted their draft NECP updates **do not show the necessary level of climate action that would be required** not only to align with a 1.5°C compatible trajectory, but also **to meet the minimum EU requirements for 2030.**

In fact, some of the countries that submitted their draft NECP update explicitly mention that the **planned levels of action are not even in line with the respective binding ESR obligations** (Cyprus, Denmark, Finland, Italy, the Netherlands). This is not to say that the remaining countries have done their minimum job. On paper, Estonia, Hungary, Luxembourg, Portugal, Slovakia, Slovenia, Spain and Sweden would all meet the ESR requirements. However, for some of them (Portugal, Slovakia, Sweden) **projections** with existing and additional policies and measures (WEM and WAM scenarios) are either missing or not credible in the current political context. Croatia and Lithuania also meet their minimum targets. However, it is worth flagging that a significant discrepancy exists between data used in the plans and European Environment Agency (EEA) data on historical emissions³, to the point that both countries would fail to meet their respective targets if EEA data were used for the 2005 baseline (instead of data provided by the national governments in their draft NECP updates that refers to a higher baseline). This should be scrutinised by the Commission.

In most cases, PAMs are inadequate to meet the set targets. In some cases, countries have simply laid out existing measures (Denmark, Finland, Sweden), which are either not aligned with additional policies (WAM) scenarios, or reflect frozen policy (WEM) scenarios that only confirm existing policies, without increasing ambition. In other countries, such as Croatia, Cyprus, Portugal and Slovakia, PAMs lack detail and notably do not include a comprehensive assessment of their emission reductions. In other cases, such as Hungary, Italy and Lithuania, the ambition of PAMs needs substantial improvements in order to achieve the ESR targets. Slovenia has simply not presented any climate PAMs.

In the end, **only four countries have developed plans that meet (Estonia, Lithuania) or surpass (Spain, Luxembourg) their ESR targets, and include credible emission reductions projections as well as PAMs that, while they could be improved, are sufficient and detailed enough to back them up.** In all cases, however, they remain insufficient to be in line with a 1.5°C trajectory and in light of historical responsibilities. In addition, Estonia is not doing great, as it would still fail to meet its other 2030 EU binding requirement (the 2030 LULUCF target).

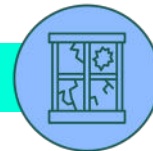
³ Some discrepancies between data used in the draft NECP updates and EEA historical emissions data under the Effort-Sharing Decision ([here](#)) have emerged in the vast majority of cases analysed. In some circumstances, discrepancies in the baseline year (2005) were over 1 Mt CO₂-eq, notably for the cases of Croatia, Italy, Lithuania, the Netherlands and Spain.

If too many countries underperform on their ESR targets, there will be scarcity of surplus emissions to be traded (as the ESR ‘flexibility’ would allow for a certain amount of emissions to be traded between EU countries). This scarcity paired with the higher demand would result in significantly higher prices for the emission allowances. This is important, because in this case countries with higher targets cannot economically rely on buying allowances to cover for their underperformance (as was the case for example in Germany for the 2013-2020 period). To prevent this scenario, all countries, even the ones with higher targets have to deliver domestic emission cuts according to their obligations – which would even be cheaper than having to deal with expensive traded allowances.

Besides the ESR targets, several Member States (seven of the 15 that submitted the draft updates) also have **national binding economy-wide climate targets** that should be integrated and reflected in their NECP updates. Unfortunately, this is largely not the case in the available plans. The ambition levels in the draft NECP updates of Denmark, Finland and the Netherlands fail to achieve their respective national 2030 economy-wide targets; for Hungary, Portugal and Slovenia, existing and planned PAMs are insufficient to meet them. Several of them also have national **long-term targets** for climate neutrality, in some cases (Sweden) before 2050. The draft NECP updates largely fail to align with these long-term targets, for instance in Denmark, Luxembourg, Hungary, the Netherlands, Slovenia and Sweden.

Besides submitted NECPs, **preliminary drafts** were available in Austria, Belgium, Czechia and Greece. Overall, they are **also unfit to meet basic EU requirements**. Austria would not meet its ESR target in the presented scenario with additional measures; Belgium would also not meet its ESR target, due to the lack of ambition of one of its regions (Flanders); Greece plans to surpass it, but has not presented any scenario with additional measures supporting its intentions; Czechia would surpass it in the scenario with additional measures, but it has not yet laid out any of the additional measures.

2. INCREASE THE AMBITION ON ENERGY SAVINGS



The draft NECP updates show that the ambition level on energy savings is too low to reap the multiple benefits of energy savings for the people, the economy and for the climate. The newly revised 2023 Energy Efficiency Directive (EED) mandates that a minimum of 11.7% energy consumption reduction for 2030 needs to be reached. As a minimum, national energy efficiency contributions should at least add up to match this new EU energy efficiency target, while more is required for staying within 1.5°C of global warming. A reduction of energy consumption of at least 20% by 2030 is needed⁴ to stay in line with the Paris Agreement goals.

Overall, many countries fail to indicate a national contribution for energy efficiency. Among the countries that have submitted a draft to the European Commission, Denmark, Finland and the Netherlands did not indicate a national contribution for both primary and final energy consumption for 2030. Additionally, Hungary, Slovakia and Luxembourg failed to indicate a national contribution for primary energy consumption, whereas Portugal did not indicate one for final energy consumption. Slovakia did not fully state a national contribution for final energy consumption, but indicates different levels of energy consumption.

⁴ CAN Europe recommends an EU binding energy efficiency target of at least 45% in 2030 compared to the 2007 EU Reference Scenario or at least 20% compared to the 2020 EU Reference Scenario: <https://caneurope.org/content/uploads/2021/11/CAN-Europes-Position-on-the-Energy-Efficiency-Directive-Recast.pdf>. CAN Europe’s Paris Compatible (PAC) Energy Scenario shows how the higher EU energy efficiency target can be reached.

Member States are not on track to achieve the EU 2030 energy efficiency target, taking into account that many Member States did not include yet a national contribution for energy efficiency and that many Member States did not yet submit their draft NECP update. We compared the national contributions for energy efficiency already submitted to the European Commission with the combined outcome of the benchmarks for national contributions as per the 2023 EED for these countries (methodology in Annex I of this report, where you also find a table with the benchmarks for national contributions). **For primary energy, the contributions of 9 EU Member States alone that have already submitted their contributions, fall short by around 30.1 Mtoe to the agreed EU target. This constitutes an ambition gap of around 11%. In terms of final energy, the distance to the EU binding energy efficiency target is around 14.8 Mtoe, which constitutes an ambition gap of around 7% for final energy consumption compared to what 10 Member States combined should have planned.**

Considering that this ambition gap exists already for the small group of Member States that have submitted their national contributions, Member States with many large energy consumers like Germany and France not even taken into account, this does not bode very well for the achievement of the EU's 2030 energy efficiency target. **National contributions combined only reach around 30% of the EU energy efficiency target, taking into account only national contributions that were submitted to the European Commission.**

Only Lithuania submitted a national contribution in line with the EU 2030 energy efficiency target in both primary and final energy terms, meaning that it complies with the formula of the 2023 EED. Estonia and Italy on the other hand indicate national contributions for final energy consumption that use the legal option of a 2.5% deviation from the formula. This is still compliant with the 2023 EED, but not enough to be fully in line with the EU energy efficiency target for final energy consumption. Croatia, Cyprus, Hungary, Luxembourg, Portugal, Slovenia, Spain and Sweden indicate a national contribution for 2030 that is not ambitious enough for the reduction of energy consumption needed to align with the 2030 EU energy efficiency target. It can be noted that Czechia's not yet submitted draft NECP's national contribution seems to be formally in line with the 2030 EU energy efficiency target. **However, all countries need to step up efforts to go beyond minimum requirements and get on the right track to surpass these and align with 1.5°C trajectories.**

From the submitted draft NECP updates, there are two countries that unfortunately indicate a higher energy consumption in 2030 compared to today (based on the latest 2021 Eurostat data). Cyprus indicates an increased energy consumption in 2030 compared to 2021 for final energy consumption and Portugal indicates a higher primary energy consumption compared to 2021.

Energy efficiency measures are often missing and too vague. Whereas Slovenia does not specify any energy efficiency measures, Denmark, Estonia, Finland and the Netherlands only mention existing measures or as per 2019 NECP. The majority of countries which submitted their draft NECP update to the Commission, such as Cyprus, Estonia, Hungary, Luxembourg, Portugal, Slovakia, the Netherlands, Sweden, list many measures without the necessary level of detail, including without a quantification in terms of energy savings per measure. From the preliminary drafts, Austria and Greece lack details and Czechia still refers mostly to measures already present in the 2019 NECP.

3. INCREASE THE AMBITION ON RENEWABLES



The RED revision increased the EU 2030 renewable energy target. The binding target was increased from 32% to 42.5%. Additionally, the RED revision also included an additional 2.5% indicative top up that would allow the EU to reach 45%. However, a renewable energy target of at least 50% by 2030 would be needed to put the EU on track with a 1.5°C trajectory. When Member States had to submit their draft NECP updates by June 2023, they needed to include a national renewable energy contribution that should contribute to the EU 2030 renewable energy target. It is however still unclear what measures will be taken in case the Member States contributions are not enough to reach the indicative 45% EU renewable energy target.

In its recommendations, the European Commission will assess the national renewable contributions, based on the formula set out in Annex II of the Governance Regulation (referred to as the Governance Regulation formula benchmark). As the European Commission has chosen not to publicly disclose these benchmarks which correspond to the EU 2030 renewable energy target of 42.5% and 45%, a comprehensive assessment of the national renewable energy contributions is currently not possible. As only benchmarks in line with a 40% EU renewable energy target are publicly available, we used these data to make careful assessments of the available national renewable energy contributions.

The current draft NECP updates only give a partial overview of the national renewable energy contributions. Some countries, such as the Netherlands and Sweden indicated they would include updated national renewable energy contributions in their final updated NECPs (when the RED revision process will have come to an end).

As not all Member States submitted their draft NECP updates or as some submitted draft NECP updates did not include national renewable energy contributions, we cannot assess if an EU renewable energy target of 42.5% or 45% is within reach. But even without the publication of the Governance Regulation Formula benchmarks, we noticed there are several Member States that have put forward national renewable energy contributions which will not be enough to be in line with the EU 2030 renewable energy target of 42.5% let alone 45%. Examples are Cyprus, Slovenia and Slovakia.

When looking at the national renewable energy contributions included in the NECPs, it is also important to look at the history and what happened in the past few years. France did not reach its national legally binding renewable energy target in 2020. In 2021, four Member States (France, Ireland, the Netherlands, Romania) went below their baseline share (equal to its binding national renewable energy target in 2020). Member States will have to take additional measures to ensure they are on a trajectory in line with the Paris Agreement goals.

Some NECP updates **fall short in terms of policies and measures (PAMs)** supporting the updated national renewable energy contribution. Key issues include **inadequate projections with additional measures** not aligning with national renewable energy contribution (Cyprus, Slovakia), and in some cases **lack of clear timeframes** or **binding nature of measures** (Luxembourg, Portugal).

There are positive developments in **solar energy**, in particular related to the enhancement of **measures for small scale rooftop solar PV**. In Cyprus, for example, financial support is foreseen for vulnerable consumers to install solar PV, though details are missing. However, **areas of concern remain**. Italy underestimates the capacity for installation of renewables, despite studies indicating a much higher potential than in the NECP update. Portugal could be more ambitious with regards to decentralised solar. Slovenia needs to step ahead and significantly increase its current renewables ambition, after being at the tail end of EU Member States in terms of newly installed solar and wind capacity in past years. The plan from Luxembourg only includes two solar PAMs, with a narrow scope: one only focuses on new buildings, excluding existing ones; the other, for industrial and agricultural buildings, only focuses on “PV-ready” buildings instead of introducing an overall installation obligation.

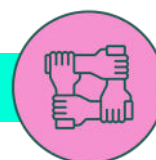
There is **room for improvement with regards to wind**. The current uncertain framework for renewables hinders investment confidence. Particularly in Hungary, there is an urgent need to lift legal restrictions on wind energy. In Czechia, new wind power installations are hampered by long and complicated administrative procedures and lack of political support.

PAMs related to **bioenergy also raise concerns**. Denmark's plan relies heavily on unsustainable volumes of imported wood biomass. Portugal promotes better use of biomass for energy purposes, but without including an assessment of the potential of residual biomass, nor mentioning the cascading principle in its use. The plan of Spain is missing information on the origin, type and quantities of forest and agricultural biomass that corresponds to the 2030 renewables target. Other countries, such as Lithuania and Slovenia, include PAMs that favour bio-energy without ensuring they do not hamper biodiversity and carbon sinks, and at the expense of other renewable sources such as wind and solar.

Streamlining permitting remains a persistent challenge. As part of the REPowerEU RED revision, there has been a lot of discussion about streamlined permitting. In the EC's [guidance](#) for the Member States on the update of the NECPs (December 2022), it was highlighted that a particular challenge that needs to be addressed by the NECP updates concerns permitting. Yet, it's concerning to see the limited focus on this in several draft NECP updates. Italy's plan does not sufficiently address the major hurdle in the development of RES facilities, primarily associated with the challenge of concluding authorization processes within definite and sustainable timeframes. Slovakia's plan lacks measures on acceleration of renewables and to overcome identified barriers. In Czechia, the preliminary draft introduces measures to simplify administrative procedures for renewables and for acceleration zones but lacks details, including on their expected impact. It would be crucial for Slovenia to include measures tackling issues of lack of staff capacity for deployment of renewables.

While the draft NECP updates also offered the opportunity to strengthen PAMs **with regards to energy communities, varied approaches among Member States reveal both progress and missed opportunities**, with some plans introducing promising measures and others lagging in concrete implementation. Croatia added a new measure to encourage energy sharing and establishment of energy communities. Lithuania incorporated financial support for energy poverty reduction to municipality-led renewable energy communities. In Cyprus, the regulatory framework is set to be completed by 2024. On the other hand in Spain, despite the latest advances in regulation for renewables self-consumption, local energy communities are still waiting for their legal framework. The plans of Estonia and Slovenia are missing measures promoting energy communities. Italy added strategies and actions also supporting self-consumption and the fostering of renewable energy communities, but these often seem more like broad intentions without a detailed, time-bound implementation plan. Portugal still undervalues the potential of decentralised energy production and energy communities in their plan. And even though Czechia mentioned support of energy communities and energy sharing in the draft plan (not submitted yet), it is noticeable that it still did not fully transpose RED II.

4. DEVELOP MORE ROBUST POLICIES AND MEASURES



The NECPs need to include strong policies and measures (PAMs) that will substantiate the delivery of the 2030 climate and energy targets. This means that PAMs should be described clearly and in detail, and they should be comprehensive, credible, quantified and based on up-to-date information. Most Member States still have much work to do to ensure that the existing and additional PAMs described in the plan are up to the task, before the final plans are submitted in June 2024. In the current draft NECP updates, PAMs still have large margins of improvement.

Some countries, such as Denmark, Estonia and Finland, have **not presented any additional PAMs, while Slovenia did not present any PAMs at all**. It goes without saying that this must be addressed as a priority in the final NECPs update or in a revised draft plan. Other countries (Cyprus and, among those that have not submitted a draft, Belgium) would likely require more measures to achieve the targets set in the plans, or could achieve them more easily by taking into account other dimensions (for instance, Lithuania and Luxembourg are weak on regulatory and behavioural measures respectively).

In most countries, however, PAMs simply do not have the **level of detail** that is required to assess whether or not they support the targets set in the plans. For countries such as Czechia, Greece, Luxembourg, Portugal, Slovakia and, to some extent, Croatia and Spain, measures require more details on timeframes, planned actions and prioritisation among measures. In several cases, the **assessment of their impacts** is either absent or not detailed enough. The impact of PAMs on emission reductions is not adequately addressed in countries such as Belgium, Croatia, Czechia, the Netherlands, Portugal and Slovakia. Several plans are also lacking an analysis of PAMs impact on the environment (Austria, Croatia, Spain), the social dimension (Slovakia) or both (Belgium, Czechia, Greece, the Netherlands, Portugal, Sweden).

Last but not least, countries are also supposed to look into **how much funding** they need to implement each PAM, and which sources will be used to get it. This aspect should also be drastically improved in the final NECP updates, compared to the current ones. On investment needs, several plans either include incomplete explanations (Czechia, Sweden) or completely lack them (Austria, Greece, the Netherlands, Slovakia, Slovenia). In some cases, investment needs are provided but lack methodology (Croatia) or are not credible (Cyprus). Explanations on funding sources are incomplete or missing for Austria, Finland, Greece, the Netherlands, Slovenia, and Sweden. In Lithuania, PAMs are financed without duly taking the polluter pays principle into account. Finally, the integration and use of EU funds in the plans could be improved in several plans, including those of Cyprus, Czechia, Hungary, Slovenia or Denmark, where EU funds are used to fund measures previously funded by the state.

5. PHASE OUT FOSSIL FUELS AS SOON AS POSSIBLE



Phase out coal as soon as possible

To be in line with a 1.5°C pathway, the EU must phase out coal by 2030. This implies that coal phase-out plans should already be well underway across the EU, and clearly reflected in the draft NECP updates. This should be facilitated by the fact that planning for coal regions was already addressed in the Territorial Just Transition Plans (TJTPs).

Unfortunately, some concerning elements emerge from the draft plans. In Croatia, Slovenia and Czechia, coal will continue to play an important role in the energy mix beyond 2030, with possibilities for earlier exit dates not sufficiently considered. In Croatia, coal would be fully phased out only as late as 2040, leaving existing coal plants untouched before 2030. In Czechia, lignite mining risks being prolonged until 2035 despite the government's commitment to phase out coal usage by 2033. Worryingly, both Hungary and Italy have delayed their coal phase-out plans compared to the 2019 NECPs. Hungary has delayed the phase-out of the Matra power plant, in contradiction with its TJTP; while in Italy, coal power plants in Sardinia will only be phased out as late as 2028 (and not in 2025 as formerly planned). Some countries, such as Hungary, Italy and Slovakia, plan to transition from coal to fossil gas power generation, which is doubtfully in line with decarbonizing the energy mix. All these choices move away from the Paris agreement objectives and are costly for European citizens.

Estonia, where **oil shale** is the main fossil fuel, is a case on its own. Unfortunately, the Estonian draft NECP update projects oil shale production to remain unchanged until 2030, and does not project any deadline for its phase-out, despite it being present in the TJTP.

Halt fossil gas expansion and plan its phase-out

To be in line with a 1.5°C pathway, the EU must phase out fossil gas by 2035. In their NECP updates, Member States should therefore include plans for its progressive phase-out, and prioritise investments in clean energy solutions that will truly speed up the transition.

The draft NECP updates submitted so far tell a different story. In the vast majority of countries, there are **no plans for fossil gas infrastructure decommissioning**, nor clear exit dates. Only Portugal plans to phase out fossil gas by 2040 (which remains too late), while Luxembourg and Austria have phase-out dates only for some sectors. However, in all cases decommissioning timelines and strategies remain too vague, and Portugal directly contradicts its target with some planned measures to expand LNG infrastructure. Maintaining fossil gas infrastructure bars the way to a system-switch towards energy savings and renewables.

Significant **expansion of fossil gas infrastructure** is actually envisaged in several plans, in countries such as Croatia, Cyprus, Czechia, Greece, Hungary, Italy, Slovakia and Slovenia. Italy has set plans to double the Trans-Adriatic Pipeline pipeline and to finalise the Melita pipeline, which connects it with Malta. In Cyprus, fossil gas is seen as the cornerstone of the energy transition and as a fundamental decarbonisation tool. Currently absent from the energy mix, fossil gas is projected to represent the main source of electricity generation in Cyprus already in the coming years. Investing in new fossil fuel infrastructure risks creating lock-in effects and stranded infrastructure assets; the EU already has substantial fossil gas overcapacity and does not need more.

6. STAY AWAY FROM FALSE SOLUTIONS



In some cases, Member States fail to prioritise investments in bulletproof climate or energy solutions, and instead prefer to bet too much on solutions that will not deliver the transition to a 100% renewables-based energy system that the EU truly needs.

In several of the plans – including Cyprus, Denmark, Italy, Luxembourg, the Netherlands, and, based on preliminary drafts, also Austria and Czechia – there is an over-reliance on **CCS and CCU technologies** in reducing emissions. This is despite the fact that such technologies have so far consistently proven unreliable, as well as energy-intensive, economically inefficient and play a role in prolonging fossil fuels use.

In some plans, **nuclear power** also plays an important role. Notably, both Czechia and Slovakia plan to substantially increase its expansion. Czechia plans the construction of at least 3 conventional reactors and at least one SMR, while Slovakia sees it as key for its energy security and decarbonisation. This reliance on nuclear expansion to meet energy targets, coming at the expense of renewables, is misplaced – especially given nuclear's costs and long (often unrealistic) construction timelines.

Hydrogen is not a false solution in itself, provided that it is exclusively based on renewables and, being a limited source, that its use remains limited where most needed, notably in hard-to-abate industrial sectors. However, some countries such as Hungary, Portugal, Slovakia, Spain, but also Belgium, are planning a significant expansion of hydrogen capacity, however it's not always clear how it will be generated and used. The unregulated expansion in hydrogen use risks to give the fossil gas industry the perfect excuse for continued fossil gas investments and to generate lock-in effects.

7. PLAN TO PHASE OUT FOSSIL FUEL SUBSIDIES



In their NECPs, Member states are required to report all their energy subsidies, including fossil fuels subsidies and, if they exist, report policies and plans to phase them out. They are also expected to monitor progress in the National Energy and Climate Progress Reports (NECPRs). The NECPs planning and monitoring process should therefore be an opportunity for transparency and for planning towards a socially just transition, as fossil fuel subsidies disproportionately benefit the middle and upper classes.

Unfortunately, as it happened for the 2019 NECPs, the available draft NECP updates show significant gaps on subsidies reporting and phase-out plans. 6 out of the 15 countries that have submitted a draft did not make any list of fossil fuel subsidies available (Croatia, Hungary, Italy, Luxembourg, the Netherlands, Slovakia) and such list does not appear also in the preliminary drafts of Austria and Greece. Other countries have provided a list, which however is either incomplete (Cyprus, Estonia, Slovenia) or fails to recognize indirect and implicit fossil fuel subsidies (Czechia, Denmark, Finland, Portugal). Also, none of the drafts analysed (including preliminary ones) include a comprehensive and detailed plan for their phase-out. Portugal and Belgium intend to phase them out by 2030, but they all lack detailed plans, with clear timelines and concrete targets. Lithuania's phase-out plan, instead, is only valid for some subsidies.

8. SIGNIFICANTLY IMPROVE PUBLIC PARTICIPATION



According to the [Governance regulation](#) and the [Aarhus Convention](#), Member States must organise early and effective public consultations when all options are still open, prior to the submission of draft and final NECPs. They must also establish a Multilevel Climate and Energy Dialogue to discuss energy and climate policies, including NECPs. During this round of revision, compliance to such requirements ranged from poor to non-existent. Member States should significantly improve public participation processes before the submission of their final NECP updates.

Public consultations

In the vast majority of EU Member States, some form of public consultation took place – but most often, several [minimum legal requirements](#) either of EU law or the [Aarhus Convention](#) were missing. Only in Lithuania and Belgium (with the exception of the Flanders) CSOs found public consultations satisfactory.

Member States must also ensure that the public is given early opportunities to participate in the preparation of the draft NECP update. Despite this legal requirement, some consultations were **organised late, and some even after the 30 June deadline for submission** of the draft NECP update to the European Commission (Austria, Cyprus). Public consultations must take place when all options are still available, which was clearly not the case in several countries where everything was already decided when the consultation took place (Denmark, Estonia, Hungary).

Sufficient information must be provided as part of the public consultation process, including and most importantly the draft NECP. However, **in several countries, the draft NECP was not shared during the consultation** (Cyprus, Portugal, Czechia and France) or was shared, but too late to provide meaningful input (Cyprus, Slovakia, Spain) or incompletely (for instance in Hungary). In many cases, scenarios with additional policies were not presented (including in Denmark, Estonia, Hungary, Slovakia and Spain). Effective public consultations were hampered by the **short timeframe to provide comments** (Czechia, Slovakia, Croatia, Luxembourg) or the limited space to provide feedback (Czechia, Poland, Portugal).

Several countries did not organise any form of public consultation specifically around the NECP update. This includes most of the 12 Member States that did not submit their draft NECP updates, such as Bulgaria, Ireland, Germany or Poland.

Multilevel Climate and Energy Dialogues (MCED)

According to Article 11 of the Governance Regulation, NECPs should be discussed in the framework of Multilevel Climate and Energy Dialogues (MCED). Some countries simply did not set up a MCED, for instance Belgium, Czechia, Denmark, Ireland, Slovakia, Slovenia and Spain.

In several countries, an MCED exists in some form (for instance in Croatia, Portugal, Lithuania or France) but recommendations were only considered in a small amount by the government (Luxembourg), the MCED was not well-known (Cyprus), its expected impact on the draft was very unclear (Austria), or the MCED is not a permanent structure and consists of ad-hoc meetings (Hungary). In several countries, an MCED has been put in place but with one or several key actors missing: the general public (Estonia), local authorities (Hungary) or the private sector (Portugal).

In the vast majority of Member States that have not submitted their draft NECP update, MCEDs were not used as a platform to discuss these plans.

DRAFT NECP COUNTRY MATRIX

No outline = draft NECP update not submitted - analysis is based on national expertise and documents

Outlined = analysis based on submitted draft NECP update

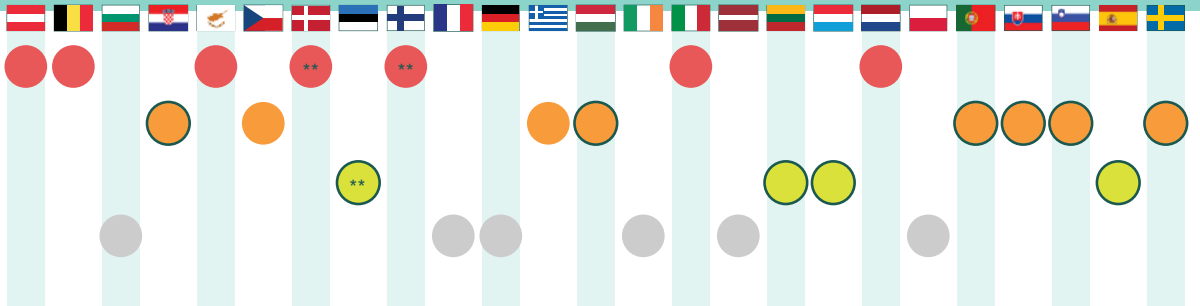
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CLIMATE AMBITION

- Not on track to meet ESR target
- likely paper targets, additional measures are not sufficient or missing
- in line with ESR target
- Not enough information available

**** not on track to meet LULUCF target**

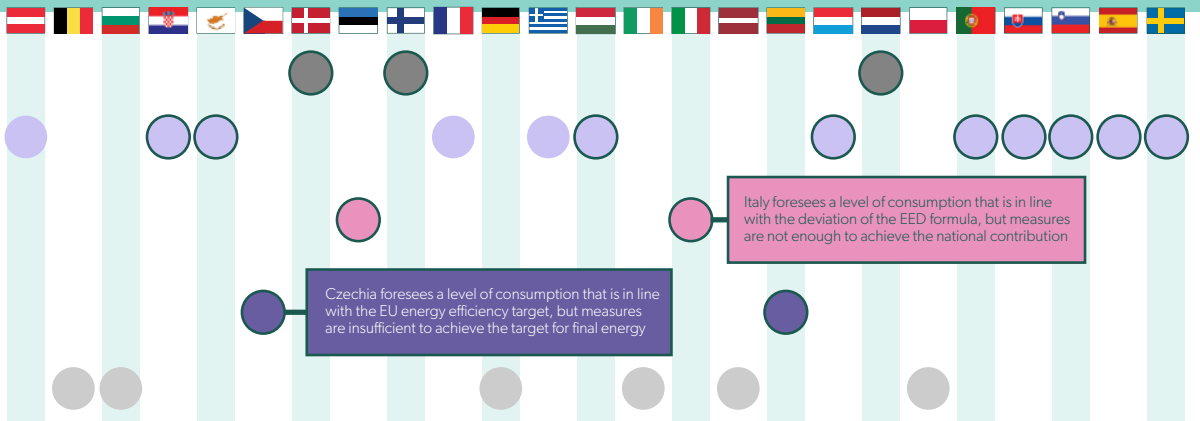


ENERGY EFFICIENCY NATIONAL CONTRIBUTION

- No indication for primary and final energy consumption in 2030
- National contribution not in line with the EU energy efficiency target
- National contribution compliant with the EED deviation for the 2030 final energy consumption target
- National contribution formally compliant with the EU energy efficiency target
- Not enough information available

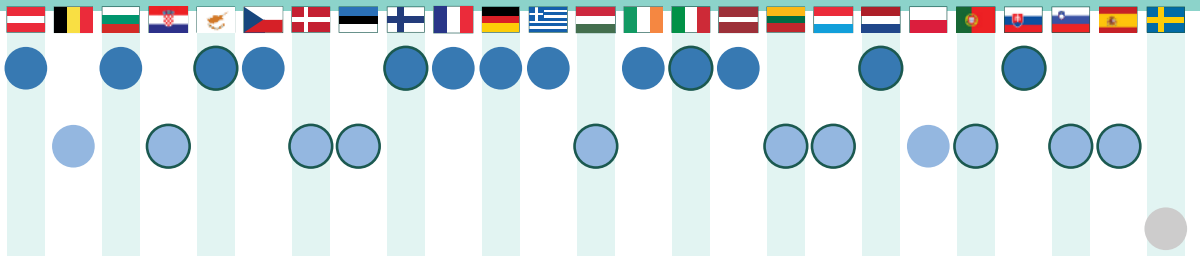
Czechia foresees a level of consumption that is in line with the EU energy efficiency target, but measures are insufficient to achieve the target for final energy

Italy foresees a level of consumption that is in line with the deviation of the EED formula, but measures are not enough to achieve the national contribution



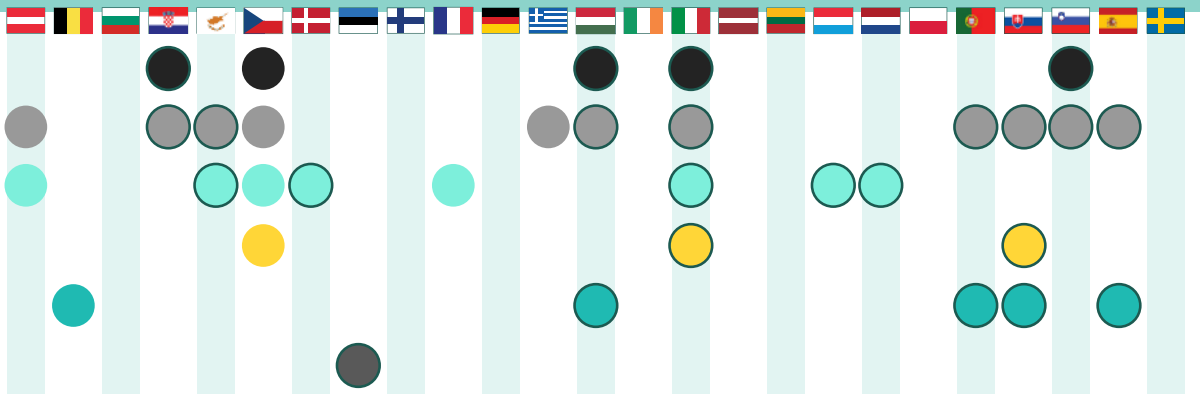
PUBLIC PARTICIPATION

- Non-existing or very poor public participation
- Much to improve: (e.g. scenarios are missing from the draft, too short time and space for consultations)
- Not enough information available



ALERTS

- Too much room for coal
- Too much room for fossil gas
- CCS and CCU expansion
- Nuclear (slow phase out or expansion)
- Hydrogen expansion - danger of fossil hydrogen
- Oil shale



*Disclaimer - it was not possible to assess the national renewable energy contributions, as the European Commission has chosen not to publicly disclose these benchmarks which correspond to the EU 2030 renewable energy target of 42,5% and 45%,

Austria



Inputs from: Greenpeace; GLOBAL 2000; WWF; Klimavolksbegehren

STATE OF PLAY

Austria has not submitted its draft National Energy and Climate Plan (NECP) update to the European Commission, as of 30 September 2023. This assessment is based on a preliminary draft NECP update shared for the public consultation.

OVERVIEW

With this preliminary draft, Austria fails to integrate the new EU energy and climate targets and overall does not go towards a 1.5°C trajectory. It does not reach the minimum 2030 requirements for climate effort sharing and renewable energy with the indicated additional policies and measures. The contribution for energy efficiency is not in line with the EU 2030 energy targets as a minimum. Policies and measures (PAMs) are too vague.

RECOMMENDATIONS

Include more policies and measures to at least reach the non-ETS 2030 target

Improve the description of energy efficiency measures and add more renewables measures to fill the gap to the 100% renewable electricity goal

Include a phase out plan of all fossil fuel subsidies

CLIMATE AMBITION

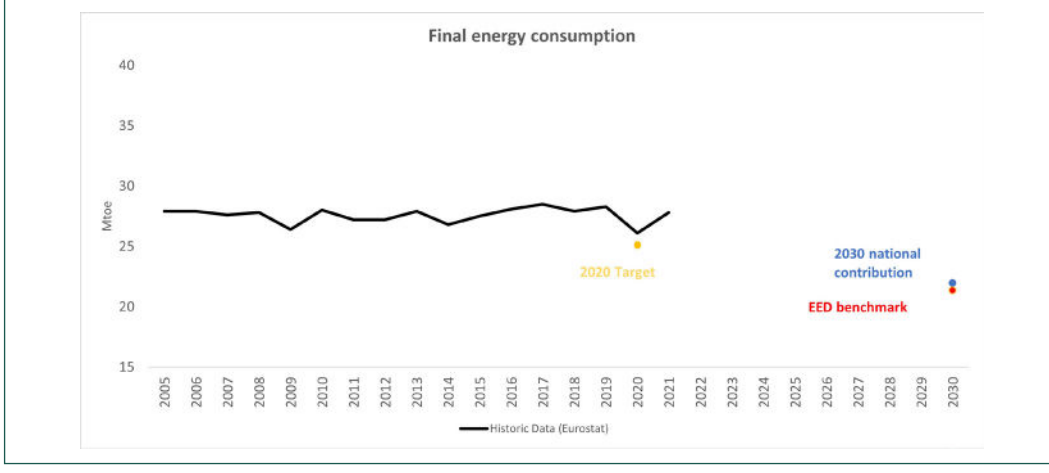
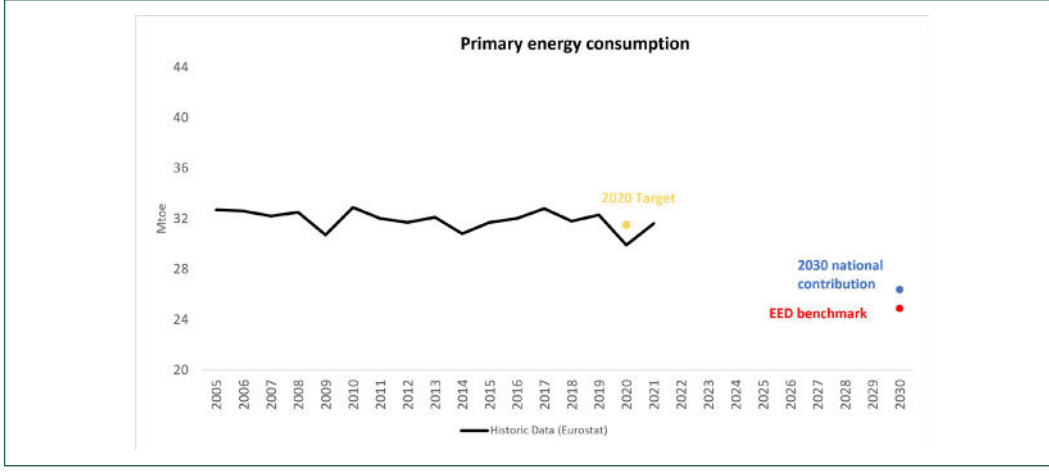
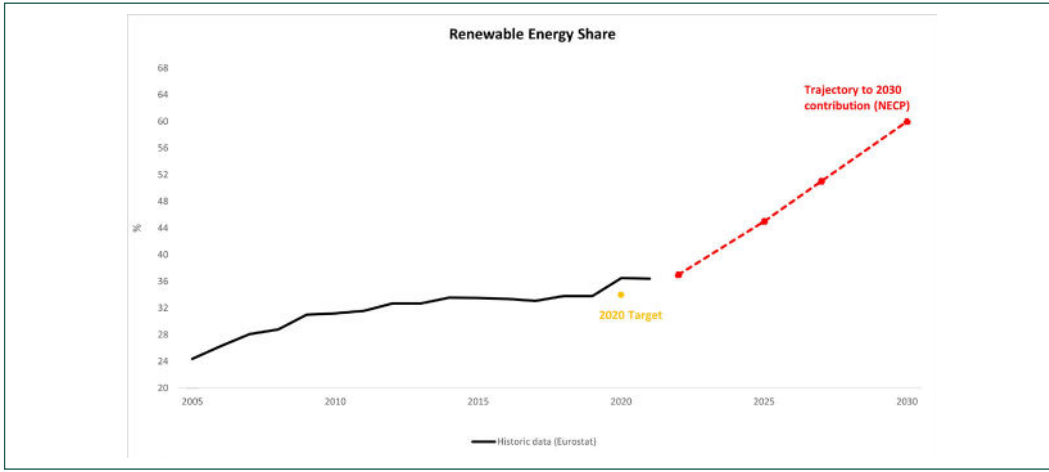
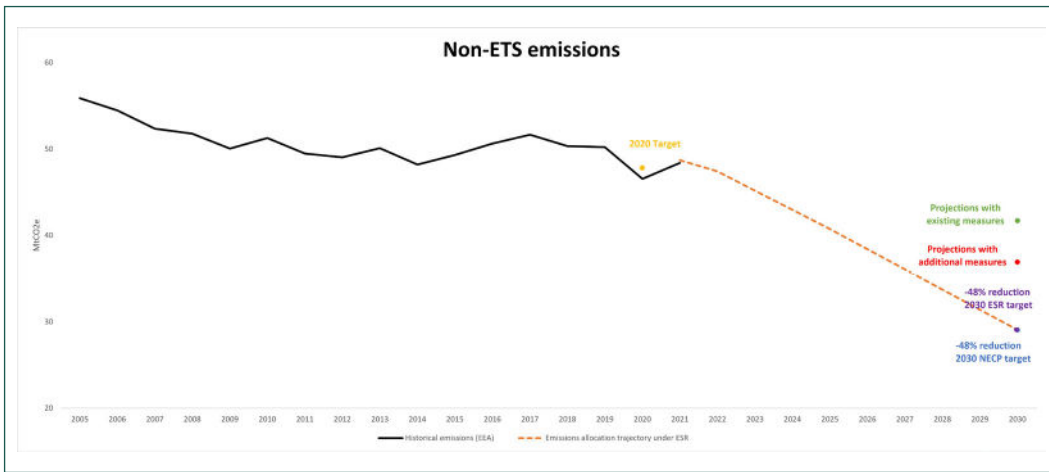
The preliminary draft NECP update refers to the unambitious 2030 target for **non-ETS sectors** set under the Effort Sharing Regulation (ESR) – -48% compared to 2005 levels. Sectoral targets have been adjusted accordingly, but they are not legally binding.

This small increase in targets, however, is currently not fully reflected in the existing policies and measures. With existing policies, Austria will fail to reach the non-ETS 2030 target by 23 percentage points. The preliminary projections with additional measures included in the draft indicate that Austria would still miss its non-ETS 2030 target by 13 percentage points. In addition to better detailing the additional policies currently planned, further **additional measures** are needed. These should notably include behavioural and fiscal measures tackling greenhouse gas emission in the transport sector, as well as an increase in CO₂ pricing (the planned increase to 55 euros per ton of CO₂ is too low).

ENERGY TRANSITION

In its preliminary draft NECP update, Austria sets a **renewable energy contribution** of 60% by 2030. However, the described measures are not sufficient to reach the 2030-target as the scenario with additional measures only projects a renewable energy share of 52.6% by 2030.

The overall target for **energy savings** has not changed significantly compared to Austria's 2019 integrated NECP and the new Energy Efficiency Directive is not mentioned. The draft plan indicates a level of energy consumption in 2030 of 1.104 PJ for primary energy and 920 PJ of final energy, which equals 26.37 Mtoe and 21.97 Mtoe respectively. This is not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. There is a gap of 1.5 Mtoe for primary and 0.62 Mtoe for final energy consumption compared to the formula benchmark in the revised 2023 Energy Efficiency Directive (EED). The measures underpinning the target are too vague and not quantified in terms of energy savings.



FOSSIL FUELS ALERT

Fossil gas – The draft mentions a fossil gas phaseout by 2040 in the Austrian heating sector, which is however still not legally approved. Also, there are no phase-out dates for the power or industry sectors. Decommissioning of fossil gas infrastructure is not mentioned – the text only mentions its “transformation” into hydrogen infrastructure. New fossil gas explorations are being discussed.



FALSE SOLUTIONS ALERT

An expansion of **CO₂ pipeline infrastructure** is planned.



IS MONEY WHERE THE MOUTH IS?

No finance explained yet. It should be addressed in the draft NECP update, to be published this Autumn.



SNEAKY SUBSIDIES

Austria mentions that green budgeting processes – which include fossil fuel subsidies reporting – are currently being developed. So far, however, no concrete plan or policy for phasing out all fossil fuel subsidies exists. Independent analysis estimates them to be up to 5.7 billion euros per year.



PUBLIC PARTICIPATION

Public consultations took place only after the deadline for the draft NECP submission.

Multilevel dialogues with regional and local levels exist, but the concrete impact of those consultations is unclear.



Belgium



Inputs from: Bond Beter Leefmilieu; Canopea

STATE OF PLAY

Belgium has not submitted its draft National Energy and Climate Plan (NECP) update due to the lack of an agreement between its governments, as of 30 September 2023. This assessment is based on the draft plans from the various entities (Flanders, Wallonia, Brussels and Federal).

OVERVIEW

Belgium overall does not strive towards a 1.5°C trajectory. With the current regional plans, Belgium would not fulfil the EU requirements for climate effort sharing. There is not enough information available with regards to energy efficiency and renewables. Planned policies and measures (PAMs) are likely not enough to achieve the non-Emission Trading System (non-ETS) target.

RECOMMENDATIONS

Increase climate targets, at least up to the 2030 target set in the ESR

Add more measures to bridge the gap between climate targets and PAMs, and improve clarity of their impacts on reducing emissions

Improve current lack of coordination and integration across sub-governments

CLIMATE AMBITION

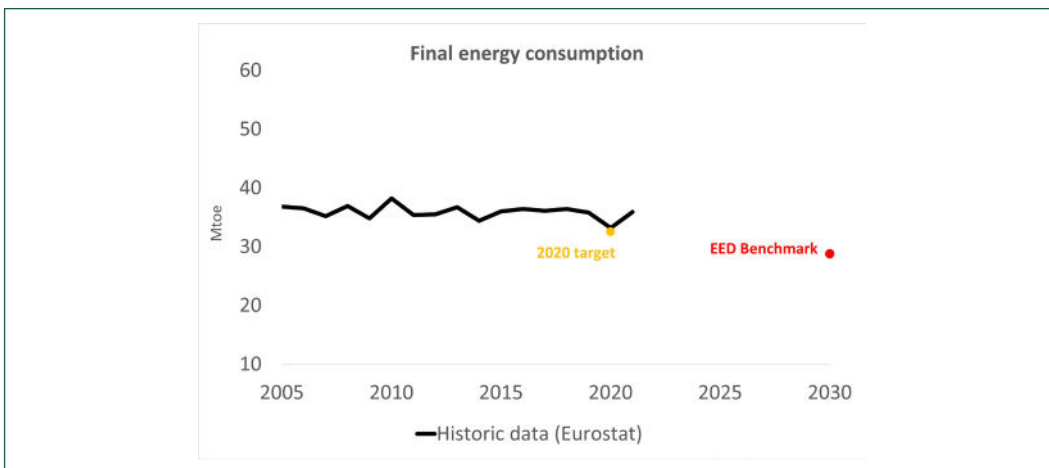
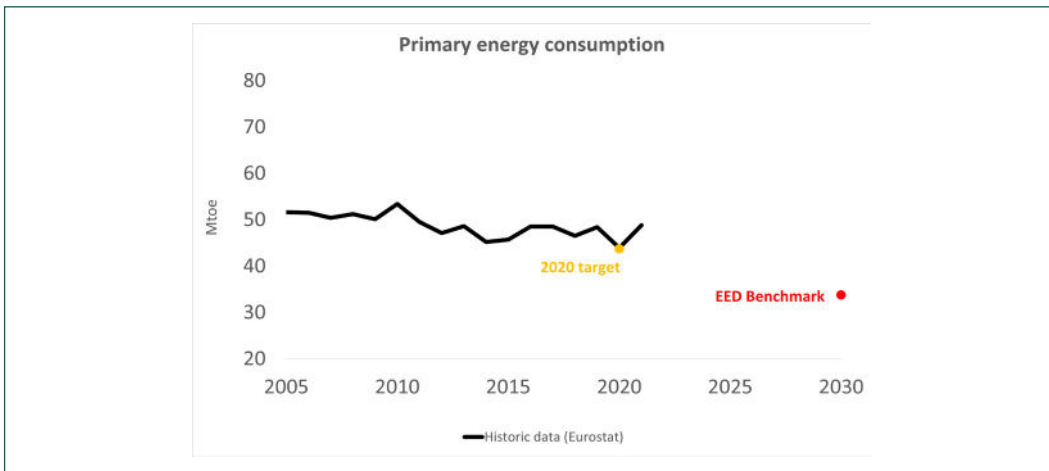
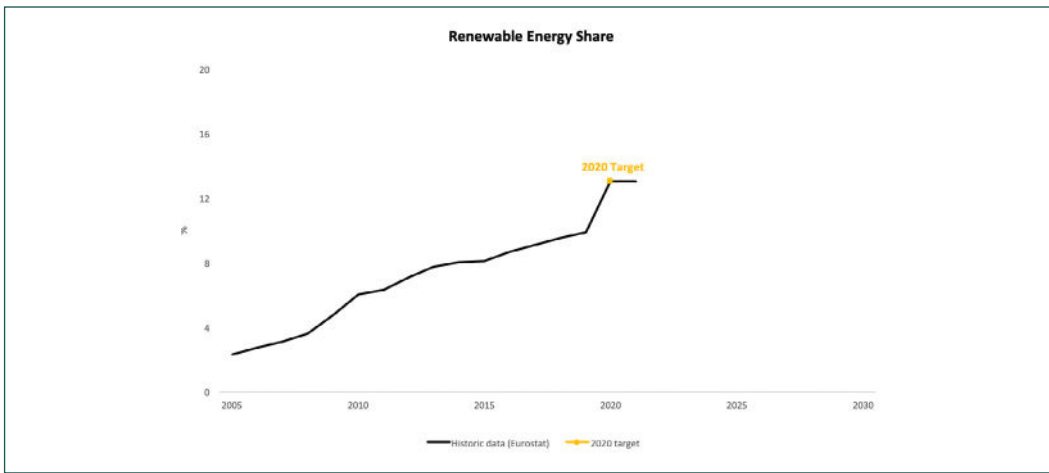
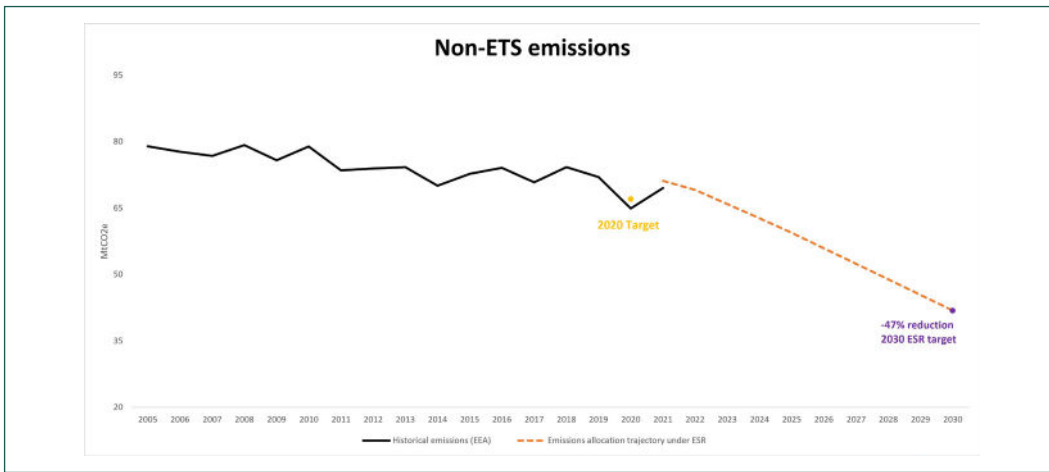
In Belgium, the only binding national target is the 2030 **non-ETS target** set in the Effort-Sharing Regulation (ESR). Combining the targets currently available in all the governments' draft NECPs will likely result in a non-ETS 2030 target of -43% (compared to 2005 levels), which would fall short of meeting the -47% target set in the ESR, let alone its fair contribution to tackle the climate crisis. Flanders, the biggest emitting region, sets the bar too low (40%). All of the other entities have set goals in line with the ESR target (-47%). This is demonstrative of Belgium's poor governance of climate policy, with governments formulating sub-national targets and policies before discussing national ones.

A worrying gap is also expected between climate targets and the **policies planned** to achieve them. The regional plans do not detail the impact of PAMs on emissions, nonetheless, shortfalls are to be expected in the buildings and transport sectors, where Wallonian and Flemish plans either lack ambition or have not developed sufficient PAMs. Important interfederal policies (notably related to energy taxation and subsidies) have also not progressed.

ENERGY TRANSITION

At the moment, there is no information about Belgium's national **renewable energy** contribution to the overall increased EU renewable energy target. Negotiations are ongoing regarding how such contributions will be spread across the various regions and entities. Ambition was raised both in Flanders and Wallonia compared to 2019, but it is not possible to evaluate to which extent. Only few additional policies have been announced to back it up.

At the moment, there is no information about Belgium's overall **energy efficiency** contribution to the overall increased EU energy efficiency target. This contribution should surpass a minimum reduction of energy consumption of at least 33.77 Mtoe for primary energy and 28.78 Mtoe for final energy in line with the EU energy efficiency target, as per formula benchmark of the new 2023 Energy Efficiency Directive (EED). However, both draft plans indicate slightly more ambitious objectives for final energy consumption per region compared to previous benchmarks, but it is not possible to evaluate to which extent.



FALSE SOLUTIONS ALERT

The **hydrogen hype** is all over the place – including at the federal level, which projects high consumption levels of low-carbon (i.e. derived from fossil gas) hydrogen and derived fuels in 2050. 20 hydrogen stations are also planned for road transport by 2030. Hydrogen must only be renewables-based and, being a limited source, its use should be limited to industrial needs.



IS MONEY WHERE THE MOUTH IS?

Unclear. Individual measures sometimes include budgetary implications and projected sources of income, but more comprehensive overviews of **investment needs** and **funding sources** are not included in the regional plans.



SNEAKY SUBSIDIES

At the federal level, a comprehensive inventory of fossil fuel subsidies has been published twice. There is a plan to phase them out by 2030, but concrete timelines and targets are missing. At the regional level, the situation is less clear.



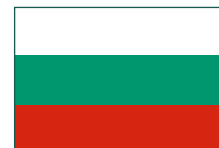
PUBLIC PARTICIPATION

Public consultations took place with a varying degree of quality. Strong and broad engagement of stakeholders took place in Wallonia and Brussels, while in Flanders and at the federal level, the process was poor and without discussions on scenarios.

Regional coordination in the NECP drafting process in Belgium has been insufficient, due to dysfunctional multilevel procedures used to coordinate across the various entities. As a consequence, the NECP update risks being a poorly readable and poorly coordinated synthesis of the various sub-plans.



Bulgaria



Inputs from: Za Zemiata

STATE OF PLAY

Bulgaria has not yet submitted its draft National Energy and Climate Plan (NECP) update, nor started any form of public consultation, as of 30 September 2023. It is not clear what the progress on the update is, as no draft or relevant related studies have been released so far. With the new government, a first draft might be expected in late Autumn. Based on previous experiences and available information, civil society organisations have developed a set of recommendations.

RECOMMENDATIONS

GENERAL REMARKS

Ensure the NECP has high ambition and is consistent with all strategic documents – including the National Recovery and Resilience Plans (NRRP) update Territorial Just Transition Plans (TJTPs) and the Roadmap to Climate Neutrality (a decarbonization Roadmap model of the Energy Transition Commission).

Ensure all national strategic energy and climate documents are subject to a Strategic Environmental Assessment (SEA) and to the Do-Not-Significant Harm (DNSH) principle.

CLIMATE AMBITION

Establish a climate neutrality target and sectoral emissions targets in the national Climate Change Mitigation Act (CCMA) which will shape the NECP update.

Significantly increase the ambition for the **2030 sectoral targets** compared to the 2019 NECP, notably for buildings, transport and industry.

ENERGY TRANSITION

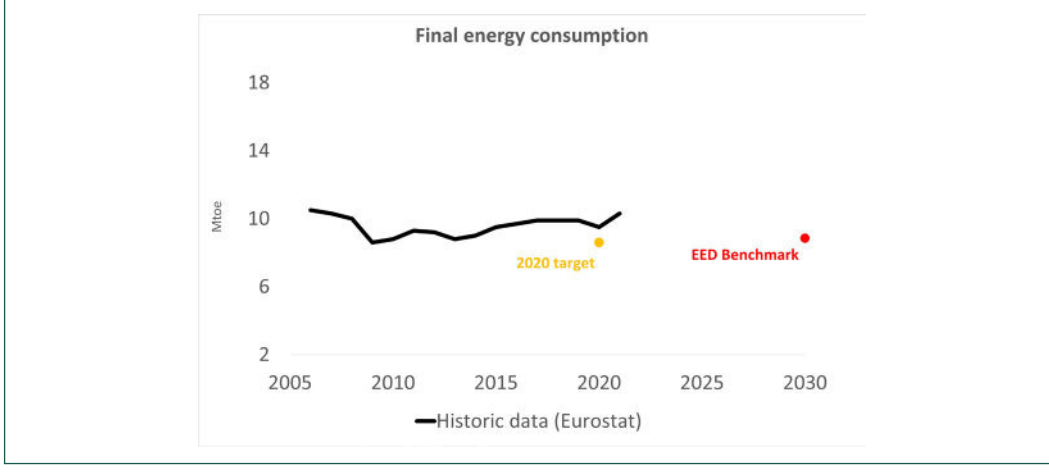
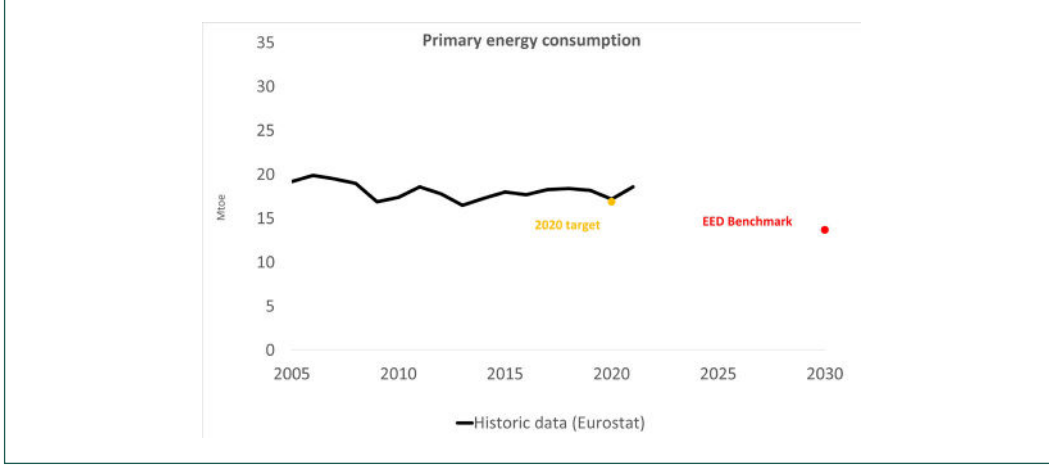
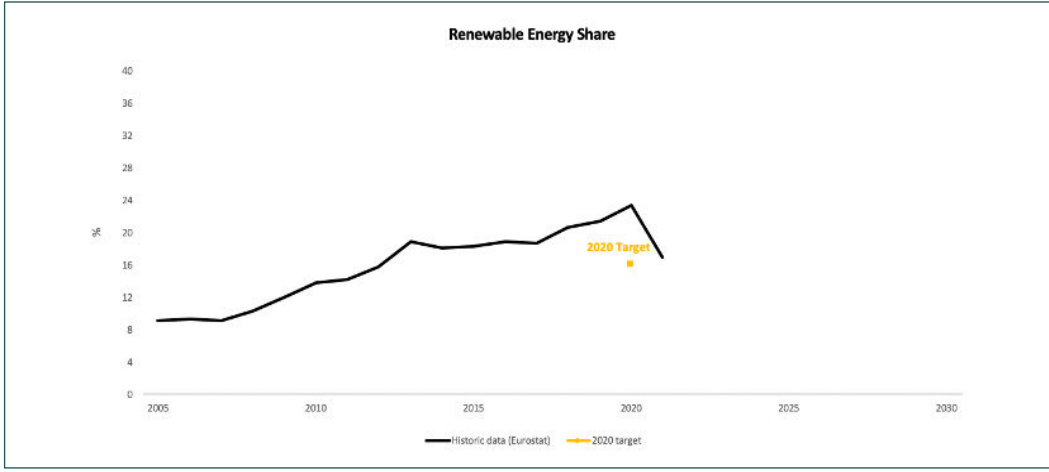
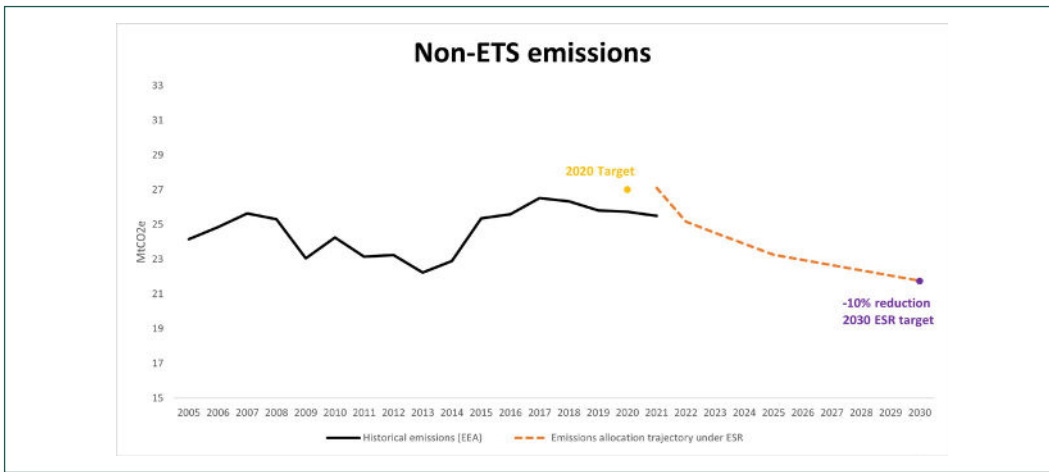
Energy efficiency – Establish a national energy efficiency contribution that surpasses a minimum reduction of the Energy Efficiency Directive's (EED) formula, amounting to no more than 13.71 Mtoe for primary energy and 8.85 for final energy consumption.

Energy poverty – strategically address the endemic problem of energy poverty in Bulgaria, in line with its definition in the Energy Efficiency Directive, and the need to support just energy transition for energy poor and vulnerable households in the Social Climate Fund.

Coal – Do not allow unnecessary and unfeasible coal prolongation beyond 2030, and clearly define the energy transformation role of Bulgaria's coal and carbon intensive regions, in line with the TJTPs.

Fossil gas – Propose a phaseout timeline for fossil gas to prevent lock-in and stranded assets, both in transit as well as in local extraction infrastructure (including offshore fossil gas extraction in the Black Sea).

Critical assessments – Critically examine (1) the overestimation of expected electricity demand in the current Roadmap model of the Energy Transition Commission (ETC); (2) The cost, timing and feasibility factors for energy mega-projects, including new nuclear, hydro or thermal conversion.



PUBLIC PARTICIPATION

The lack of any form of **civil society involvement** in the NECP revision process must be urgently addressed. A public consultation and multi-level dialogue on the draft NECP update must be ensured as soon as the draft NECP update is released. This should include public hearings and multi-stakeholder expert inputs in the Energy Transition Commission (ETC).

The ETC – created as a **multilevel dialogue platform** to discuss on the Roadmap to Climate Neutrality, – must remain operational at least until the finalisation of the NECP process. This is especially relevant for aligning the NECP update with the following Long-Term Strategy update, which will require crucial input by the ETC.



Croatia



Inputs from: Society for Sustainable Development Design (DOOR)

STATE OF PLAY

Croatia submitted its draft National and Climate Plan (NECP) update on time. This assessment is based on the draft available on the Commission's website.

OVERVIEW

Croatia overall does not move towards a 1.5°C trajectory. Croatia however fulfils the minimum EU requirements for climate effort sharing and likely for renewable energy. The energy efficiency contribution is not ambitious enough to align with the EU 2030 energy efficiency target. Only some policies and measures (PAMs) are laid out in detail and linked to targets, while many still remain too vague and lack credibility. On top, Croatia plans to expand fossil fuels infrastructure while they should be phased out. Communication across governance levels and with stakeholders has improved significantly compared to the 2019 NECP.

RECOMMENDATIONS

Define and set an economy-wide national climate target for 2030 as well as additional sectoral climate targets

Clearly identify financing needs and funding sources to implement some key measures, such as energy poverty alleviation

Ensure all PAMs are described in detail, including on description of activities, impacts on decrease of greenhouse gas emissions and means of monitoring

CLIMATE AMBITION

The draft update mainly refers to the 2030 target for non-Emissions Trading System (non-ETS) sectors set under the Effort Sharing Regulation (ESR) (-16.7% compared to 2005 levels). The scenarios available in the draft show that Croatia does not fulfil its 2030 target for **non-ETS sectors** with existing measures (leading to a reduction of -6.7%), but it does with additional measures (-17.1%). It is worth noting that a significant discrepancy exists between the historical emissions data used for the scenario and those of the EEA. If EEA data were used for the 2005 baseline, Croatia would fail to meet their respective targets. This discrepancy should be clarified before the final NECP update. In any case, the scenario remains unambitious: Croatia should plan to significantly surpass its ESR target.

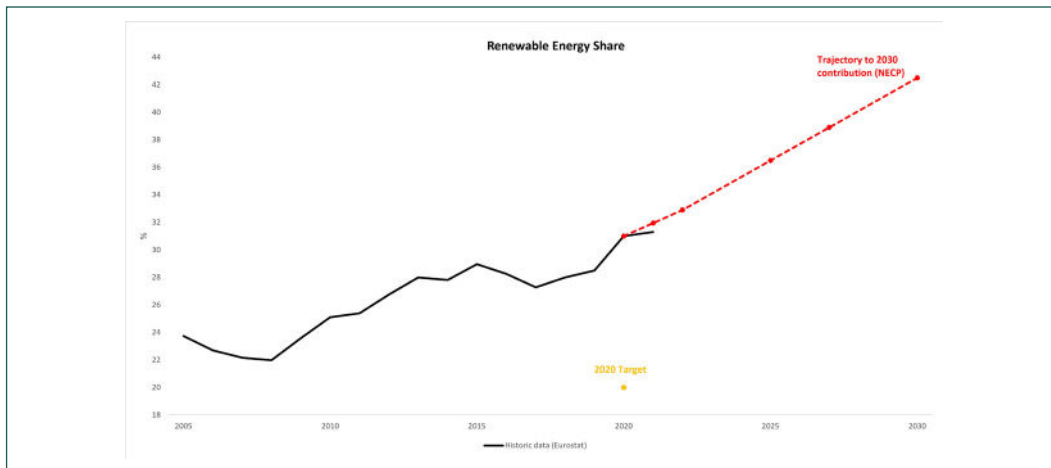
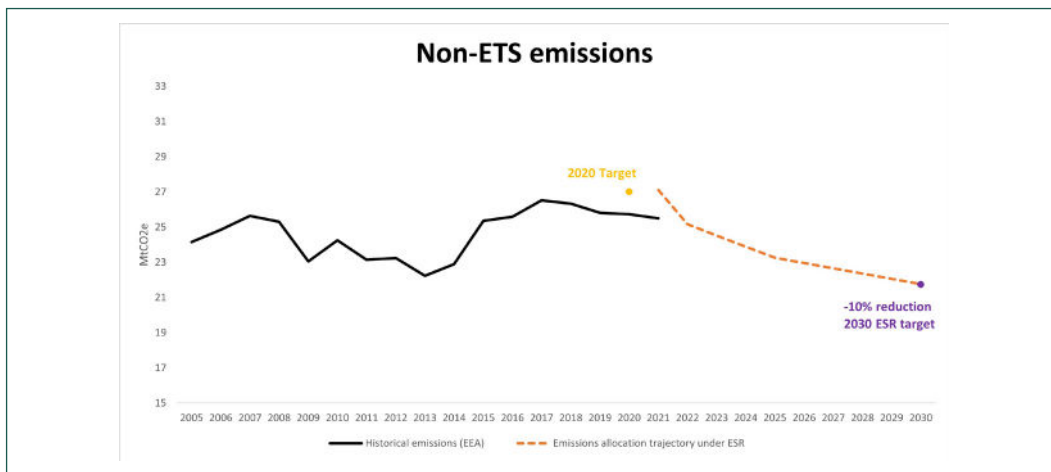
Unfortunately, the draft does not pay enough attention to **longer-term pathways**. It does not make commitments towards the EU-wide climate neutrality goal by 2050, and it is not sufficiently harmonised with the Croatian Low-Carbon Development Strategy (OG No. 63/2001), which focuses on emission reduction by 2030 with an outlook to 2050.

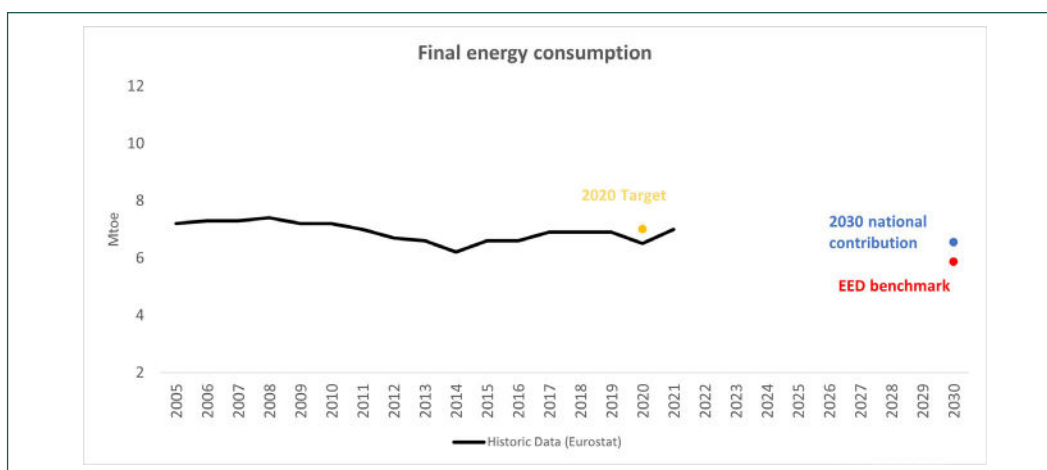
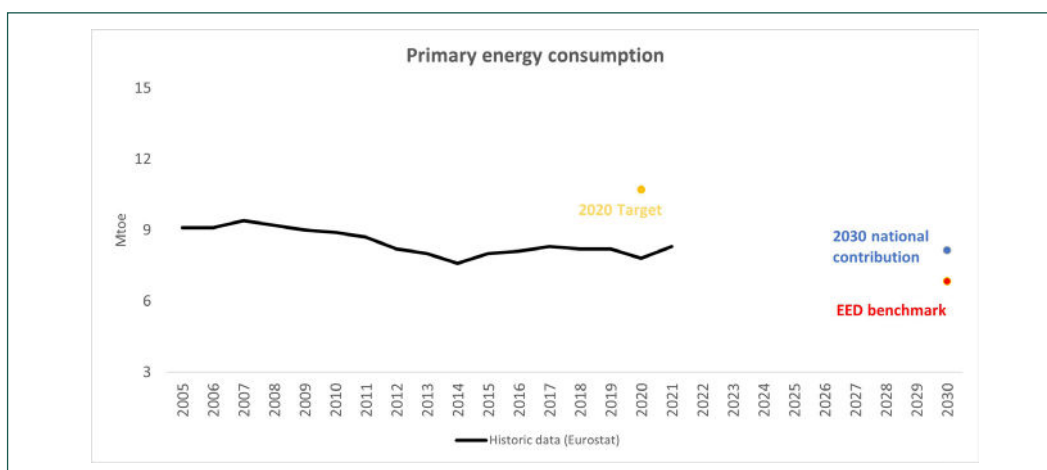
Regarding **climate PAMs**, the assessment ranges between comprehensive and credible to only sketched (e.g. MS-13, elimination of fossil fuels subsidies). All PAMs must be carefully detailed, to ensure they are effectively implemented and to make sure that Croatia achieves its ESR 2030 target.

ENERGY TRANSITION

In its draft update, Croatia sets a **renewable energy contribution** of 42.5% in 2030, which might be the bare minimum to be in line with the European Commission's benchmark to reach the binding EU 2030 renewable energy share of 42.5%. Among the PAMs for renewable energy, Croatia presented an important additional measure (OIE-7) intended to encourage energy sharing and the establishment of energy communities, starting from awareness-raising and improvements in the legislation.

The level of energy consumption foreseen in the draft plan for 2030 amounts to 8.14 Mtoe for primary energy and 6.55 Mtoe for final energy. This is not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU **energy efficiency** target and only slightly lower than today for final energy. The gap towards the required contribution as per formula benchmark in the 2023 Energy Efficiency Directive (EED) is 1.31 Mtoe for primary energy and 0.68 Mtoe for final energy. Croatia is also not compliant with the 2.5% formula deviation for final energy, with a gap of 0.54 Mtoe compared to the required level. A global list of energy efficiency measures underpin the target, but not all measures are credible and well-functioning. Within the measure to renovate family houses (ENU-4) an energy renovation programme is predicted to be approved in 2023, however there is no information from the ministry that this is being developed. The National Energy Efficiency Portal is not functioning well, with latest data from 2018.





FOSSIL FUELS ALERT

Coal – Croatia is late on quitting coal. The exit date is only in 2040, and phaseout only starts in 2030, with coal plant capacities remaining untouched before that date.

Fossil gas – Fossil gas expansion must be halted. The draft foresees an increase in gas power plants capacity from 840MW in 2021 to 2231MW in 2050. It also includes measures to expand infrastructures (notably fossil gas storage and LNG/CNG) and to increase the energy efficiency of fossil gas.



IS MONEY WHERE THE MOUTH IS?

Partially. Investment needs are covered, but the methodology used to calculate them is unclear. Several PAMs include potential funding sources, but they are only briefly detailed.



SNEAKY SUBSIDIES

Fossil fuel subsidies are only very marginally addressed, and there is no plan for their phaseout. A measure (MS-13) is planned to analyse the state of play and define a phaseout plan, but is too vague. It should be rewritten with clearer phaseout commitments and implementation frameworks.



PUBLIC PARTICIPATION

The platform normally used for **public consultations** on laws and strategies was not used so far. The government provided the possibility to send inputs to the draft (via email), but with too tight a deadline.

An official platform for **multilevel dialogues** is missing. However, satisfactory stakeholders dialogues were organised by the REGEA energy agency as part of the NECPlatform project; some sectoral workshops were also organised by the Ministry.



Cyprus



Inputs from : Terra Cypria – The Cyprus Conservation Foundation

STATE OF PLAY

Cyprus's draft National Energy and Climate Plan (NECP) update has been submitted, though with delay. This assessment is based on the draft available on the Commission's website.

OVERVIEW

Cyprus does not fulfil the minimum EU requirements for climate effort sharing, renewable energy and energy efficiency, nor does it go towards a 1.5°C trajectory. Climate effort sharing measures fall 9 percentage points short of the target. The renewables and energy efficiency contribution are both too low to be in line with the respective EU targets. Existing and additional measures are insufficient to achieve the 2030 contributions for climate and renewable energy. The introduction of fossil gas in the energy mix remains the main decarbonization policy in the energy sector.

RECOMMENDATIONS

Stop promoting false solutions such as fossil gas, and include energy scenarios not dependent on fossil gas

Improve all decarbonisation efforts – notably in the transport sector, where for some indicators ambition has decreased compared to the 2020 NECP

Phase out fossil fuel subsidies and increase investments in energy efficiency and renewables

CLIMATE AMBITION

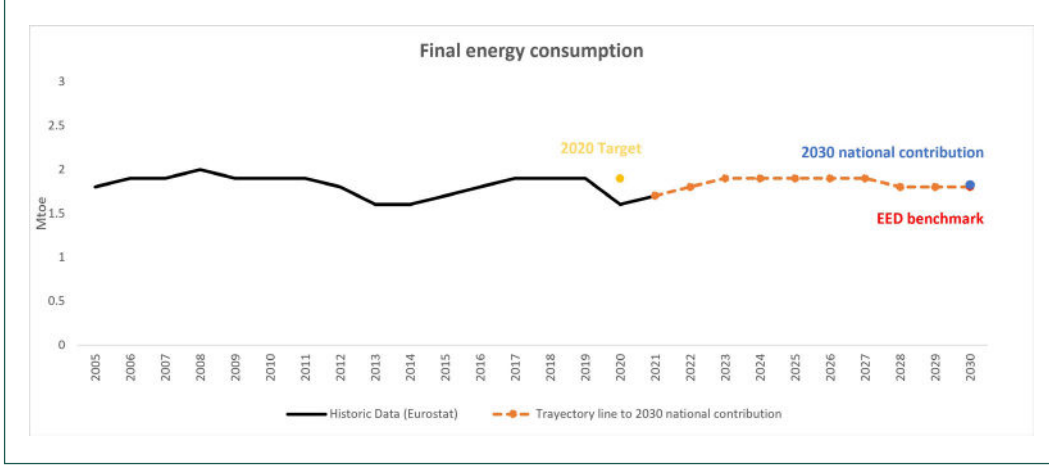
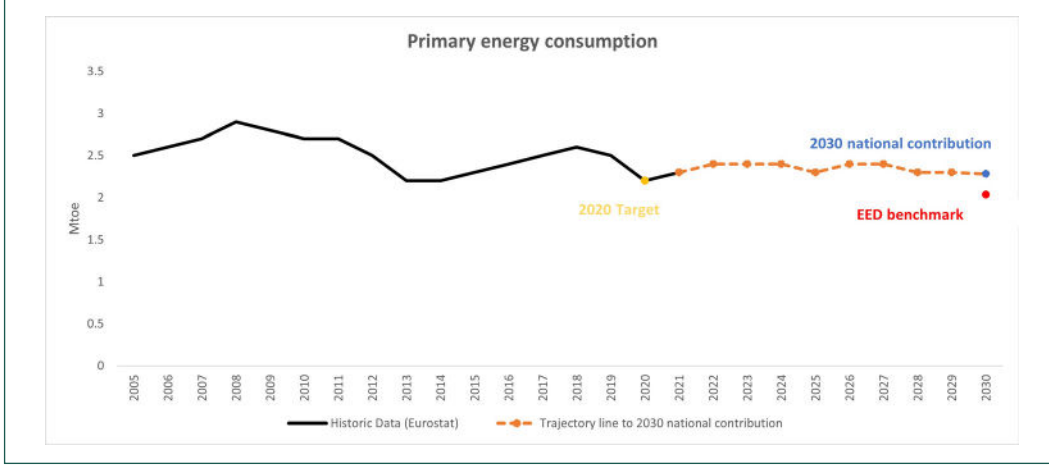
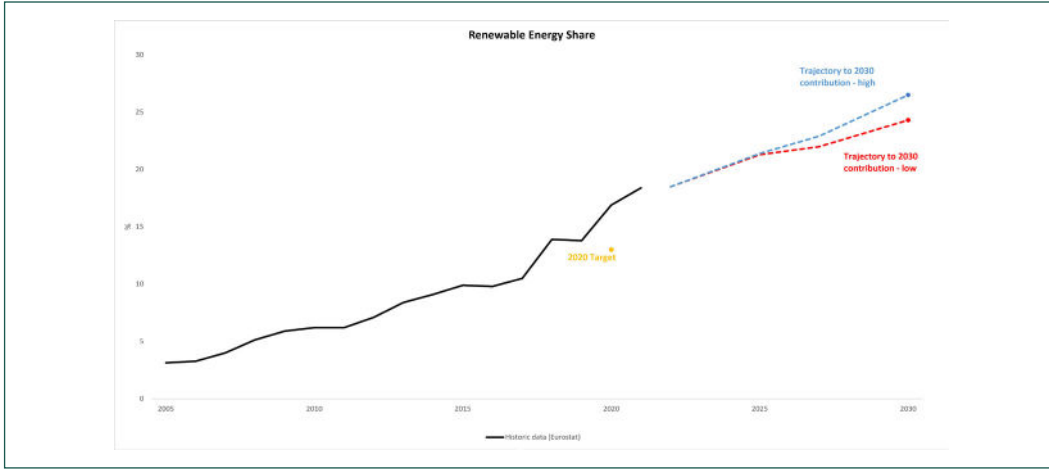
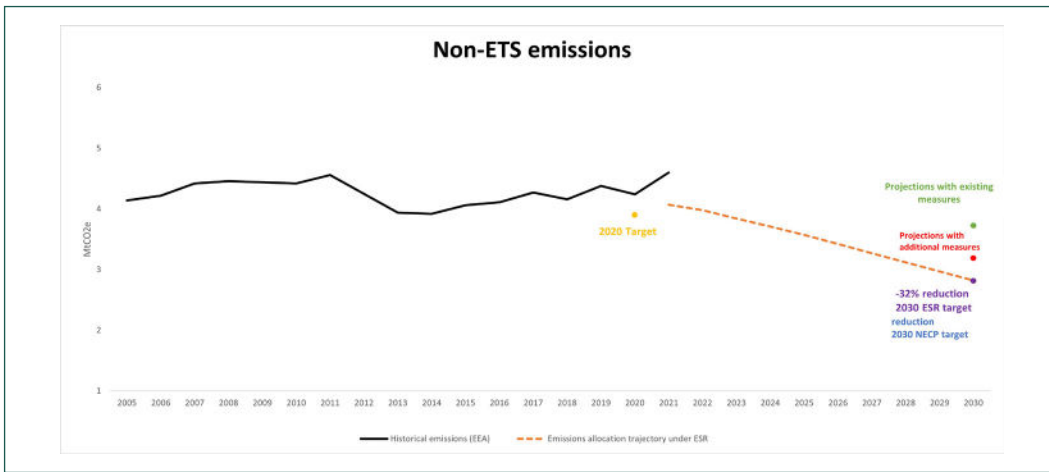
The draft refers to the 2030 target for **non-ETS sectors** set under the Effort Sharing Regulation (ESR) (-32% compared to 2005 levels). Cyprus fails to meet it by 9 percentage points: With additional measures, only a -23% reduction is achieved by 2030 in the non-ETS sectors (with existing measures, the plan projects a 10% reduction by 2030). The draft assumes this ambition gap could be filled by potential additional measures – most notably green taxation, which could guarantee a further -10% reduction – without a quantification of the impact.

Sectoral objectives for buildings and waste have largely remained the same as the 2020 NECP, while ambition has decreased in the transport sector – from 75% to 82% of car usage in the modal share. With the few and unambitious policies planned under this draft, even meeting a 82% target appears challenging (it is currently 90%).

ENERGY TRANSITION

Cyprus sets a **renewable energy** contribution of 24.3-26.5% by 2030, which will not be in line with the Governance Regulation formula benchmark corresponding to the binding EU 2030 renewable energy share of 42.5%. The projection with additional measures does not result in the updated national renewables contribution. In the updated draft NECP, the regulatory framework for the creation of energy communities is set to be completed by 2024. A positive measure foresees financial support for vulnerable consumers to install solar PVs, but lacks detail.

For **energy savings**, the draft plan sets out projections to reach a level of energy consumption amounting to 2.28 Mtoe for primary energy and 1.88 Mtoe for final energy. This is a slight increase compared to today for final energy consumption. Cyprus rightly notes that its projections are not in line with the calculation for the expected target; the target projections leave a gap of 0.24 Mtoe for primary and 0.07 Mtoe for final energy consumption compared to the formula in the Energy Efficiency Directive (EED). Cyprus also does not comply with the formula deviation flexibility for final energy consumption, leaving a gap of 0.03 Mtoe. The energy efficiency measures in the draft NECP are mostly not quantified in terms of energy savings per measure. Specific energy savings measures risk a weak implementation, the implementation of the Sustainable Urban Mobility Plans for example is behind schedule.



FOSSIL FUELS ALERT

Fossil gas – Fossil gas will be introduced in Cyprus’ energy mix by 2024 for the first time – mainly to replace Heavy Fuel Oil and diesel in electricity generation. The construction of an LNG terminal and “Cyprus2Gas” and “EastMed pipeline” are the main infrastructure projects planned in the draft. The decommissioning of this new infrastructure, or a fossil gas phaseout plan, is missing. Fossil gas represents a false solution: investing in fossil gas means going for carbon lock-ins and stranded assets, and diverting from a 1.5°C compatible trajectory.



IS MONEY WHERE THE MOUTH IS?

Investment needs estimations are not credible. Despite a considerable difference in emissions reduction between projections with existing and with additional measures (-13%), investments planned for the two only differ by 530 million euros.

EU funds are included as an important funding stream. However, EU ETS revenues’ use is not mentioned in the draft.



SNEAKY SUBSIDIES

The plan includes an overview of current subsidies. However, it fails to differentiate which subsidies promote fossil fuels. A 230 million euros subsidy for the construction of the LNG terminal is included, but is presented as a ‘means to ensure energy safety’.

The plan lacks a fossil fuel subsidies phase out plan. Instead, it diverts attention towards schemes addressed to vulnerable households to ensure that they will be able to access energy services.



PUBLIC PARTICIPATION

Public consultations were poorly designed. In the first round, no draft was made available; the second round only took place after the draft was submitted to the Commission, which hampered the public from participating in the drafting process.

A platform exists where comments can be submitted, but few stakeholders know about it and consequently use it.



Czechia



Input from: CDE

STATE OF PLAY

Czechia has not yet submitted its draft NECP update, as of 30 September. However, in September it published a preliminary draft, on which this assessment is based. This preliminary draft will probably undergo adjustments before being submitted to the Commission.

OVERVIEW

Czechia overall does not move towards a 1.5°C trajectory. Czechia however fulfils the minimum EU requirements for climate effort sharing. Czechia foresees a level of consumption that is in line with the EU energy efficiency target, but measures are insufficient to achieve the target for final energy. The renewable energy contribution might not be ambitious enough to align with the EU 2030 renewable energy target. Policies and measures (PAMs) presented for climate and are insufficient to achieve the EU 2030 effort sharing target. The draft still presents many internal inconsistencies across the document.

RECOMMENDATIONS

Revise the assumptions for the analytical model.

The current one imposes unnecessarily low limits on new solar and wind power deployment, and significantly underestimates costs and timelines for new nuclear sources

Identify and properly describe specific measures

leading to the proposed targets. Measures in the current draft are too general, lack proper impact assessments and timelines, and they include outdated and often contradictory information

Set up a proper public consultation process.

The only round of consultations was conducted when no draft, scenarios or any other supporting materials were available

CLIMATE AMBITION

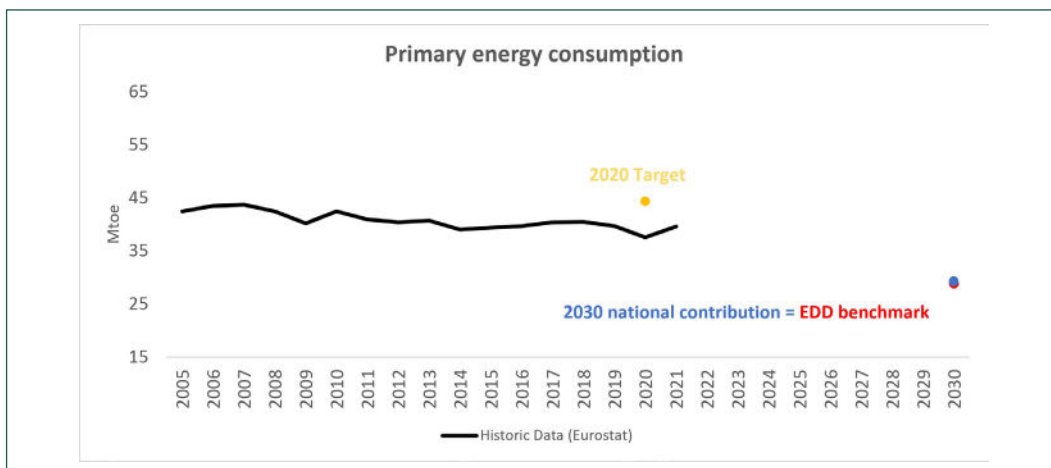
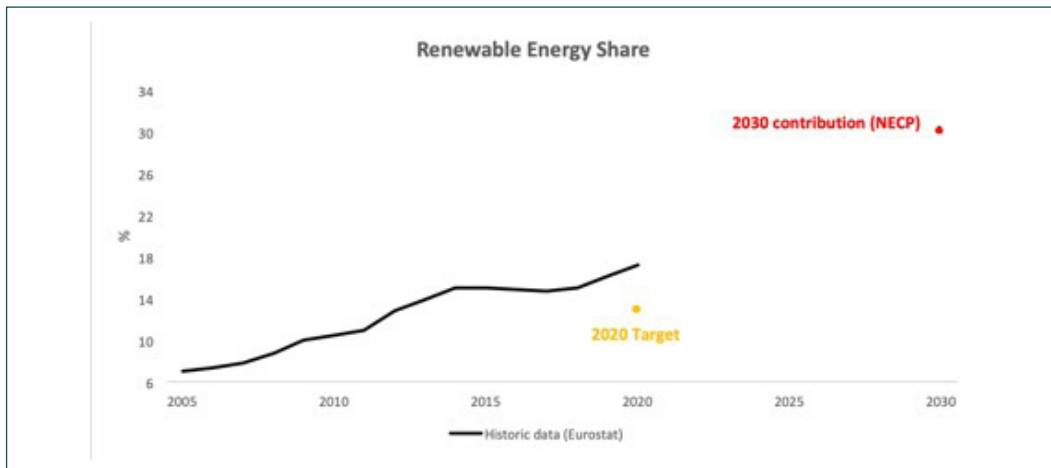
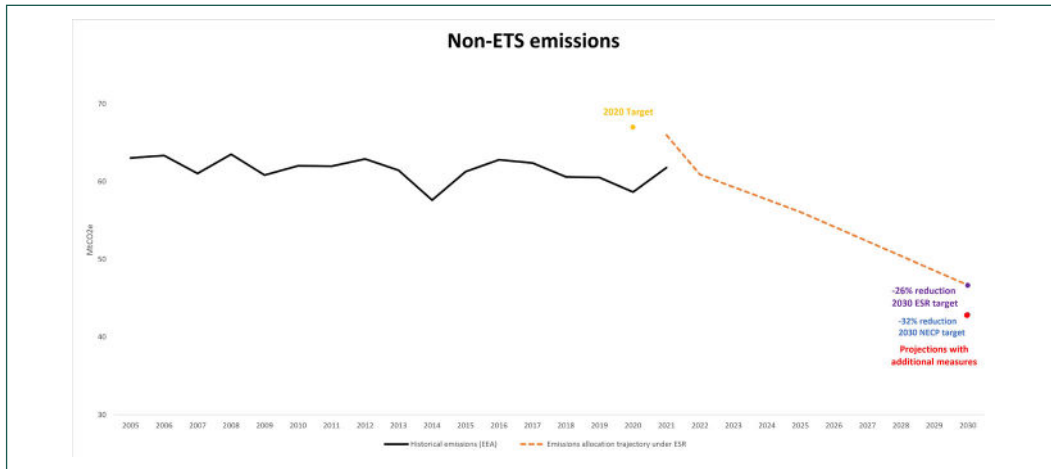
The draft does not define explicit, binding emission reductions targets; rather, it presents them as outcomes of the used scenarios. By 2030, the draft projects an **economy-wide emission** reductions of -63% (compared to 1990), which improves the 2019 NECP target (-47%); and it also projects **non-ETS emissions** to decrease by -32% (compared to 2005 levels), which surpasses the minimum requirement set in the unambitious Effort-Sharing Regulation (-26%).

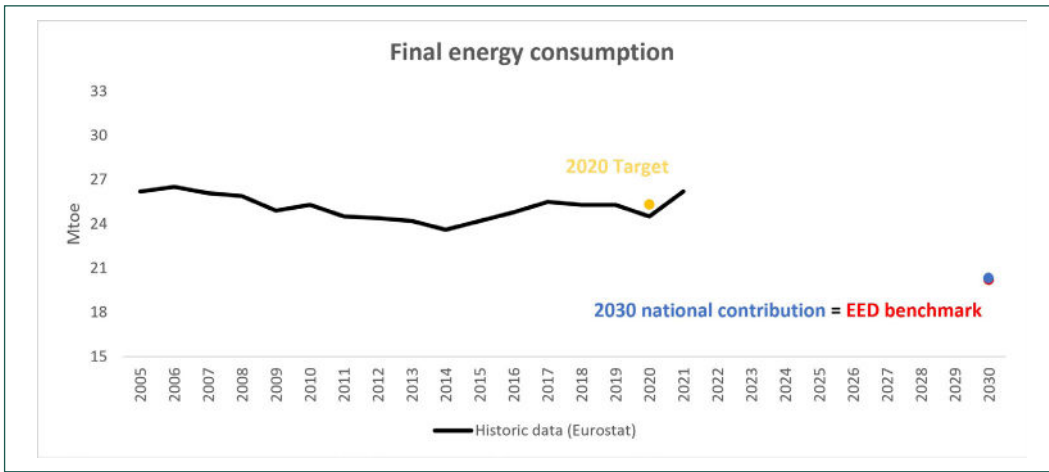
While not in line with a 1.5°C compatible trajectory, these targets would allow Czechia to be consistent with the increased EU ambition levels. However, their credibility is uncertain. The section on **PAMs** is outdated and incomplete, completely misaligned with the **scenario** with additional measures. It only includes *some* of the *already existing* PAMs, and it describes them poorly – without clarity on the analytical basis, the scope, and their impacts on emission reductions. Also, it often refers to outdated documents, instead of the updated targets.

ENERGY TRANSITION

In the preliminary draft, Czechia sets a **renewable energy** contribution of 30% in 2030, which might not be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. For what concerns PAMs, Czechia has included some positive elements on the simplification of administrative procedures and on acceleration zones, but they lack detail, notably about their expected impact. The draft also mentions support to energy communities and energy sharing, but Czechia still needs to fully transpose RED II.

For **energy savings**, the level of consumption in 2030 is estimated at 1206 PJ of primary energy and of 846 PJ of final energy, which equals 28.8 Mtoe and 20.2 Mtoe respectively. This is in line with the EU 2030 energy efficiency target, compared to the formula benchmark of the 2023 Energy Efficiency Directive (EED). However, projections of energy efficiency policies and measures only reach a level of 945 PJ (22.57 Mtoe) by 2030 for final energy, therefore additional policies and measures are needed. Except for generalities on building renovation measures, most measures have not been updated compared to the 2019 NECP.





FOSSIL FUELS ALERT



Coal – Coal phase out is foreseen by 2033. However (1) this is not reflected in the PAMs, where coal phaseout is not addressed; (2) the possibility of an earlier phaseout is not sufficiently considered; (3) there is a risk that lignite mining (Bilina mine) is prolonged until 2035, in direct contradiction with the government’s objectives. A coal mining end date should be added in the draft.

Fossil gas – No fossil gas phaseout is foreseen. Fossil gas capacity is expected to increase by 2030 and fossil gas infrastructure to expand, in contradiction with the overarching decarbonisation goals.

FALSE SOLUTION ALERT



Nuclear – Beyond 2030, the scenario with additional measures relies too much on a large-scale deployment of new nuclear sources. The timelines provided for their construction are unrealistic, and so are the expected costs (CAPEX 5400 euros per thousand watts of electric capacity /kWe, WACC 4 %), compared to any other ongoing construction in comparable conditions.

CCS – The 2050 net zero target overly relies on CCS for biomass, instead of promoting forests restoration (forests still emit more CO₂ than they absorb at the moment).

IS MONEY WHERE THE MOUTH IS?



The plan lacks an overall comprehensive analysis of PAMs investment needs. As a consequence, the integration of all funding in the plan – including EU funds, EU ETS revenues and SCF revenues – is quite poor, which decreases their effectiveness.

SNEAKY SUBSIDIES



On subsidies, the draft is almost identical to the 2019 NECP. Czechia does not have data available on its fossil fuel subsidies apart from its OECD reports; it only considers direct subsidies, omitting indirect and implicit ones; and it does not plan dates for their phaseout.

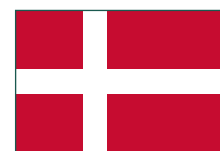
PUBLIC PARTICIPATION

Public consultations were poor. The only round of consultations was conducted via an online questionnaire, with a few broad questions and for only 3 weeks. No draft, scenarios or any other supporting materials were made available. No information was provided on the extent to which comments were reflected in the draft.

A Platform for Energy and Climate Strategies was established in April. However, it fails to meet the function of a **multilevel dialogue**: regions and cities are only represented through associations of cities and regions, without any consultations happening at the local or regional level. Members of the platform also often had very little time for comments on proposed drafts.



Denmark



Inputs from: Danish 92 Group

STATE OF PLAY

The Danish draft National Energy and Climate Plan (NECP) update was submitted only a few days after the deadline. This assessment is based on the [text](#) available on the Danish government website.

OVERVIEW

Denmark's draft NECP update fails to align with a 1.5°C compatible trajectory. It does not present an improved 2030 climate economy-wide target and it fails to meet the minimum EU requirements for climate effort-sharing and LULUCF. As no additional measures are provided, it fails to illustrate how it will bridge the gap to reach its 2030 targets. Projections show Denmark would surpass the minimum EU requirement for renewables. The draft NECP fails to align with the 2030 EU energy efficiency target. On top, meaningful stakeholder engagement was not ensured. Denmark ultimately undermines the Governance Regulation, as the NECP draft update does not increase its ambition.

RECOMMENDATIONS

Immediately **start preparing a NECP draft with increased ambition**. The current draft NECP update is only a frozen policy scenario

Include **additional policies and measures** in the new plan, in line with improved ambition

Together with stakeholders, develop several scenarios for additional measures that are sufficient to ensure that Denmark's final NECP update as a minimum provides a plan to fulfil Denmark's 2030 reduction targets, both nationally and towards the EU

CLIMATE AMBITION

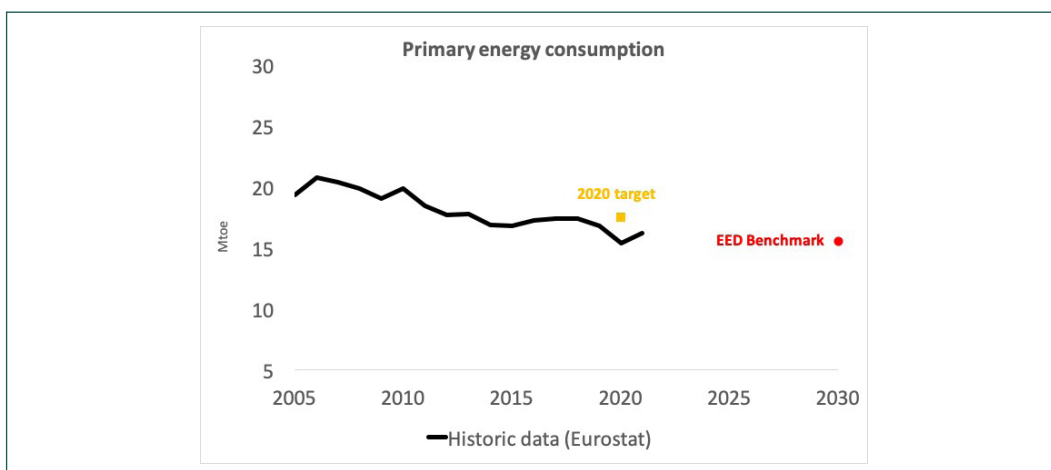
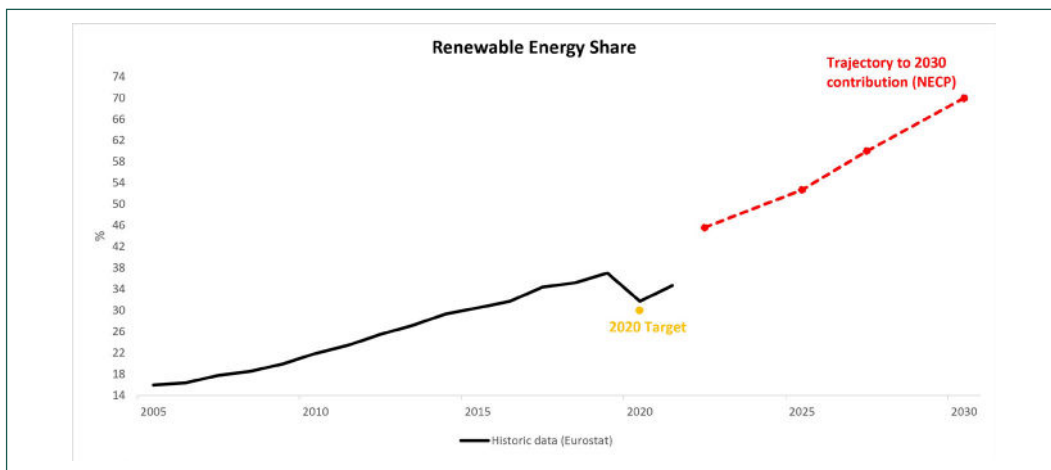
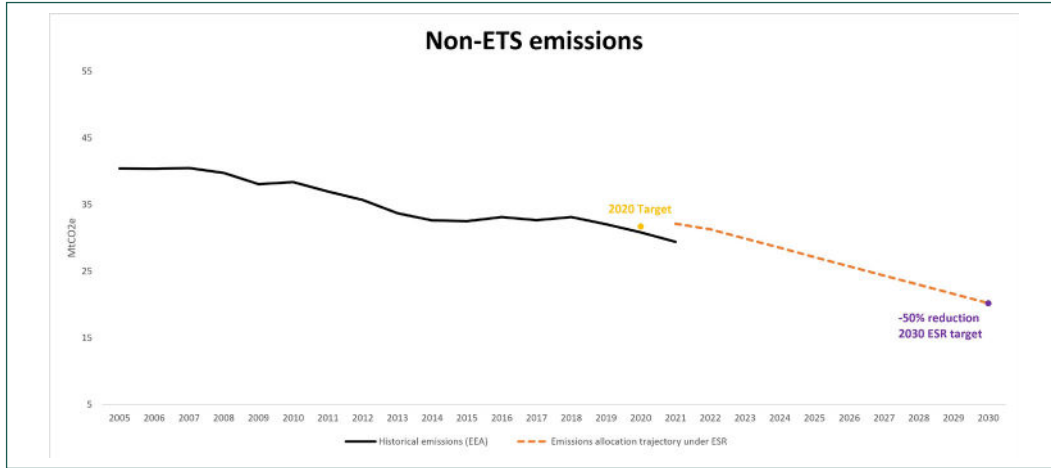
Climate targets have not increased since 2019. The draft repeats the **economy-wide target** from the 2019 NECP: 70% emissions reduction by 2030 (compared to 1990 levels). This implies that the increase that occurred in EU-wide climate ambition since 2019 is not reflected in the draft.

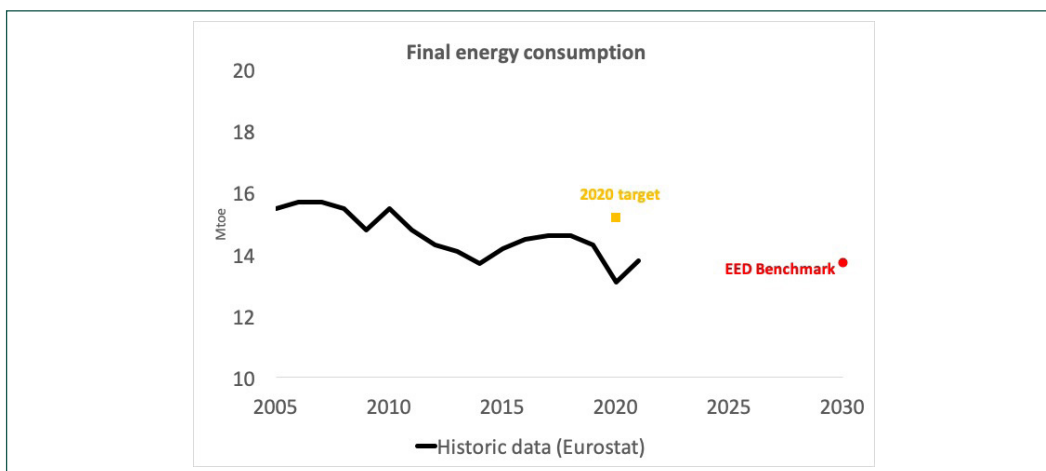
Denmark's draft contains a projection with existing measures but it does not contain any **additional PAMs** nor any **projections with additional measures**. Under the projections with existing measures, Denmark will fail to meet both its national targets and its EU obligations. It will notably fall short of its national economy-wide 2030-target of 70%. At the EU level, it will fall short of both its Land Use, Land-use Change and Forestry (**LULUCF**) and Effort Sharing Regulation (**ESR**) targets – respectively of -9.7 and -15.8 MT CO₂-eq over the period 2021-2030. Denmark must therefore plan more additional measures, and develop scenarios that include them (proposals for scenarios available [here](#)).

ENERGY TRANSITION

Denmark expects to reach a **renewable energy** share of 71% by 2030, which will surpass the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. However, the plan relies heavily on unsustainable volumes of imported wood biomass until and beyond 2030. It is not possible to assess PAMs for renewables, as the draft only includes the scenario with existing measures and no additional measures are presented.

Denmark fails to provide details on its **energy efficiency** plans. It does not indicate an energy efficiency contribution in its draft NECPs update. Denmark’s national contribution should surpass the minimum reduction of energy consumption as per formula benchmark of the 2023 Energy Efficiency Directive (EED) in line with the EU energy efficiency target. Denmark’s contribution should be at a minimum no higher than 15.52 Mtoe for primary energy consumption and 13.73 Mtoe for final energy consumption. The draft indicates that Denmark will update its national contribution, planned policies, measures and programmes in June 2024. With only existing energy efficiency measures listed in the draft, additional measures are needed to fulfil the 2030 EU energy efficiency target.





FOSSIL FUELS ALERT

Fossil gas – The draft presents no plans to decommission fossil gas infrastructure. Instead it includes in its energy planning three recent or about to be inaugurated projects that could triple fossil gas availability between 2022 and 2030. This is in sharp contrast not only with EU climate objectives, but also with the recently adopted fossil gas targets, which are not correctly reflected in the draft.



FALSE SOLUTIONS ALERT

Like the 2019 NECP, the draft bets that **CCS/CCU** will capture 3.2Mt CO₂ by 2030. 5 billion euros have been allocated. At present, only one CCS project has been approved, which only aims to capture 0.45 Mt and will not be operational before 2025.

Biomass now accounts for 29% of Denmark's total energy use, which is projected to remain after 2030. Such volumes are unsustainable – as shown also by the decline in the forest carbon sinks. Denmark should plan to rely less on biomass and phase out its annual DKK 5.8 billion biomass subsidies.



IS MONEY WHERE THE MOUTH IS?

As the draft contains no additional measures, no additional funding is required. The section on investments only outlines the costs of PAMs since 2019, which are already financed.

The draft does not mention which additional measures were financed by RRF and REPowerEU funding. This is because there was none: Denmark has not included any additional PAMs as a result of receiving this additional money; rather, EU funds were used for PAMs already funded by the state budget.



SNEAKY SUBSIDIES

The draft claims that no subsidies for fossil fuel use exist. However, Denmark subsidises fossil gas use by spending its earnings from the Baltic Pipe to reduce the domestic gas tariffs.

Denmark spends DKK 5.8 billion annually to subsidise biomass. This is harmful for Denmark's energy transition, as biomass competes with wind and solar, slowing down their development.



PUBLIC PARTICIPATION

Early and effective involvement of stakeholders was not ensured and no platform for **multilevel dialogue** was created. The quality of the involvement was ineffective, and inputs resulted in no substantial changes in the content of the draft.

The lack of projections with additional measures – which the Governance Regulation clarifies should be a key point for stakeholders and public engagement – undermined the purpose, effectiveness and quality of **public consultations**.



Estonia



Input from: Estonian Fund for Nature

STATE OF PLAY

Estonia has submitted its draft National Energy and Climate Plan (NECP) update on time.

This assessment is based on the version submitted to the Commission.

OVERVIEW

Estonia fulfils the minimum EU requirements for climate efforts sharing and renewable energy, however overall it does not move towards a 1.5°C trajectory. The energy efficiency contribution for primary energy is almost aligned with the EU 2030 energy efficiency target, while it fails to do so for final energy consumption. As the draft is mostly a summary of pre-existing national targets and measures, and it is not used as a strategic document to improve ambition, it reflects the main shortcomings of Estonia's climate and energy policy: the lack of a clear oil shale phaseout plan and the lack of policies to reach its LULUCF target.

RECOMMENDATIONS

Set binding deadlines for oil shale phaseout.

The current TJTP targets are not binding, and the oil shale industry plans to continue mining even after 2040

Set clear targets for reducing logging volumes and peat extraction,

in order to at least achieve the LULUCF target of 2.5 Mt of CO₂ sequestration by 2030

Turn the NECP into a strategic plan to raise climate ambition.

The NECP should be merged with the Estonian Energy Policy Development Plan (ENMAK). The climate law currently in preparation should also provide a clear framework for Estonian energy and climate policy and set more ambitious targets

CLIMATE AMBITION

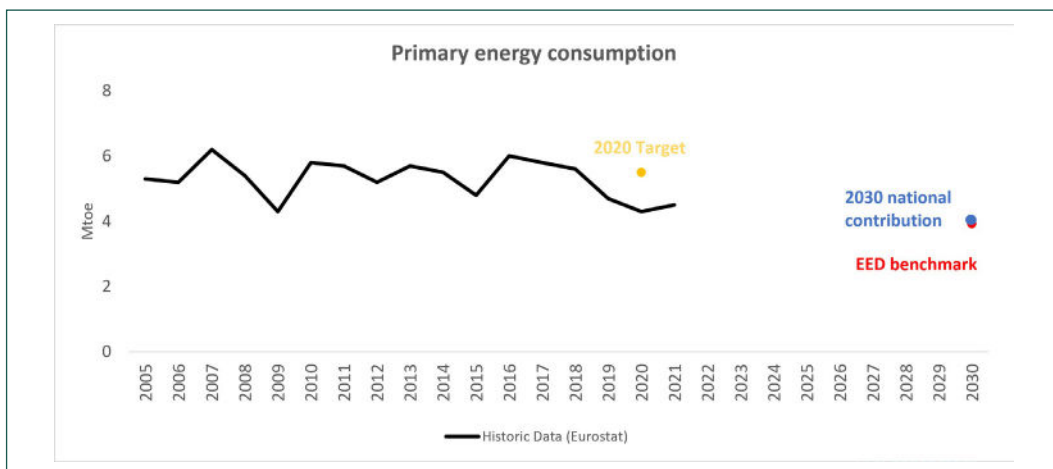
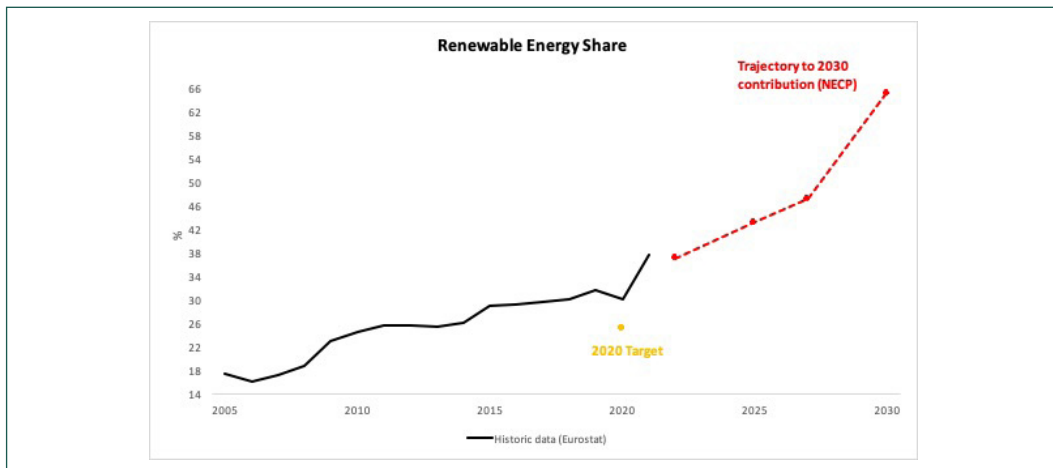
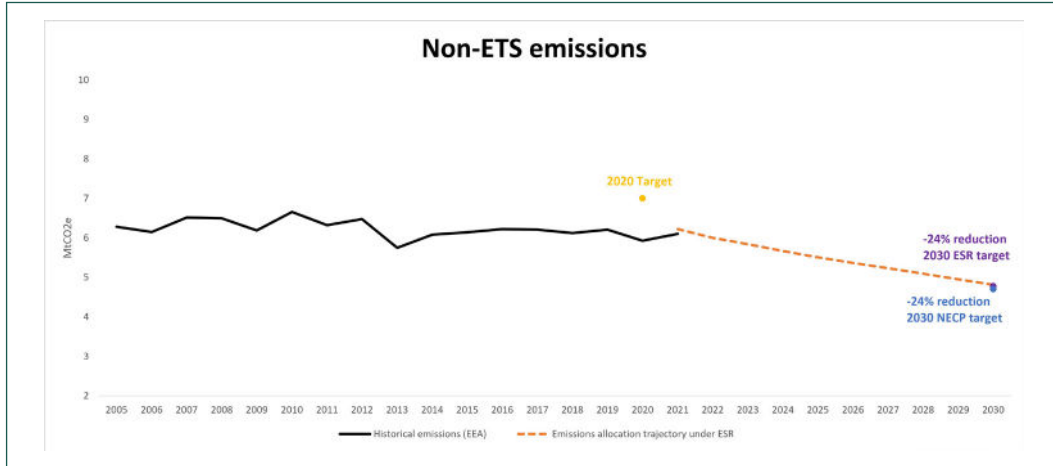
The draft simply reflects climate targets agreed as per EU requirements – notably the 2030 Effort-Sharing Regulation (ESR) target for non-Emission Trading System (non-ETS) sectors (-24% compared to 2005 levels) and the 2030 Land Use, Land-use Change and Forestry (LULUCF) target of 2.5 MtCO₂-eq by 2030.

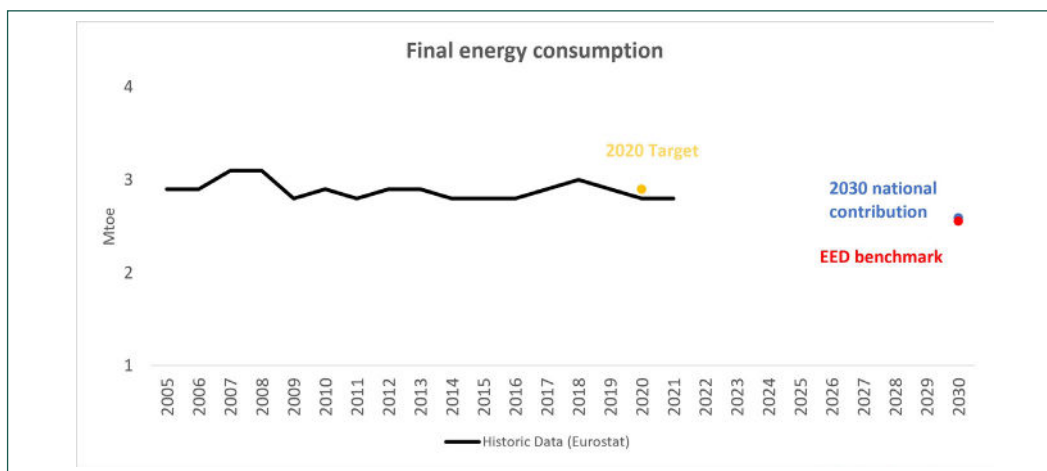
With the additional planned policies and measures (PAMs), Estonia would be able to meet its (unambitious) 2030 **non-ETS target**, but it would fail to achieve the 2030 **LULUCF target**. Since 2017, LULUCF has become an emitting sector in Estonia, and the draft predicts the same emissions rate to continue until 2050. The trend must be reversed by introducing measures that lower forestry annual cutting yields, reduce peatland farming, and support rewetting drained peatlands, for example by introducing sustainable practices such as paludiculture. Measure MM2 should be deleted, as it ensures harmful “business-as-usual” forest farming to continue.

ENERGY TRANSITION

Estonia sets a **renewable energy** contribution of 65% by 2030 which will surpass the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. While some good measures are planned, the draft notably misses additional measures promoting energy communities.

For **energy efficiency**, the level of energy consumption foreseen for 2030 is 45.72 TWh for primary energy and up to 30.19 TWh for final energy, which equals 3.93 Mtoe and 2.59 Mtoe respectively. This is close to being in line with the required national contribution to meet the EU 2030 energy efficiency target for primary energy and leaves a small gap of 0.04 Mtoe for final energy compared to the formula benchmark of the 2023 Energy Efficiency Directive (EED). Estonia complies with the formula deviation flexibility for final energy consumption. However, Estonia does not plan any new measures compared to its 2019 NECP. The Estonian Energy Policy Development Plan (ENMAK) is currently in the final stages of preparation and will give further guidance to the final NECP.





FOSSIL FUELS ALERT

Oil shale – Oil shale is still presented as crucial for Estonia’s decarbonisation efforts. The forecast of primary energy production shows oil shale use unchanged by 2030, and only decreasing around one third in 2050. This contradicts the projections with additional measures for energy sector emissions, which foresees a drop from 3Mt in 2040 to 0.2 Mt in 2045, as a result of oil shale phase out after 2040.



IS MONEY WHERE THE MOUTH IS?

Funding is robust – but is uncertain beyond 2027, due to the Estonian state budget strategy spanning four years.

The EU funds’s impact is limited by the weak nature of some of the measures they finance.



SNEAKY SUBSIDIES

Estonia claims that fossil fuel subsidies accounted for 22% of the energy subsidies paid in 2021. Unfortunately, the real number is much larger. Many subsidies mentioned by the State Audit Office [report](#) are omitted, including 661 million euros of free allowances for the oil shale industry between 2013 and 2021.



PUBLIC PARTICIPATION

Stakeholder involvement was not early and effective, as the most substantive aspects of the plan were already decided before the public could influence the process. Projections with additional measures were not discussed. Proper consultations are required before the final deadline.

The Energy Council of the Ministry of Economic Affairs and Communications cannot be considered as a **multilevel dialogue** – as it is presented in the draft – because it does not involve the general public.



Finland



Input from: Finnish Association for Nature Conservation

STATE OF PLAY

This assessment is based on the draft NECP update submitted – though with delay – to the European Commission. This version, however, could soon be subject to change, as Finland's new coalition government has stepped back on some measures.

OVERVIEW

Finland overall does not move towards a 1.5°C trajectory. It does not fulfil the minimum EU requirements for climate effort sharing and energy efficiency. No additional climate policies and measures (PAMs) are planned, and existing ones are insufficient to achieve the EU 2030 effort sharing target as well as the EU 2030 LULUCF target. There is not enough information available with regards to energy efficiency.

RECOMMENDATIONS

Develop more **measures to combat deforestation, safeguard natural carbon stocks, increase forest carbon sinks** to meet the Land Use, Land-use Change and Forestry (LULUCF) target, without cancelling existing measures

Add and improve ambition of measures in the non-Emission Trading System (non-ETS) sectors, where emission reductions currently falls short of the ESR target – notably for transport and agriculture

Get rid of **environmentally harmful subsidies**, instead of adding more

CLIMATE AMBITION

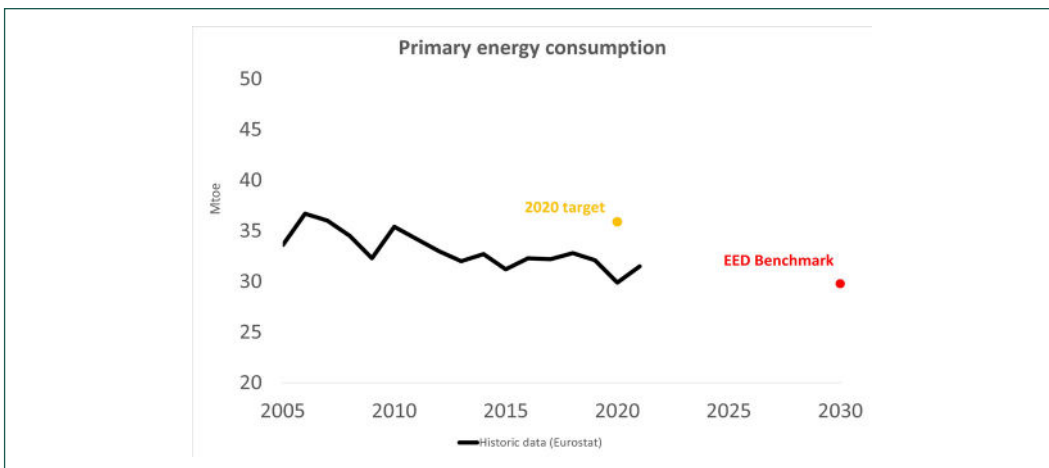
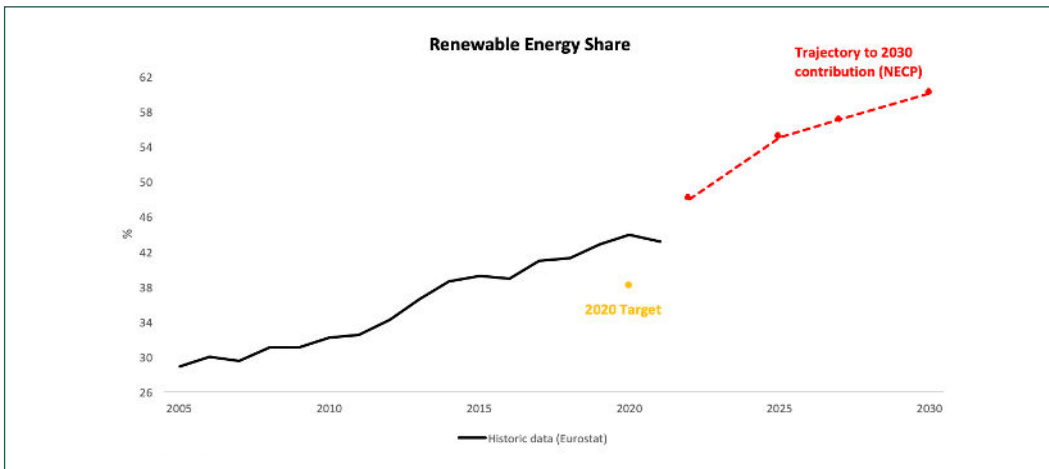
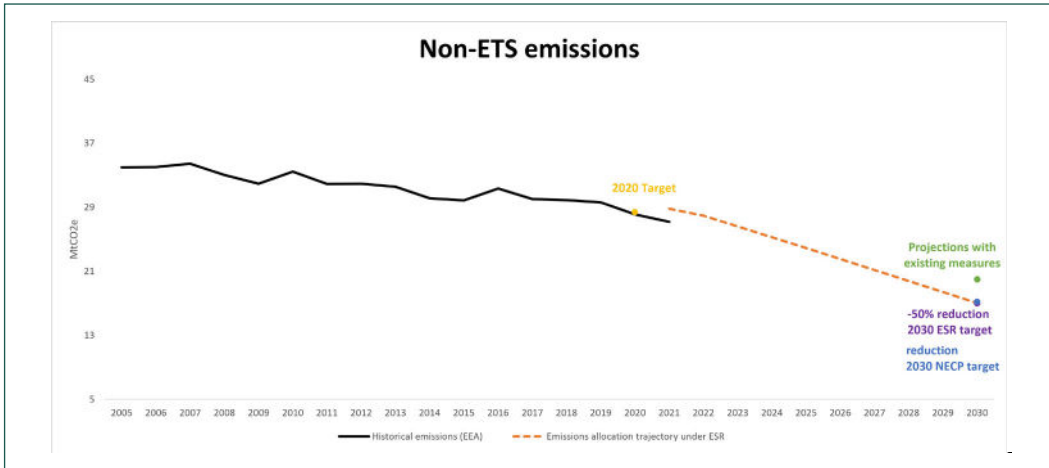
Finland's 2030 **economy-wide target** – 60% reduction compared to 1990 levels – is not properly integrated in the relevant sections of the plan, which rather focuses on the 2030 **target for non-ETS sectors** set in the Effort Sharing Regulation (ESR) (-50% compared to 2005 levels). With the existing policies, Finland would miss this target by around 9 percentage points. As the newly elected government started to cancel financial support to some **planned measures** – notably in the transport sector: alternative transport fuels, car fleet renewal, electrification – this gap would widen even further. Finland should rather do the opposite: develop more measures to decarbonise non-ETS sectors. For transport, requirements for biofuel distribution should not be reduced; for agriculture, the conversion of peatland to new fields should be banned.

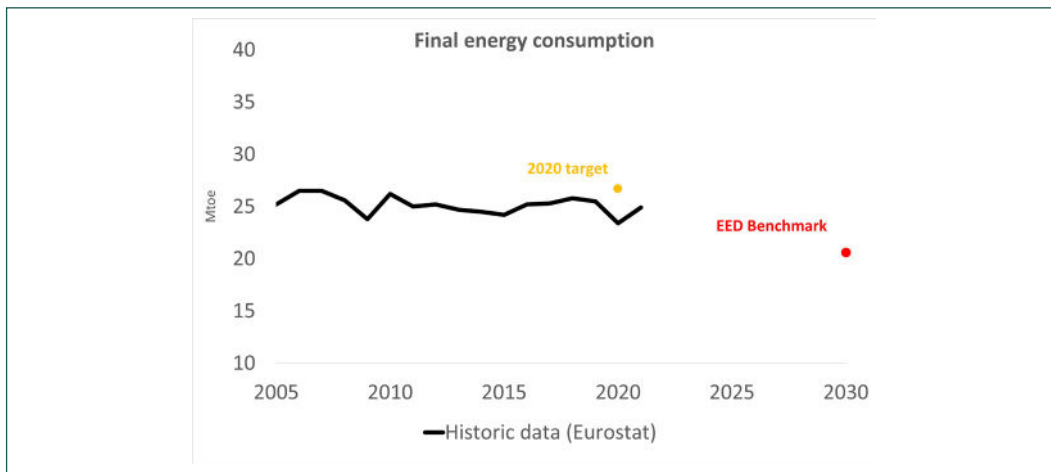
Finland is also not on track to meet its **LULUCF climate targets** (- 29.4 MtCO₂-eq annual forest carbon sink between 2021 and 2025 and -17.8 MtCO₂-eq. LULUCF sector by 2030). In 2021 the sector was for the first time a source of carbon and in 2022 the net sink was near zero. Existing measures are already insufficient and the government plans to cancel some of them, including reforestation fees and paludiculture support.

ENERGY TRANSITION

Finland expects to reach a **renewable energy** share of 60% by 2030. However, this is under a projection with existing measures Finland indicated it would include its updated national renewable energy contribution only once the RED revision process would have come to an end.

Finland fails to provide details on its **energy efficiency** plans. It does not indicate an energy efficiency contribution in its draft update, instead Finland will report the assessed targets in the final update of the NECP. Finland's 2030 energy efficiency consumption should surpass a minimum reduction of 29.78 Mtoe for primary energy and 20.6 Mtoe for final energy in line with the formula benchmark of the 2023 Energy Efficiency Directive (EED) and with the EU 2030 energy efficiency target. No new energy efficiency policies and measures are listed compared to existing ones. These are needed to fulfil a more ambitious energy efficiency contribution compared to the 2019 integrated NECP.





FALSE SOLUTIONS ALERT

The 2030 renewables share relies too much on forest-based **bioenergy**, projected to grow until 2030 – which has and will increasingly have a considerable impact on LULUCF carbon sinks.



IS MONEY WHERE THE MOUTH IS?

Financing sources for each PAM are not indicated clearly. Those that are indicated are also not fully credible, as the new government's political programme foresees funding cuts – notably in buildings, transport and land use sectors.



SNEAKY SUBSIDIES

The draft plan includes a list of energy subsidies, but it does not clearly distinguish fossil fuels and environmentally harmful subsidies from other energy subsidies.

Also, there are no plans to phase out measures related to fossil fuel subsidies, specifically the tax refunds for energy intensive industries and professional farmers (which are mentioned in the plan), as well as tax exemptions for wood fuels and peat burning.

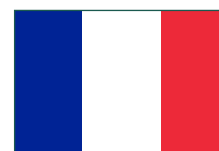


PUBLIC PARTICIPATION

Public consultations took place not around the draft NECP update, but rather around the national strategies it is based on. Scenarios were presented during the process; however, land use scenarios were drastically updated only at the end of the consultation period, and such shifts were not taken into account in the plan. Feedback provided in those consultations was only partially integrated in the draft.



France



Input from: Réseau Action Climat France

STATE OF PLAY

France still needs to submit its draft NECP update. However, the main objectives and levers have been published in an [Action Plan](#), evaluated in this assessment. The plan will be incorporated into a bill or draft plans to be finalised in autumn, and then submitted to the Commission as a NECP update.

OVERVIEW

Many details still cannot be derived from the Action Plan. France does not move towards a 1.5°C trajectory. As it increased its 2030 economy-wide target, however, France should likely be in line with the EU target for non-ETS sectors. Conversely, the energy efficiency contribution is likely not ambitious enough to align with the EU 2030 energy efficiency target. There is not enough information available with regards to the renewable energy contribution. The draft NECP update needs to be the space to plan for policies and measures (PAMs) that are not laid out in the Action Plan.

RECOMMENDATIONS

Strengthen the 2030 gross emission reductions target, to avoid a risky over-reliance on carbon sinks to reach the net emission reductions target

Specify the policies and measures planned for each sector

Reinforce and promote sufficiency policies in the NECP update (e.g. decrease the size and weight of vehicles)

CLIMATE AMBITION

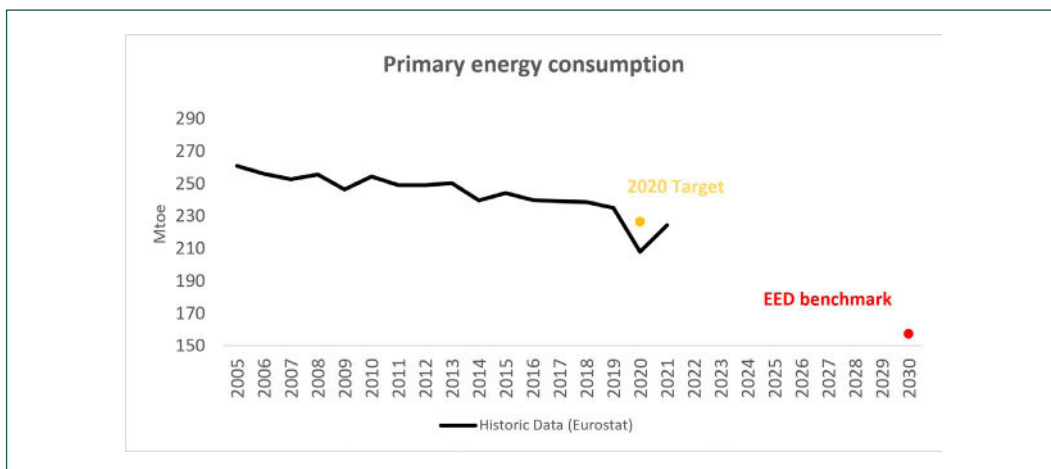
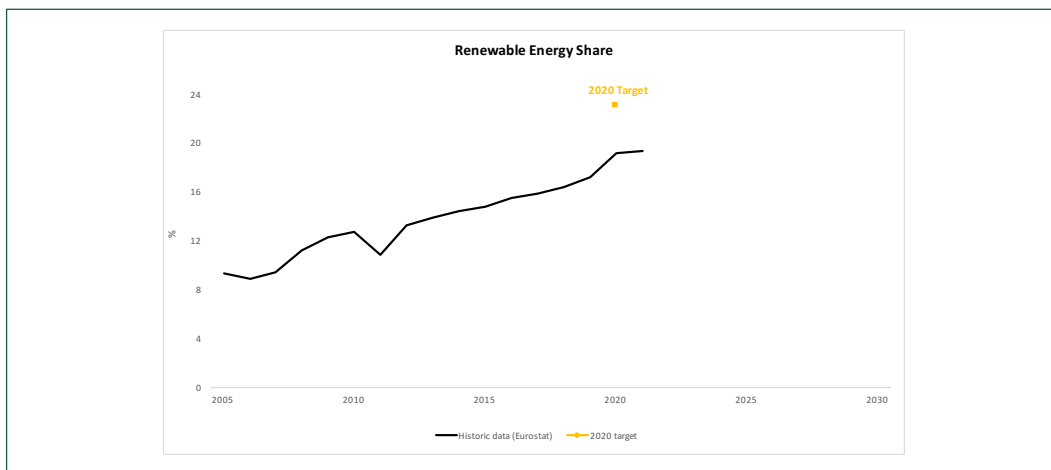
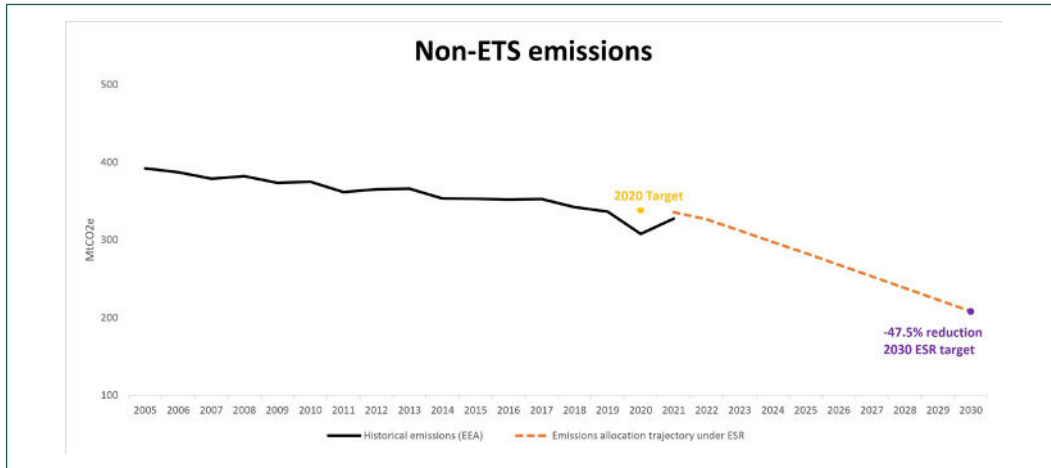
The Plan sets a new **economy-wide** 55% net emission reductions target by 2030 (compared with 1990 levels). This improves the current 2030 economy-wide target (-40% in gross emissions) and should put France in line with EU ambition levels. The target, however, relies heavily on carbon sinks, whose capacity has halved in the past decade. France should reinforce its new gross emissions target (-50.5%), to ensure ambition is met even if carbon sinks do not increase as much as expected.

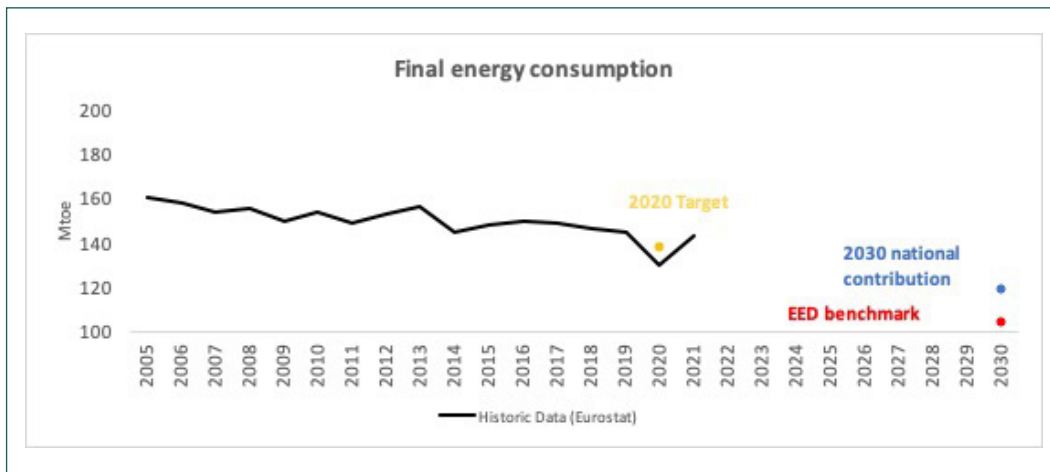
The Action Plan does not distinguish between Emission Trading System (ETS) and non-ETS sectors – hence, no detailed comparison with Effort Sharing Regulation (ESR) ambition levels is possible (France has an **ESR target** of -47.5% by 2030, compared to 2005 levels). However, it provides a breakdown of emission reductions by sector: emission cuts are expected to be significant in the transport and buildings sector, while they remain unambitious for agriculture. The biggest question mark remains whether these objectives will be backed up by robust PAMs. The NECP update must be the place where PAMs are spelled out in detail.

ENERGY TRANSITION

France did not include a 2030 national **renewable energy** contribution in its Action Plan. The national renewable energy contribution should be backed up with detailed policies and measures in the NECP update to ensure that France, after failing to meet its 2020 renewables target, manages to deliver an ambitious contribution for 2030.

On **energy savings**, France’s Action Plan foresees a 17% reduction in final energy consumption by 2030 compared to 2021 levels. This could equal 118.86 Mtoe compared to 2021 Eurostat data, which would not be in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. The gap towards the required contribution as per formula in the 2023 directive would amount to 14.85 Mtoe for final energy; with a possible deviation of 2.5% the gap would still amount to 12.25 Mtoe. France fails to indicate the level of primary energy consumption in 2030. This contribution for primary energy consumption should surpass a reduction of 157.34 Mtoe as per formula in the directive. Policies and measures for energy efficiency and energy sufficiency needed to reach the 2030 target are not sufficiently laid out in detail in the Action Plan.





FALSE SOLUTIONS ALERT

The Plan puts too much hope on Carbon capture, utilisation and storage (5Mt of CO₂ per year from 2030 onwards). The government plans to invest significantly in CO₂ capture facilities at major industrial sites.



SNEAKY SUBSIDIES

The Action Plan does not discuss fossil fuel subsidies. This should be addressed in the NECP update, as subsidies exist that are clearly in conflict with climate and energy transition objectives (67 billion euros in 2023 according to RAC France's calculations).



PUBLIC PARTICIPATION

France's Action Plan was not discussed with the general public. **Public consultations** took place only on the energy mix (with great margins for improvement). The NECP update must be the opportunity for the government to develop a proper consultation process.

The National Council for Ecological Transition (CNTE) is a permanent forum for **dialogue** with civil society and other relevant stakeholders, which was asked to give feedback on the Action Plan. However, it is still not clear whether feedback will be incorporated.



Germany



Input from: Germanwatch

STATE OF PLAY

Germany has not submitted a draft National Energy and Climate Plan (NECP) update, as of 30 September 2023, and it is not clear when it will. In June, the long-awaited Climate Action Programme – a cornerstone also for the NECP update – was finally adopted. This should imply that the NECP update will soon be submitted. The Climate Action Programme, however, is not sufficient to achieve the 2030 climate targets set in the Federal Climate Protection Act. This was also confirmed by the German Council of Experts on Climate Change. The draft NECP update presents itself as a perfect opportunity to adjust its trajectory. Environmental organisations have developed a set of recommended policies and measures to fill this gap.

RECOMMENDATIONS

CLIMATE AMBITION

CO₂ prices must increase more rapidly than what is currently set in the Fuel Emissions Trading Act (BEHG). Also, it must be accompanied by the introduction of a climate dividend to ensure social justice.

To align with the national 2030 climate targets (-65% by 2030 compared to 1990), additional measures are needed especially in transport and building sectors:

In the **transport** sector, effective short-term measures include revising the company car benefit to smaller electric cars and introducing a bonus-malus system in vehicle taxes. In the medium term, the focus should be on expanding rail and public transport infrastructure and on halting the construction of new highways.

In the **building** sector, in addition to the ramp-up of renewable heating and district heating systems, an ambitious renovation strategy is also needed. Priority should be given to existing buildings constructed before the first thermal insulation ordinance.

ENERGY TRANSITION

Establish a national **energy efficiency contribution** that surpasses the Energy Efficiency Directive's (EED) formula, amounting to no higher than 194.23 Mtoe for primary energy consumption and 155.95 Mtoe for final energy consumption as per 2023 EED. The new German Energy Efficiency Act points to a national contribution aligned with the EED, while it is of paramount importance that this minimum level becomes more ambitious and more energy efficiency measures are included than in the German Act.

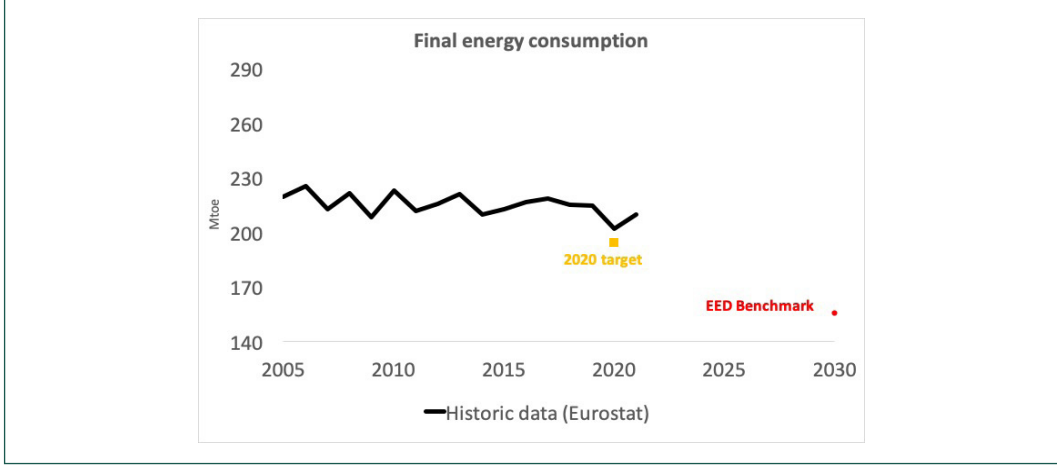
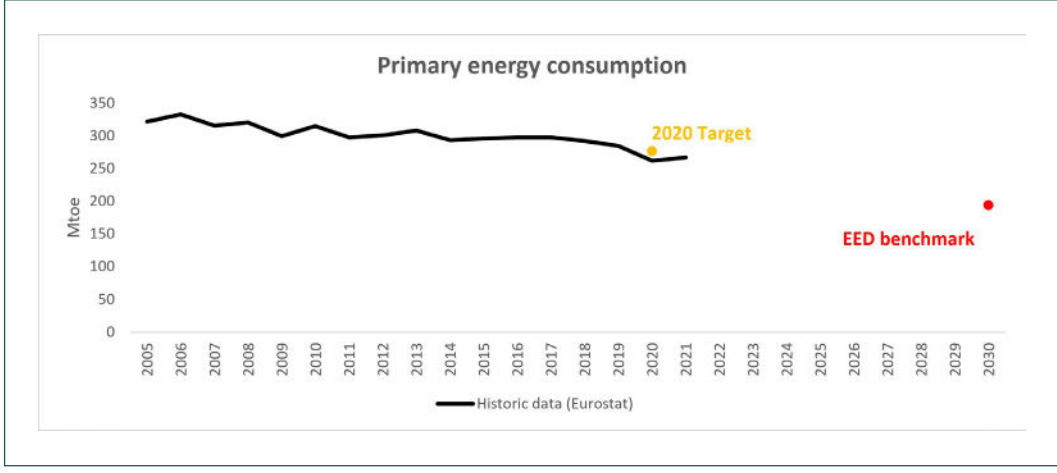
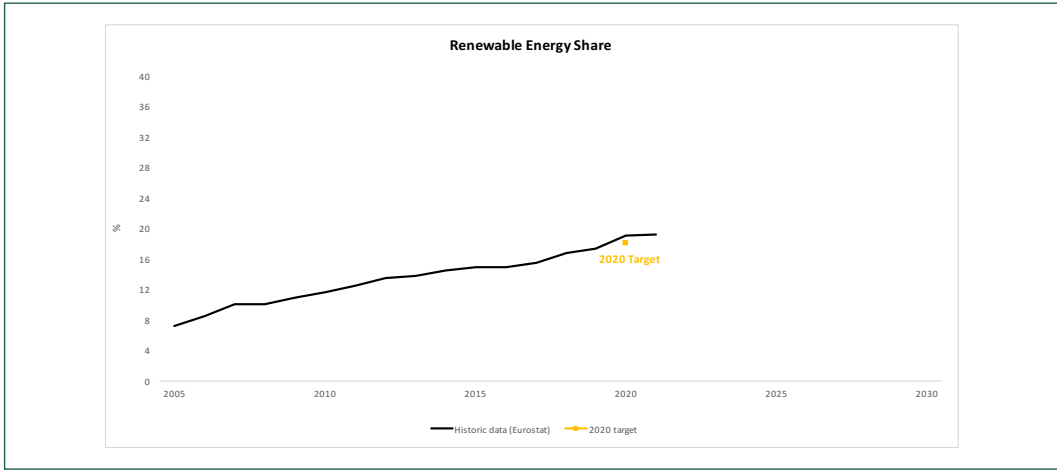
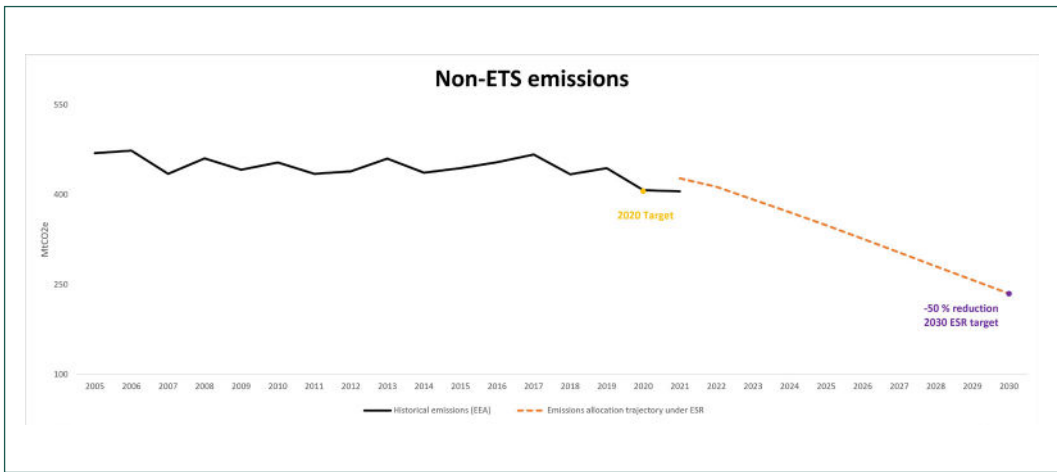
Set binding **annual energy savings targets** for individual sectors, accompanied by monitoring and sanctioning mechanisms.

Set a nationwide, **legally binding solar standard for new buildings**, as well as for conversions and renovations for all suitable roofs and other suitable surfaces. This standard should apply, for example, to residential buildings, office and commercial buildings, public buildings, and parking lot surfaces (roofing), as well as to noise barriers.

Set an effective **energy sharing concept** and enabling conditions for tenant electricity needs.

Design – quickly and respectfully of the environment – the land targets set out in the Wind Energy Surface Area Requirements Act.

Step up transparency and coherence in reporting on supply and demand for **biomass** and **renewable-based hydrogen** and on just transition and **energy poverty alleviation**.



Greece



Input from: WWF Greece

STATE OF PLAY

Greece did not submit its draft NECP update, as of 11 October 2023. This analysis is based on a draft that has been shared by the Ministry with selected stakeholders at the end of July, for a closed consultation.

OVERVIEW

Greece plans to align with the (very low) minimum EU requirements for climate effort sharing and renewable energy; however it does not go towards a 1.5°C compatible trajectory. The energy efficiency contribution does not even align with the EU 2030 energy efficiency target. Overall, detailed information on policies and measures and on funding sources are missing from the latest available draft. Moreover, a number of crucial topics are not presented, such as oil and fossil gas exploration, fossil fuel subsidies phase-out and just transition aspects.

RECOMMENDATIONS

Increase the ambition of the energy efficiency contribution, surpassing the energy consumption level of at least 17.13 Mtoe for primary energy and 14.64 Mtoe for final energy

Develop a clear plan to phase out fossil fuels, including fossil gas, which remains in the energy mix until 2050

Implement a strong public participation process, which has been inadequate so far

CLIMATE AMBITION

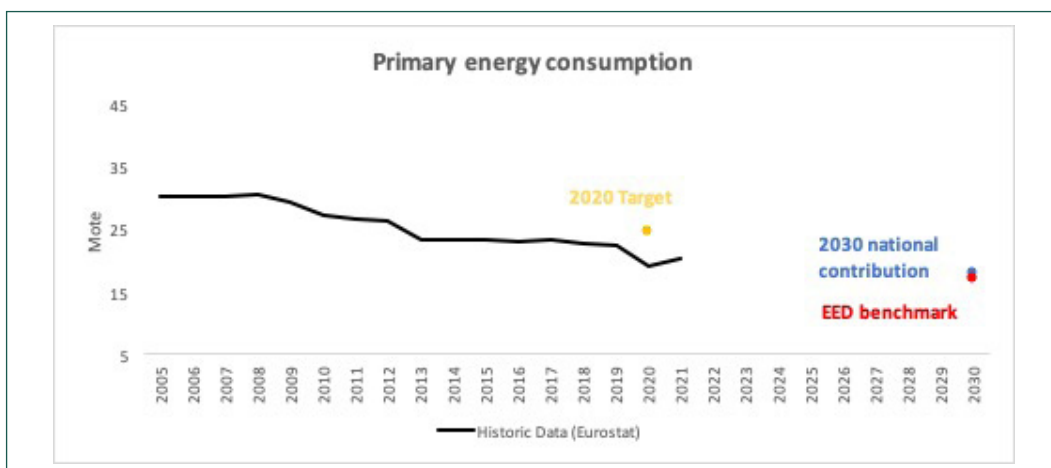
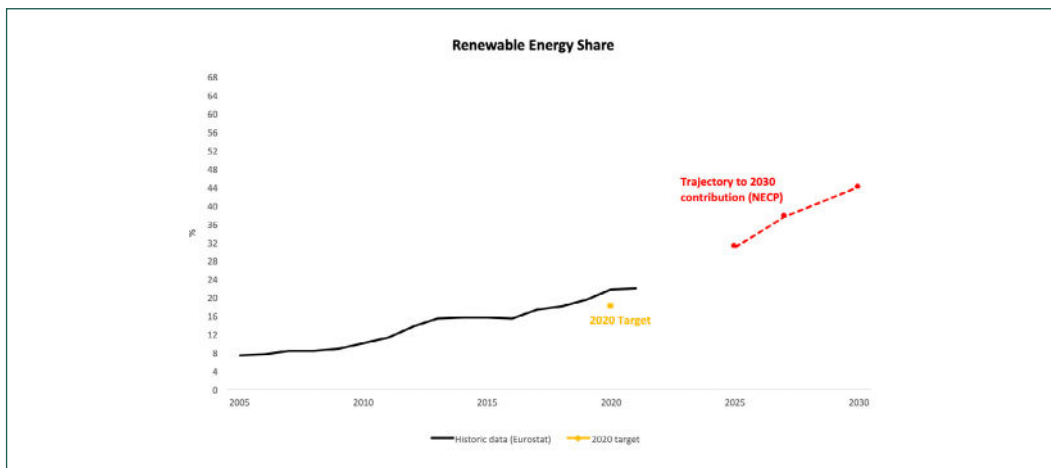
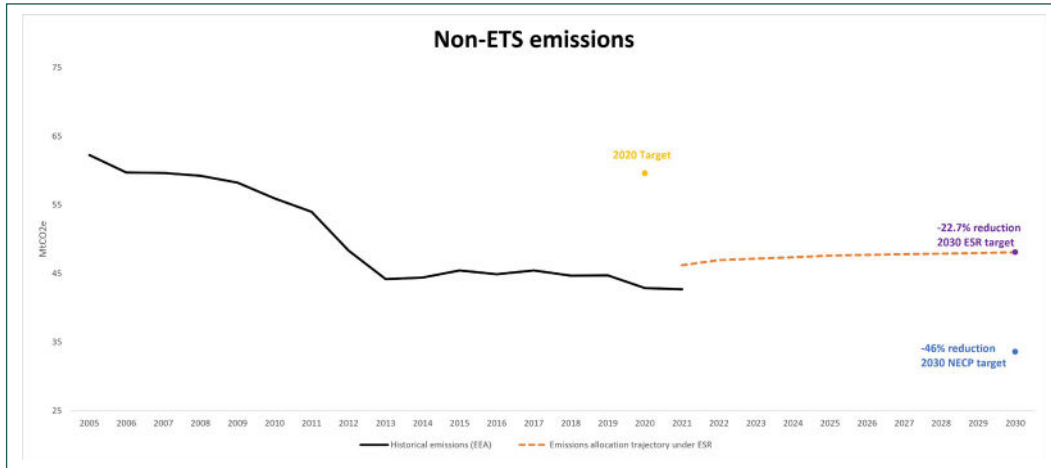
The draft NECP update fails at being a roadmap towards a 1.5°C-compatible trajectory. The draft contains 2030 **economy-wide targets** for net and gross emission reductions – respectively -57% and -54% compared to 1990 levels. They have been increased compared to the 2019 version to better align with the Greek Climate Law (4936/2022) 2030 target of 55% net emission reductions. The draft also improves Greece's **non-ETS 2030 target** from 40% to 46% (compared to 2005 levels). This surpasses the Effort Sharing Regulation's (ESR) ambition level of 22.7% reduction in 2030 (compared to 2005 levels) by about 23 percentage points. The ESR 2030 target is however a very low bar; Greece had already achieved those emissions levels already in 2013.

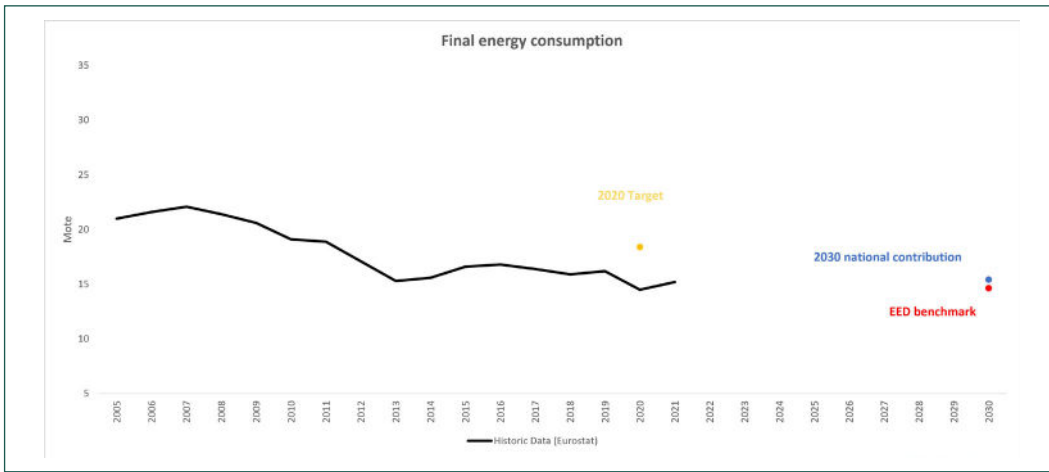
The credibility of these targets, however, is uncertain. The current draft does not include **detailed policies and measures** nor **climate scenarios** with existing and additional measures. This must be addressed in the version submitted to the Commission. Another worrying element is that the **national carbon budget** considered in the NECP is double what would be fair and 1.5°C aligned, based on the European Scientific Advisory Board on Climate Change's advice to the EU.

ENERGY TRANSITION

In its preliminary draft plan, Greece sets a **renewable energy contribution** of 44% by 2030, which will surpass the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. Unfortunately, a 100% RES energy contribution in the power sector by 2035 is not achieved with fossil gas remaining in the energy mix of the power sector until 2050, with no further explanation on how or when it will be phased-out. It should be noted, however, that the draft presents a few tables and values that are inconsistent with the abovementioned renewable energy contribution. The draft also fails to address crucial issues such as proper terrestrial and marine spatial planning of RES.

For a 7% final energy target and 11% primary energy target compared to the 2019 NECP, the Greek draft indicates a level of energy consumption in 2030 of around 18.2 Mtoe for primary energy and 15.4 Mtoe for final energy. For final energy, this means a slight increase in energy consumption compared to recent levels (2021). It is not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU **energy efficiency target**. The gap towards the required contribution as per the benchmark formula in the 2023 directive amounts to 1.07 Mtoe for primary energy and 0.76 Mtoe for final energy. With a possible deviation of 2.5%, the gap for final energy would still amount to 0.4 Mtoe. Energy efficiency policies and measures are indicated, but not sufficiently laid out in detail.





FOSSIL FUELS ALERT

Coal – Coal is planned to be phased out by 2028. However, the continued practice of approving legally questionable derogations of lignite plants from the IED could potentially prolong coal use in the energy mix.

Fossil gas – Fossil gas not only remains in the energy mix until 2050, but its contribution to the power sector increases in the last decade of the energy transition (from 1.2 TWh in 2040 to 2.9 TWh in 2050). No references are made to ongoing oil and fossil gas exploration activities.



SNEAKY SUBSIDIES

The plan does not include a mapping of fossil fuel subsidies, nor is the phaseout of fossil fuel subsidies mentioned or planned.



PUBLIC PARTICIPATION

The NECP updating process is characterised by a total lack of public participation. The draft has only been shared with certain stakeholders for a closed consultation, which was not extensive and did not include different scenarios.

At present, no information is available on the timely and inclusive participation of the **general public** to the revision process when all options are still open.



Hungary



Input from: MTSZ

STATE OF PLAY

The Hungarian draft National Energy and Climate Plan (NECP) update was submitted only in August 2023. This assessment is based on the version submitted to the Commission.

OVERVIEW

Hungary overall does not move towards a 1.5°C trajectory. While the EU requirement for climate effort sharing is met, most decarbonisation efforts only occur after 2030. The contributions for renewable energy and energy efficiency are not even ambitious enough to align with the EU 2030 energy targets. Planned policies and measures (PAMs) are not enough to meet the national 2030 climate target. Coal phaseout is delayed and fossil gas infrastructure expanded.

RECOMMENDATIONS

Plan for more deep renovations of buildings

and support them with more funding than currently planned. EU and national Funds need to allow a yearly average of energy renovations of 130-140.000 homes, instead of the total 60.000 homes currently planned to be renovated till 2029 with EU Funds

Increase the renewables' share in the energy mix.

Wind capacity must increase to at least half of the PV capacity, energy communities must become more prominent, the electricity grid urgently upgraded

Remove all environmentally harmful subsidies and refrain from providing new ones, including subsidies for forced reindustrialisation,

which could lead to +2 MtCO₂-eq emissions annually, unsustainable energy demand levels and delayed fossil fuels phaseout

CLIMATE AMBITION

The draft aims for a 2030 **economy-wide climate target** of -50% compared to 1990. This is not in line with a 1.5°C trajectory and with the 2050 climate neutrality target set in binding national legislation (Act XLIV of 2020) – which would require between 55%-60% emissions reduction by 2030.

Even with the additional PAMs planned in this draft, Hungary would fail to meet its -50% target: the **WAM scenario** expects emissions to fall by 47.2% by 2030 compared to 1990. The WAM scenario also shows that most decarbonisation efforts towards the 2050 climate neutrality goal only occur after 2030. For **non-Emission Trading System** (non-ETS) sectors, instead, the scenario with additional measures seems to be in line with the requirement set in the Effort Sharing Regulation (ESR) for Hungary – which is, however, unambitious (-18.7% compared to 2005 levels).

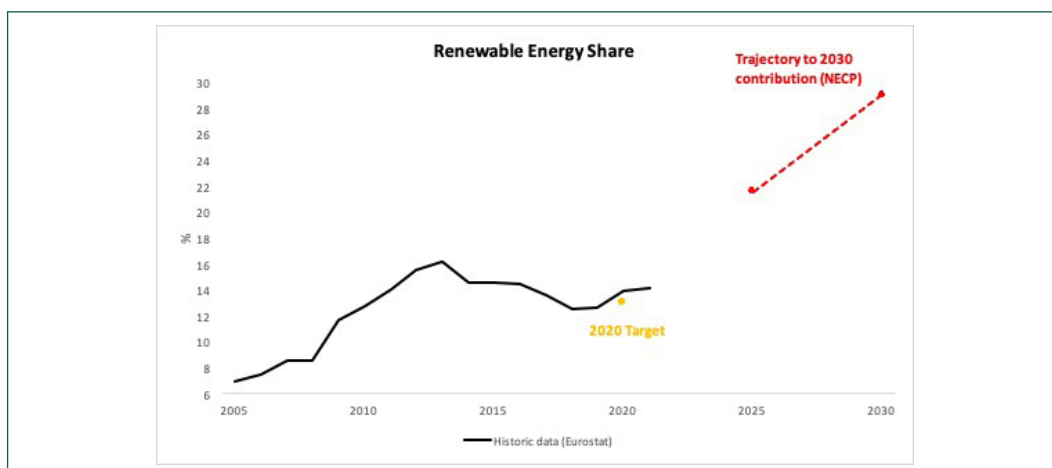
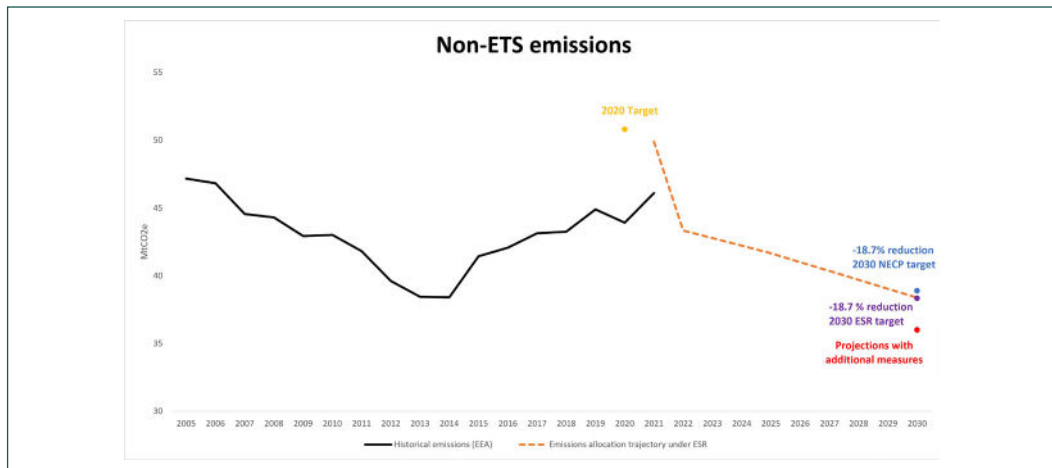
An assessment of PAMs raises doubts about the full credibility of the **scenario with additional measures**. Transport measures are not detailed and lack financial back-up; measures planned in the buildings sector only back up about 60.000 home renovations until 2030; in the industry sector, planned re-industrialisation policies could emit at least an extra 2Mt of emissions per year.

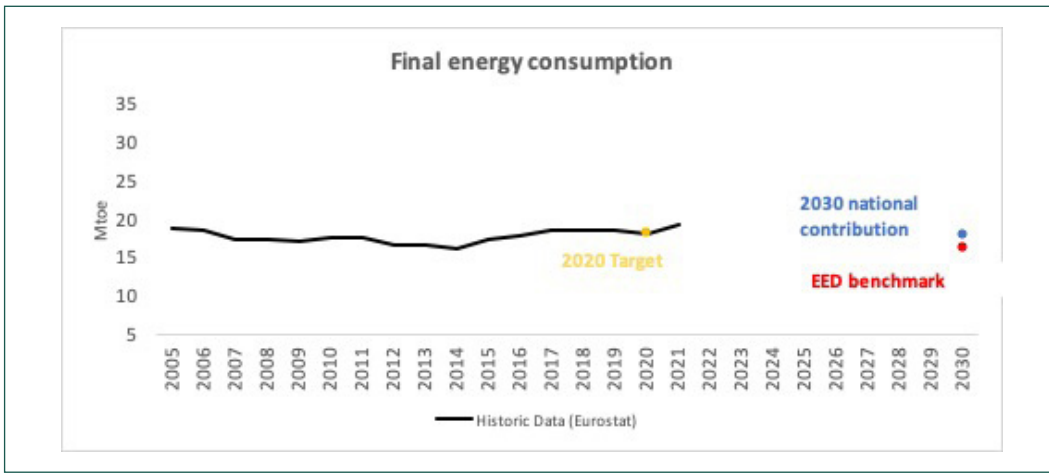
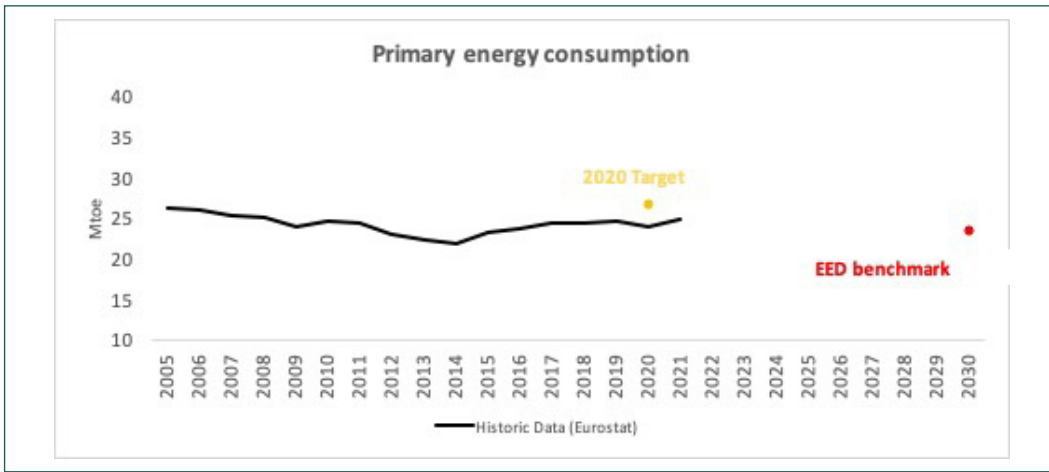
ENERGY TRANSITION

Hungary sets a **renewable energy** contribution of 29% in 2030, which might not be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. It also does not provide a clear framework for renewables investments nor lifts the legal limits that slow down solar and, notably, wind energy generation. Energy communities are only marginally addressed. Even though the planned solid biomass used will not be as dominant as today, there is no PAM explaining how electricity production on the basis of biomass will be eliminated by 2030, which seems unrealistic in light of ongoing biomass projects.

For **energy savings**, the level of energy consumption foreseen for 2030 does not exceed 750 PJ for final energy consumption, which equals 17.91 Mtoe. This is not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. The gap towards the required contribution as per formula in the 2023 directive amounts to 1.72 Mtoe for final energy; with a possible deviation of 2.5% the gap would still amount to 1.3 Mtoe. Hungary fails to indicate the level of primary energy consumption in 2030, though a projection with additional measures indicates 28.88 Mtoe. This would be too high, as primary energy consumption should surpass a minimum reduction of energy consumption of 23.31 Mtoe in 2030 as per formula of the EED. Hungary's re-industrialization strategy with 50 mostly new, battery-related factories stands in contrast to the planned reduction of energy consumption. Energy efficiency policies and measures lack detail and the deep energy renovation of homes is not given enough priority and financial support.

Energy poverty and related issues of affordability and access to energy are barely addressed in the updated national energy and climate plan.





FOSSIL FUELS ALERT

Coal –Lignite-fired units of **Mátra power plant** would be phased out only after a new fossil gas power plant is switched on (and at the latest by 2030). This is a step back from the 2019 NECP and contradicts the coal phaseout commitment made in the Territorial Just Transition Plans.

Fossil gas – 1500 MW new fossil gas capacities (3 new fossil gas-power units) are planned in the draft, but no coherent justification is provided. Building a fossil-based plant contradicts decarbonisation and importing fossil gas from outside of the EU), instead of importing electricity from the EU, is not an improvement for energy security.



FALSE SOLUTION ALERT

Hungary does not clearly say how and which hydrogen infrastructure should be developed, and for what. The plan should support only renewables-based hydrogen, and only for energy intensive industries that are hard to decarbonize.



IS MONEY WHERE THE MOUTH IS?

A considerable amount of REPowerEU and Recovery funds is planned to finance the increase in electricity demand from the industrial sector (as a consequence of the reindustrialization strategy) and the “diversification” of fossil fuel dependency. Only a scarce amount goes to measures that would truly accelerate the transition and most needed by the population, e.g. support for building renovation.



PUBLIC PARTICIPATION

Public consultations have slightly improved compared to 2019, but more still needs to be done. Fundamental issues are already decided when they enter the public domain: even if a summary of the draft was provided for consultation, its key boundaries and cornerstones (e.g. the re-industrialisation strategy) were provided without alternatives.



Ireland



Input from: Environmental Justice Network Ireland; Friends of the Earth Ireland

STATE OF PLAY

As of 30th September, Ireland had yet to submit its National Energy and Climate Plan (NECP). Public consultation will likely take place after the government receives feedback on the draft NECP from the European Commission, and not during the initial drafting process. Recommendations below draw on assessments of Ireland's 2023 Climate Action Plan (CAP) and current insight into the Government's intentions towards the NECP process. They also draw on evidence from Ireland's Environmental Protection Agency (EPA).

RECOMMENDATIONS

GENERAL REMARKS

Raise Ireland's climate ambition. Ireland is not on track to reach its 2030 targets. The NECP update should provide detailed sectoral policies and milestones aimed at achieving Ireland's near-term targets, and that put Ireland on a credible pathway to achieving net zero before 2050. All climate, energy and socio-economic policies must be supported with climate-proof investments, as well as up-to-date projections and methodologies.

Be transparent with citizens about progress and planning. This requires early and effective public participation at key stages during the revision cycle. A Strategic Environmental Assessment Report needs to be provided alongside the draft NECP update for public consultation in order to ensure compliance with the Strategic Environmental Assessment Directive and the Aarhus Convention.

Be consistent with a detailed and ambitious national Long Term Strategy (LTS). Alignment between these plans will create a comprehensive roadmap for delivering more ambitious 2030 and 2050 climate and energy targets in an orderly, inclusive, and socially just manner. The NECP update must also be consistent with all other relevant policies, programs and plans, such as the Territorial Just Transition Plan.

Avoid over-reliance on negative emissions technologies, which was a big weakness of the CAP 2023 and the draft nLTS.

CLIMATE AMBITION

Include more ambitious climate measures than currently foreseen in the 2023 Climate Action Plan (CAP). According to the EPA, even a full and rapid implementation of measures set in the CAP will not be enough to meet the 2030 non-ETS emission reductions target set under the Effort-Sharing Regulation (-42% compared to 2005 levels). As the scenario with additional measures of the NECP will likely be modelled on the CAP, there is a clear risk that planned policies and measures will not be sufficient to bridge this emission gap.

Clarify how the *de facto* domestic 2030 target enshrined in Ireland's first statutory two carbon budgets (roughly a 51% reduction in emissions by 2030 relative to 2018 levels) will interact with the Effort Sharing Regulation (ESR) target.

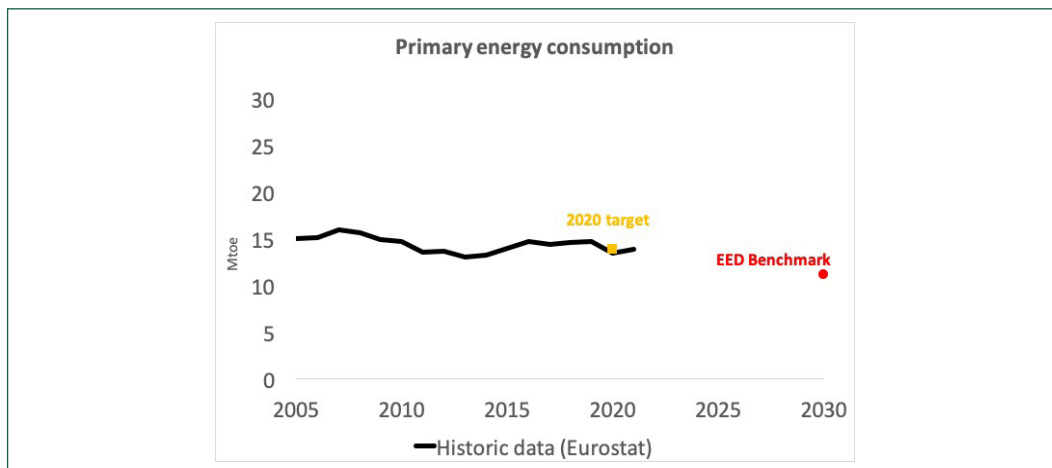
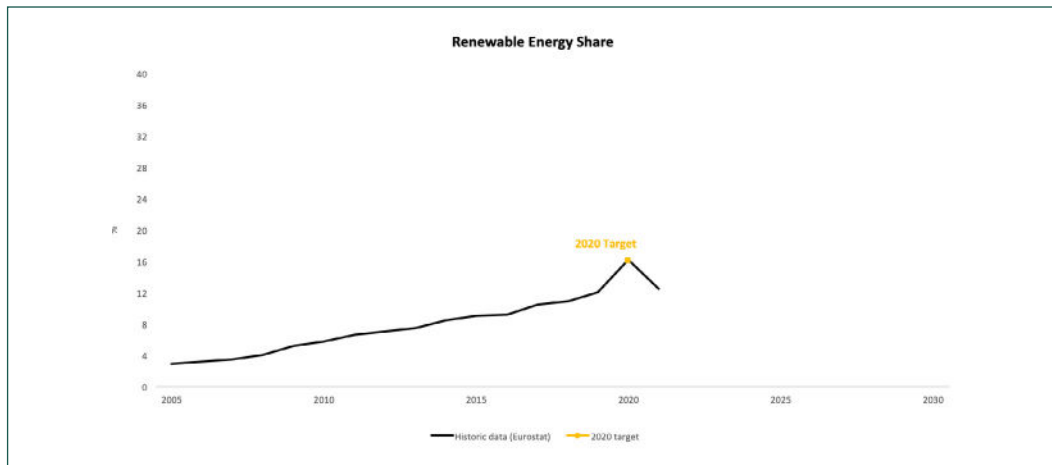
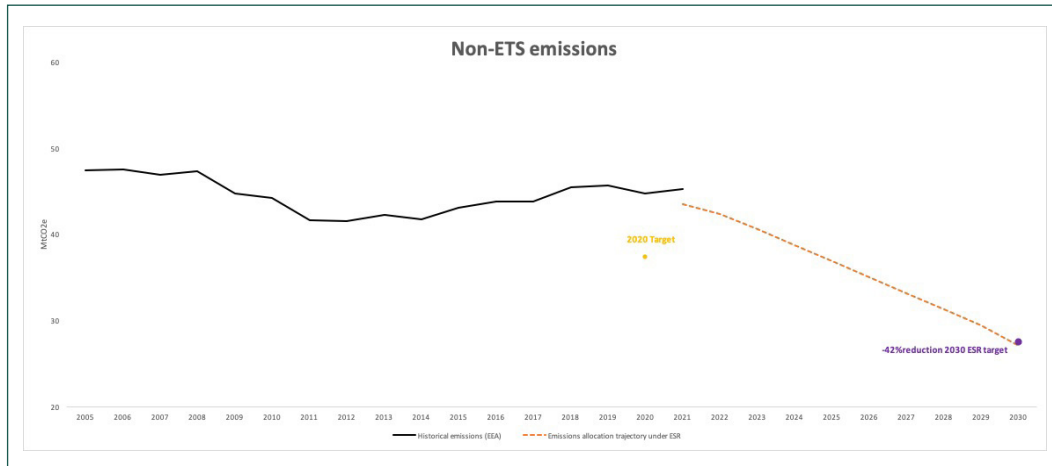
Set a domestic emissions ceiling for the Land Use, Land-use Change and Forestry sector. Without it, uncertainty will remain around how Ireland plans to meet its domestic climate target.

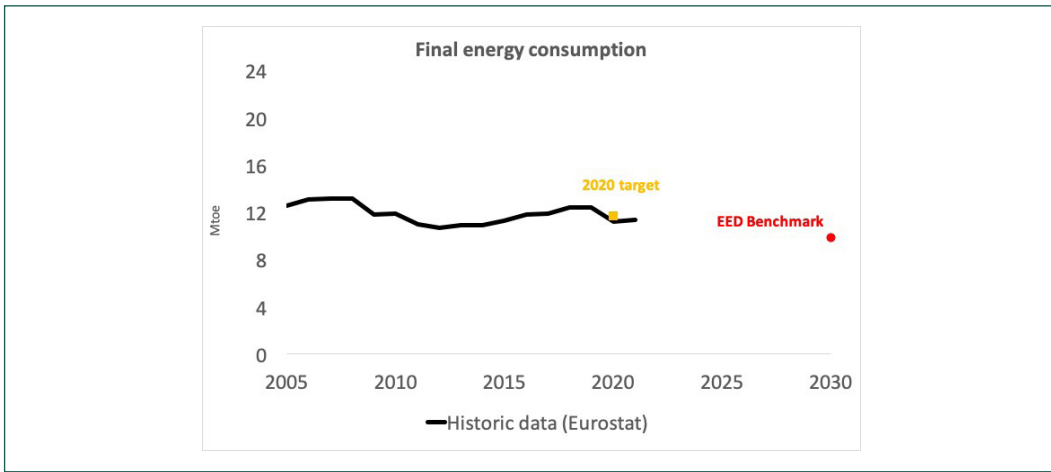
ENERGY TRANSITION

Include an energy efficiency contribution that surpasses the minimum reduction of energy consumption of 11.23 Mtoe for primary energy and 9.89 Mtoe for final energy, as per formula in the Energy Efficiency Directive.

Include a detailed timeline and plan for the phasing out of fossil fuels, starting with coal. As indicated by the Sustainable Energy Authority of Ireland (SEAI), this is needed as soon as possible to meet Ireland's binding 2050 net zero target. Notably, the NECP should include a date for **banning fossil fuels boilers** – a measure not properly addressed in the CAP.

Raise ambition on addressing energy poverty and provide more focused energy poverty and social policy measures. It must also include approaches to a socially just transition, and should establish a National Just Transition Commission.





Italy



Input from: Legambiente, WWF Italia

STATE OF PLAY

The draft NECP update has been submitted shortly after the deadline. This assessment is based on the document submitted to the Commission.

OVERVIEW

Italy overall does not move towards a 1.5°C trajectory. On climate ambition, the plan falls far from the minimum EU requirement for effort-sharing sectors and commitments made in the Recovery and Resilience Plan. The energy efficiency contribution does not align with the EU 2030 energy efficiency target, but only with the EU legal requirements. The renewables contribution would align with the minimum EU requirements. The plan also foresees an expansion of fossil gas infrastructure and a delayed coal exit. Policies and measures lack detail on their socio-economic impacts.

RECOMMENDATIONS

Increase the level of climate ambition at least in line with EU objectives, and include policies and measures to bridge the current emissions gap

Plan the phaseout of fossil gas from all sectors, instead of investing on its expansion, and **do not delay coal phaseout**

Improve public participation, so far extremely inadequate, by developing a constructive dialogue with civil society and the general public

CLIMATE AMBITION

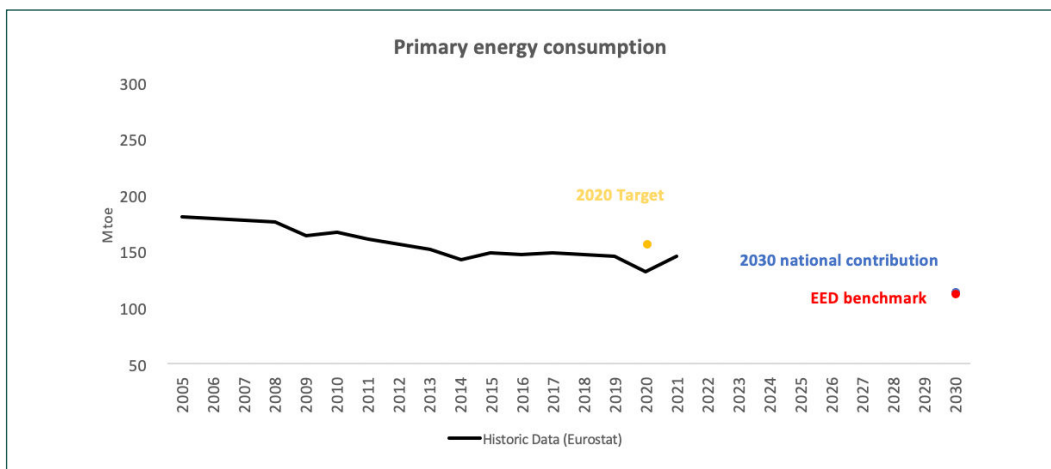
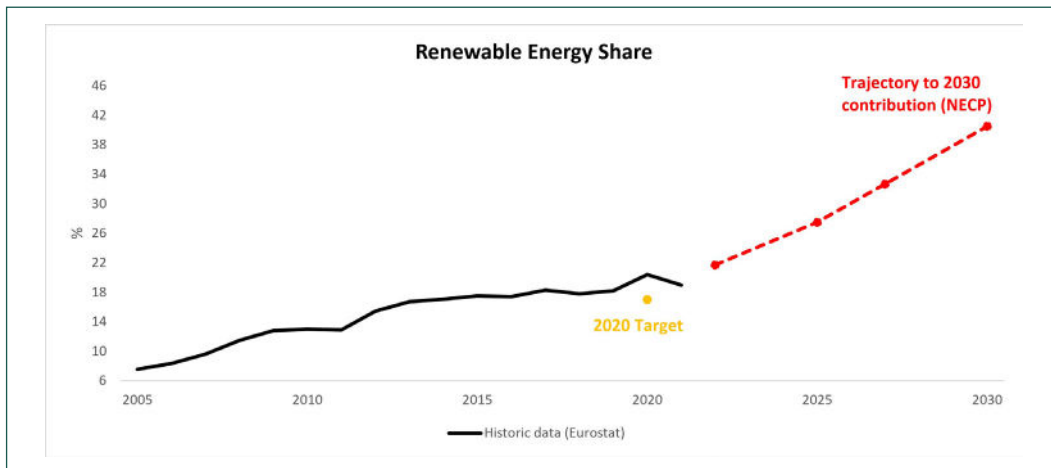
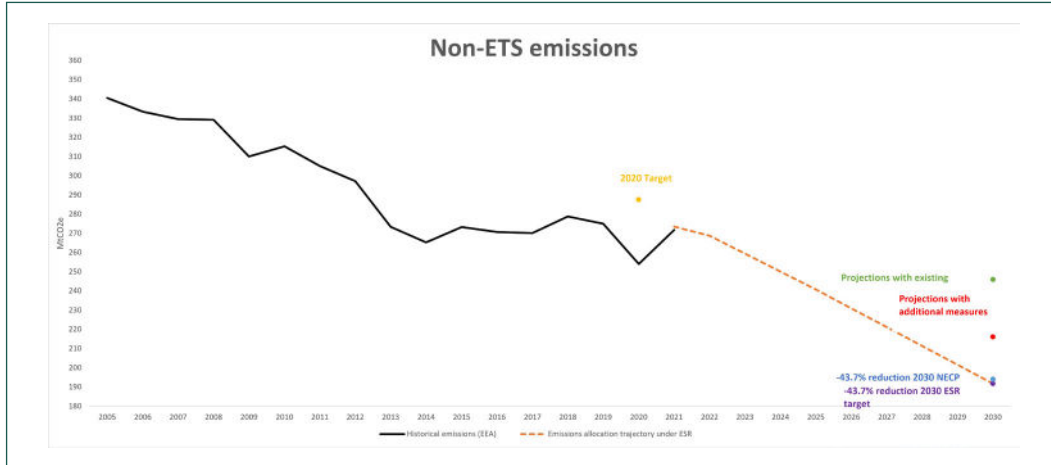
This draft NECP update is a step back in climate ambition, which is severely misaligned with EU objectives (let alone a 1.5°C compatible trajectory). With additional measures, Italy projects to achieve an **economy-wide** -40.3% reduction in emissions compared to 1990 levels – more than 10 percentage points less than the -51% objective set in the Recovery and Resilience Plan.

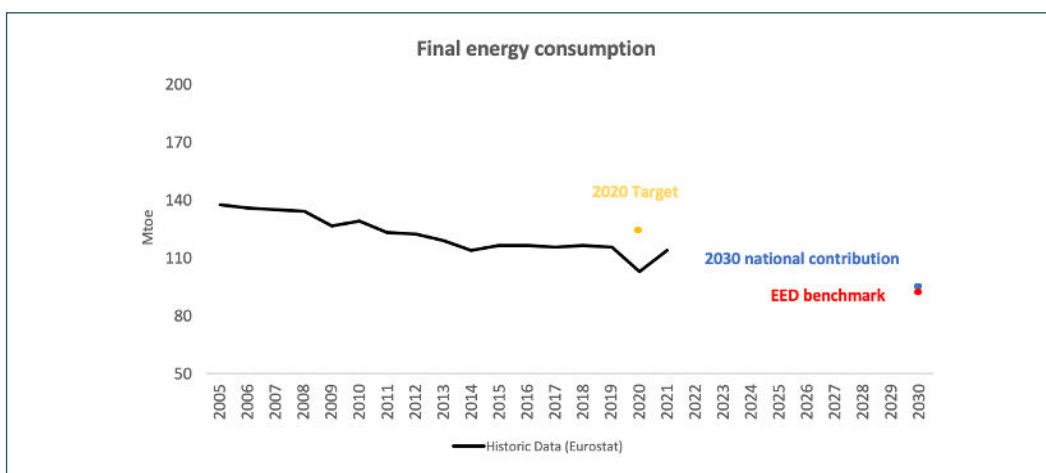
Non Emission Trading System (**Non-ETS**) sectors play a marginal part in this already unambitious trajectory. With the additional measures mentioned in the plan, 2030 non-ETS emissions are projected to be in a range between -35.3% and -37.1% compared to 2005 levels, which implies that Italy would fall 6 to 8 percentage points short of the new (unambitious) 2030 Effort Sharing Regulation target (-43.7%). For non-ETS sectors, the plan is mostly based on already existing measures, compared to which it only plans an additional reduction of 30-33 Mt. They are poorly presented in the plan, with section 3.1.1 mentioning only a small range.

ENERGY TRANSITION

Italy sets a renewable energy contribution of 40 % which will be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. Italy underestimates the installation capacity of **renewable energy**. The clearest discrepancy is with regards to solar PVs, which have much more potential capacity than what is currently added in the NECP. The PAMs presented in the plan also fail to improve authorization procedures within clear and sustainable timeframes, which slow down renewables deployment. Finally, the plan also includes PAMs supporting self-consumption and renewable energy communities. However, these mostly lack a clear identification of the problems and a structured and analytical implementation plan with strict timeframes.

For what concerns **energy savings**, the level of energy consumption foreseen for 2030 amounts to 115 Mtoe for primary energy and 94.4 Mtoe for final energy consumption. This is in line with the 2.5% deviation of the formula for final energy, as per Energy Efficiency Directive. However it is not enough to be in line with the 2030 EU energy efficiency target. The gap compared to the formula in the Energy Efficiency Directive amounts to 2.84 for primary energy 2.3 Mtoe for final energy. Energy efficiency policies and measures are not very detailed and expected energy savings per measure are mostly not quantified. Existing and planned measures are projected to reach 122 Mtoe for primary energy consumption and 100 Mtoe for final energy consumption. Additional measures are needed to reach the indicated national contribution, including for final energy consumption.





FOSSIL FUELS ALERT

Coal – A step back from the 2019 NECP, this draft does not foresee a coal phaseout by 2025 anymore. Sardinia’s coal-fired units are phased out only in January 2029, only upon completion of the Tyrrhenian Link. Concerningly, coal electricity production is mostly replaced by additional fossil gas-fired units.

Fossil gas – The plan has no phaseout date for fossil gas. On the contrary, the expansion of fossil gas infrastructure is a cornerstone of the plan’s energy strategy – starting from recently authorised LNG regasification projects, the doubling of the Trans-Adriatic Pipeline, the interconnection with Malta. The objective is to become a fossil gas hub in the Mediterranean.



FALSE SOLUTION ALERT

CCS – The draft strongly bets on Carbon Capture and Storage (CCS) technologies, despite them being too expensive, uncompetitive when used with fossil electricity generation compared to renewables and delivering shaky mitigation results. Results of two CCS projects currently taking place in the country were not assessed.

Technological neutrality – The draft misinterprets the concept of “technological neutrality” by advocating for measures and technologies that hinder the energy transition.

Nuclear – Despite the fact that Italy has no nuclear plants, the draft strongly favours R&D for nuclear energy without considering its technical feasibility challenges, high costs, environmental risks, and very low social acceptability



SNEAKY SUBSIDIES

Legambiente estimates 41.8 billion euros in Italy were “invested” on fossil fuels in 2021, of which 13.4 were direct subsidies. No progress was made in this regard. The plan says that fossil fuel subsidies remain necessary, and it only promises a vague plan to identify harmful subsidies and evaluate the impact of their removal.



Latvia



Input from: Biedrība “Zaļā brīvība”

STATE OF PLAY

Latvia has not submitted its draft NECP update, as of 30 September. The drafting process is still ongoing and no draft has yet been shared for public review. A formal public consultation is only expected later in autumn; so far consultations were fragmented and purely informative.

Discussions already took place on additional climate measures to reach a 17% decrease in the non-Emissions Trading System (non-ETS) sectors by 2030, but concrete actions have not been proposed yet. The Latvian NECP update is also expected to set a reasonably higher RES target compared to 2020 (50%), which recent changes in the energy market have deemed unambitious.

RECOMMENDATIONS

CLIMATE AMBITION

In the **transport sector**, the plan should strengthen the role of public transportation and support the expansion of cycling and walking infrastructures to substitute over-reliance on private car use. When designing the support schemes for electrical vehicles and air quality measures, aspects of distributive justice and equality should be accounted for.

In the **buildings sector**, where the renovation rate is too slow to tackle the adverse effects of high energy prices, the plan should enable more active and affordable energy saving measures. New financial instruments and standardised projects are needed especially for the multi-apartment buildings.

In the **waste sector**, the plan should cancel all new incineration projects, and rather focus on the huge untapped potential of reducing packaging waste and implementing bio-waste collection systems in all municipalities.

In the **land use sector**, the plan should focus on preserving carbon sinks, adopting a more environmentally focused management of wetlands and forests. It should also focus on decreasing industrial animal farming and the promotion of plant-based diets.

ENERGY TRANSITION

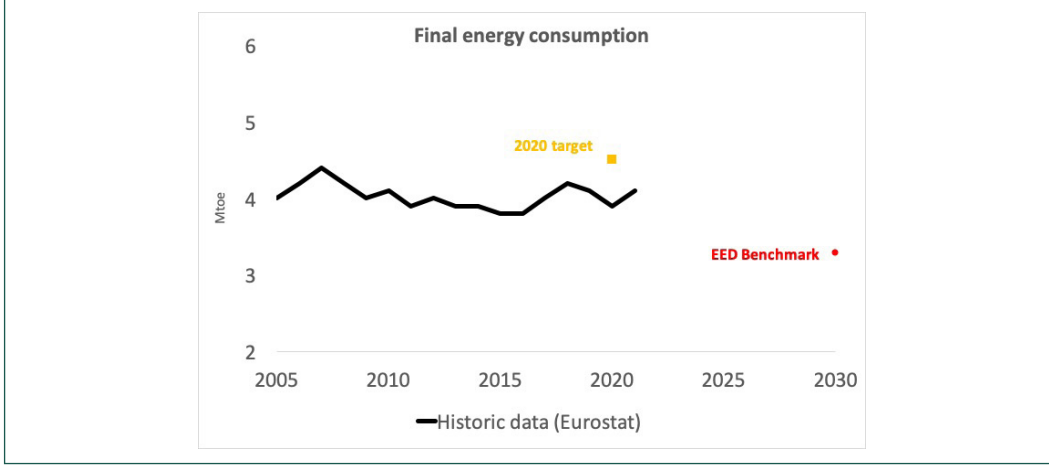
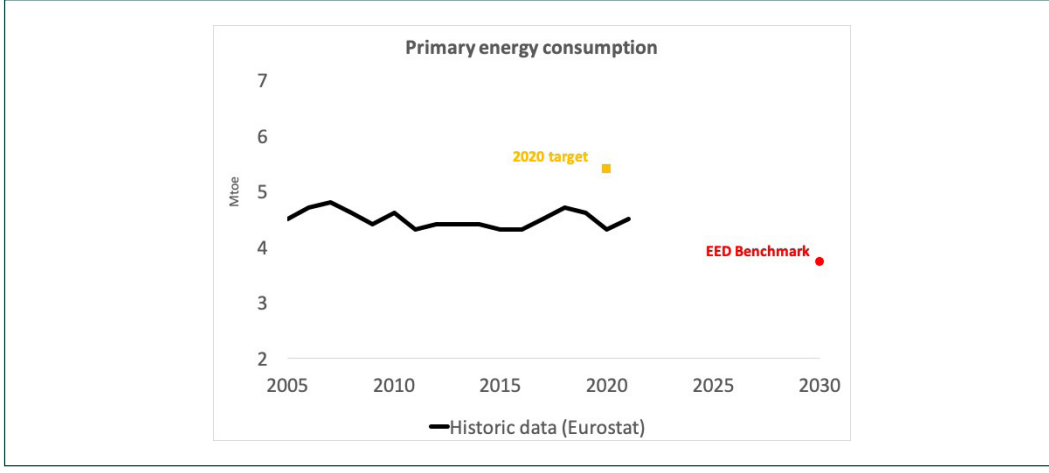
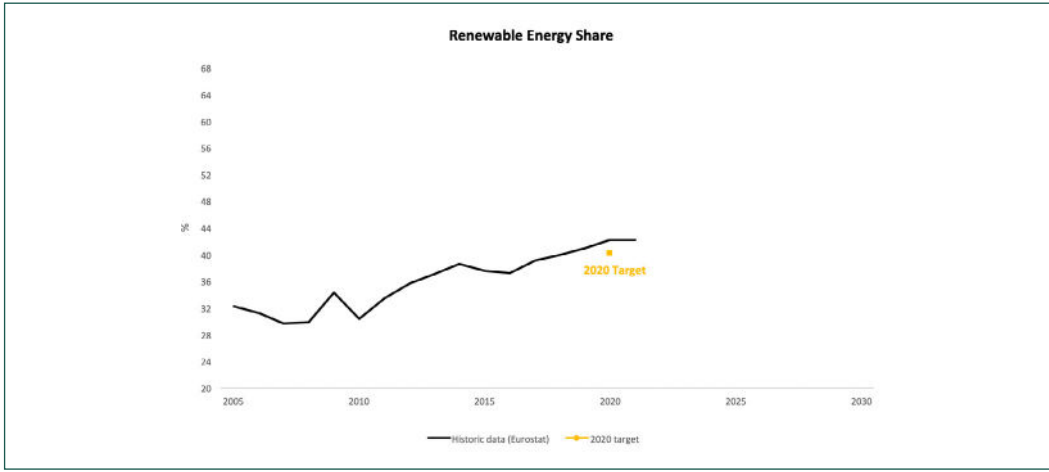
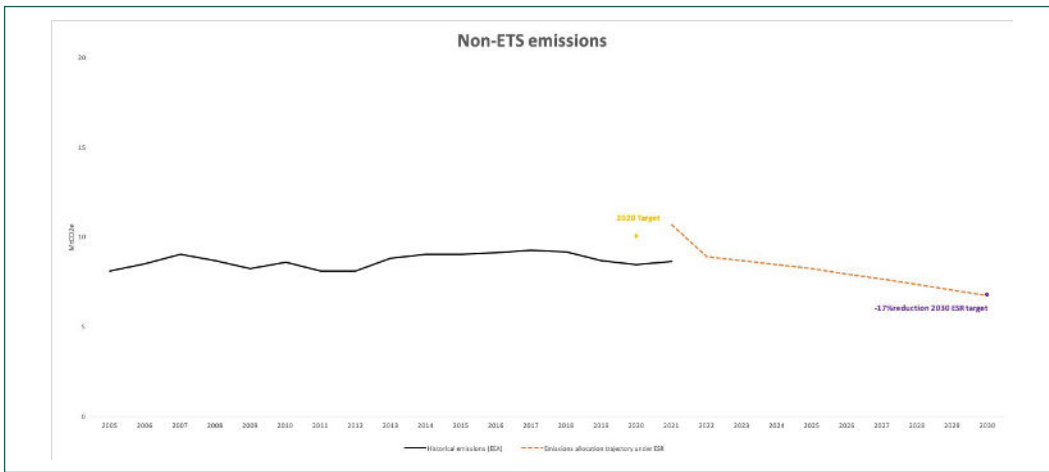
The plan should set a **more ambitious 2030 renewable energy contribution**, grounded in long-term energy transition scenarios. The near-term goal is to build a supportive legal framework for various energy community models and decide on a pathway to establish a 100% renewable power system by 2035.

Address permitting barriers and regulatory gaps that slow down solar and wind deployment, and adopt a regulation for energy communities.

The NECP should set an ambitious 2030 **energy efficiency** contribution and surpass the minimum reduction of energy consumption as per Energy Efficiency Directive’s (EED) formula benchmark, amounting to no more than 3.73 Mtoe for primary energy and 3.28 for final energy consumption.

The NECP should set a **concrete fossil gas phaseout date**, limiting its use to negligible amounts.

It should also refrain from **excessive expansion of biomethane** production, which shifts the focus away from electrification, and decrease biomass use, to mitigate the impacts of industrial forestry. **Nuclear** energy should also remain out of Latvia’s power system.



Lithuania



Input from: Ziedine Ekonomika

STATE OF PLAY

Lithuania submitted its draft NECP update to the Commission, though with delay. This assessment is based on the draft available on the Commission's website.

OVERVIEW

Lithuania fulfils the EU minimum requirements for climate effort-sharing and energy efficiency and surpasses them for renewable energy. However, Lithuania overall does not move towards a 1.5°C trajectory. Some measures in the draft plan are too weak and should be improved to ensure targets are met, including for climate and energy efficiency, and with regards to biofuels and public spending.

RECOMMENDATIONS

Apply the "Polluter pays" principle when developing policies and measures, instead of solely relying on public spending

Introduce more regulatory measures, which are almost absent in the current draft

Phase out all remaining fossil fuel subsidies, beyond those currently foreseen in the plan

CLIMATE AMBITION

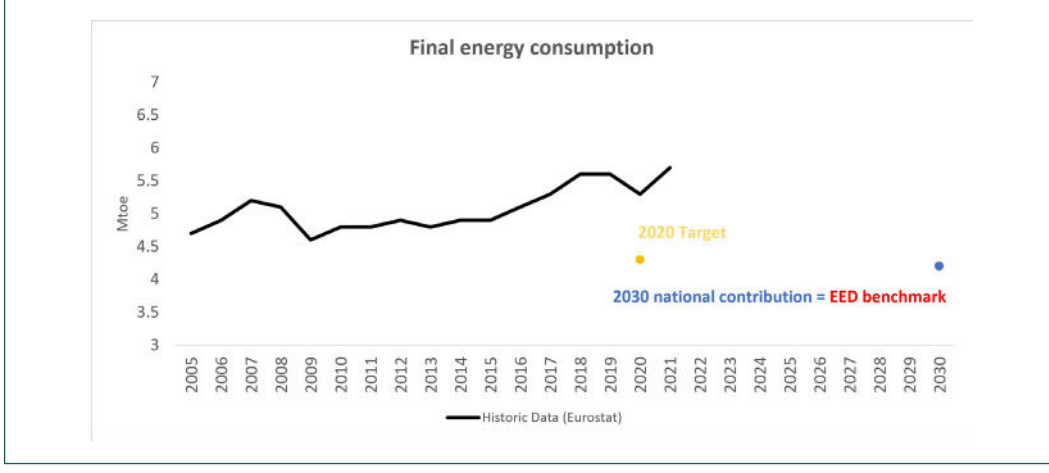
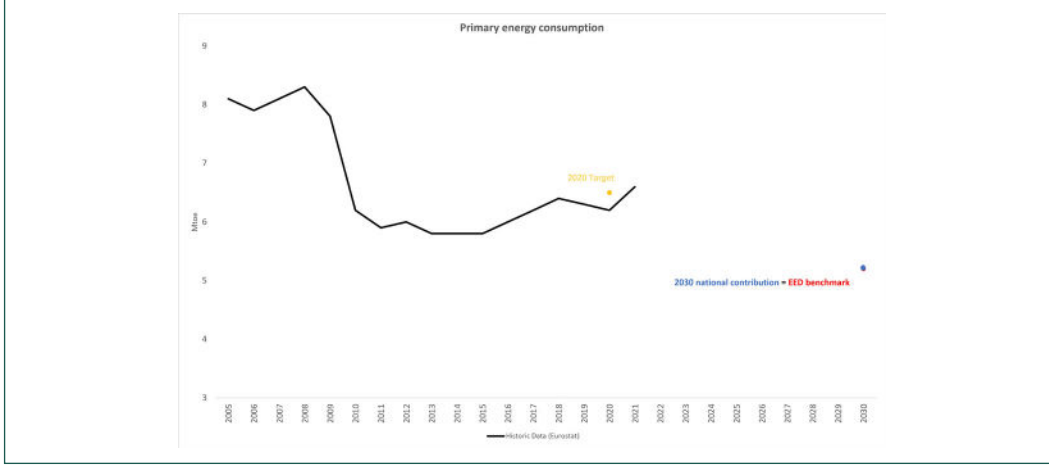
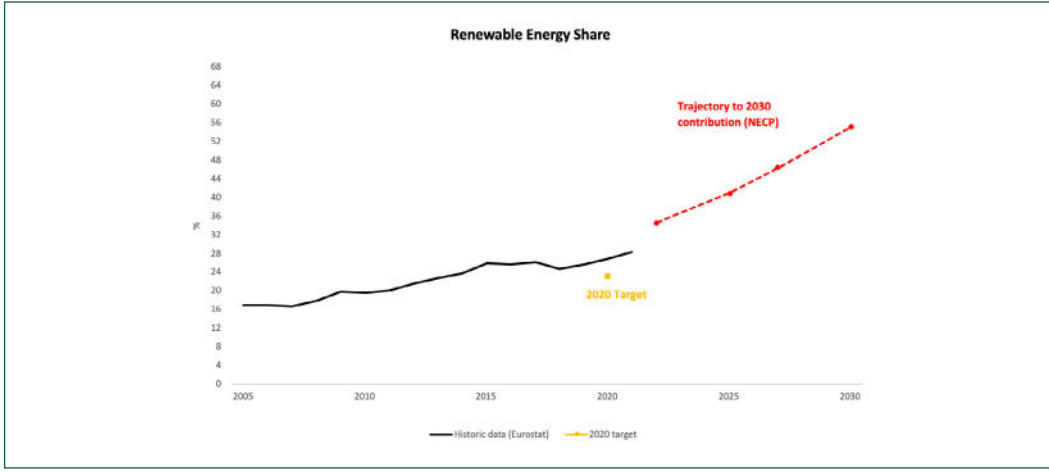
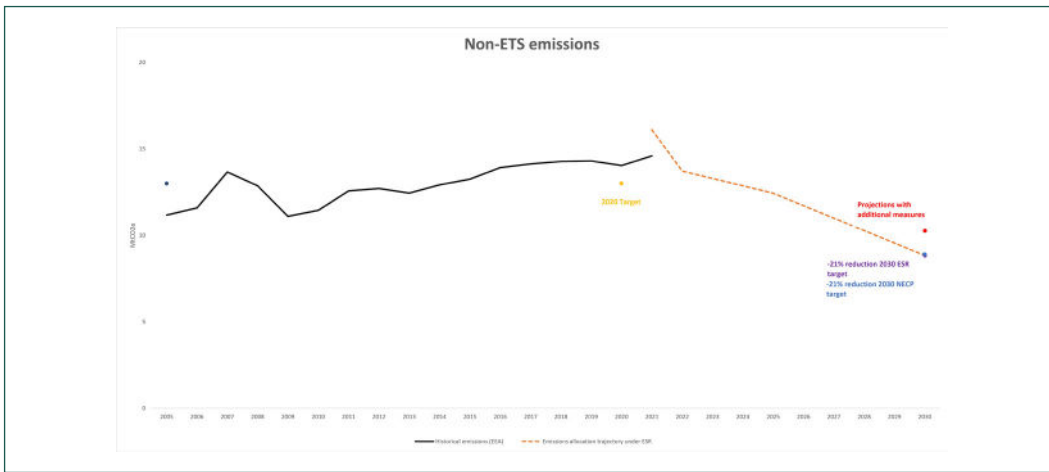
With the additional policies and measures (PAMs) planned in this draft, climate ambition in **non-ETS sectors** would increase by 7 percentage points by 2030 compared to the scenario with existing measures. According to the data provided in the draft (which differs from EEA data), this would allow Lithuania to meet its non-ETS 2030 target set under the unambitious Effort-Sharing Regulation (-21% compared to 2005 levels). While the ambition may be there, its achievement will mostly depend on public money, rather than on polluters' contributions – as it should be according to the "polluter pays" principle.

To make sure Lithuania confidently meets its ESR requirement, some of the **planned measures** should be improved. In the transport sector, for instance, it should invest in electric buses rather than inefficient hydrogen ones (T2-P); in the agriculture sector, it should rewrite measure A21-P, setting a much lower limit for nitrogen use (now 250 kg N/h) and pair it with monitoring measures.

ENERGY TRANSITION

In the draft, Lithuania sets a **renewable energy** contribution of 50% by 2030, which will surpass the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. For what concerns policies and measures, Lithuania added financial support for energy poverty reduction to renewable energy communities run by municipalities. The plan does not foresee the preparation of acceleration zones for wind and solar.

For what concerns **energy savings**, the level of energy consumption foreseen for 2030 amounts to 5.2 Mtoe for primary energy and 4.2 Mtoe for final energy. This is approximately in line with the EU 2030 energy efficiency target for both primary and final energy consumption, compared to the formula of the 2023 Energy Efficiency Directive (EED). Lithuania is therefore in line with the EU energy efficiency target. The draft indicates planned PAMs, including mostly a quantification of energy savings per measure, but further details on the measures are missing. It is not indicated how and whether the fossil fuels exclusion for the energy savings obligation is applied, including for the modernisation of heating as part of the measures. The measure to renovate/modernise multi-apartment buildings is not credible: 3267 multi-apartment units are to be renovated between 2021-2026, while currently only 400 per year are renovated.



FALSE SOLUTION ALERT

Biofuels – Measure “RES8-E – Mandatory blending of biofuels” should be rejected. Forcefully including biofuels in the oil fuel mix creates an unnecessary lock-in into first-generation biofuels, which comes at the expense of wind and solar.



SNEAKY SUBSIDIES

Current fossil fuel subsidies are listed. While there is a plan to gradually phase them out, it is valid only for some of them. The final NECP update should plan for a complete phaseout.



Luxembourg



STATE OF PLAY

Luxembourg submitted its draft NECP update to the Commission, though with delay.

This assessment is based on the draft available on the Commission's website.

OVERVIEW

Luxembourg overall falls short of a 1.5°C trajectory and does not meet its binding national climate neutrality target. However, Luxembourg fulfils the minimum EU requirements for climate effort sharing and renewable energy. The energy efficiency contribution does not align with the EU 2030 energy efficiency target. Public participation was insufficient, as flaws of the plan were flagged by civil society and the Climate Policy Observatory, but were not taken into account.

RECOMMENDATIONS

Increase the 2030 climate target and plan for climate neutrality ahead of 2050

Update the energy efficiency target, which should reflect the updated 2020 Reference Scenario and surpass the minimum reduction as per formula of the EED

Clarify the hierarchy of policies and measures, and develop clear timeframes to ensure their effective implementation and enhance transparency

CLIMATE AMBITION

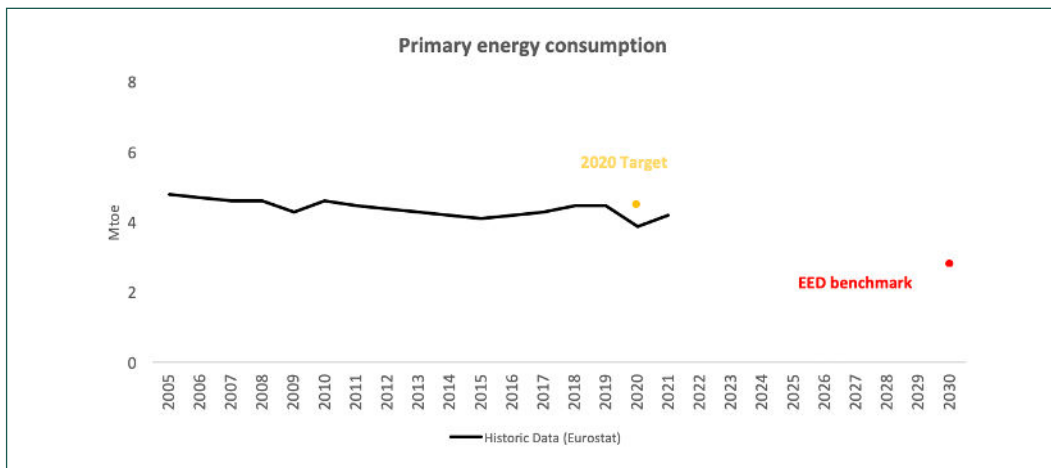
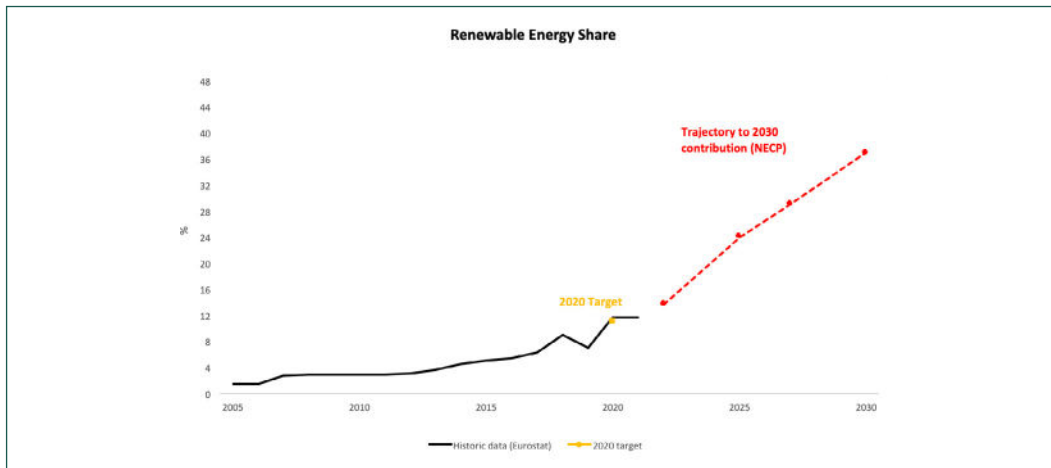
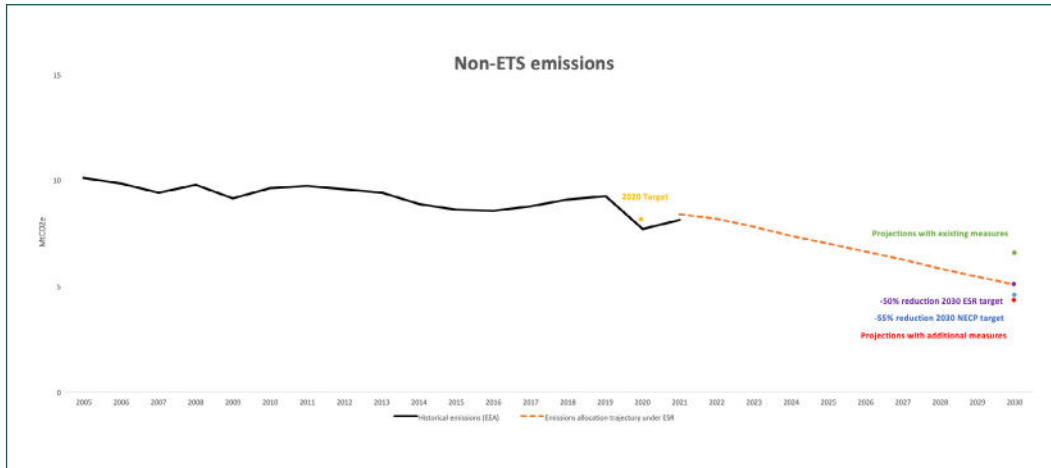
Climate targets remain the same as the 2019 NECP. Luxembourg has a 2030 non-ETS target of -55% compared to 2005 levels – which is higher than the -50% requirement set in the Effort-Sharing Regulation. With additional policies and measures planned in the draft, Luxembourg would go beyond these targets, achieving a -58% emissions reduction compared to 2005 levels. While meeting EU requirements, this is not enough to be in line with a 1.5°C compatible trajectory. Also, the scenario projects that additional measures would not be sufficient to meet the binding national climate neutrality target by 2050.

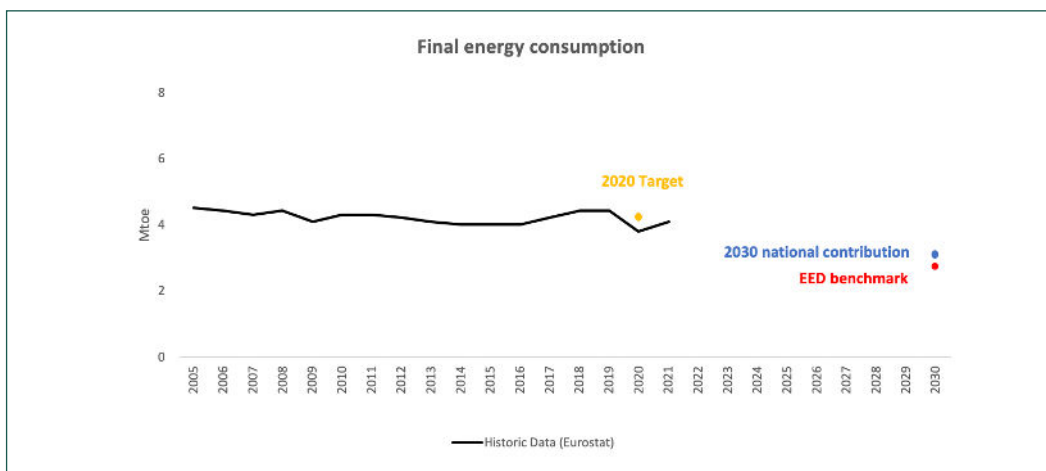
Some climate policies and measures (PAMs) could be improved. The loss and damage fund (N°118) should receive more funding; the CO₂ price set for the CO₂ tax should have a much higher baseline (200 euros per ton of CO₂ instead of 45 euros per ton of CO₂) and increase yearly; the Climate Law should include countermeasures if sectors do not fulfil their emissions reduction pathways. Finally, behavioural measures and consumption reduction are not taken sufficiently into account.

ENERGY TRANSITION

Luxembourg sets a **renewable energy** contribution of 37 % which will be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. With regards to PAMs, most of them are based on financial incentives or are on a voluntary basis – a strategy that has not been effective so far. More clear and binding timeframes are needed to meet the 2030 target. On solar, the plan only includes two PAMs, whose scope is however too narrow: one only focuses on new buildings, excluding existing ones; the other, for industrial and agricultural buildings, only focuses on “PV-ready” buildings instead of introducing an overall installation obligation.

For a 44% **energy efficiency** improvement target by 2030 compared to PRIMES 2007, Luxembourg foresees a level of final energy consumption amounting to 35.430 GWh. The target is similar to Luxembourg’s 2019 integrated NECP and equals 3.05 Mtoe for final energy. It is not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. The gap towards the required contribution as per formula in the 2023 directive amounts to 0.33 Mtoe for final energy; with a possible deviation of 2.5% the gap would still amount to 0.27 Mtoe. Luxembourg fails to indicate the level of primary energy consumption in 2030, which should surpass the minimum amount of 2.82 Mtoe as per formula of the EED. Energy efficiency measures often miss a quantification of energy savings per measure and do not entail many new measures compared to the 2019 integrated NECP and existing measures. It is positive that Luxembourg plans to analyse the possibility to pre-finance renovation projects with subsidies.





FOSSIL FUELS ALERT

Fossil gas – Luxembourg mentions a fossil gas phaseout in the heating sector, but it does not provide a detailed phase out timeline and a specific exit date.



FALSE SOLUTION ALERT

The plan includes several Carbon Capture Utilisation and Storage (**CCUS**) measures (notably PAM N° 522, but also 515 and 518). CCUS are economically inefficient, energy-intensive and prolong fossil fuel use. The priority must remain curbing emissions, not capturing them.



SNEAKY SUBSIDIES

There is no list of fossil fuel subsidies and no plan for their phaseout. The only one that is mentioned – fuel sales to non-residents and transit traffic – is not properly addressed.



PUBLIC PARTICIPATION

The summary presented in the draft does not give a realistic overview of public consultations, which were disappointing. Despite the presence of several platforms – Climate Citizen Council, Climate Policy Observatory – the vast majority of propositions were completely ignored in the draft.

The Climate Action and Energy Transition Platform was involved in the drafting process only marginally and in an chaotic way.



Netherlands



Input from: Natuur & Milieu

STATE OF PLAY

The Netherlands have submitted its draft NECP update with delay. This assessment is based on the draft available on the Commission's website.

OVERVIEW

The Netherlands fails to integrate the new EU 2030 energy and climate targets in its draft NECP update, which so far is also not aligned with the 2030 national climate target. There is not enough information available with regards to the national climate target, climate effort sharing, renewable energy and energy efficiency. Policies and measures lack detail and are inconsistent with the decarbonisation scenarios.

RECOMMENDATIONS

Start preparing a more ambitious draft NECP update that **surpasses the EU minimum requirements on climate and energy**, in line with 1.5°C

Improve the quality of climate policies and measures, by including financing needs, financing sources and their individual impact on reducing emissions

Set up a plan for public consultations as soon as possible, and enforce it

CLIMATE AMBITION

The draft explicitly aims at the **economy-wide target**, soon to be enshrined in the national Climate Law, of -55% net reductions by 2030 compared to 1990 levels. As of now, however, the plan fails to achieve this target under the scenario with additional measures, which would deliver between -41% and -52% net reductions by 2030.

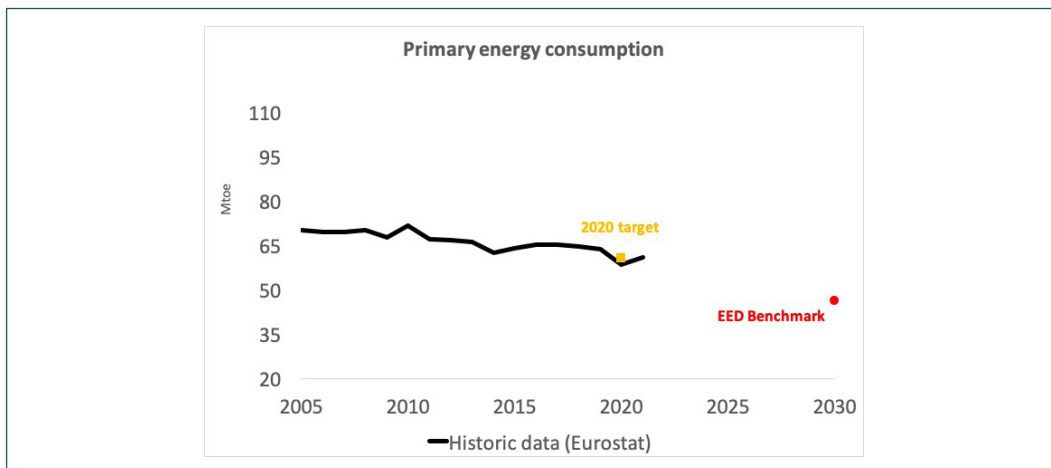
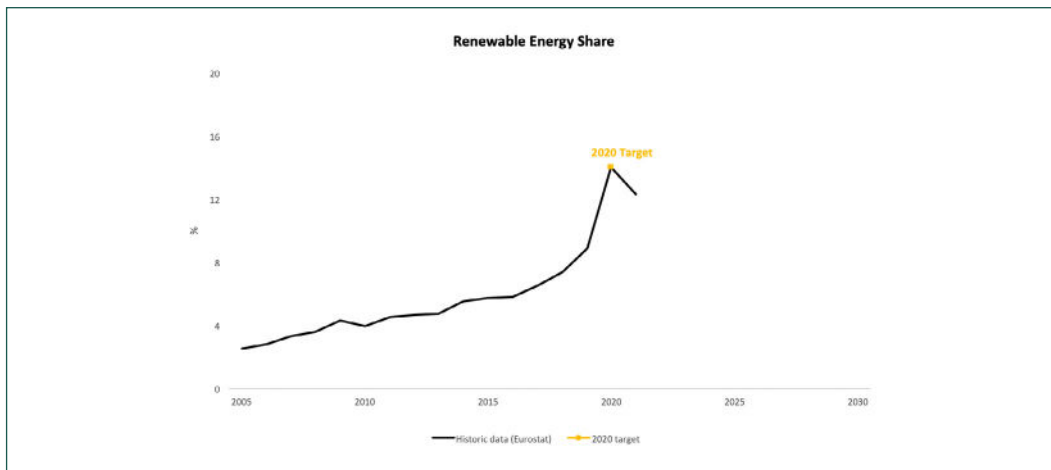
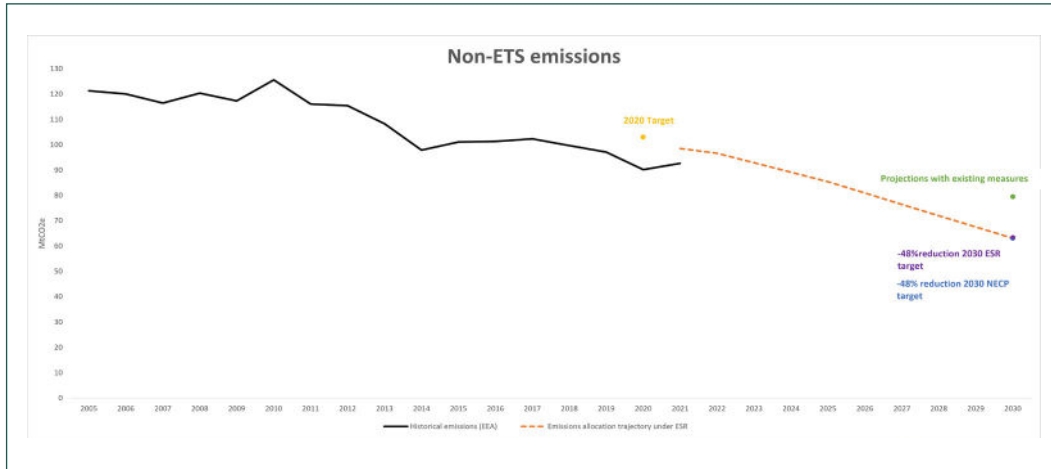
For non Emissions Trading System (non-ETS) sectors, the Netherlands have a 2030 target of -48% compared to 2005 levels, set under the unambitious Effort-Sharing Regulation (ESR). The draft assumes that reaching the economy-wide target would suffice to reach the **non-ETS target**. For now, however, the scenario with existing measures projects 79.5 MtCO₂-eq by 2030, which falls short by 8-10 percentage points compared to the ESR requirement.

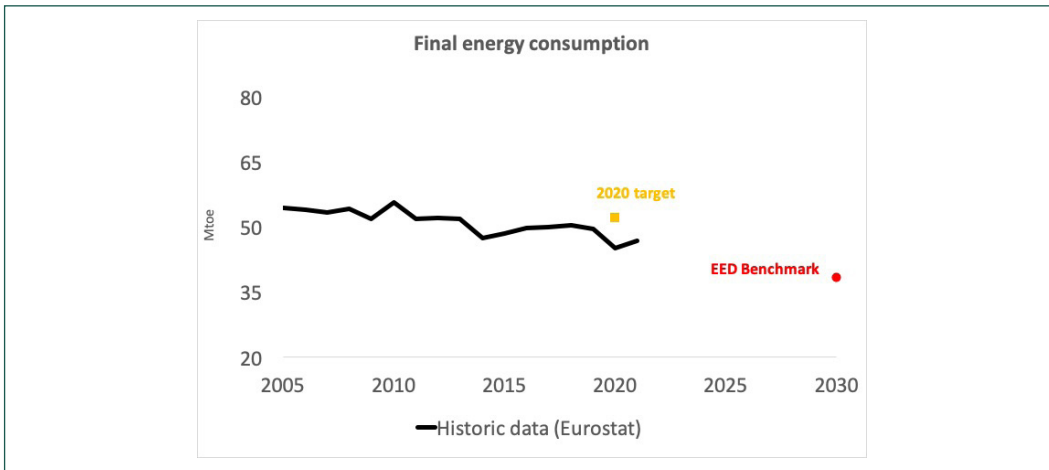
Overall, it is not possible to assess whether these targets are achievable. Both the **scenarios** with existing and additional measures do not take into account recent policy packages. On the contrary, Section 3 includes all planned **PAMs** (including from the most recent policy packages), but these lack detail: funding sources, financing needs and their impact on reducing emissions is not included.

ENERGY TRANSITION

The Netherlands indicates that due to the revision of the Renewable Energy Directive (REDIII), the Netherlands still needs to establish its national **renewable energy** contribution. On the basis of May 2022 policies, the renewable energy share could be 30.5% by 2030. This contribution would not be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. In 2021, the renewable energy share of the Netherlands was below the baseline share (meaning their 2020 national renewable energy target).

The Netherlands also fails to provide details on its **energy efficiency** plans. It does not indicate an energy efficiency contribution in its draft NECPs update. However, the draft mentions that the Netherlands will determine its indicative national contribution on the basis of the EED formula. The energy efficiency contribution for 2030 should surpass a reduction of energy consumption of at least 46.21 Mtoe for primary energy and 38.42 Mtoe for final energy, which aligns with the EU energy efficiency target, as per formula benchmark of the 2023 Energy Efficiency Directive (EED). The description of energy efficiency measures is too broad.





FALSE SOLUTION ALERT

CCS – The plan overrelies on Carbon Capture and Storage (CCS), as it expects 10 Mt of annual injection capacity by 2030, while all national CCS projects are currently still under development.



SNEAKY SUBSIDIES

Fossil fuel subsidies were not mentioned in the plan.

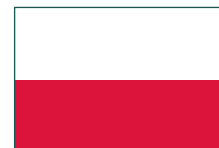


PUBLIC PARTICIPATION

There was no public consultation of the draft NECP update. The explanation provided was that the document does not contain new policies that have not been in public consultation before.



Poland



Input from: Institute for Sustainable Development (ISD)

STATE OF PLAY

Poland did not submit its draft National Energy and Climate Plan (NECP) update, as of 30 September. While the Ministry of Climate and Environment is working on it, it appears that a draft will only be produced after national elections (15 October 2023).

Proper public consultations, in line with the requirements of the Governance Regulation, did not take place so far, and will only happen once the draft is finalised, thus not before Q4/2023. Pre-consultations have been carried out with relevant stakeholders, who were asked to fill in a form (with many questions, but too little space for answers). Further cooperation is expected within an ad hoc NECP working group recently set up, composed of the Ministry of Climate and Environment and civil society organisations.

RECOMMENDATIONS

GENERAL REMARKS

Ensure timely public consultation and multi-level dialogues around the draft NECP update, as soon as the draft is released. This should include public hearings and multi-stakeholder expert dialogues.

CLIMATE AMBITION

Propose own country goals for reduction of greenhouse gas emissions for each sector by 2030 in line with the Paris Agreement and set a national objective to achieve climate-neutrality.

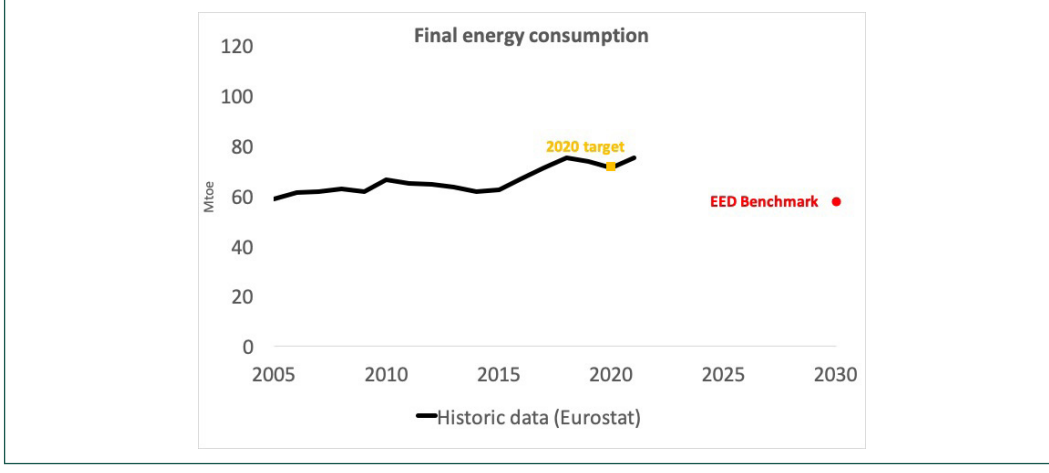
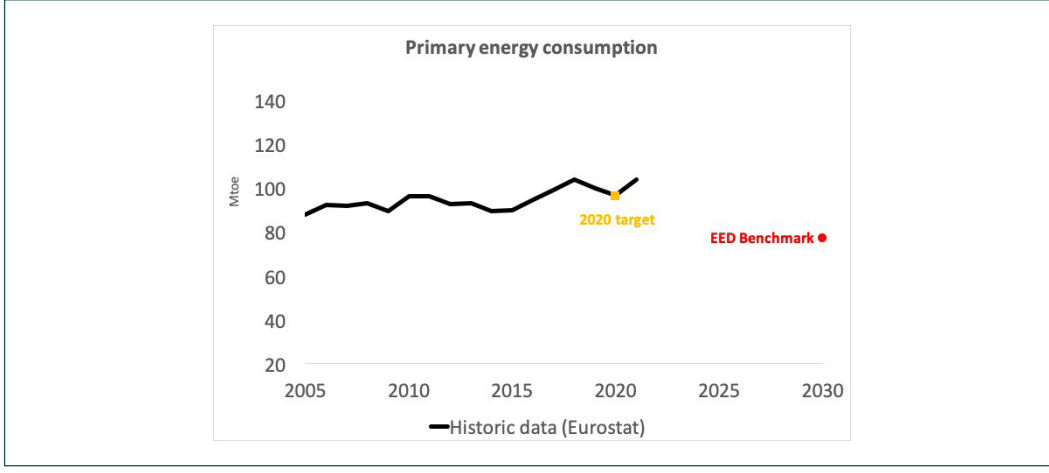
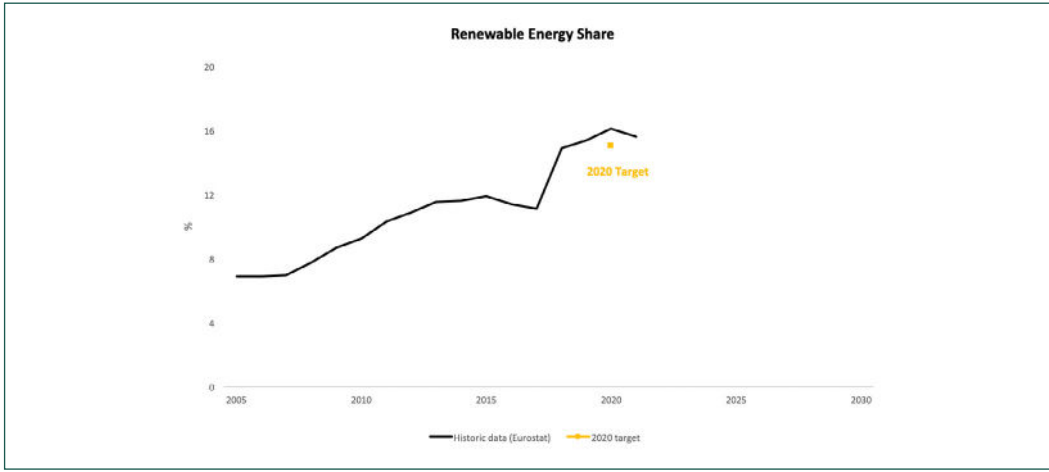
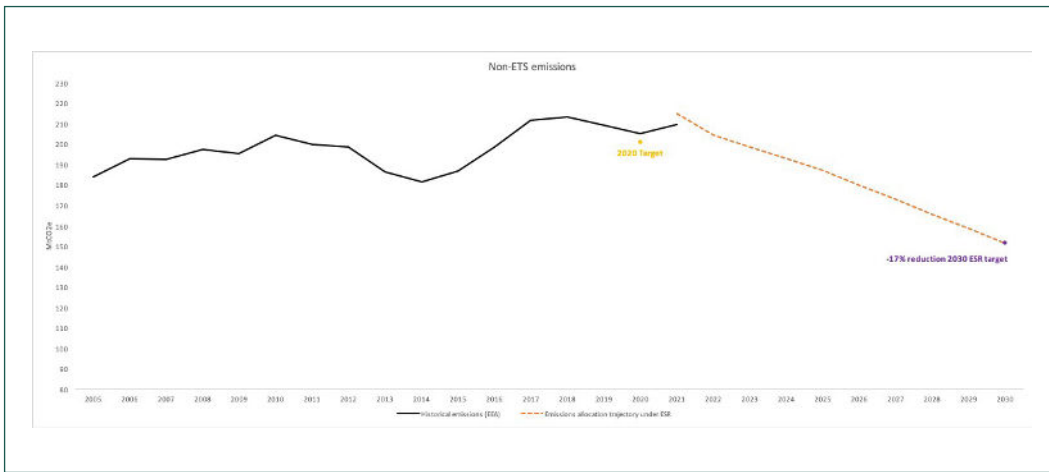
ENERGY TRANSITION

Include a strategy to phase out fossil fuels well before 2040, starting with coal and continuing with fossil gas. The unofficial draft update of the 2040 Polish Energy Policy still foresees 34.7% of coal and 15% of fossil gas in the electricity mix by 2030.

Establish a national **energy efficiency contribution** that surpasses the minimum reduction in line with the Energy Efficiency Directive's (EED) formula, amounting to no more than 77.16 Mtoe for primary energy and 57.73 for final energy consumption.

Define a roadmap leading to annual energy efficiency improvements and dynamic demand-side management.

Build a pathway towards a truly ambitious renewables share in the electricity mix by 2030, enhancing the role of solar and wind, onshore and offshore. The unofficial draft update of the 2040 Polish Energy Policy includes a scenario according to which the renewables share in the electricity mix could be 46.6% by 2030, but alternative scenarios show that more ambition (from 55% up to 68%) is possible.



Portugal



Input from: ZERO

STATE OF PLAY

Portugal submitted its draft National Energy and Climate Plan (NECP) update on time.

This assessment is based on the draft available on the Commission's website.

OVERVIEW

Overall Portugal does not move towards a 1.5° trajectory. The plan fulfils the minimum EU requirement for climate effort sharing. However, the energy efficiency contribution is not in line with the EU 2030 energy efficiency target and it is unclear whether the contribution for renewable energy is in line with the EU-binding renewables target. Policies and measures (PAMs) overall lack detail and are insufficient in some sectors.

RECOMMENDATIONS

Do not use the increased renewables capacity on expensive hydrogen production to export through the H2Med, as hydrogen transport is a highly inefficient process

Better detail the policies and measures, to ensure consistency with the proposed targets (e.g. impact on emissions, financing needs, indicators to assess achievements and a shorter horizon of application)

Include more transformative measures for sectors that are currently out of their 2030 target trajectory, such as transport, agriculture, energy consumption and efficiency

CLIMATE AMBITION

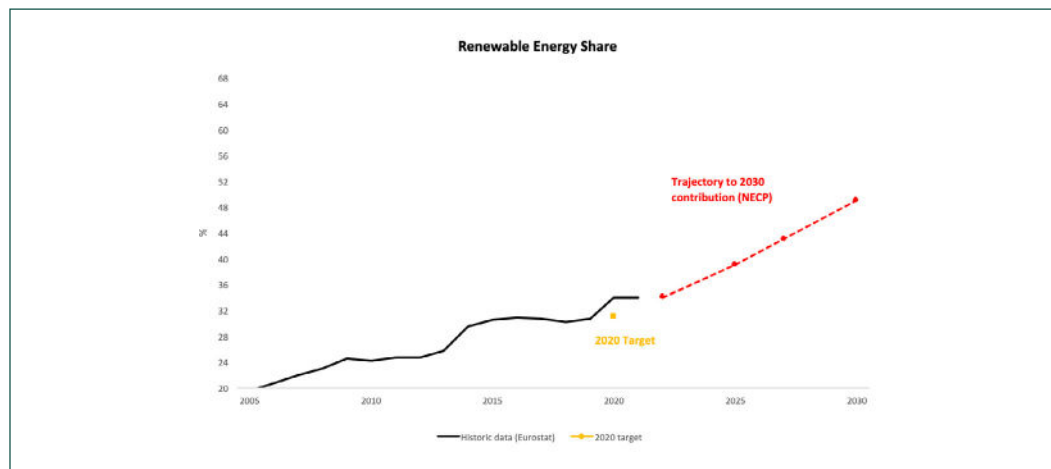
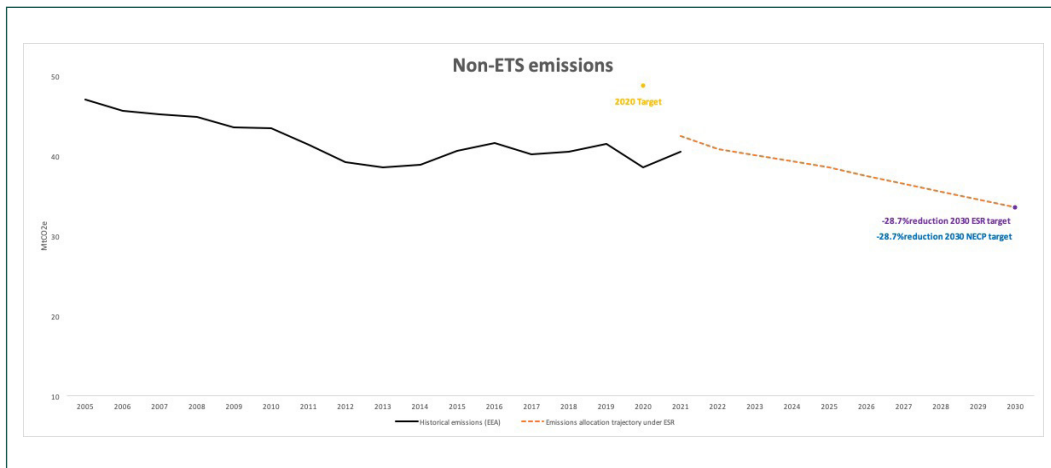
The 2030 **economy-wide** target is a -55% gross reduction compared to 2005 levels, which reflect the new National Climate Law and corresponds to the higher value of the 45-55% range set in the 2019 NECP. The 2030 **non-ETS target** reflects Portugal's requirement under the Effort-Sharing Regulation (-28.7% compared to 2005). Notably, the economy-wide target uses 2005 as a baseline year, which corresponds to the moment of peak emissions in Portugal; the percentage of reduction is lower if compared to 1990 levels.

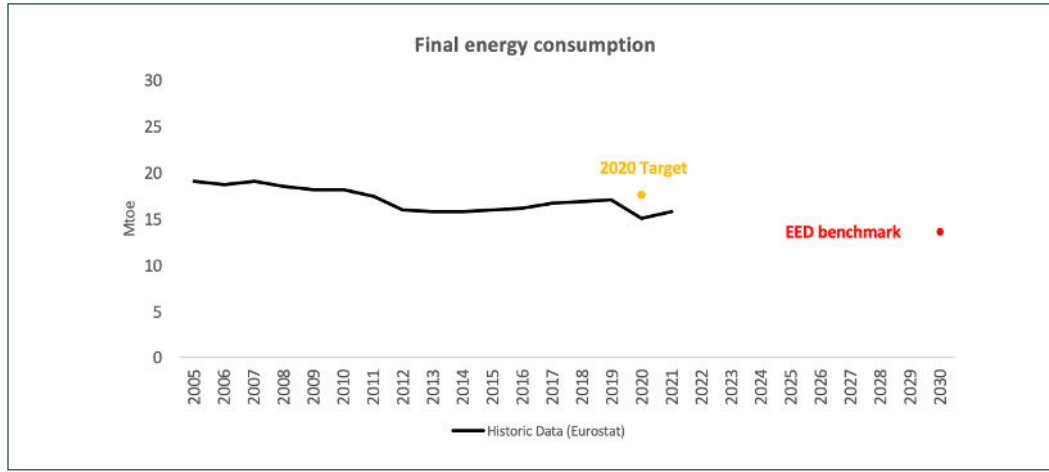
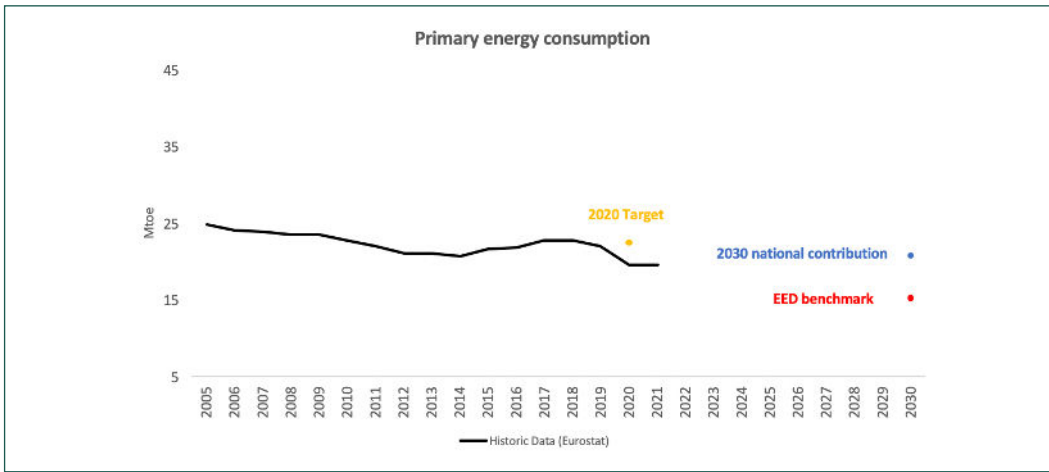
The draft does not provide enough elements to ensure the credibility of these targets. **Scenarios** with additional measures are not presented for all sectors (and not for non-ETS sectors as a whole). **PAMs** are only vaguely described: the impact on emissions, achievement indicators and required funding are not quantified and the timeline for their application is generally too broad. For agriculture – where Portugal failed to meet its 2020 target – no additional measures are presented and PAM 6.2 continues to finance intensive livestock production. For transport – where emissions are constantly increasing – substantial investments in public transport and railways are required.

ENERGY TRANSITION

Portugal sets a **renewable energy** contribution of 49 % in 2030. It is unclear if this will be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. The sectoral target for transports of incorporating 23% renewables is insufficient, according to REDIII it should be at least 29%. In addition, the plan undervalues the potential of decentralised energy production and energy communities. Decentralised solar has a higher potential than what is proposed (5.5GW of installed capacity by 2030), while measures should be included to facilitate access for energy communities to centralised energy production, such as the introduction of non-economic criteria in the selection procedure for new projects. PAM 3.7 promotes biomass use, but without including an assessment of the potential of residual biomass, nor mentioning the cascading principle in its use.

With a 35% primary energy consumption reduction target compared to 2007 projections, Portugal's draft plan equals a level of energy consumption of 20.73 Mtoe for primary energy, according to own calculations. The target has not been updated since Portugal's 2019 NECP and it is not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU **energy efficiency** target. Portugal fails to indicate a national contribution for final energy consumption in 2030, which should surpass the minimum energy consumption reduction amounting to 13.41 Mtoe as per EED formula benchmark. The gap towards the required contribution as per formula in the 2023 directive amounts to 5.57 Mtoe for primary energy consumption. Elements from the Portuguese Long-Term National Strategy to Combat Energy Poverty, which is not yet approved, should be included in the final NECP, especially with regards to indicators on thermal comfort that should not be dissociated from energy consumption reduction. Energy efficiency measures lack details, as PAMs in general across all sectors, including the quantification of energy savings per measure.





FOSSIL FUELS ALERT

Fossil gas – The draft projects fossil gas to be phased out by 2040. However, fossil gas infrastructure decommissioning or reconversion is never discussed, and some elements of the plan seem to go in the opposite direction: PAM 4.8.3 boosts maritime LNG infrastructures.



FALSE SOLUTION ALERT

The significant expansion of **hydrogen** capacity mainly to export through the H2Med (PAM 4.11) is highly inefficient and its needs are unjustified.

A voluntary carbon market (PAM 1.11) is a risk given the huge uncertainties as to its real contribution in reducing emissions. At most, it could be an additional instrument, on top of more robust PAMs.



IS MONEY WHERE THE MOUTH IS?

Funding sources, including EU funds, are identified for most PAMs, while financing needs are not. PAMs are potentially competing over the same funding sources, and the feasibility of the plan could be at risk.



SNEAKY SUBSIDIES

The NECP includes a phase out plan for fossil fuel subsidies, although it does not foresee the end of exemptions to the tax on oil and energy products and to the carbon tax for fossil gas in the electricity sector, (its gradual phase out is not defined after 2024).



PUBLIC PARTICIPATION

While **public consultations** took place early enough, no draft was presented and no discussions on scenarios took place, both for the 'public consultation', where the public was asked to fill in a questionnaire, and for the 'participatory assemblies'.

Multilevel dialogues took place thanks to the LIFE NECPlatform project, with the participation of local authorities, energy agencies and national representatives responsible for drafting the NECP (APA and DGEG). APA and DGEG prevented civil society organisations (besides ZERO) and private sector representatives from participating. It is unclear to what extent the dialogue influenced the draft NECP update.



Slovakia



Input from: Slovakia Climate Coalition

STATE OF PLAY

Slovakia submitted its draft National Energy and Climate Plan (NECP) update in September 2023. This assessment is based on the draft available on the Commission's website.

OVERVIEW

Slovakia does not move towards a 1.5°C trajectory. There is not enough information to assess whether Slovakia fulfils the minimum EU requirements for climate effort sharing. The renewables contribution is likely not in line with the EU 2030 renewables target. Public participation was insufficient. Overall, the plan does not change substantially compared to the 2019 NECP.

RECOMMENDATIONS

Include national climate targets for 2030 and 2040 and put climate neutrality goal as a core principle for all policies

Stop funding false solutions such as nuclear and fossil gas (for which a phaseout plan should be developed) and focus on planning for an ambitious renewables contribution

Set up a real public participation process, as well as a well-timed, continuous dialogue with all experts

CLIMATE AMBITION

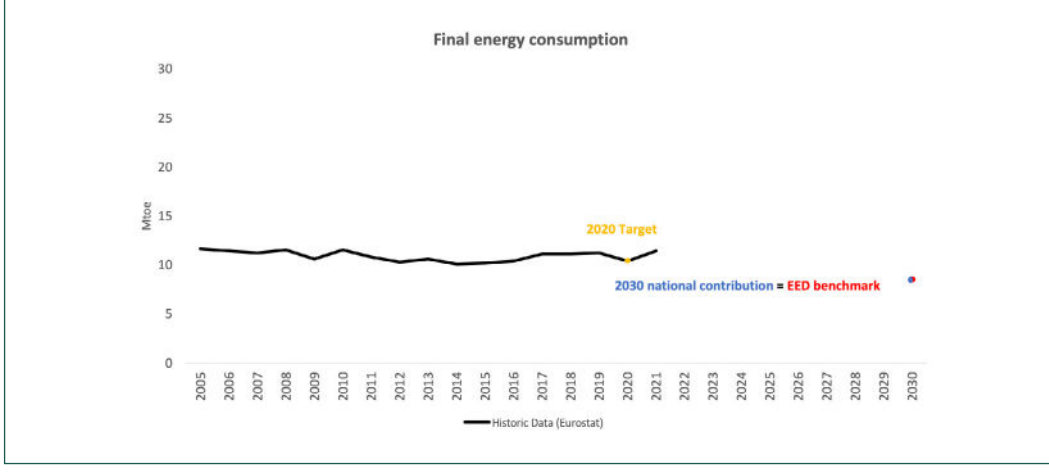
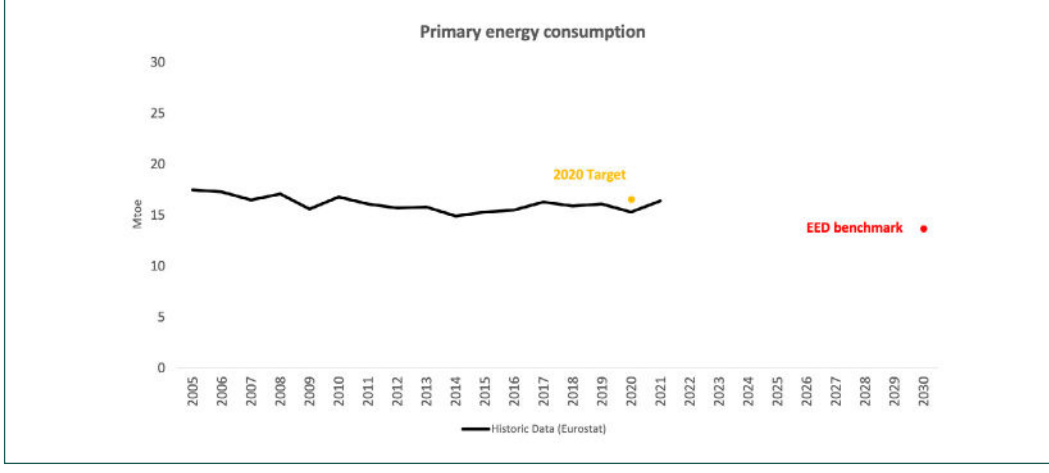
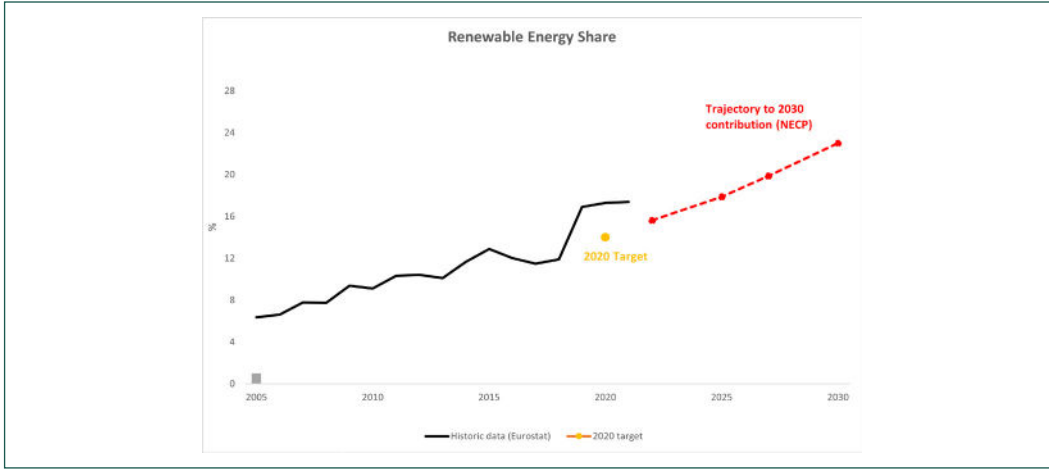
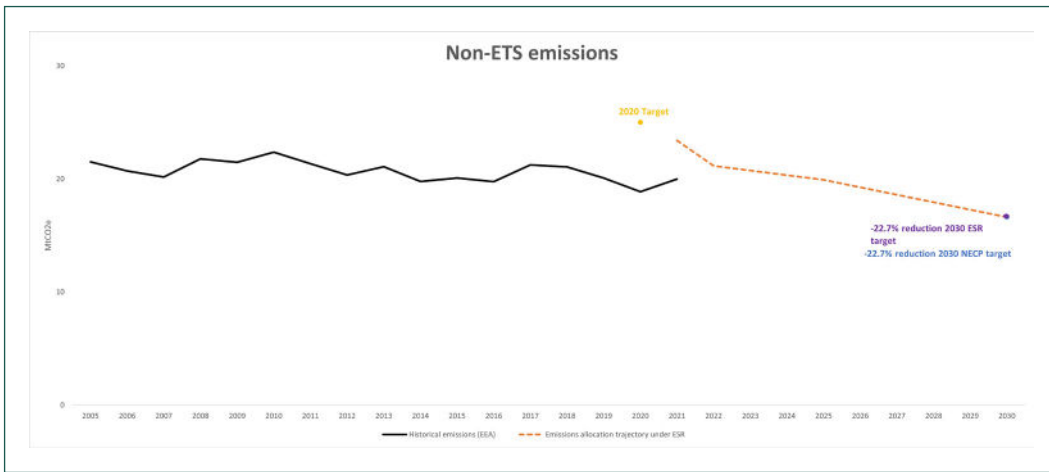
The draft NECP update fails to integrate the targets of the Climate Law (not officially adopted), notably including a 2030 **economy-wide target** (-55% compared to 1990 levels) and a 2050 climate neutrality target. Rather, it mostly refers to the EU climate targets, notably the unambitious 2030 target for **non-ETS sectors** set under the Effort-Sharing Regulation (-22.7% compared to 2005 levels).

Unfortunately, it is not possible to assess whether the ESR target will be met with existing and additional policies and measures (PAMs). **PAMs** appear as a mere list of measures with no clear prioritisation, rather than a comprehensive decarbonisation pathway, and their individual impact on emissions reduction is not assessed. In addition, a comprehensive, updated and complete decarbonisation scenario with additional measures is not available.

ENERGY TRANSITION

Slovakia sets a **renewable energy** contribution of 23% in 2030, which will not be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. Overall, the renewables section is poorly developed throughout the plan. Sub-targets, trajectories and projections are difficult to assess without a clear explanation of the methodology behind them. Policies and measures should not be a mere list, but be better connected with the target. Measures on the acceleration of renewables and on the removal of specific, pre-identified barriers, are missing.

On **energy savings**, Slovakia's draft indicates different levels of final energy consumption for 2030. Firstly, it mentions 8.46 Mtoe for final energy consumption in 2030. This is in line with the requirements of the 2023 Energy Efficiency Directive (EED) for final energy consumption, as it aligns with the EED formula. Second, it specifies that the deviation of the formula leads to 8.25 Mtoe or 8.675 Mtoe. Slovakia fails to indicate the level for primary energy consumption, which should surpass the minimum energy consumption reduction, amounting to no more than 13.62 Mtoe as per EED formula benchmark. The description of energy efficiency measures is vague and the quantification of energy savings per measure is missing. Details are also missing with regards to energy poverty, as the share of energy poverty is not declared and there are no specific indicators, which would help to determine the amount of cumulative end-use energy savings among energy poor.



FOSSIL FUELS ALERT

Coal – Coal exit is planned for 2025. However, there is a risk of stranded assets in case of switching to fossil gas and biomass co-firing in district heating and smaller cogeneration plants.

Fossil gas – Rather than planning its phaseout, the draft sees fossil gas as a prerequisite for decarbonisation. It foresees the expansion of fossil gas infrastructure and around 30 million euros of investments on top of those already allocated to projects included in the Ten-Year-Network-Development-Plan.



FALSE SOLUTION ALERT

Expansion and investments are expected on fossil gas (see above) nuclear, and hydrogen. These are framed as ‘alternative fuels’ to replace existing fossil fuels, but no objective assessment is made of their efficiency, impacts or contribution to a decarbonization path.

Nuclear is mentioned as key for energy security and decarbonisation, and new nuclear capacity is included in the scenario with additional measures.

Hydrogen is considered an ‘alternative fuel’ partially replacing fossil fuels, without any proper justification or reference to relevant studies.



IS MONEY WHERE THE MOUTH IS?

Investment needs and funding sources should be better detailed and connected to planned additional PAMs. For non-ETS sectors, it is unclear which investments are needed – and on which exact measures – to achieve the 2030 climate targets. Without a clear decarbonisation path, it is impossible to fully assess the impact of funds allocated.



PUBLIC PARTICIPATION

Public consultations were not early and meaningful. Only one open public presentation of the draft took place, with too short a timeline to provide meaningful inputs. Written inputs by civil society organisations were not reflected in the text.

Multilevel dialogues do not exist.



Slovenia



Input from: Focus, Association for Sustainable Development

STATE OF PLAY

The Slovenian National Energy and Climate Plan (NECP) was submitted on time. This assessment is based on the draft available on the Commission's website.

OVERVIEW

Slovenia overall does not move towards a 1.5°C trajectory. Climate targets surpass the EU minimum requirements for climate effort sharing, while both the renewable and the energy efficiency contributions are not in line with the new EU 2030 energy targets. The absence of policies and measures makes it impossible to assess their credibility.

RECOMMENDATIONS

Increase the renewables contribution and put community energy at its core – by eliminating administrative barriers and establishing an enduring supporting mechanism

Plan for a substantial reduction in energy use, by including a sufficiency scenario in the draft assessing Slovenia's capacity to reduce energy use

Include policies and measures, which are completely absent from the current draft

CLIMATE AMBITION

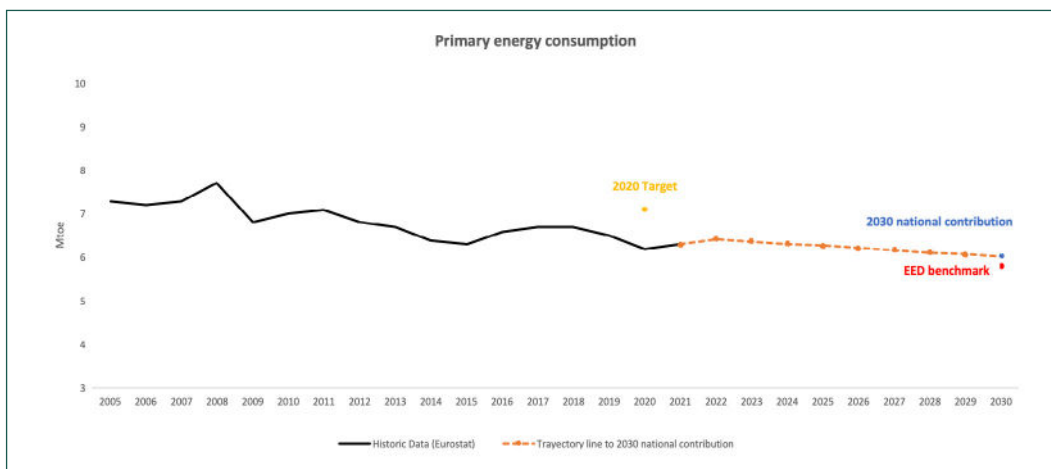
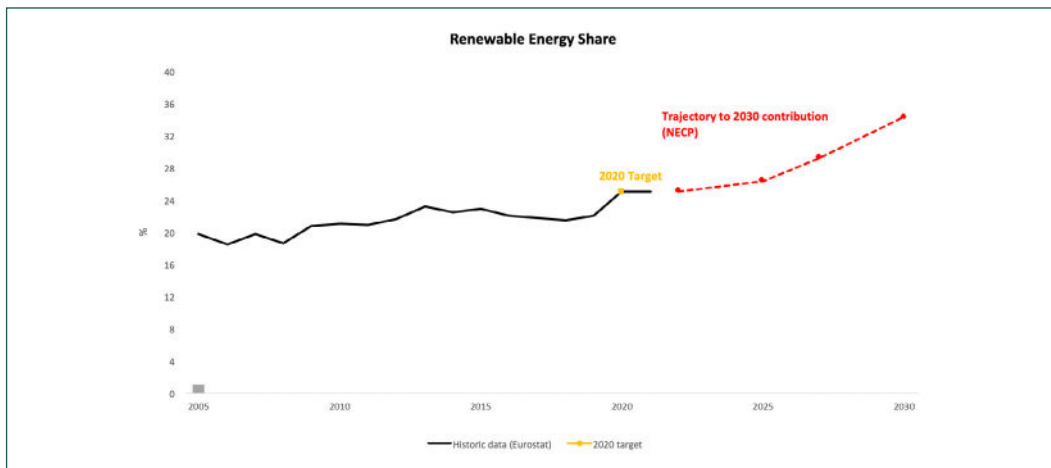
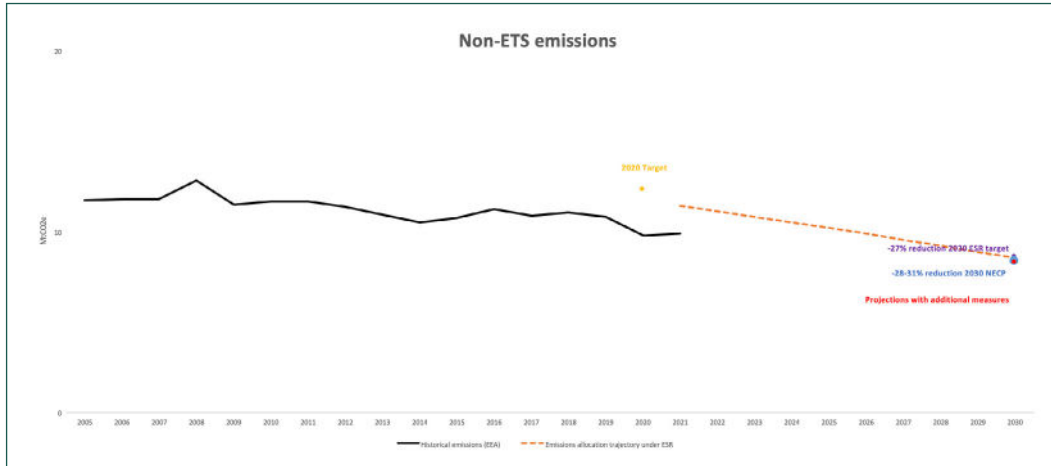
Climate targets remain incompatible with a 1.5°C trajectory. The draft shows an **economy-wide** emissions reduction of 37-40% by 2030 (compared to 2005 levels), and a **target** of 55% by 2033, when coal is expected to be phased out. The draft also plans for a 2030 **non-ETS target** of -28-31% (compared to 2005 levels), which is higher than the one set in the unambitious Effort-Sharing Regulation (-27%). The draft also sets out to achieve climate neutrality by 2050, but projects most emissions reductions to take place only after 2030.

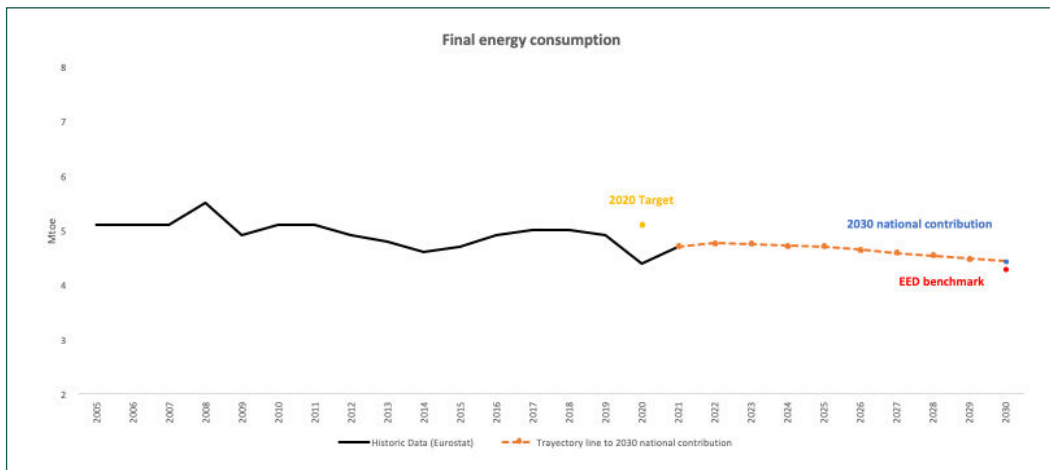
It is impossible to assess whether the plan will meet these targets, because the draft does not include any policies and measures (**PAMs**). On the other hand, if it plans the right PAMs, Slovenia certainly has the potential to raise its ambition levels, notably in the agriculture and transport sectors. For agriculture, it should focus on sustainable measures (e.g. agro-ecological practices) rather than purely technological ones; for transport, passenger transport should focus on developing public transport to move away from motorised individual transport.

ENERGY TRANSITION

Slovenia sets a **renewable energy** contribution of 30-35 % in 2030, which will not be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. The plan should include more PAMs to accelerate newly installed solar and wind capacity. The acceleration in the installation of solar PVs on roofs should not only focus on the public sector. More measures to promote energy communities should be included, focusing on removing administrative barriers for their implementation, providing long-term stable funding and including households affected by energy poverty.

On **energy savings**, the level of energy consumption foreseen for 2030 amounts to 6.026 Mtoe for primary energy and 4.426 Mtoe for final energy. This is not in line with the minimum requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. The gap towards the required contribution as per formula benchmark in the 2023 directive for primary energy would amount to 0.24 Mtoe. The gap towards the required contribution amounts to 0.14 Mtoe for final energy as per EED formula; with a possible deviation of 2.5% the gap would still amount to 0.03 Mtoe. Additionally, the expected increase in final energy use in industry in 2030 and 2040 compared to 2020, while other sectors decrease their energy consumption, is problematic. The Slovenian draft does not indicate any policies and measures; both energy efficiency and sufficiency measures are needed to significantly reduce Slovenia's current energy consumption levels.





FOSSIL FUELS ALERT

Coal – Slovenia’s coal exit date is planned for 2033, while it should be by 2030 at the latest. The draft also fails to provide detailed steps for the shutdown of the TEŠ power plant, specifically the development of a legal framework is missing.

Fossil gas – While the scenario with additional measures foresees a decrease in fossil gas consumption by 2030 compared to existing measures, the draft does not discuss any decommissioning of gas infrastructure, and actually includes several fossil gas projects of common interest in its planning.



FALSE SOLUTION ALERT

Biogas – the draft relies too much on biogas. The final NECP update should not include incentives for expanding biogas production, but rather focus on solutions with fewer negative impacts, such as direct electrification.



IS MONEY WHERE THE MOUTH IS?

Funding sources and investment needs are not provided for PAMs. EU funding sources are mentioned but not concretely integrated in the plan.



SNEAKY SUBSIDIES

The NECP includes just a mere paragraph on short assessment of existing fossil fuel subsidies and does not include a clear phaseout plan, despite existing subsidies for fossil fuels in Slovenia being still high (81 million euros in 2020, based on [available data](#)).

Refunds of excise duties on commercial diesel (for trucks and passenger vehicles), remain the most problematic (37% of incentives going against decarbonisation).



PUBLIC PARTICIPATION

The **public consultations** process was satisfactory in terms of design, but civil society organisation’s recommendations were not taken into account in the final document. The online questionnaire did not provide room for questioning the document’s key assumptions.

Multilevel dialogues do not exist.



Spain



Input from: SEO/BirdLife, WWF Spain, ECODES

STATE OF PLAY

Spain submitted its draft National Energy and Climate Plan (NECP) update on time. This assessment is based on the draft available on the Commission's website.

OVERVIEW

Spain does not move towards a 1.5°C trajectory. However, the climate target surpasses the minimum EU requirement for effort sharing, and the renewables contribution is in line with the EU 2030 targets. Only the energy efficiency contribution is not ambitious enough to align with the EU 2030 energy efficiency target. Overall, measures seem to support the targets and have grown (107) compared to the 2019 NECP (78). However the draft still includes too many policies and measures that perpetuate the use of fossil fuels, notably fossil gas.

RECOMMENDATIONS

Set higher and binding climate targets that take into account historical responsibilities and are in line with a 1.5°C trajectory

Improve the plan for renewables deployment, which currently concentrates too much on mega-projects on a few specific areas, together with local authorities and communities

Phase out fossil fuels – their share remains too high in 2030 – and set a **100% renewables target in electricity generation** by 2030

CLIMATE AMBITION

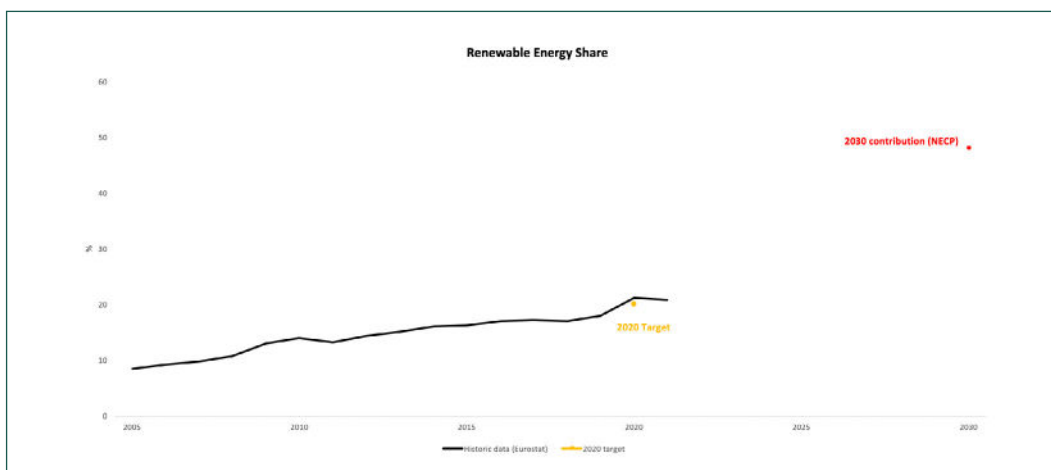
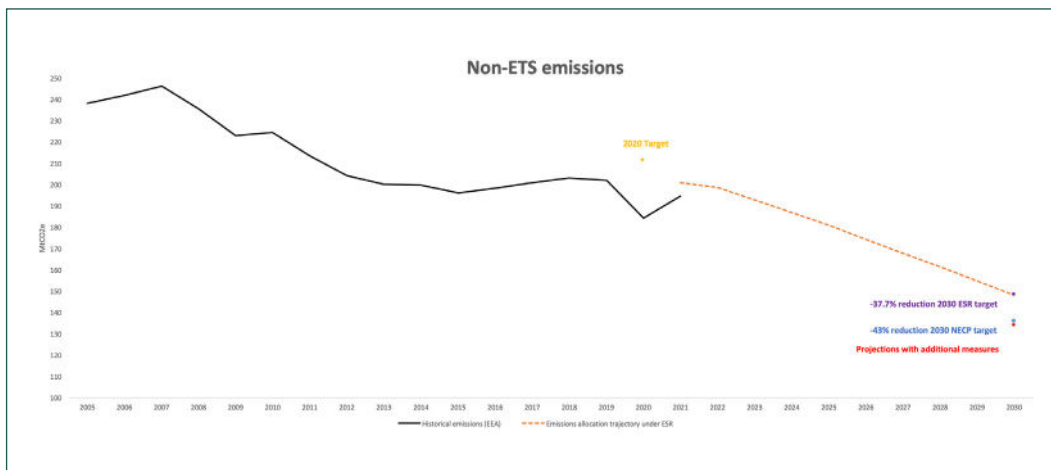
The draft projects a 2030 **economy-wide target** of -32% compared to 1990 levels and a 2030 **non-ETS target** of -43% compared to 2005 levels – which is higher than in the 2019 NECP (-39%) but also higher than the (unambitious) target set in the Effort-Sharing Regulation (-37.7%). These targets are not binding, but represent the outcome of the projected decarbonisation impacts of policies and measures (PAMs) laid out in the plan. Also, they are in line with climate neutrality by 2050 and the EU targets, but still not in line with a 1.5°C trajectory that should take into account Spain's (and the EU's) historical responsibility and capacity to act.

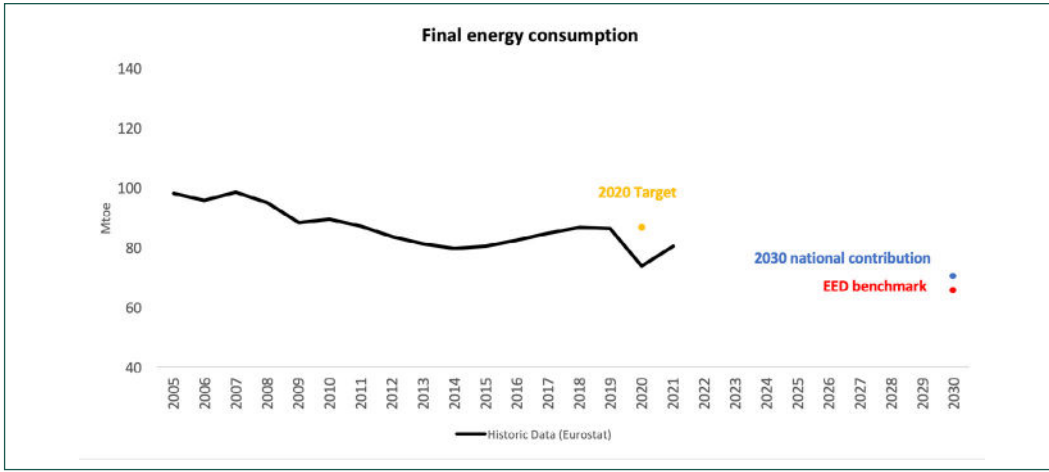
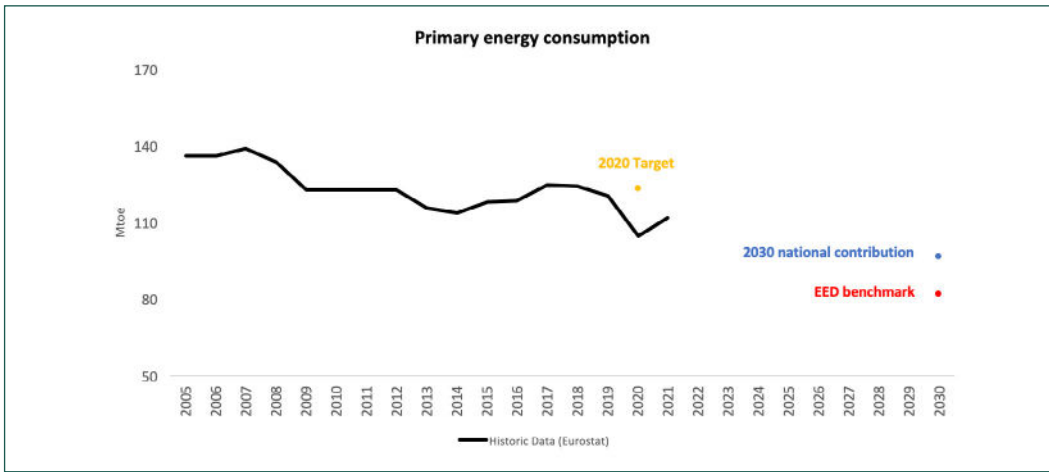
13 additional **climate PAMs** are included compared to the 2019 NECP. While being overall feasible and consistent with the targets, some can be improved and some should be reformulated. For transport, a dedicated state fund should be created for financing public transport and electric mobility (EV subsidies, charging points). For agriculture, behavioural PAMs should be included (e.g. promotion of more sustainable diets), as well as climate and biodiversity certifications. For waste, reuse and recycling of materials must be prioritised, together with research and development for the materials needed for the transition. A carbon absorption target should be set.

ENERGY TRANSITION

Spain sets a **renewable energy** contribution of 48% which will be in line with the Governance Regulation formula benchmark to reach the binding EU 2030 renewable energy share of 42.5%. PAMs are credible but should be improved. The plan lacks a planning framework at the regional level which would identify areas of low environmental impact to be used for renewables installations. The target for installed self-consumption by 2030, which was increased from 9-14 GW to 19 GW, must be further increased, and supported by an appropriate regulatory framework for energy communities that facilitates their creation. Finally, the plan does not include information on the origin, type and quantities of biomass that corresponds to the 2030 renewable energy target.

On **energy savings**, the draft NECP includes a level of consumption in 2030 which amounts to 96.7 Mtoe of primary energy and a binding level of 70.2 Mtoe of final energy. The objective is set compared to PRIMES 2007. The 2030 consumption levels are not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. The gap towards the required contribution as per formula in the 2023 directive amounts to 4.82 Mtoe for final energy; with a possible deviation of 2.5% the gap would still be at 3.19 Mtoe. For primary energy consumption, the gap is 14.92 Mtoe. Energy efficiency measures are expanded from 16 to 23 measures compared to the 2019 integrated NECP and many measures are described in detail, including with regards to expected energy savings. Especially for measures concerning the renovation of buildings (measures 2.17 and 2.8) more funding is needed.





FOSSIL FUELS ALERT

Fossil gas – The plan does not contain any plans to phase out fossil gas. On the contrary, it includes several measures that perpetuate the use of fossil gas directly or indirectly (such as measure 3.2, 4.9, 4.10, 4.11 and 2.21).



FALSE SOLUTION ALERT

CCUS – The draft plan foresees an important role of and investments in Carbon Capture Utilisation and Storage in the decarbonisation of the hard-to-abate industry sector.

Slow nuclear phaseout – While installed capacity decreases in the period 2021-2030, nuclear still contributes to 11% of gross electricity generation and 10% of total primary energy consumption by 2030.



IS MONEY WHERE THE MOUTH IS?

Only energy efficiency and internal energy market PAMs include a specific section on financial needs and public funding sources (and not in all cases either); the others are not detailed enough.

Overall, EU funding instruments – notably the Recovery and Resilience Plan and the Strategic Projects for its implementation (PERTE) – are well integrated in the draft NECP planning. Cohesion Policy funding should support NECP measures that are small-scale and in rural areas, rather than big projects.



SNEAKY SUBSIDIES

The draft presents a table that includes fossil fuel subsidies (Annex A, section A.5.6), but it does not mention plans for their phaseout, as the last column is empty.

Resources derived from their phaseout should be directed towards a rehabilitation plan for homes, starting with the most vulnerable ones, to reduce the demand for fossil gas.



PUBLIC PARTICIPATION

Public consultations were insufficient during the drafting phase. The Ministry held two debate sessions in Spring 2023, but these were only open to selected stakeholders, organised with pre-set questions and no presentation of drafts or scenarios. A public consultation only opened in the summer, after the draft NECP update was published.

Multilevel dialogues do not exist.



Sweden



Input from: WWF Sweden

STATE OF PLAY

The plan has been submitted to the European Commission with some delay. This assessment is based on the draft available on the Commission's website.

OVERVIEW

Sweden fails to move towards a 1.5°C trajectory. The plan includes a climate target that would surpass the minimum EU requirements for climate effort-sharing, but is not credible as not backed up by additional policies and measures (PAMs) nor updated scenarios. The renewables target is not presented. The energy efficiency target is the same as the 2019 NECP, and fails to align with the 2030 EU energy efficiency target. Overall, little additional PAMs have been included.

RECOMMENDATIONS

Develop a more ambitious draft NECP update that **goes beyond the minimum EU requirements on climate and energy**, in line with 1.5°C

Develop a credible plan with ambitious additional policies and measures, that would allow Sweden to meet EU obligations without being dependent on purchasing emission allowances from other Member States

Include updated policy scenarios including political decisions taken by the new government, which would show that Sweden is not on track to meet its climate targets

CLIMATE AMBITION

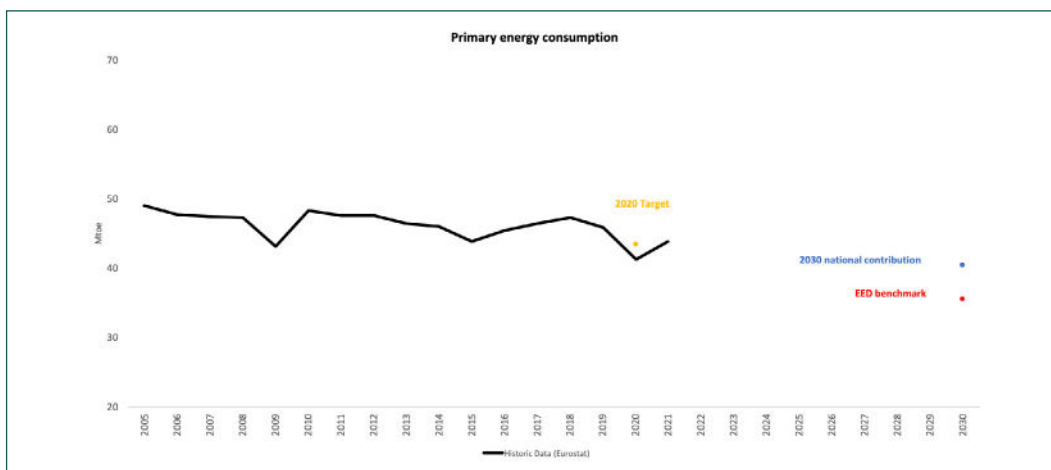
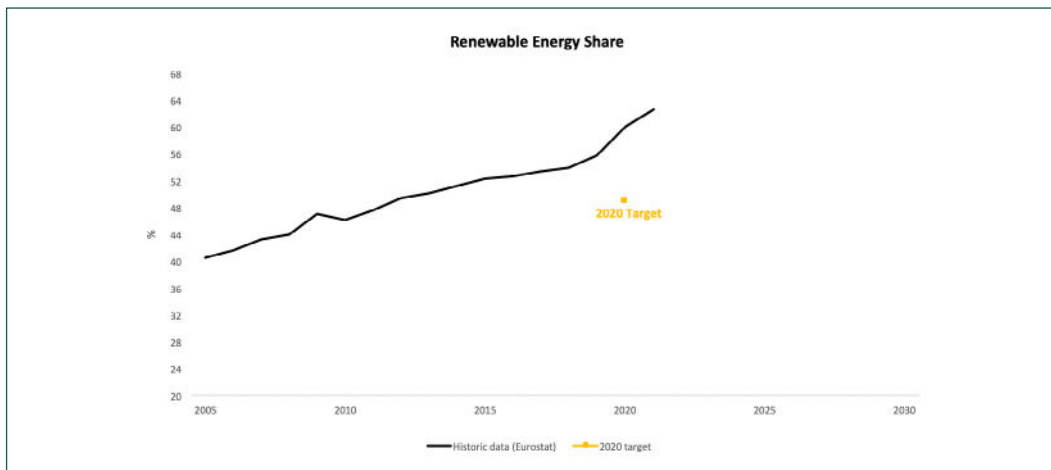
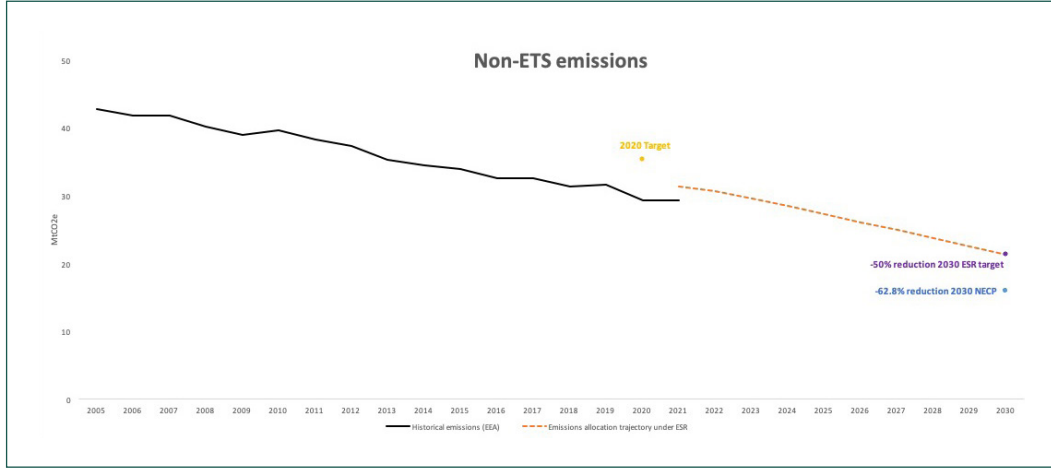
The draft mentions Sweden's current climate targets. It includes an **economy-wide net zero target** by 2045, as well as a **2030 non-ETS target** of -63% compared to 1990 levels, which surpasses the minimum requirement set under the Effort-Sharing Regulation (-50% compared to 2005 levels).

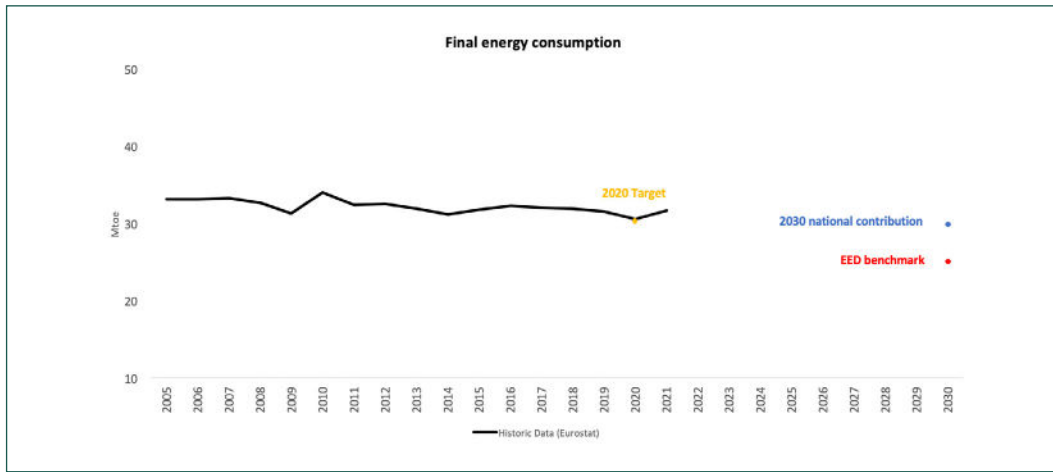
The targets presented in the draft, however, are not credible. Section 3 does not contain any additional **policies and measures** (PAMs) compared to the 2019 NECP, and existing ones are not sufficient for Sweden to achieve its climate targets. Also, both climate targets and scenarios are not credible because they were set by the previous government. The current government still needs to present its new Climate Policy Action Plan, but several of its political decisions that are already slowing down climate action (lowering fuel taxes, removing the carbon tax for district heating, lowering obligations to blend renewable fuels in the transport sector, abolishing the bonus for new EVs etc.) are not reflected in the draft. Even the abolition of the national climate target is currently being discussed.

ENERGY TRANSITION

Sweden did not propose a national **renewable energy** contribution, saying it would do so once the RED revision process would have come to an end. In the current draft, a renewable energy share of 75% by 2030 is included, based on the most recent calculation method adopted in accordance with the Second Renewable Energy Directive. A reason for concern is that the plan substitutes the previous target for electricity generation of 100% renewables with a 100% fossil-free target.

For **energy savings**, the overall target has not changed compared to the 2019 NECP. For a 50% energy intensity target compared to 2005 levels, the draft indicates an estimation of a level of energy consumption in 2030 of 470 TWh for primary energy and 347 TWh of final energy, which equals 40.41 Mtoe and 29.84 Mtoe respectively. This is not in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. There is a gap of 4.99 Mtoe for primary and 4.74 Mtoe for final energy consumption compared to the formula benchmark in the revised 2023 Energy Efficiency Directive (EED). The possible formula deviation flexibility for final energy still leaves a gap of 4.14 Mtoe. Measures are too vague and Sweden indicates only two new energy efficiency measures compared to the 2019 NECP.





FOSSIL FUELS ALERT

No clear exit dates are set for fossil fuels phaseout. Sweden has set as an objective the electricity mix to be 100% fossil free by 2040. However, some decisions of the current government in favour of fossil fuels use – including lowering fuel taxes and removing the carbon tax for district heating – may prevent Sweden from reaching it.



IS MONEY WHERE THE MOUTH IS?

Information on financing needs and funding sources is incomplete, both at the aggregated level and for each policy and measure.



Annex I – METHODOLOGY

This assessment is based on information and data included in the draft NECPs that are publicly accessible on the European Commission’s website as well as on preliminary plans that were open for consultation on national level. For countries where neither of the above mentioned options were available, recommendations have been put forward on the basis of information available at the national level. Country sheets for Malta and Romania were not developed.

Below are more details regarding the methodology used for the assessment of non-ETS targets and energy savings contributions.

METHODOLOGY FOR NON-ETS TARGETS

The analysis of the climate targets mostly focused on the requirements for non-ETS sectors set under the Effort-Sharing Regulation, and notably on the individual 2030 target contribution of each Member State in relation to their 2005 levels, as indicated in Annex I of the revised Effort-Sharing Regulation. With one exception, annual emission limits were not taken into account, as annual emissions trajectories were mostly unclear, incomplete or unreliable across the draft NECP updates. Annual emissions limits, as updated under the revised Effort-Sharing Regulation, are however indicated in the non-ETS graphs available in the country sheets. Flexibilities to access allowances from the EU ETS were also not taken into account.

The EEA dataset provided under the Effort-Sharing Decision ([here](#)) was used as reference for historical emissions in non-ETS sectors, and notably as a reference point for the 2005 baseline year. Unless indicated otherwise, the absolute value of 2030 non-ETS requirements set under the Effort-Sharing Regulation for each country was calculated against the 2005 baseline provided in the EEA dataset.

Not all draft NECP updates provided the same data with respect to their 2030 non-ETS sector targets and objectives. Some expressed a target both in absolute and relative numbers (percentages); some only expressed it either in absolute or relative terms; some others did not express a specific target, and only provided projections until 2030. Several of them did not specifically mention the 2005 baseline data in absolute numbers. The EEA 2005 baseline was used as reference to calculate the relative or absolute emission reduction values in non-ETS sectors where national data was not provided, or as a comparison with national data when the latter were available.

In all but two cases, some level of discrepancies emerged between EEA data and data provided by Member States for historical emissions in non-ETS sectors. In some circumstances, discrepancies in the baseline year (2005) were over 1 MtCO₂-eq (notably for the cases of Croatia, Italy, Lithuania, the Netherlands and Spain). In two cases, the discrepancy was so significant that it affected whether or not the Member State would meet its ESR requirements.

METHODOLOGY FOR ENERGY SAVINGS

With regards to energy savings the assessment takes into account the EU 2030 energy efficiency target of 11.7% compared to the EU 2020 Reference Scenario as per 2023 Energy Efficiency Directive (EED), which translates into a level of energy consumption for 2030 of 992.5 million tonnes of oil equivalents (Mtoe) for primary energy consumption and 763 Mtoe for final energy consumption for the EU overall. Each Member States has to contribute a certain share to this overall target. Benchmarks for national contributions can be calculated using the formula enshrined in Annex I of the 2023 EED. Table 1 below shows the results of this formula for the EU energy efficiency target of 11.7%.

The assessment for energy savings compares the planned level of energy consumption for 2030 for each Member States to the values in table 1. Alignment with the 2023 energy efficiency target is postulated when the level of energy consumption for 2030 in the NECP draft matches the outcome of the EED formula. The gap in commitments is calculated by subtracting the result of the formula from the level of the 2030 energy efficiency national contribution. Another level of analysis points at the 2.5% deviation of the formula for final energy consumption, which is in line with the requirements of Article 4 of the 2023 EED. Finally the gap of the collective level of ambition of submitted draft NECPs (chapter 2 of the report) is calculated by adding up the gaps towards the formula for all Member States that have submitted a national contribution to the Commission.

Table 1: Results of the Energy Efficiency Directive formula for the EU energy efficiency target of 11.7%

| Member State | Result of the formula for primary energy consumption for 2030 (Mtoe) | Result of the formula for final energy consumption for 2030 (Mtoe) |
|---------------------|---|---|
| Austria | 24.879 | 21.35 |
| Belgium | 33.769 | 28.783 |
| Bulgaria | 13.707 | 8.85 |
| Croatia | 6.83 | 5.866 |
| Cyprus | 2.038 | 1.807 |
| Czechia | 28.807 | 20.209 |
| Denmark | 15.524 | 13.73 |
| Estonia | 3.927 | 2.555 |
| Finland | 29.781 | 20.6 |
| France | 157.343 | 104.011 |
| Germany | 194.23 | 155.953 |
| Greece | 17.126 | 14.639 |
| Hungary | 23.31 | 16.191 |
| Ireland | 11.23 | 9.858 |
| Italy | 112.161 | 92.119 |
| Latvia | 3.726 | 3.284 |
| Lithuania | 5.157 | 4.248 |
| Luxembourg | 2.821 | 2.712 |
| Malta | 0.829 | 0.687 |
| Netherlands | 46.21 | 38.419 |
| Poland | 77.156 | 57.731 |
| Portugal | 15.164 | 13.41 |
| Romania | 30.161 | 22.757 |
| Slovakia | 13.621 | 8.461 |
| Slovenia | 5.787 | 4.287 |
| Spain | 81.782 | 65.382 |
| Sweden | 35.424 | 25.1 |
| EU-27 | 992.5 | 763 |

Energy consumption is expressed in Mtoe, as it is the unit of energy used to express the EU energy efficiency target. However, some Member States have presented their energy consumption in a different unit, which has been converted to Mtoe for comparison reasons.

If not indicated otherwise, it is assumed that Member States used the new definition of primary energy consumption and final energy consumption to calculate their 2030 energy consumption levels for their national contributions, as required per Article 2 of the 2023 EED. Primary energy consumption means gross available energy, excluding international maritime bunkers, final non-energy consumption and ambient energy. Final energy consumption means all energy supplied to industry, to transport, including energy consumption in international aviation, to households, to public and private services, to agriculture, to forestry, to fishing and to other end-use sectors, excluding energy consumption in international maritime bunkers, ambient energy and deliveries to the transformation sector and to the energy sector, and losses due to transmission and distribution. A clear indication of a different methodology being used is only available for the draft Flemish regional plan.

METHODOLOGY WITH REGARDS TO RENEWABLE ENERGY

In its recommendations, the European Commission will assess the national renewable contributions, based on the formula set out in Annex II of the Governance Regulation (referred to as the Governance Regulation formula benchmark). As the European Commission has chosen not to publicly disclose these benchmarks which correspond to the EU 2030 renewable energy target of 42.5% and 45%, a comprehensive assessment of the national renewable energy contributions is currently not possible. As only benchmarks in line with a 40% EU renewable energy target are publicly available (pg 66 - 67 of Impact Assessment Report accompanying the proposal for amending the Renewable Energy Directive. SWD(2021) 621 final), we used these data to make careful assessments of the available national renewable energy contributions.

