



# Mind the NECP Gap

**Main findings on ambition  
and implementation gaps  
from the latest NECPs**

**(based on the October 2024  
NECPs Tracker update)**



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# INTRODUCTION

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National Energy and Climate Plans, [or NECPs](#), outline European country's integrated climate and energy targets and the policies and measures they will implement to achieve them by 2030 (with a longer-term outlook to 2040 and beyond). NECPs are binding documents under the [EU Governance Regulation](#), but they are also key to achieving climate neutrality and ensuring a just transition, both at the centre of the EU Green Deal and also pursued in the new [EU Strategic Agenda](#) (2024-29). If planned and implemented in a timely and ambitious manner, **NECPs are a powerful tool for the EU and its Member States to drastically accelerate climate action and the energy transition already in this decade.**

EU Member States were required to submit their final updated National Energy and Climate Plans ([NECPs](#)) to the European Commission by 30 June 2024. However, as of 30th September 2024 – three months after the deadline – **only 11 of the 27 final NECP updates have been submitted.**

SUBMITTED	NOT YET SUBMITTED
Denmark	Austria <sup>1</sup>
Finland	Belgium
Italy	Bulgaria
Netherlands	Croatia
Sweden	Cyprus
France	Czechia
Germany	Estonia
Ireland	Greece
Latvia	Hungary
Luxembourg	Lithuania
Spain	Malta
	Poland
	Portugal
	Romania
	Slovakia
	Slovenia

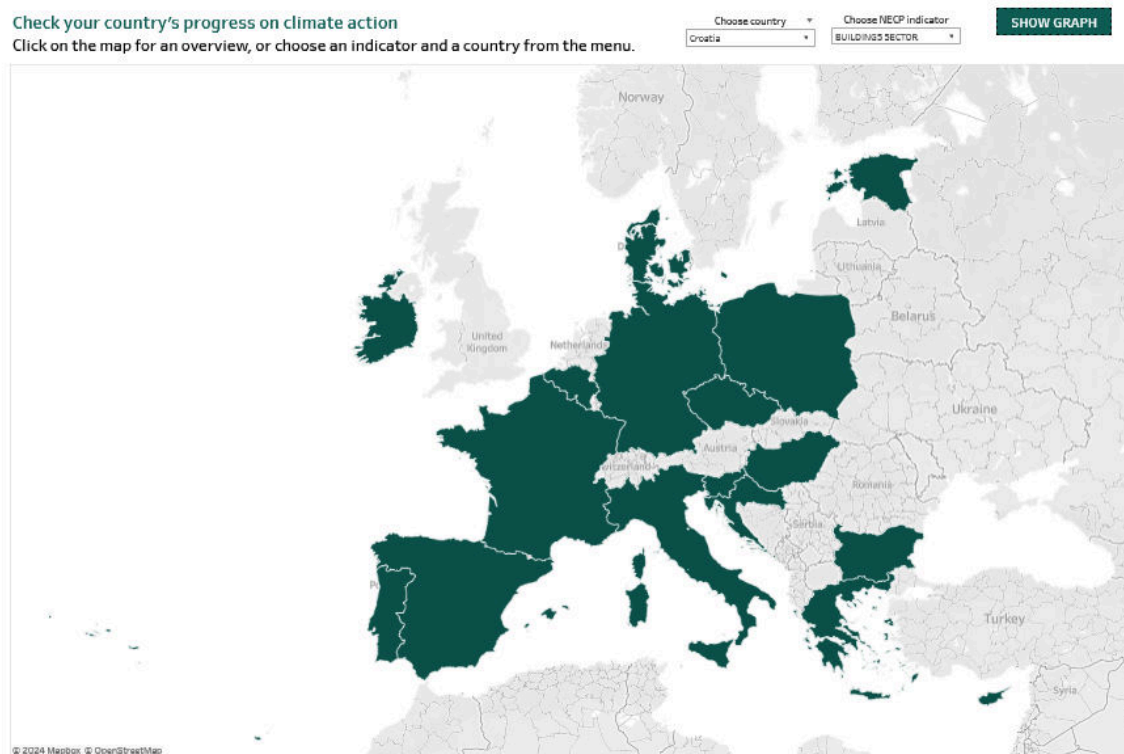
Green: submitted on time // Yellow: submitted late // Orange: not submitted

**This briefing assesses the level of ambition and implementation of NECPs based on the [NECP tracker](#).** The NECP tracker, developed by the [LIFE TogetherFor1.5](#) project, is an online tool that provides a visual representation of the ambition and implementation of NECPs, based on a selection of greenhouse gas emissions and energy indicators.

<sup>1</sup> Austria's submission in 2024 counts as a draft NECP update, since the country had previously withdrawn its 2023 draft. Therefore, it still needs to go over the feedback loop of the European Commission to be then submitted as a final plan.

The NECP tracker has a double function: on the one hand, *it assesses the ambition of the latest available NECPs* (i.e. either the draft or final updates) by comparing them with EU 2030 climate targets and energy benchmarks. On the other hand, *it monitors whether national governments are implementing their old 2019 NECPs as planned*, by comparing them with historical data. It currently covers 17 EU Member States: Belgium, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Poland, Portugal, Slovenia and Spain.

## — NECPs TRACKER TOOL —



While results vary across countries, the NECP tracker depicts a rather bleak picture. It notably finds that:

- Despite some improvements, the current level of **ambition** of the latest available NECP updates is **insufficient** not only to align with Paris Agreement commitments, but also **to reach the EU 2030 climate and energy objectives**, which would be in breach of the European Climate Law.
- The **implementation of the old 2019 NECPs is lagging behind**. All Member States assessed in the tracker seem to show some worrying trends and gaps in keeping up to their pledges.
- In retrieving data for the tracker, the authors found that NECPs present a varying but overall **poor transparency and quality of data**, which hinders the plans' credibility as well as access to information.

These points are further elaborated in the main findings section, which provides an aggregate picture and an overview of the main trends and gaps. The country sheets sections provide country-specific, more detailed assessments of both ambition and implementation trends. An Annex at the end of this briefing provides details on the NECP tracker methodology and sources.



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# MAIN FINDINGS

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## Ambition towards 2030 targets

*Despite some improvements, the current level of ambition of the latest available NECP updates is insufficient not only to align with Paris Agreement commitments, but also to reach the EU 2030 climate and energy objectives.*

The EU has no more time to lose: bold steps towards climate neutrality are needed before the end of this decade. Despite some efforts so far, scientific warnings are mounting about the alarming pace of climate change. For example in 2023, [global temperatures](#) reached unprecedented highs, with July being recorded as the hottest month in history.

Only through unified, ambitious action can Europe avoid the catastrophic consequences of inaction and lead the world towards a more sustainable future. Moreover, aligning with the Paris Agreement scenario would allow EU countries to reap the socio-economic benefits of the transition, amounting to [at least €1 trillion by 2030](#). NECPs are the tool to plan and deliver such a transition. However, Member States are not using them to their full potential.

For the EU to meet its 2030 climate objective (55% net emissions reductions compared to 1990 levels) and, even more so, to do its [fair share](#) under the Paris Agreement (for which 76% net emissions reductions are needed), it is essential that all Member States accelerate their national climate and energy action through their NECPs.

**The aggregate level of ambition of the draft updated NECPs is clearly insufficient** to meet the EU 2030 climate and energy targets, let alone to align with Paris Agreement commitments. This was clearly emphasised by previous [NGO reports](#), but also by the Commission's [assessment](#) of the draft NECPs (December 2023); by the ESABCC, which [called on](#) Member States to “urgently adopt and implement national measures to increase the pace of emissions reductions and reverse the declining EU carbon sink,” making specific reference to NECPs (January 2024); and, most recently by the **latest State of the Energy Union report (September 2024), which emphasises “ambition gaps, including bottlenecks and missing links for integrated infrastructures towards the Union’s 2030 targets”**.

So far, it seems that these urgent warnings did not have much effect. The delay in submitting the final NECP updates – only 11 out of 27 as of October 2024, three months after the deadline – is in itself an alarming signal that Member States are neglecting their responsibility and their legal duty to plan and deliver 2030 climate and energy targets. It also makes it difficult to assess the real level of climate and energy ambitions of the EU in the next, crucial years.

To assess climate and energy ambitions of EU Member States, this latest [NECPs tracker](#) release includes data from all final NECPs available as of the 30th September 2024. When final NECPs were not available, the most recent update draft was used as reference (in Bulgaria and Slovenia, for instance, these versions are more recent than the draft NECPs assessed by the Commission in December 2023).

The ambition of the plans is measured by comparing targets/national contributions and With Additional Measures (WAM) scenarios of the NECPs to EU 2030 binding climate targets – for non-ETS sectors falling under the Effort-Sharing Regulation (ESR) and Land use, land use change and forestry (LULUCF) – and to EU 2030 benchmarks for primary and final energy consumption as per the 2023 Energy Efficiency Directive (EED), as well as for renewables (RED).

The available **final updated NECPs** (6 of the countries featured in the NECP tracker) show **some improvements compared to the drafts**. ESR targets have improved in all 6 countries to better align with EU legislation, while LULUCF targets have improved in the final plans of Italy, Ireland and Spain. On the energy dimension, renewables targets have improved in Denmark and Ireland, while Germany, Italy and Ireland have improved their respective national contributions for final energy consumption.

But all that glitters isn't gold. In many cases, **these target improvements are not fully backed up by policies and measures**, whose impact should be evaluated in the WAM scenarios. For instance, none of the improvements in ESR targets is backed up by equally ambitious WAM scenarios – with the notable exception of Spain, where the WAM scenario leads to a result higher than the target. The same reasoning applies to WAM scenarios for LULUCF in Ireland, Italy and Spain; for renewables in Germany; and for primary and/or final energy consumption in Ireland and Italy.

In other cases, **these enhanced figures are still not enough to align with EU benchmarks**. This is the case for the LULUCF sector – in France and Germany – but also for energy efficiency contributions. For example, Italy is not in line with the minimum EED obligations for its primary energy consumption, while Spain is not in line for both primary and final energy consumption. Also, none of the 6 countries has made pledges that equal the most ambitious results of the EED formula. In a few circumstances, the final NECPs even made a **step backwards compared to the drafts**. These include the renewables target in Italy; primary and final energy consumption in Spain and France and improved projection methods show the same for the German LULUCF target.

The **analysis carried out on draft NECPs** – including the latest available draft updates – highlights **similar trends**. Compared to the final plans, several ESR targets are not formally aligned with EU targets (in 4 countries: Belgium, Cyprus, Estonia, Poland). In some cases, the draft updates do not comply with the minimum LULUCF targets (for example in Belgium, Croatia, Cyprus, Greece and Poland); while in others they do not fully comply with the expected renewables contributions (for example in Belgium, Croatia, Cyprus, Czechia, Hungary, Poland, Portugal and Slovenia). None of the plans pledge energy efficiency national contributions that equal the most ambitious results of the EED formula.

An important aspect related to future compliance using emission trading – as allowed under the Effort Sharing Regulation – is that, if EU countries fall short of their 2030 emission reduction targets, cross-country trading of Annual Emission Allowances (AEAs) would become difficult. In such a situation there would be a severe shortage of surplus AEAs available for purchase, and this would **eliminate the possibility of an easy buy-out** for countries struggling to meet their targets in 2030. The limited availability of AEAs would drive up prices, leading to an economic burden. Consequently, relying on AEA trading as a fallback option becomes highly uncertain and costly. Therefore, **it is**

**crucial to enhance emission reduction measures as early as possible**, also to avoid a future situation where countries are forced to resort to more costly or punitive actions to meet their commitments.

## Implementation of NECPs as of 2022

*The implementation of the old 2019 NECPs is lagging behind. All Member States assessed in the tracker seem to show some worrying trends and gaps in keeping up to their pledges.*

Between 2023 and 2024, EU Member States have been updating their NECPs. The original versions, however, date back to 2019 (2020 for some latecomers), and Member States should now be in the process of implementing them.

While the NECP tracker does not have the granularity required to assess the implementation of specific policies and measures, it does provide a bird's eye perspective regarding whether Member States are on track to achieve their old climate and energy objectives – at least where data was available and could be retrieved. This is done by comparing the old 2019 NECPs targets and trajectories with historical data (retrieved from EEA and Eurostat datasets) up to 2022.

By showing where (i.e. in which sectors and areas) EU Member States are lagging behind, such monitoring is mainly useful for **identifying policy gaps that require an immediate increase in efforts**. Being on track with the implementation of the old 2019 NECP is not necessarily a positive sign in itself: to achieve the 2030 EU climate and energy targets and align with Paris Agreement objectives, EU Member States will need to **significantly increase** the ambition of their national targets and drastically accelerate the implementation of policies and measures in the next few years. Failure to implement the now outdated 2019 NECP targets sends an extremely worrying signal that EU Member States should correct immediately.

Overall, the results of the NECP tracker are not reassuring. While positive examples exist, as of 2022 (the latest available data set), EU Member States were not fully on track with their 2019 NECP trajectories and objectives. **All of the 17 EU Member States featured in the tracker were lagging behind in at least one of the NECP tracker indicators<sup>2</sup>**. While performances and motivations vary significantly across countries, it is nonetheless possible to highlight some common trends.

The NECP tracker shows that several countries – including big emitters such as France, Italy and Poland, as well as Croatia, Cyprus, Greece and Ireland, Italy – are not in line with at least one of their overall greenhouse gas emission reduction targets (net or gross). In many cases, the delay has been caused by **too slow a decarbonisation rate in the sectors** covered by the Effort-Sharing Regulation

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<sup>2</sup> For Czechia and Hungary, the NECP tracker only includes 2030 targets, which prevents a comparison between the old 2019 NECP and 2022 historical data. Nonetheless, in both countries some decarbonisation trajectories are clearly off track compared to their projected direction of travel (see next footnote).

(road transport, buildings, agriculture, waste and small industry). As of 2022, 8 out of the 17 countries featured in the tracker were not aligning with the non-ETS targets or trajectories of the old 2019 NECPs (Belgium, Cyprus, Denmark, Estonia, Ireland, Italy, Slovenia, Spain). This is especially worrying because all ESR targets have since been revised and raised as part of the Fit for 55 package.

Among non-ETS sectors, **transport** is the one that raises most concerns. As of 2022, implementation of the old 2019 NECP trajectories was not on track in 10 out of 17 countries<sup>3</sup> (Belgium, Croatia, Estonia, France, Greece, Italy, Poland, Portugal, Slovenia, Spain). In many of these countries, transport emissions have bounced back after 2020 and, in some cases, are now higher than pre-pandemic levels. The NECP tracker's findings confirm the assessment of the [2024 State of the Energy Union](#) report, which indicates transport as one of the sectors where 'required emissions reductions are significant' to meet the 2030 targets.

The NECP tracker also shows that EU Member States need to improve ambition, policies and measures in the **agriculture** (which is off track in 6 EU countries) and in the **waste** sectors (off track in 5 EU countries).

The decline of **LULUCF** net sinks is also a reason for concern: 6 countries featured in the tracker were not on track compared to their old 2019 NECPs (Belgium, Bulgaria, Estonia, Germany, Ireland and Italy).

When it comes to **energy indicators**, the tracker shows mixed results. Despite wind and solar taking up all over the EU, several countries are still marginally lagging behind compared to the renewable trajectories of their old 2019 NECPs. The **share of renewables** in electricity generation and/or final energy consumption was off track with expected trajectories in 10 out of the 17 countries (Bulgaria, Croatia, Cyprus, Denmark, France, Italy, Poland, Portugal, Slovenia and Spain). This indicates that, despite progress, Member States still have much untapped renewables potential.

Energy consumption indicators show a more positive picture, but a general lack of data from old NECPs (notably WAM trajectories) needs to be factored in the evaluation. The 2020-2022 period was unusual due to the COVID pandemic and high energy prices, which had a significant impact on energy consumption. Also the [EEA](#) underlines that the reductions for final and primary energy consumption in 2022 can be attributed to high energy prices, especially for gas. These developments occurred mainly as a result of the invasion of Ukraine and the EU's reduction in Russian fossil fuel imports. Despite recent progress on energy consumption, it is clear that accelerated implementation of energy savings measures are needed to meet the 2030 EU energy efficiency target, leading to even steeper annual reductions than in the last few years.

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<sup>3</sup> If we also consider Czechia and Hungary, the count is 12 out of 17. In both countries, emissions from the transport sector show a steep upward trend for the past ten years, going in an opposite direction compared to what would be required to achieve their 2030 old NECP targets.

## Quality of data in the NECP updates

*NECPs present a varying but overall poor transparency and quality of data, which hinders the plans' credibility as well as access to information.*

As highlighted in the previous [NECP tracker update](#), as well as in a [report](#) assessing the main gaps in transparency and access to climate data, easily-accessible, good-quality, and consistent data are key for planning effective policies and identifying gaps. These are also essential for improved stakeholder and civil society involvement in planning and decision-making processes, in line with the [Aarhus Convention](#).

While developing and updating the NECP tracker, the authors found several gaps and inconsistencies in the data in both draft and final updated NECPs, as well as in the old 2019 NECPs. These gaps and inconsistencies made it difficult – at times impossible – to retrieve and assess data or make valid national comparisons. Below, we provide an overview of the most common critical aspects found during our analysis of the plans, with a particular attention to the last round of updates.

- **TRANSPARENCY**
  - **Unavailability, partial availability and complex accessibility of data.**

To develop this briefing, the authors looked into two main categories of climate and energy data: scenarios with existing and additional measures (WEM and WAM scenarios), and 2030 targets. Both targets and scenarios are essential for a thorough assessment of the plans: targets show the plans' commitments; scenarios (which often don't align with targets) show whether they have planned enough policies and measures to back them up.

In the majority of circumstances, either targets or (more often) WEM and WAM scenarios, were not adequately provided. In some cases, such as Bulgaria, Cyprus, Hungary, Portugal, Slovenia and Greece, they were missing some indicators and sectors.

In other cases, it was extremely difficult to access data: values were either provided only in percentages (and not in absolute terms), or the opposite; or they were provided only within graphs with little to no explanation or context. An example is Bulgaria, where GHG Net and GHG gross WAM emissions were retrieved from a graph and where the non-ETS (ESR) indicator was calculated from a percentage. Another example is France, where in some cases 2030 targets per se were provided, but carbon budgets for 2024-2028 and 2029-2033 with an average annual number per year within those periods, and thus the 2030 target and trajectories were calculated.

The absence of a clear and unified reporting framework for data hinders consistency both within different sections of the plans and across plans from various EU countries. **This severely undermines transparency and access to information**, and prevents an effective, thorough and timely analysis of the plans.

**To improve both, a clear and common reporting framework for data should be developed by the**

**European Commission**, and EU Member States should include a full list of spreadsheets and datasets as an annex.

- **QUALITY**
  - **Lack of consistency with EU datasets.**

To ensure cross-country data consistency in the NECP tracker, authors have only used EU datasets (EEA and Eurostat) to retrieve historical data. This was deemed necessary because, in some circumstances, historical data in the NECPs – which constitute the baseline to derive 2030 targets and scenarios – are not matching historical data of the EEA and Eurostat datasets – which constitute the baseline on which EU institutions set targets and scenarios. There are two possible explanations for the lack of data consistency between NECPs and EU sources:

- national datasets have been used in the NECP that are not aligned with EEA and Eurostat datasets; or
- the scope of certain categories used in the NECP does not match the scope used in EU datasets. This is often the case of sectoral emissions indicators. For example, in Belgium, Estonia, Ireland and Italy the GHG emissions sectoral data were reorganised to achieve a better alignment with the EEA historical data. In these cases, for instance, under the Energy sector there were values that could fit entirely or in part in other sectors emissions, such as Buildings, Transport, Industry and Agriculture.

In both cases, **the problem can be traced back to the absence of a common reference framework** which – if applied to both EEA datasets and NECPs – could significantly improve cross-country consistency in data use and categorisation. This lack of consistency affects the quality and reliability of the plans and, consequently, on the ability of third parties to assess them. Basing common targets and benchmarks on inconsistent datasets hampers the ability to assess whether a target is compliant, ambitious, or achieved.



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# NATIONAL COUNTRY SHEETS

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# Belgium

*As of 30 September, Belgium did not submit its final updated NECP.*

## 1. NECP ambition toward 2030 targets

The data and analysis of this section refer to the draft updated NECP (2023).

AMBITION						
		ESR (MtCO <sub>2</sub> -eq)	LULUCF (MtCO <sub>2</sub> -eq)	RES (% in FEC)	PEC (Mtoe)	FEC (Mtoe)
2023 draft NECP (2030)	Target/ Contribution	46.8	-1.3	21.70%	36.5	29.9
	WAM	46.79	-1.30	21.69%	36.52	29.93
2024 final NECP (2030)	Target/ Contribution	N/A	N/A	N/A	N/A	N/A
EU targets/ benchmarks (2030)*		43.2	-1.35	33%	33.77	28.78

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The draft updated NECP (submitted to the European Commission in 2023) is unstructured and hard to process, since it consists of a collection of federal and regional plans. Continuous discussions between the various governments about the burden sharing have led to deadlocks and significant opacity in targets and projections. Nonetheless, it is possible to conclude that the **overall ambition is insufficient not just to align with Paris Agreement commitments, but also to contribute to the EU's 2030 climate and energy objectives**. It is also not in line with the 2023 court ruling in the 'Klimaatzaak', which imposed a -55% target by 2030 (all GHG, compared to 1990).

The draft NECP update does not meet the EU 2030 **target** for emissions reduction in non-ETS sectors (ESR). The plan is also, according to the European Commission, 'significantly below' the EU 2030 benchmarks for renewables (21.7% compared to 33%) and energy efficiency. Belgium is not in line with the minimum EED obligations for primary and final energy consumption and it does not pledge



contributions equal to the most ambitious results of the EED formula. This should be improved in the final version.

While **scenarios** with additional measures (WAM) seem to align with the NECP's (insufficiently ambitious) targets, concerns remain regarding the (quantifiable) impact of planned policies. Especially as it was recently announced that a number of policies that were included in the WAM will experience a rollback. Despite attempts, especially at the federal level, to improve its governance, the draft NECP remains marred by a lack of coherence. Moreover, the social dimension is underdeveloped and inconsistent.

**Quality of data in the draft NECP update (2023)** – Overall, the Belgian draft NECP update (2023) provides clear 2030 objectives and/or scenarios with additional measures (WAM). The scope of NECP data also seems to largely overlap with the EEA and Eurostat datasets used in this report to retrieve historical data. However, some information and data had to be rearranged to achieve a good level of match between the two datasets. This is notably the case at the sectoral level: emissions from the buildings, agriculture, industry and energy sectors were categorised differently in the NECP, compared to the EEA dataset. Such discrepancies can hinder transparency and accessibility of information.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/A	N/A	N/A	N/A

Blue: on track / Orange: not on track / N/A = not available

As of 2022, Belgium was not fully on track to implement its old 2019 NECP, which is now obsolete in terms of ambition.

Climate indicators (GHG emissions reductions): Belgium is not on track<sup>4</sup> in the LULUCF sector: the 2022 historical value (-0.41 MtCO<sub>2</sub>-eq) is higher than both the NECP value for 2020 (-0.7) and the 2025 target (-0.9). Implementation is also lagging behind in non-ETS sectors covered by the Effort-Sharing Regulation, notably in the transport and waste sectors – the former having experienced a substantial uptake in emissions after the 2020 pandemic.

Implementation is on track for gross and net emissions, as well as in the ETS sectors. However, the 2019 NECP trajectories for these indicators were extremely unambitious, as they all projected an increase in emissions between 2020 and 2025.

Energy indicators: data from the Belgian 2019 NECP was not retrieved.

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<sup>4</sup> The 2019 NECP trajectories for climate data have 5-year milestones (in 2020, 2025 and 2030). For 2022, we have therefore compared historical data with the result of a linear trajectory from 2020 to 2025 milestones.

# Bulgaria

*As of 30 September, Bulgaria **did not submit its final updated NECP.***

AMBITION						
		ESR (MtCO <sub>2</sub> -eq)	LULUCF (MtCO <sub>2</sub> -eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	Target/Contribution	M**	M	34.10%	12.4	8.42
	WAM***	21.73	-9.50	34.47%	13.22	8.85
<b>2024 final NECP (2030)</b>	Target/Contribution	N/A	N/A	N/A	N/A	N/A
<b>EU targets/ benchmarks (2030)*</b>		20.1	-9.72	33%	13.71	8.25

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

\*\*In the 2023 draft NECP the ESR target is missing, but in the most updated version of the draft NECP the ESR target is -10%, thus 20.1 MtCO<sub>2</sub>

\*\*\* WAM values refer to the most updated draft version of June 2024

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

## 1. NECP ambition towards 2030 targets

*The data and analysis of this section refer, where possible, to the latest draft updated NECP made available during public consultations in June 2024.*

The last available draft of the Bulgarian NECP update, made available during public consultations in June 2024, is not ambitious enough to align with Paris Agreement commitments, and not even with all EU 2030 climate targets and energy benchmarks.

Even with the latest WAM scenarios, the Bulgarian draft NECP update fails to meet the EU 2030 **climate targets** for emissions reduction in both the non-ETS and LULUCF sector. The sectoral scenarios themselves look unconvincing, as they over rely on the absorption capacity of carbon sinks (LULUCF), as well as on market forces and business initiatives, while being supported by just a few scattered measures (or no measure at all). An example is the transport sector, where objectives

appear unrealistic considering the registered constant increase in emissions despite all the implemented measures and spendings for the last 10 years and the lack of new consistent measures which can lead to significant change in the current pattern.

For **energy**, the most significant improvement of the June 2024 version, compared to previous drafts, is on **renewables**. The 2030 target for renewables in final energy consumption is higher than the EU benchmark (34.10% compared to 33%). The target for renewables in electricity generation was also significantly improved (55.6% in the June 2024 version, compared to 42% in the 2023 draft and 30,33% from 2019 NECP). Regarding **energy efficiency**, Bulgaria is in line with the minimum EED obligations for primary and final energy consumption, but it fails to align with the most ambitious result of the formula for final energy consumption. This should be adjusted in the final version. For primary energy consumption, Bulgaria pledges a more ambitious contribution than the most ambitious result of the formula.

However, the plan still includes several gaps and missed opportunities for the energy transition, including:

- The renewables share in the heating and cooling sector has decreased compared to previous drafts (from 45.5% to 43.5%) without any explanations.
- The lack of recognition of the role of energy communities (notably for heating and cooling) and of Bulgaria's involvement in the Net Zero Government Initiative.
- The lack of phase out plans for fossil fuels, and even the denied existence of fossil fuel subsidies, due to be phased out by 2025.
- The planned increase in nuclear capacity which, given the expected expansion of renewables, would be unreasonable and unprofitable.

**Quality of data in the latest draft NECP update (June 2024)** – The latest available draft of the Bulgarian NECP includes targets or scenarios for several NECP tracker indicators. However, several gaps and inconsistencies exist. The plan does not clearly report both gross and net GHG emissions scenarios, as well as the ETS and binding non-ETS contribution, all of which had to be derived from graphs or formulas. Scenarios for the energy, industry, buildings and transport sectors show significant misalignments with the EEA and Eurostat datasets used in this report to retrieve historical data. Such misalignments may depend on differences in scopes or data sources. This makes it difficult to assess the ambition and, in the future, the implementation of the plan.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
N/A	N/A		N/M	N/A

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
	N/M	N/A	N/M		N/A

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Bulgaria was not fully on track to implement its old 2019 NECP (especially in the transport sector), which is now obsolete in terms of ambition.

*Climate indicators (GHG emissions reductions):* In the majority of cases, it is not possible to track the implementation of the Bulgarian 2019 NECP when it comes to emissions reduction trajectories. Several targets and/or scenarios are missing or difficult to retrieve in the 2019 NECP – including for overall net and gross emissions – while many others have scopes that differ significantly from the EEA dataset that was used to retrieve historical data for the NECP tracker. Nonetheless, it appears that Bulgaria is lagging behind in the LULUCF and agriculture sector, while the transport sector emissions are well above the projected peak of emissions.

*Energy indicators:* In 2022, Bulgaria was on track with the 2019 NECP trajectories for final energy consumption, but not on primary. Primary energy consumption has experienced a worrying upward trend in the years after the pandemic. Trends in renewables shares in both the electricity and energy mix also raise concerns. The share of renewables in electricity generation only initially was on track, but then decreased from 23.6% to 20.23%; identically the share of renewables in final energy consumption initially overachieved the target for 2020, then it plummeted, putting Bulgaria off-track compared to the 2019 NECP projections.

# Croatia

As of 30 September, Croatia **did not submit** its final updated NECP.

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer to the draft updated NECP (2023).

AMBITION						
		ESR (MtCO <sub>2</sub> - eq)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
2023 draft NECP (2030)	Target/ Contribution	15.005	-4.24	42.5%	8.14	6.55
	WAM	9.32	-4.11	33%	8.14	6.55
2024 final NECP (2030)	Target/ Contribution	N/A	N/A	N/A	N/A	N/A
EU targets/ benchmarks (2030)*		15.1	-5.53	44%	6.67	5.81

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The draft updated NECP, published in July 2023, is not ambitious enough to align with Paris Agreement commitments, and not even to contribute to the EU’s 2030 climate and energy objectives.

The plan fails to meet the EU 2030 **targets** for greenhouse gas removals in LULUCF. It also fails to meet the EU 2030 benchmark for renewables and is not in line with the minimum EED obligation for primary and final energy consumption. It also fails to align with the most ambitious results of the EED formula for energy efficiency (both for primary and final energy consumption). These national targets and contributions were set too low and should be adjusted in the final version.

In addition, national targets that are apparently in line with EU objectives are not backed up by **scenarios with additional measures** (WAM). Notably, WAM scenarios for emissions in non-ETS sectors (ESR) and renewables project significantly less ambitious results for 2030 compared to the respective targets.

Other reasons for concern about the draft NECP include:

- Measures that would predictably incentivise fossil fuels use, which are likely to remain in the final NECP update.
- Gaps identified in the 2019 NECP that have not improved in the 2023 draft update: both the research, innovation and competitiveness dimension and energy poverty are poorly defined and lack targets and objectives.
- An intransparent public consultation process. The document was made public only four weeks before submissions, and comments could be sent only by e-mail. A public consultation on the final NECP update should be kickstarted shortly, but the timeline remains unclear.

**Quality of data in the draft NECP update (2023)** – The draft plan contains scenarios with additional measures (WAM). However, only for some indicators the NECP scenarios match the EEA and Eurostat datasets used to retrieve historical data for this report (2021 was used as the reference year). The most relevant discrepancy was found for overall non-ETS emissions. Such misalignments may depend on differences in scope or data sources. This makes it difficult to effectively assess the ambition and, in the future, the implementation of the plan.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
				N/M

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
			N/M		N/M

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/M			

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Croatia was not fully on track to implement its old 2019 NECP, which is now obsolete in terms of ambition.

*Climate indicators (GHG emissions reductions):* In 2022, Croatia was lagging behind in overall greenhouse gas emissions reduction. Gross emissions (25.7 MtCO<sub>2</sub>-eq) were well above the trajectory anticipated by the 2019 NECP (23.4 MtCO<sub>2</sub>-eq). While marginally mitigated by improvements in the LULUCF sector, the implementation gap exists also for net emissions.

Values for non-ETS sectors do not always match the scope of the EEA dataset used to retrieve historical data for this report. Nonetheless, the tracker shows Croatia clearly being off-track both in the energy sector – where 2022 values are higher than pre-pandemic 2018 values – and transport sector – where emissions have increased after the pandemic (2020).

*Energy indicators:* Croatia is lagging behind its trajectories for final energy consumption. The share of renewables in the electricity mix has increased, but not enough to be reflected in final energy consumption, where the share of renewables has plummeted by almost 2 percentage points in 2022 compared to 2021.



# Cyprus

*As of 30 September, Cyprus did not submit its final updated NECP.*

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer to the draft updated NECP (2023).

AMBITION						
		ESR (MtCO <sub>2</sub> - eq)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	<b>Target/ Contribution</b>	<b>3.3</b>	<b>-0.325</b>	<b>26.5%</b>	<b>M</b>	<b>1.81</b>
	<b>WAM</b>	<b>3.28</b>	<b>-0.33</b>	<b>26.5%</b>	<b>2.28</b>	<b>1.80</b>
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>EU targets/ benchmarks (2030)*</b>		<b>2.9</b>	<b>-0.352</b>	<b>33%</b>	<b>1.92</b>	<b>1.71</b>

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The draft updated NECP, published in 2023, does not align with Paris Agreement commitments, nor with any of the EU’s 2030 climate and energy objectives.

**Cyprus does not fulfil the minimum EU requirements** for climate effort-sharing, LULUCF, renewable energy and energy efficiency. Climate effort sharing measures fall 9 percentage points short of the EU target. The renewables contribution falls short by 6.5 percentage points. Cyprus is in line with the minimum EED obligations for final energy consumption, but fails to submit a national contribution for primary energy consumption. It also fails to align with the most ambitious result of the formula for final energy consumption.

In addition, **existing and additional measures** seem insufficient even to back up the unambitious 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; the draft assumes this ambition gap could be filled by potential additional measures – most notably green taxation – without a quantification of the impact.

**Quality of data in the draft NECP update (2023)** – The draft plan contains scenarios with additional measures (WAM) only for some NECP tracker indicators. It notably lacks all sectoral WAM emissions reduction scenarios, raising concerns regarding the evaluation of the impacts of additional policies and measures. The WAM scenarios provided align with the EEA and Eurostat datasets used to retrieve historical data for this report.

## 2. Implementation of the old (2019) NECP as of 2022

The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
		N/M		

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
	N/A	N/M	N/M	N/A	

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/A			

**Blue:** on track / **Orange:** not on track / **N/A** = not available / **N/M** = not matching

As of 2022, Cyprus was not fully on track to implement its old 2019 NECP, which is now obsolete in terms of ambition.

*Climate indicators (GHG emissions reductions):* Where a comparison is possible, the NECP tracker shows that Cyprus is completely off-track in the implementation of its (now obsolete) 2019 NECP greenhouse gas emission reduction trajectories – notably gross and net emissions. Many sectoral targets were either unavailable or difficult to retrieve, while others have scopes that differ significantly from the EEA dataset that was used to retrieve historical data for the NECP tracker.

*Energy indicators:* While in 2022 Cyprus remains on track with its old NECP trajectory, final energy consumption has increased steadily after the pandemic (between 2020 and 2022). The uptake of renewables – notably wind and solar – is also lagging behind 2019 NECP projections: the share of

renewables in electricity generation is around 3 percentage points below expectations (16.96% compared to 19.89%).

# Czechia

*As of 30 September, Czechia **did not submit its final updated NECP.***

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer, where possible, to the latest available version of the updated NECP, which was supposed to be submitted as the final plan in July 2024 but still has to be approved.

AMBITION						
		ESR (MtCO <sub>2</sub> - eq)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	<b>Target/ Contribution</b>	<b>48.08**</b>	<b>Between -0,40 and -1.63</b>	<b>30%</b>	<b>28.8</b>	<b>20.35</b>
	<b>WAM</b>	<b>43.4**</b>	<b>-1.22</b>	<b>30%</b>	<b>M</b>	<b>22.57</b>
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A%</b>	<b>N/A</b>	<b>N/A</b>
<b>EU targets/ benchmarks (2030)*</b>		<b>48.1</b>	<b>-1.23</b>	<b>33%</b>	<b>28,81</b>	<b>20.21</b>

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

\*\*Czechia's draft NECP included incorrect projections of ESR emissions. The correct figures were reflected in [European Commission's recommendations from 23rd February 2024](#) and the [Country Factsheet](#).

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

As of 30th September, the Czech government has not approved a final NECP and the timeline for submission remains uncertain as the government decided to postpone its approval indefinitely and shows signs of backtracking on its previous decisions.

The last available draft (2024) is still not ambitious enough to be on track to fulfil the Paris Agreement objectives, however on paper it presents **climate** targets aligned to the ESR and LULUCF EU benchmarks, with relatively aligned WAM projections.

The draft fails to incorporate the Commission's recommendation to increase its target for the share of **renewable energy** to 33% of final energy consumption by 2030 as instead it keeps the same target of 30% (as in the original draft), despite more ambitious scenarios being available and cost-effective.

Czechia is in line with the minimum EED obligation for primary and final **energy consumption**, however it fails to align with the most ambitious result of the EED formula for final energy consumption. In addition, those targets are still projected to be missed in the WAM scenario.

The last available draft shows an improvement when it comes to mapping and analysing investment needs of the transition. However, it still fails to incorporate a plan for the **phase-out of fossil subsidies** as recommended by the Commission.

Although a second round of public consultation took place at the beginning of 2024, the most recent draft NECP fails to respond to the Commission's recommendations on public consultation and it is unclear how the results of the process have been taken into account, if at all.

**Quality of data in the draft NECP update (2024)** – Targets in the draft NECP are often not consistent with the results of the WAM scenario: some targets are lower/less ambitious than WAM projections by 2030 (e.g. total GHG emissions, ESR emissions reductions), some are higher (e.g. the target for final energy consumption is not projected be achieved in the WAM scenario). Trajectories remain unclear, as no annual data is available in the NECP. The model used for WAM works in 5 year increments and most of the underlying data is not openly available.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
N/A	N/A	N/A	N/A	N/M

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
N/M	N/M	N/A	N/A	N/M	N/M

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/M	N/A	N/A	N/M

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

Assessing the implementation of the Czech old 2019 NECP is very difficult due to the lack of trajectories (only a few 2030 targets are available in the NECP tracker). It is nonetheless clear that, as

of 2022, Czechia was still far from moving towards the 2030 objectives of its 2019 NECP, whose ambition is now obsolete.

Climate indicators (GHG emissions reductions): Not enough data was retrieved for a thorough assessment of Czechia's implementation of its 2019 NECP climate targets. Nonetheless, a few 2030 targets are available at the sectoral level which make some inferences possible. As of 2022, Czechia was still far from its 2030 sectoral targets – with the agriculture, transport and waste sectors showing worrisome trends. Notably, emissions in the transport sector have increased every year in the last decade (except during the pandemic year), and they are now 30 percentage points higher than the old NECP target for 2030.

Energy indicators: Not enough data was retrieved for a thorough assessment of Czechia's implementation of its 2019 NECP energy targets. It is nonetheless clear that, as of 2022, Czechia remained very far (38.6 Mtoe) from meeting its 2019 NECP target for primary energy consumption in 2030 (22 Mtoe). A sharp improvement in energy efficiency is therefore urgently required. On the other hand, renewables uptake in 2022 was on track with old NECP objectives.

# Denmark

*Denmark submitted its final NECP on time.*

## 1. NECP ambition towards 2030 targets

*The data and analysis of this section refer to the final updated NECP (2024).*

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> -e q)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP target (2030)</b>	<b>Target/ Contribution</b>	<b>24.44</b>	<b>M</b>	<b>70.9%</b>	<b>M</b>	<b>M</b>
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	<b>20.02</b>	<b>-0,4</b>	<b>60%</b>	<b>15.35</b>	<b>13.73</b>
	<b>WAM</b>	<b>22.44</b>	<b>0.69 (WEM)</b>	<b>73.79% (WEM)</b>	<b>15.35</b>	<b>13.17</b>
<b>EU targets/ benchmarks (2030)*</b>		<b>20.2</b>	<b>5.338</b>	<b>60%</b>	<b>14.67</b>	<b>12.69</b>

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The final Danish NECP presents ambitious climate and renewable energy targets to 2030 with 70% emission reduction for 1990-2030 that are in line with the EU benchmarks to 2030, but the overall climate target itself is still not aligned to a 1.5°C compatible development.

With respect to its draft version (2023), the final plan presents **enhanced ambition to 2030 for its ESR and LULUCF targets** but the ESR budget would be only met with WAM scenarios that are still being discussed at the national level, so its **achievement is still uncertain**, according to the projections included in the plan.

Denmark is in line with the minimum EED obligations for primary and final **energy consumption but this is not ambitious enough**, as it does not pledge contributions equal to the most ambitious results of the EED formula. Similarly to ESR, the energy efficiency 2030 contributions are not expected to be met with existing measures in place, but only with WAM scenarios that are still being negotiated at the national level.

Regarding its energy use, Denmark provides a linear reduction trajectory, which is relatively small due to its final energy objective.

There are still some critical implementation issues ahead, including:

- The ongoing LULUCF evaluation, due late 2024, can result in a downward revision of LULUCF sinks.
- Decisions on significant reduction measures still need to be put in place for agriculture, the sector with the largest emissions in Denmark.
- The climate target forecasts the use of CCS that might imply costs exceeding the available budget and the intensive use of pyrolysis of biomass for biochar, a practice not well developed yet.
- The solutions outlined above require the continued import of biomass (wood), which presents sustainability and cost uncertainties.

**Quality of data in the final updated NECP (2024)** – Data for different targets and indicators are available for most of the sectors and the 2022 information overlaps quite perfectly with the EEA and Eurostat historical data, this allows reliable comparisons while monitoring the ambition and implementation of the NECP. However, the WAM scenario is provided just for a few indicators such as Primary and Final Energy Consumption, non-ETS emissions (ESR). Solely the WEM scenario, and no WAM projections, are defined for relevant indicators such as the GHG gross and net emissions. The lack of this information makes it complex to evaluate if the measures and policies are going to be adequate to achieve the national and EU targets, arising an issue in terms of transparency of the information provided.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
	N/A		N/M		N/M



IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Denmark was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

Climate indicators (GHG emissions reductions): While much more will be required to meet the new NECP climate targets, as of 2022 Denmark was roughly on track in the implementation of its 2019 NECP. It nonetheless fails to align with its non-ETS trajectory, largely due to its delay in curbing emissions in the agriculture sector at a faster rate. Discrepancies in scope seem to exist when comparing certain NECP trajectories with the EEA dataset used for historical data. This hinders the possibility of more detailed assessments.

Energy indicators: While Denmark is on track with the primary and final energy consumption trajectories of the 2019 NECP, it is surprisingly lagging behind in renewables indicators: as of 2022, the share of renewables in final energy consumption was 41.6%, compared to the 44.7% projected in the old NECP trajectory.

# Estonia

*As of 30 September, Estonia **did not submit its final updated NECP.***

## 1. NECP ambition towards 2030 targets

*The data and analysis of this section refer to the draft updated NECP (2023).*

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP target (2030)</b>	<b>Target/ Contribution</b>	5.49	Between -2.8 and 3.6	65%	5.13	2.59
	<b>WAM</b>	5.589	-1.39	M	M	M
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	N/A	N/A	N/A	N/A	N/A
<b>EU targets/ benchmarks (2030)*</b>		4.78	-2.545	50%	3.14	2.53

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The final updated NECP has not yet been published, and this ambition analysis is then based solely on the draft updated NECP (2023). This draft represents an improvement over the previous plan (2019), with notable additions such as the goal of achieving climate neutrality by 2050 but - except for the RES and LULUCF - **it doesn't align with the EU benchmarks to 2030** (see ESR, PEC, FEC).

Estonia's draft NECP fails to align with the minimum EED obligations for primary and final energy consumption, nor does it comply with the most ambitious result of the formula for both primary and final energy. The WAM scenarios to reach the RES target and the national contributions for primary and final energy consumption are lacking **and the draft as of today does not demonstrate additional ambition either**, except perhaps in the target to produce renewable electricity in the amount equal to national consumption by 2030.

It is important to consider the targets in the draft final NECP as provisional, as Estonia's Climate Law is in its final stages of development and will introduce new sector-specific targets that will be

reflected in the final plan as well. The final NECP will be informed by the Climate Law, not the existing draft NECP and this mis-alignment is concerning as the current draft Climate Law proposes significantly lower climate targets.

The Ministry of Climate aims to reduce the overall GHG emission reduction target for 2030 from 70% to 59%, and emissions from shale oil production are allowed to increase up to 40% by 2030. **With these proposed targets, Estonia would not be on track to meet the objectives of the Paris Agreement and will exceed the carbon budget required to limit global warming to 1.5°C and even well below 2°C.**

**Quality of data in the draft updated NECP (2023)** – Data for different targets and indicators are available and, for the WAM scenarios, the 2022 information overlaps quite perfectly with the EEA and Eurostat historical data. That means that, when monitoring the ambition, the implementation of the NECP and its consistency with the EU targets it is possible to do reliable comparisons. However, the absence of a common framework for the data reporting in terms of sector division may badly influence the accessibility and transparency of the information. For instance, the emissions of the Buildings and Transport sectors, and part of the emissions for the Agriculture and Industry sectors, were considered as part of the Energy sector in the Estonian draft NECP; while categorised differently in the EEA dataset.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/A (target)	N/A (target)	N/A	

**Blue:** on track / **Orange:** not on track / **N/A** = not available / **N/M** = not matching

As of 2022, Estonia was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

*Climate indicators (GHG emissions reductions):* In 2022, Estonia's overall emissions were on track with the trajectories projected in the old 2019 NECP – despite they've increased after the sharp drop of the pandemic year (2020). However, implementation was lagging behind in the LULUCF sector, which did not serve as a carbon sink in 2022, and in some sectors not covered by ETS, such as waste – where emissions are not decreasing fast enough to align with the 2019 NECP scenarios – and transport – where emissions are now higher than pre-pandemic levels. Emissions are also on the rise in the agriculture sector.

*Energy indicators:* For primary and final energy consumption, the NECP tracker only includes the 2019 NECP targets (i.e. not scenarios), hence a full comparison is not possible. Estonia seems capable of achieving these unambitious targets, as long as it halts the increase in primary energy consumption experienced in the past two years. In 2022, the share of renewables in final energy consumption exceeded expectations of the 2019 NECP (38.46% compared to 33%), signalling that much higher ambition is possible.

# France

*France submitted its final NECP on July 10th 2024*

## 1. NECP ambition towards 2030 targets

*The data and analysis of this section refer to the final updated NECP (2024).*

AMBITION						
		ESR (MtCO <sub>2</sub> - eq)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	<b>Target/ Contribution</b>	<b>215</b>	<b>-18</b>	<b>N/A</b>	<b>157.3</b>	<b>104.1</b>
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	<b>215</b>	<b>-18</b>	<b>35%</b>	<b>158.6</b>	<b>106.9</b>
	<b>WAM</b>	<b>253</b>	<b>-18</b>	<b>41.3% (WEM)</b>	<b>192.5</b>	<b>118.7</b>
<b>EU targets/ benchmarks (2030)*</b>		<b>210.6</b>	<b>-34.05</b>	<b>44%</b>	<b>157.34</b>	<b>104.01</b>

*\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula*

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The final French NECP, even if submitted on July 10th, **includes many targets that are yet to be consulted on and the reported numbers are therefore draft projections that could be modified.**

The GHG and renewable energy **targets** are not consistent with EU legislation as France committed to -50% gross GHG emission target, instead of the -55% net GHG emission target required by EU law for 2030. The NECP does not formally include a target on the share of **renewable energy** in final energy consumption, and the ambition outlined (35%) is not consistent with the 44% by 2030 target enshrined in EU law. For what concerns **energy efficiency**, France is in line with the minimum EED obligations for both final and primary energy consumption but this is not ambitious enough as it does not pledge contributions equal to the most ambitious results of the EED formula.

**For what concerns the plan's implementation, key elements are missing.** A trajectory of how energy consumption will be reduced year by year is missing and WAM projections show that France is not on track to respect its pledges on energy efficiency and ESR. Projections on renewables targets lead to an improved RES target, even if still below the EU benchmark. French carbon sink potential is also lower than expected, which has led France to lower its ambition on LULUCF to -18MtCO<sub>2</sub> for 2030.

On another note, France has included more **social measures** than most other Member States to minimise the negative incidence of the NECP on low-income households. However, overall, the policies and measures included in the NECP will not be enough to achieve the targets and ensure a socially just climate ambition. The situation could get worse given the recent cuts in the national budget on climate and energy transition investments and social measures in key sectors such as building renovation and clean transportation.

**Quality of data in the final updated NECP (2024)** – Data for different targets and indicators are available even though the information is not always easily deductible. Moreover, on some sectors, the 2022 Target baseline has relevant discrepancies with the EEA and Eurostat Historical data. Thus, even with all the data provided, the absence of a common framework for data reporting in terms of sector division may badly influence the accessibility and transparency of the information (e.g. for Final Energy Consumption and Transport sectors). These discrepancies make it difficult to do reliable comparisons for all sectors when monitoring the ambition and the implementation of the NECP.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
		N/M	N/A	N/A

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
N/M	N/M				N/M

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / **N/A** = not available / **N/M** = not matching

As of 2022, France was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

Climate indicators (GHG emissions reductions): It is difficult to assess the implementation of the 2019 NECP climate targets. For several of the NECP tracker climate indicators, the 2019 NECP values seem not to match with the EEA dataset used for historical data; in addition, aggregate non-ETS and ETS values are not available. As of 2022, overall greenhouse gas emissions were roughly on track with the trajectory projected in the 2019 NECP (gross emissions were slightly below, net emissions slightly above), which calls for a drastic acceleration of climate action to meet the new 2030 climate targets. This is notably the case for sectors such as transport, where emissions have spiked again after the year of the pandemic (2020).

Energy indicators: France is on track with its old NECP energy efficiency trajectories, while implementation is clearly lagging behind for renewable energy uptake. As of 2022, the share of renewables in both electricity generation and final energy consumption was around 2 percentage points below the trajectory projected in its 2019 NECP.

# Germany

Germany submitted its final NECP on 29th August 2024.

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer to the final updated NECP (2024).

AMBITION						
		ESR (MtCO <sub>2</sub> - eq)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
2023 draft NECP (2030)	Target/ Contribution	317	-18	40%	193.6	160.5
2024 final NECP (2030)	Target/ Contribution	242.4	-3.80	42.5%	193.64	155.55
	WAM	287	-2.00	38.2%	242.4	186.6
EU targets/ benchmarks (2030)*		242.4	-30.84	41%	191.06	154.75

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The final German NECP is more ambitious than the 2023 draft and, except for the LULUCF sector, **targets** are aligned to the minimum 2030 EU benchmarks *on paper*. Germany respects its **renewable energy** contribution and meets minimum EED obligations for **energy consumption**, its national pledges fall between ambitious and unambitious benchmarks set by the EED formula.

For **climate**, the final NECP reports an ESR contribution compliant with the EU benchmark on paper, but according to projections Germany is expected to fall short on meeting several climate targets, especially in the ESR and LULUCF sectors. The reported **targets are mostly not backed up by credible trajectories supporting their achievement**. Even in projections following the WAM scenario, which is not sufficiently described, Germany is not on track to achieve most of the EU climate and energy targets. The target gap is particularly wide in the LULUCF sector, in which methodological improvements in emissions reporting lead to considerably more pessimistic projections.

The LULUCF sector is projected to not become a permanent sink by 2050. Regarding energy efficiency, even if the NECP provides a detailed trajectory for both primary and final energy consumption with a linear reduction of energy use, the WAM are resulting in higher FEC and PEC contributions. The NECP does not contain enough information on how Germany intends to close the



gaps in these sectors. Overall, the federal government is overly relying on price developments under the upcoming ETS II to close the ESR and energy efficiency target gaps, which poses questions regarding the social and political feasibility of the trajectories presented in the NECP.

Concerning issues also remains which could weaken the implementation of the planned measures:

- The recent budgetary cuts to the Federal Climate and Transformation Fund, which jeopardise the financing and thus the implementation of planned measures, make the achievement of trajectories included in the NECP uncertain.
- The plan overall remains vague on the financing needs and sources of planned measures and does not include phase out dates for fossil fuels subsidies.
- From a **social** point of view, the final NECP only partially addresses the aspects of a just transition as it does not adequately address the socio-economic aspects of the transition, overlooking the impacts on employment and skills, and fails to include estimations on energy poverty.

**Quality of data in the final updated NECP (2024)** – Data for different targets and indicators are available but the absence of a common framework for data reporting in terms of sector division may badly influence the accessibility and transparency of the information. Moreover, even if the 2022 information for WAM scenarios overlaps quite well amongst the different datasets, some discrepancies between the NECP historical data and the EEA and Eurostat dataset persists (e.g. for Energy sector, Primary Energy Consumption) These discrepancies mean that, when monitoring the ambition and the implementation of the NECP and its consistency with the EU targets it is not possible for all the sectors to do reliable comparisons as the scope or the source of the information is not the same and thus not compatible.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
N/M	N/A		N/M		N/M

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
			N/A

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Germany was not fully on track to implement its old 2019 NECP, whose ambitions are now obsolete.

Climate indicators (GHG emissions reductions): While Germany must accelerate climate action to achieve its new 2030 targets, it was, as of 2022, roughly on track with the greenhouse gas emission reduction trajectories projected in the 2019 NECP. The only notable and worrisome exception is the LULUCF sector, where implementation clearly seems to be lagging behind: in 2022, emissions from the LULUCF sections were at 4.38 MtCO<sub>2</sub>-eq, compared to the -10 MtCO<sub>2</sub>-eq projected in the 2019 NECP, though some of these developments may be due to methodological improvements in the emissions reporting.

It was not always possible to assess sectoral emission reduction trajectories, as 2019 NECP values seem not to match with the EEA dataset used for historical data for the agriculture, industry and waste sectors. In the energy and transport sectors, as of 2022 the implementation seemed to still be on track; however, after 2020 emissions have an upward trend in both sectors. On sectoral targets it is worth noting that the Federal Climate Action Law was recently amended to delete binding sectoral targets at national level in favour of a compliance with cross-sectoral GHG emissions reductions targets.

Energy indicators: Germany is roughly on the trajectory to meet its old NECP 2030 energy targets both for energy efficiency and renewables. Nonetheless, efforts must increase sharply if the new NECP targets are to be met.

# Greece

As of 30 September, Greece **did not submit its final updated NECP**.

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer, where possible, to the latest draft updated NECP made available during public consultations in August 2024.

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	<b>Target/ Contribution</b>	M	-4.8	44%	18.2	15.4
	<b>WAM**</b>	M	-7.59	45.39%	19.14	15.18
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	N/A	N/A	N/A	N/A	N/A
<b>EU targets/ benchmarks (2030)*</b>		<b>48.7</b>	<b>-4.37</b>	<b>39%</b>	<b>17.13</b>	<b>14.64</b>

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

\*\* WAM Values for the draft NECP are referred to the latest available draft version of August 2024

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The draft NECP published for consultation in August 2024 is more ambitious than the 2019 NECP but remains fundamentally inadequate to fulfil the EU obligations and to be in line with the Paris Agreement objectives. While the plan lacks to feature the ESR target for Greece, the national **emission reduction target is set to -58.6%** for 2030 (slightly over the EU target of -55%) but the last can only be achieved with a high LULUCF contribution. For **energy**, while the RES target is compliant with the EU Benchmark, Greece does not align with the minimum EED obligations for primary and final energy consumption and fails to pledge in line with the most ambitious results of the EED formula and will therefore not meet the benchmarks even when considering the WAM scenarios included in the latest available draft NECP (2024).

Therefore, according to the inconsistent policies and measures outlined in the draft plan, it is still **uncertain if and how these targets will be fulfilled**. The renewable energy sources capacity for example is set to double from now to 2030 but the lack of a proper spatial planning framework endangers the safeguarding of natural ecosystems and the realisation of the set contribution. Moreover, the NECP foresees additional planning for additional gas capacity and infrastructure while supporting the realisation of hydrocarbon exploration and drilling programmes.

Additional issues that delay effective climate action at the country level are:

- Public acceptance of clean energy is hindered.
- A clear and ambitious target for self-consumption is missing.
- The plan emphasises the development of new energy carriers more than energy efficiency and it **fails to phase out fossil fuels** (including subsidies) even by 2050.
- The final draft was tabled with a long delay and without an effective public consultation process.

**Quality of data in the latest available version of the draft updated NECP (2024)** – In the draft NECP few relevant data indicators are not provided such as the non-ETS, ETS and GHG gross emissions. Moreover, the absence of a common sectoral framework makes it difficult to compare information. For instance, the data reported for the Energy and Transport sectors WAM scenarios have discrepancies with the historical data provided by the EEA dataset. The lack of this information hinders the monitoring of the NECP ambition and its compliance with the EU targets.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
	N/A	N/A		

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
N/A			N/M		N/A

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/M			

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Greece was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

*Climate indicators (GHG emissions reductions):* There seems to be a delay in the implementation of 2019 NECP climate targets. Greenhouse gas gross emissions have increased between 2020 and 2022, which has put Greece off-track from the (now obsolete) trajectory projected in the 2019 NECP. A similar spike is also visible in the indicator for overall non-ETS sectors and in specific sectoral targets: between 2020 and 2022, emissions have increased both in the buildings and transport sector. As a consequence, when compared with the trajectories set in the 2019 NECP, Greece is now barely aligning with the overall (and extremely unambitious) non-ETS sectors trajectory and is lagging behind in both the buildings and transport sectors.

*Energy indicators:* As of 2022, Greece was in line with the final energy consumption trajectory set in the 2019 NECP – despite energy consumption having increased after the pandemic – and with the trajectory for the share of renewables in electricity generation. On the other hand, the share of renewables in final energy consumption has remained slightly below what was expected in the 2019 NECP.

# Hungary

As of 30 September, Hungary **did not submit its final updated NECP**.

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer to the draft updated NECP (2023)

AMBITION						
		ESR (MtCO 2-eq)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
2023 draft NECP (2030)	Target/ Contribution	36.4	M	29%	M	17.91
	WAM	36.43	M	29.8%	28.32	17.62
2024 final NECP (2030)	Target/ Contribution	N/A	N/A	N/A	N/A	N/A
EU targets/ benchmarks (2030)*		38.9	-5.72	34%	23.31	16.12

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

As of 30th September, the last official public version of the draft NECP is the draft from August 2023 and its **overall ambition is insufficient not just to align with Paris Agreement commitments, but also to contribute to the EU's 2030 climate and energy objectives**. The submission and publication of the final updated NECP is expected by mid-October 2024. According to informal information, even if in the final NECP the final energy consumption contribution and the renewables share target are expected to be strengthened, they would not still reach the ambition required by the EC mentioned in the EC's assessment on the draft updated NECP.

Regarding **climate targets**, the ESR target in the draft plan is in line with the European requirements but the 2050 climate neutrality national goal (set also in national law) may be jeopardised by the uncertain LULUCF calculation method and relative target that was missing from the draft.

The target rate of **renewable energy in final consumption was set to 29% in the 2023 draft updated NECP**, and is expected to be increased to 30% in the final NECP, thus still lagging behind the EU benchmark set to 34% (as also outlined in the Commission’s recommendations).

Regarding **energy efficiency**, the final energy consumption contribution in the draft updated NECP is not in line with the minimum EED obligations for final energy consumption nor with the most ambitious result of the EED formula. The draft failed to pledge a national contribution for primary energy consumption. The expected energy efficiency target in the final NECP (740 PJ final energy consumption by 2030) would be more ambitious than the draft but still not reach the most ambitious result of the EED formula.

Despite some improvements achieved during the drafting process, the 2023 draft NECP postpones the bulk of necessary energy transition **measures** to later or after 2030, Additional measures set to achieve the renewable energy share in final consumption to 2030 highlight Hungary will still fall short to achieve the EU Benchmark recommended by the European Commission. WAM projections are missing for the LULUCF sector and, even if they project to fulfil the ESR target, they rely on an uncertain LULUCF calculation method.

The document lacks a detailed action plan for decarbonization, including milestones and deadlines, as well as measures for phasing out fossil subsidies, investments. It also included the construction of three new fossil gas power plants (CCGT).

In order to meet 2050 climate neutrality goals, the final NECP should also include:

- Measures to perform 130,000 energy renovations of homes per year.
- Lifting restrictions on wind energy.
- Assessment of and addressing energy poverty in Hungary, proposing adequate national measures and tasks to be detailed at least in the Hungarian Social Climate Plan.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
N/A	N/A	N/A	N/A	N/A

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
N/A	N/M	N/M	N/M	N/A	N/A

IMPLEMENTATION – energy indicators
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PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/A	N/A	N/A	N/A

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

The old Hungarian 2019 NECP only includes targets for 2025 and 2030. Assessing its implementation by comparing historical data (until 2022) with the NECP scenarios is therefore difficult. The general trends could nonetheless be analysed, and show that, as of 2022, Hungary was not fully on track with implementation.

Climate indicators (GHG emissions reductions): Economy-wide greenhouse gas emissions are currently roughly on track with the decarbonisation trajectories of the 2019 NECP – which, however, are not very ambitious.. A clear example is the overall non-ETS sectors indicator, which roughly remains on track with NECP trajectories despite emissions having increased substantially over the past 10 years (44.2 MtCO<sub>2</sub>-eq in 2022 compared to 38.4 in 2013). Among non-ETS sectors, the most worrisome remains transport where emissions, with the exception of the pandemic year (2020), have only increased since 2013, and which now looks clearly off track compared to the 2019 NECP trajectories. The assessment of other sectors was not always possible, as 2019 NECP values for buildings, energy and industry do not align with the EEA dataset used to retrieve historical data.

Energy indicators: Overall, as of 2022, there seemed to be a positive trend in the implementation of the 2019 NECP energy targets. Nonetheless, Hungary needs to significantly improve energy efficiency and renewables deployment to meet the new 2030 targets.



# Ireland

*Ireland submitted its final NECP on the 22nd July 2024*

## 1. NECP ambition towards 2030 targets

*The data and analysis of this section refer to the final updated NECP (2024).*

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
2023 draft NECP (2030)	Target/ Contribution	42.84	9.7	31.4%	M	12.9
2024 final NECP (2030)	Target/ Contribution	27.7	3.73	43%**	11.29	10.45
	WAM	35.56	4.91	42.71%	13.93	12.46
EU targets/ benchmarks (2030)*		27.7	3.73	43%	11.23	9.86

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

\*\* In the NECP two different values are reported. Page 10 states: "Following a decision by the Government of Ireland, Ireland's objective is to contribute to this target by achieving a 43% share of renewable energy in total energy consumption by 2030" Page 336 reports Table 43: Ireland's progress towards overall renewable share (RES) target (SEAI Energy in Ireland Report 2023 (Table 8.2)), states that the IE Overall RES Target is 34.1%.

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

Ireland's final NECP is slightly more ambitious than the 2023 draft, it includes **2030 targets** for energy efficiency, renewable energy, and emissions reduction in line with the EU benchmarks but it will face substantial challenges in achieving them. Ireland is compliant with the minimum EED obligations for both final and primary **energy consumption** but does not pledge contributions equal to the most ambitious results of the EED formula. It also argues that its contributions are too ambitious and contests the assumptions of the EED formula to set these contributions, which is not perceivable.

Even if targets are aligned with EU benchmarks on paper, the WAM projections highlight that the **policies and measures in the plan are not enough** to meet them and will lead to implementation gaps that require systemic changes to be filled. As an example, current LULUCF emissions are rising,

with no clear strategy to reverse the trend and, even if Ireland indicates a trajectory to meet its national EED contributions, there is an implementation gap for both final and primary energy consumption due to missing additional measures.

There are still some critical implementation issues ahead, including:

- Ireland seeks to source 80% of its electricity from renewables but grid capacity and energy integration remain significant obstacles for its realisation.
- The NECP relies on technological advancements (false solutions) and energy efficiency, but it falls short of addressing deeper systemic transformations, such as reducing energy demand and rethinking policy and economic models in high-emission sectors, hindering progress toward long-term climate goals.
- Population and economic growth are cited as presenting challenges to reaching targets.

**Quality of data in the final updated NECP (2024)** – Overall, the final Irish plan provides clear 2030 objectives and/or scenarios with additional measures (WAM). The scope of NECP data also seems to largely overlap with the EEA and Eurostat datasets used in this report to retrieve historical data. However, some information and data had to be rearranged to achieve a good level of match between the two datasets. This is notably the case at the sectoral level: emissions from the buildings, agriculture, industry and energy sectors were categorised differently in the NECP, compared to the EEA dataset. Such discrepancies can hinder transparency and accessibility of information.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption
N/A	N/A	N/A	N/A

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Ireland was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

Climate indicators (GHG emissions reductions): As of 2022, Ireland was not in line with the implementation of the net emissions trajectory projected by its 2019 NECP; net emissions have actually not decreased in the past ten years (64.6 MtCO<sub>2</sub>-eq compared to 63.6 in 2013). Implementation is notably lagging behind in the LULUCF sector as well as in the non-ETS sectors. The most worrisome remains agriculture, where emissions are completely off track compared to the 2019 NECP objectives and have experienced an upward trend in the past 10 years. Emissions are off-track also in the waste and energy sectors.

Energy indicators: data from the Irish 2019 NECP was not retrieved.

# Italy

## Italy submitted its final NECP on 1st July 2024

### 1. NECP ambition towards 2030 targets

The data and analysis of this section refer to the final updated NECP (2024).

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
2023 draft NECP (2030)	Target/ Contribution	Between 223.02 and 216.25	-34,9	40.5%	115	94.4
2024 final NECP (2030)	Target/ Contribution	193.2	-35.8	38.7%	115	93.05
	WAM	204	-28.3	39.39%	123.3	101.7
EU targets/ benchmarks (2030)*		193.2	-35.76	39%	111.18	92.12

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The updated final Italian NECP remains grossly inadequate in addressing the climate emergency and accelerating Italy's decarbonization, showing no meaningful improvement from previous drafts and failing to address the majority of the Commission's recommendations. **Climate and energy targets** reported in the final NECP are aligned with the EU benchmarks but the plan lacks both ambition in emission reduction targets and the necessary social structural responses for a just transition. The proposed overall reduction of **greenhouse gas emissions** by only 44.3% by 2030 falls significantly short of the 51% target set by the National Recovery and Resilience Plan (PNRR) and the EU 55% goal. Italy is in line with the minimum EED obligation for its final energy contribution, but not for its primary energy contribution. It shall be noted that Italy's primary energy contribution for 2030 is coherent with the EED deviation of the formula.

According to the projections resulting from **policies and measures** contained in the final NECP, they **won't be enough to reach the climate and energy targets outlined in the plan**. Italy will not meet the ESR target and is projected to achieve only a 40.6% reduction by 2030, compared to the target of

-43.7% under the Effort Sharing Regulation (ESR). Additionally, the plan's treatment of carbon sinks is inadequate, with projections at only 28.4%, falling short of the 35.8% required by the LULUCF Regulation. Although there are improvements in renewable energy commitments, Italy has a higher projected consumption in 2030 than its targets, with national policy measures leading to 123.3 Mtoe for primary energy consumption and 101.7 Mtoe for final energy consumption in 2030, way above Italy's indicated contributions. Measures are then not enough to achieve the national EED contributions, and additional measures must be planned together with a detailed trajectory (that is currently missing).

Additionally, Italy should address:

- Its reliance on “false solutions” such as Carbon Capture and Storage and nuclear energy, which in Italy are neither developed nor will be feasible by 2030 and thus undermines genuine progress.
- The lack of timelines, policies, or measures for phasing out fossil fuels and fossil fuel subsidies.
- The inadequacy of the current permitting process for renewable energy power plants, which has become more cumbersome rather than simplified.
- The overall lack of engagement with civil society during the drafting process severely undermines the credibility and effectiveness of the Italian NECP.

**Quality of data in the final updated NECP (2024)** – Data for different targets and indicators are available and for the WAM scenarios the 2022 information overlaps quite well with the EEA and Eurostat historical data. However, some information and data had to be rearranged to achieve a good level of match between the NECP and EEA datasets (e.g. Buildings sector). Thus, even with all the data provided, the absence of a common framework for the data reporting in terms of sector division may badly influence the accessibility and transparency of information. This is notably the case at the sectoral level: emissions from the buildings, agriculture, industry and energy sectors. Such discrepancies can hinder transparency and accessibility of information.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

<b>IMPLEMENTATION – overarching climate indicators</b>				
<b>Gross GHG emissions</b>	<b>Net GHG emissions</b>	<b>LULUCF</b>	<b>ETS</b>	<b>non-ETS</b>
			N/A	

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
N/M					N/M

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Italy was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

*Climate indicators (GHG emissions reductions):* As of 2022, Italy was largely not in line with the decarbonisation pathway projected in its 2019 NECP. Both gross and net historical emissions are off-track, and carbon sinks almost halved in just a few years (-21.1 MtCO<sub>2</sub>-eq compared to -41.8 in 2018). Implementation is lagging behind also in some non-ETS sectors, including energy and transport. In both cases, emissions have spiked up after the pandemic year (2020) and are now higher than pre-pandemic levels. It was not possible to assess implementation in the agriculture and waste sectors, as the 2019 NECP values do not seem to be matching with the EEA dataset used to retrieve historical data.

*Energy indicators:* As of 2022, Italy was lagging behind also in the implementation of its objectives for renewables deployment and, to a lesser extent, energy efficiency. After a noticeable spike in 2020, renewables deployment is not accelerating fast enough to align with the 2019 NECP projections: in 2022, the share of renewables in final energy consumption was 2 percentage points below expectations (19.1% compared to 21%).

# Poland

*As of 30 September, Poland **did not submit its final updated NECP.***

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer, where possible, to the latest available draft of the updated NECP (2024).

AMBITION					
	ESR (MtCO <sub>2</sub> -eq)	LULUCF (MtCO <sub>2</sub> -eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
2023 <i>draft</i> NECP target/contribution (2030)	165.26	-6.9	29.8	79.9	58.5
2024 <i>final</i> NECP target/contribution (2030)	N/A	N/A	N/A	N/A	N/A
EU targets/benchmarks (2030)*	158.4	-38.10	32	77.16	57.73

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

According to the latest available version of the Polish draft NECP (2024) presented in September 2024 targets have been improved with respect to the 2019 NECP and the 2023 draft NECP (submitted to the European Commission only in March 2024). The presented document proposes 50,4% vs. 1990 reduction of **GHG emissions** up to 2030, whereas in 2019 the ambition was below 30%. Nevertheless, the proposed indicative reduction of GHG is only 70% up to 2040. There is a 32,6% target for **renewables** in final energy use (electricity 56,1%), which is also higher than in the 2019 NECP and March 2023 NECP draft. The Energy efficiency contributions have not been presented while the focus is set on the reduction of costs of energy production to the end users. However, in the Polish 2023 draft NECP, Poland was in line with the minimum EED obligation for final and primary energy consumption, however it is not ambitious enough to align with the most ambitious result of the EED formula.

The document will likely gather 149 **measures** to achieve the identified targets and those will mainly

support renewables, energy efficiency and decarbonization of industry, transport and agriculture. It is still unclear if and how the proposed measures will back up an effective transformation and some of them will rely on Carbon Capture and Storage, nuclear energy, thus overlooking the need to provide a systemic change to reach the climate and energy targets.

Other needs identified to deliver on EU obligations in Poland are:

- The political will to phase out coal by the 2030s (currently set to be phased out from housing as late as in 2040)
- The rapid expansion of electricity grid capacity
- Establish an enabling framework for RES investment and the need to implement the principle energy efficiency first. The consultation with full access to the draft document is planned not earlier as in November 2024.

## 2. Implementation of the old (2019) NECP as of 2022

The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
				N/M

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
	N/A		N/A		N/M

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Poland was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

*Climate indicators (GHG emissions reductions):* As of 2022, Poland was roughly on track to implement the decarbonisation trajectories projected in its old 2019 NECP, mostly thanks to a sharp decline in emissions from ETS sectors between 2020 and 2022. On the other hand, the NECP tracker shows that implementation is lagging behind in all non-ETS sectors where 2019 NECP trajectories could be retrieved, such as agriculture and transport. The trend in the transport sector is particularly



worrisome: after the pandemic year (2020), emissions have risen sharply and well above pre-pandemic levels (69.3 MtCP2-eq in 2022 compared to 66 in 2019), putting Poland off track compared to its 2019 NECP objectives and confirming an upward trend that continues steadily since 2013.

Energy indicators: As of 2022, Poland was lagging behind also in the implementation of its energy transition scenarios. Both final and primary energy consumption levels have been above the 2019 NECP trajectory for all the years where the comparison was possible (from 2020 onwards). Renewables deployment shows a more encouraging trend, with renewables taking up in the past years. Nonetheless, the share of renewables in electricity generation remains below the expectations of the 2019 NECP.

# Portugal

*As of 30 September, Portugal **did not submit its final updated NECP.***

## 1. NECP ambition towards 2030 targets

The data and analysis of this section refer, where possible, to the latest available draft of the updated NECP (2024).

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	Target/ Contribution	M*	-9.6	49%	20.8	14.37
	WAM**	29.5	-6.54	>50%	23.75	14.27
<b>2024 final NECP (2030)</b>	Target/ Contribution	N/A	N/A	N/A	N/A	N/A
<b>EU targets/ benchmarks (2030)***</b>		<b>34.7</b>	<b>-1.36</b>	<b>51%</b>	<b>15.16</b>	<b>13.41</b>

\*In the most updated version of the draft NECP (2024) the ESR target is 33.51 MtCO<sub>2</sub>e

\*\* WAM Values for the draft NECP refer to the latest updated version of the draft NECP (2024). The values for FEC and PEC are not indicated directly in the NECP but are inferred from 2 figures.

\*\*\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The latest available draft of the final NECP (2024), yet to be submitted to the EC in its final version, has increased its ambition with respect to the 2023 draft but it still falls short of what is needed to be aligned with the 1.5°C goal of the Paris Agreement.

The economy-wide GHG **emission reduction** target has been updated to 55% by 2030, compared to 2005, and the climate neutrality target has been anticipated to 2045. To be aligned with the Paris Agreement objectives, however, these targets should be respectively 60% and climate neutrality closer to 2040. The **renewable energy** target has also been updated, from 47% to 51% by 2030 and

the RES target in the production of electricity was updated to 90% by 2030, an ambitious yet feasible target, given the positive evolution in the sector. For the energy efficiency national contributions, 16.711 Mtoe for primary energy consumption and 14.371 for final energy consumption are foreseen in Portugal's final NECP update, which align with the minimum EED obligation. However, this is not ambitious enough to align with the most ambitious results of the EED formula for both primary and final energy consumption.

Meeting the targets of the plan doesn't seem feasible since the proposed **policies and measures lack sufficient detail** such as clear metrics of implementation, associated emission reduction and financing amounts.

Moreover there are sectors that are consistently increasing their emissions, such as agriculture, waste management and transport. The last one in particular jeopardises the achievement of national targets due to its weight in national emissions: around 30% of national emissions).

## 2. Implementation of the old (2019) NECP as of 2022

The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
N/A (target)	N/A (target)		N/A	N/A (target)

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
		N/A	N/A		

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Portugal was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

*Climate indicators (GHG emissions reductions):* Assessing the implementation of overall climate objectives from the Portuguese 2019 NECP is difficult due to the lack of trajectories: for several overarching indicators, the NECP tracker only features 2030 targets. Nonetheless, it appears that

Portugal could be lagging behind and would need to accelerate climate action even to achieve its old targets. Net and gross emissions have stagnated in the past two years and, as of 2022, they were around 30 percentage points away from the planned 2030 targets. Emissions from non-ETS sectors seem to be on track to meet the (extremely unambitious) old NECP objectives. Emissions from the transport sector remain a reason for concern: after a sharp decline during the pandemic year (2020), they increased again at a relatively fast rate.

*Energy indicators:* As of 2022, Portugal was not on track to meet most of the 2030 energy objectives projected in its old 2019 NECP. Primary and final energy consumption increased sharply between 2020 and 2022, putting Portugal off-track from its old energy efficiency trajectory. Renewables are increasing their relevance in the energy mix but, in 2022, the share of renewables in electricity generation was still not aligning with the 2019 NECP trajectory.

# Slovenia

*As of 30 September, Slovenia **did not submit its final updated NECP.***

## 1. NECP ambition towards 2030 targets

*The data and analysis of this section refer, where possible, to the latest available draft of the updated NECP (2024).*

AMBITION						
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> - eq)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	<b>Target/ Contribution</b>	<b>8.4</b>	<b>M</b>	<b>Between 30% and 35%</b>	<b>6.03</b>	<b>4.43</b>
	<b>WAM**</b>	<b>8.42</b>	<b>M</b>	<b>M</b>	<b>M</b>	<b>4.436</b>
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<b>EU targets/ benchmarks (2030)*</b>		<b>8.6</b>	<b>-0.146</b>	<b>46%</b>	<b>5.68</b>	<b>4.29</b>

*\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula*

*\*\* WAM Values for the draft NECP are referred to the latest available draft version of August 2024*

*\*\*\*In the most updated version of the draft NECP (August 2024) the LULUCF target is - 0.146 MtCO<sub>2</sub>eq*

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The latest available version of the Slovenian NECP (August 2024) presents some improvements with respect to the 2023 draft NECP but **climate** targets are still not compatible with the Paris Agreement objectives. The latest draft proposes a 28% GHG reduction in non-ETS sectors, which is only 1% above the EU binding target and 35% gross emissions reduction target for 2030 which is far below the European Commission's recommendation of 55%. The present plan also sets a target of 55% reduction in gross emissions for 2033, following the expected closure of the country's biggest coal power plant. On **energy**, one of the main issues remains a very weak RES target of 33% by 2030 which is more than 10% below the target recommended by the European Commission. Some

positive improvements might regard the 2030 targets for primary and final energy consumption compared to the 2023 draft NECP. In the latest draft of revised NECP from August 2024, Slovenia is in line with the EED obligation for final energy consumption (4.32 Mtoe) but not for primary energy consumption (5.98 Mtoe). Even if these updated values present an improvement with respect to the 2023 draft, they are still not ambitious enough, as both fail to align with the most ambitious EED formula results.

The latest available version of the NECP provides WAM scenarios to reach the ESR target and a FEC contribution but does not include WAM scenarios to back up the LULUCF and the PEC contribution. Nevertheless, it includes new important additional **measures**, especially in the field of the transport sector. This is relevant as significant additional potential remains in the transport and agriculture sectors, with only a 1% reduction in transport emissions compared to 2005 and a 2.8% reduction in agriculture emissions compared to 2005.

In addition, a major problem is the significant weakening of measures and targets regarding the phase-out of fossil fuel subsidies compared to the 2023 draft NECP and currently valid 2019 NECP.

**Quality of data in the latest available draft of the updated NECP (2024)** - Data for different targets and indicators are available but data concerning the ETS, non-ETS and GHG Net emissions are missing (for the NECP Tracker update they have been calculated with the available information from the other sectors and indicators). While for the WAM scenarios the 2022 information overlaps quite well with the EEA and Eurostat historical data, some discrepancies between the NECP historical data and the EEA and Eurostat dataset persist. In this context a reliable monitoring of the ambition and the implementation of the Slovenian draft NECP and its consistency with the EU targets is not always possible as the scope or the source of the information may not be the same and thus not compatible.

## 2. Implementation of the old (2019) NECP as of 2022

*The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.*

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS
N/A	N/A	N/A	N/A	

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste
		N/M	N/M		

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Slovenia was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

Climate indicators (GHG emissions reductions): Several overarching climate targets or trajectories from the old 2019 NECP are not available in the NECP tracker. While, as of 2022, both gross and net emissions were on a declining trend, emissions from the LULUCF sector raise concerns: values have worsened every year since 2019.

Slovenia is also off the decarbonisation trajectory projected in the 2019 NECP for non-ETS sectors, with 2022 values surpassing pre-pandemic levels (11.1 MtCO<sub>2</sub>-eq compared to 10.8 in 2019). The available data indicates that the transport sector is an important component of this surge in emissions. An assessment could not take place for the energy and industry sectors, for which 2019 NECP values do not match the scope of the EEA dataset used to retrieve historical data.

Energy indicators – As of 2022, Slovenia was on track to implement the 2030 objectives set for energy efficiency in the old 2019 NECP tracker (nonetheless, increased efforts will be needed to achieve the new 2030 targets). On the other hand, Slovenia is slightly below expectations of the 2019 NECP when it comes to the share of renewables in final energy consumption.

# Spain

## Spain submitted its final NECP on 26th September 2024

### 1. NECP ambition towards 2030 targets

The data and analysis of this section refer to the final updated NECP (2024).

		AMBITION				
		ESR (MtCO <sub>2</sub> -e q)	LULUCF (MtCO <sub>2</sub> -e q)	RES (%)	PEC (Mtoe)	FEC (Mtoe)
<b>2023 draft NECP (2030)</b>	<b>Target/ Contribution</b>	<b>133.8</b>	<b>-34</b>	<b>47.9%</b>	<b>96.7</b>	<b>70.2</b>
<b>2024 final NECP (2030)</b>	<b>Target/ Contribution</b>	<b>150.8</b>	<b>-43.6</b>	<b>48%</b>	<b>98.4</b>	<b>71.7</b>
	<b>WEM</b>	<b>134.13</b>	<b>-38.5</b>	<b>47.9%</b>	<b>98.4</b>	<b>77.2</b>
<b>EU targets/ benchmarks (2030)*</b>		<b>150.8</b>	<b>-43.6</b>	<b>43%</b>	<b>81.78</b>	<b>64.94</b>

\*The EU FEC and PEC benchmarks always refer to the most ambitious result of the EED formula

N/A Not available = the document was not submitted

M Missing = the document was submitted, but the target was not included

The updated Spanish final NECP positively aims at climate neutrality before 2050 and the ESR, LULUCF, RES **targets** - at least on paper - are aligned to the EU benchmarks. However, compared to the previous draft version, a worrying downward readjustment in ESR sectors and energy efficiency targets can be observed. The 2030 gross GHG emissions target (-32% compared to 1990) remains insufficient for Spain to contribute to the Paris Agreement with responsibility and solidarity.

Spain is not in line with the minimum EED obligations both for primary and final energy consumption for 2030 and is therefore not compliant with the EU 2030 energy efficiency contributions.

The **projections** resulting from the final plan show Spain wouldn't be able to comply with its obligations in relation to the LULUCF Regulation as the planned measures would lead to a contribution of -38.5 MtCO<sub>2</sub>e instead of the pledged -43.6MtCO<sub>2</sub>e. In addition, under the EED, Spain falsely argues that the PRIMES 2020 Reference Scenario does not reflect the reality of the Spanish energy system. The plan reinforces the actions provided from 78 to 110 measures, most of which are focused on the energy sector (nevertheless providing a limited trajectory with only one milestone for



final energy consumption in 2025) and the improvement of the economic and industrial competitiveness of Spain.

The plan also presents positive **social measures** on just transition and energy poverty, and incorporates the gender perspective. However, it also includes other measures that perpetuate the use of fossil gas and the phasing out of fossil fuels subsidies is not clearly addressed.

## 2. Implementation of the old (2019) NECP as of 2022

The data and analysis of this section refer to the 2019 NECP in comparison to 2022 historical data.

IMPLEMENTATION – overarching climate indicators				
Gross GHG emissions	Net GHG emissions	LULUCF	ETS	non-ETS

IMPLEMENTATION – sectoral climate indicators					
Agriculture	Buildings	Energy	Industry	Transport	Waste

IMPLEMENTATION – energy indicators			
PRIMARY energy consumption	FINAL energy consumption	Renewables % in electricity generation	Renewables % in final energy consumption

**Blue:** on track / **Orange:** not on track / N/A = not available / N/M = not matching

As of 2022, Spain was not fully on track to implement its old 2019 NECP, whose ambition is now obsolete.

*Climate indicators (GHG emissions reductions):* As of 2022, gross and net emissions were still on track with the trajectories projected in the old 2019 NECP, despite having bounced up after the pandemic year (2020). On the other hand, implementation is lagging behind in non-ETS sectors. The most worrisome developments are in the agriculture and transport sectors, where emissions have increased in the past two years and are not aligned with 2019 NECP trajectories anymore. Implementation is also lagging behind in the industry and waste sector.

*Energy indicators:* Spain is on track to implement its old 2019 NECP energy efficiency objectives. Both primary and final energy consumption values are on track with projected trajectories, despite having

risen compared to the pandemic year (2020). On the other hand, the share of renewables in final energy consumption is 2 percentage points below the 2019 NECP trajectory.



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# ANNEX – METHODOLOGY AND SOURCES

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This assessment monitors the level of implementation of the 2019 NECPs and the ambition of the drafts and final 2023-2024 NECPs for 17 European Member States. All these documents are publicly accessible on the European Commission's website as well as on preliminary plans that were open for consultation on a national level.

## Implementation gap assessment

For the implementation gap assessment the 2019 NECPs were compared to the historical data from the EEA and Eurostat (see below).

All the 2019 NECPs are available in the European Commission website at this link: [https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans\\_en](https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en)

## Ambition gap assessment

For the ambition gap assessment three different kinds of NECPs were analysed when available: the 2023 Draft NECPs (17 countries); the most updated version of the draft NECPs (4 countries); and the Final updated NECPs (5 countries). The quantitative analysis is based on the comparison between the targets and benchmarks of the different NECPs to evaluate whether improvements were done in the latest versions and if they are in line with the EU laws. The qualitative analysis is based on the different contributions and assessments from the CAN Europe's members on the specific policies and measures inside the NECPs.

All the documents used can be retrieved as follows:

- 2024 Final updated NECPs, [European Commission, National Energy and Climate Plans, Website Page](#).
- 2023 draft NECPs, [European Commission, National Energy and Climate Plans, Website Page](#).
- 2024 Most updated draft NECPs:
  - [Bulgaria](#) June 2024 version
  - [Greece](#) - August 2024 version
  - [Portugal](#) - July 2024 version
  - [Slovenia](#) - August 2024 version

## Quality and transparency of data assessment

For the 2023-2024 Draft NECPs and final updated NECPs an analysis on the quality and transparency of the data was conducted. To assess these aspects, two main indicators were considered.

First, the availability and accessibility of the data in the NECPs, both targets and policy and measures scenarios on the EU indicators and sectoral targets. In this case the absence of part or of the whole

data, was considered as negative. When the countries provided extensive data sheets for all the sectors, years and indicators, it was considered as positive.

Second, the alignment of the NECPs historical data with the European Union databases (EEA and Eurostat). In this case the absence of a common framework creates an overall negative feedback. However, rearranging part of the sector's information in the NECPs was possible to achieve a good alignment with the EEA datasets and this was considered as positive since it allows a more reliable comparison with the EU benchmarks and targets.

## Historical data

For climate indicators, the European Environmental Agency (EEA) was used as the main data source for historical data. The specific datasets used are the following:

- For gross, net and LULUCF emissions (1990-2022):  
<https://www.eea.europa.eu/data-and-maps/data/dataviewers/greenhouse-gases-viewer>
- For emissions in ETS sectors (2005-2022):  
<https://www.eea.europa.eu/dataand-maps/dashboards/emissions-trading-viewer-1>
- For emissions in non-ETS sectors (2005-2022):  
<https://www.eea.europa.eu/en/datahub/datahubitem-view/e9ce7eb8-8439-4f2f-96f8-279a36c5fa7a>

For energy indicators (2005-2022), Eurostat was used as the main data source for historical data. The specific datasets used are the following:

- For energy savings indicators (primary and final energy consumption):  
<https://ec.europa.eu/eurostat/web/energy/database/additionaldata#Energy%20balances>
- For renewables indicators:  
[https://ec.europa.eu/eurostat/databrowser/view/nrg\\_ind\\_ren\\_custom\\_8490338/default/table?lang=en](https://ec.europa.eu/eurostat/databrowser/view/nrg_ind_ren_custom_8490338/default/table?lang=en)

## Methodology and sources for targets and benchmarks

The targets and benchmarks reported in the assessment's tables are in part retrieved directly from the NECPs, in part retrieved from European Commission assessments, and in part from a study from ECNO that will be released after the publication of this briefing.

### NECPs targets and WAMs (2030)

- 2023 draft NECP targets (2030) - European Commission Assessments of the draft updated National Energy and Climate Plan by Country available [on the NECPs webpage of the commission](#). The FEC values of Czechia, Denmark, Germany, Ireland, France, Cyprus, Poland and Portugal represent an exception, as these countries notified national contributions to the European Commission in January 2024. Therefore those values are retrieved from the [“Indicative national contributions to the Union’s energy efficiency target for final energy consumption, after application of the ‘ambition gap mechanism’ in accordance with Article 4\(5\) of the Directive \(EU\) 2023/1791 on energy efficiency”, Table 14](#)

- 2024 final NECP target (2030)
  - France and Spain Final NECPs Targets and WAM values were retrieved from ECNO.
  - Denmark, Ireland and Italy final NECPs Targets were retrieved from ECNO
  - Denmark, Ireland and Italy final NECPs WAMs were taken from the NECP tracker tool after the NECPs analysis conducted respectively by Danish 92; ENJI, and WWF Italy

## EU targets and benchmarks (2030)

The European Union ESR and LULUCF Targets, and Renewable Energies Benchmarks in the tables where retrieved from ECNO study according to the following sources:

- ESR - Annex I Revised Effort Sharing Regulation (2023) - <https://eur-lex.europa.eu/eli/reg/2018/842/2023-05-16>.
- LULUCF - ANNEX 2a Revised LULUCF Regulation (2023) - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02018R0841-20230511>
- RED - Annex - EU wide assessment of the draft updated National Energy and Climate Plans - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A796%3AFIN>

For the Energy Efficiency indicators the most ambitious result of the 2023 Energy Efficiency Directive formula from the "[EED recast Annex I formula results \(EU Reference Scenario 2020 & updated EU Reference Scenario 2020\)](#)" was used as a benchmark. A comparison was also done with the least ambitious result of the formula for primary energy consumption and with the corrected contribution by the European Commission, which were marked as minimum EED obligation. The benchmarks were taken from a [document presenting the detailed calculations that the Commission performed and communicated to Member States in accordance with Article 4 and Annex I of the EED](#).

Note: ESR - Baseline (2005) commission data is different from EEA historical data. In this assessment, in line with ECNO analysis, were used the data of the [COM NECP assessment \(2023\)](#) – Annex I.

## The NECP Tracker methodology and sources

The informations reported on this briefing relies partially on the [NECP Tracker](#), a tool developed by the TogetherFor1.5 project, that monitors and assesses the implementation of National Energy and Climate plans, or NECPs is not exhaustive, as it does not cover all the dimensions that Member States shall include in their NECPs. Rather, it provides information on a selected amount of indicators for climate and energy policies, chosen by the LIFE TogetherFor1.5 project partners based on relevant common policies and availability of accurate historical data. More information on the NECP tracker methodology and sources can be found [here](#).

The NECP Tracker provides information on a selected range of indicators for climate and energy policies, chosen by the LIFE TogetherFor1.5 project partners based on relevant common policies and

availability of accurate historical data. For what concerns climate policies, the tracker monitors greenhouse gas emission levels. The selected indicators are the following:

- Greenhouse gas net emissions
- Greenhouse gas gross emissions
- LULUCF sector greenhouse gas emissions and removals
- ETS sector greenhouse gas emissions
- Non-ETS sector greenhouse gas emissions

Sectoral greenhouse gas targets:

- Agriculture
- Industry
- Energy
- Waste
- Buildings
- Transport

All climate indicators are expressed in MtCO<sub>2</sub>-eq. They compare historical greenhouse gas emission levels with the targets and trajectories in the old and new NECPs. This allows users to easily see whether Member States are in line with emission reduction trajectories promised in the old NECPs, as well as to show where are the gaps – both in terms of ambition and implementation – that must be addressed in the final version of the new NECPs. The tracker also allows to easily visualise which climate targets and trajectories are missing from either old or new NECPs; these should be included by Member States in the final version of the NECPs update, to ensure transparency and allow for effective monitoring of their implementation.

For what concerns energy policies, the tracker includes a set of indicators covering the energy savings and renewables dimensions. The selected indicators are the following:

For the energy savings dimension:

- Primary energy consumption
- Final energy consumption

For the renewables dimension

- Share of renewables in gross final consumption of energy
- Share of renewable energy in the electricity sector (%)

For the energy savings dimension, indicators are expressed in million tons of oil equivalent (Mtoe). They compare historical energy consumption levels with the targets and trajectories to reduce energy consumption in the old and new NECPs. For the renewables dimension, indicators are expressed in percentage terms (%) compared to the total absolute value. They compare the historical share of renewables, in different sectors and by different technologies, with the increase in renewables use promised by Member States in their old and new NECPs. They allow users to see whether Member States are (1) reducing their energy consumption levels and (2) increasing the share of renewables in the energy and electricity mix as they promised in the old NECPs, and the extent to which they have increased ambition in the

updated ones. The tracker also allows to easily visualise which energy targets are missing from either old or new NECPs; these should be included by Member States in the final version of the NECPs update.



**Date of publication:**

Published in October 2024 by Climate Action Network Europe, Brussels, Belgium.  
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**The report was drafted with contributions from CAN Europe member organisations:**

BELGIUM (BBL - Bond Beter Leefmilieu)  
BULGARIA (Za Zemiata)  
CROATIA(DOOR)  
CYPRUS (Terra Cypria)  
CZECHIA (CDE - Centrum pro dopravu a energetiku)  
DENMARK (Vedvarende Energi and Danish92)  
ESTONIA (ELF -Eestimaa Looduse Fond)  
FRANCE (RAC France)  
GERMANY (Germanwatch)  
GREECE (Greenpeace Greece and WWF Greece)  
HUNGARY Magyar Természetvédők Szövetsége - Friends of the Earth Hungary)  
IRELAND (EJNI)  
ITALY(WWFItaly)  
POLAND (ISD)  
PORTUGAL (ZERO)  
SLOVENIA (Focus)  
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The Together For 1.5 project has received funding from the LIFE Programme of the European Union. The information and views set out in this document are those of the authors and do not necessarily reflect the official opinion of the European Commission.



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