

# 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.