IS THE LONG-TERM STRATEGIES PROCESS WORKING? EVIDENCE AND RECOMMENDATIONS FROM SELECTED NATIONAL CASES.



ACCELERATE CLIMATE ACTION IN EUROPE









NARODOWY FUNDUSZ OCHRONY ŚRODOWISKA i gospodarki wodnej

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Highlights

| Country | LTS adopted | LTS revision |
|----------|-------------|-----------------------------------|
| Belgium | 2020 | No |
| Croatia | 2021 | No |
| Czechia | 2017 | Yes (finalised 2024, not adopted) |
| Estonia | 2017 | No |
| France | 2020 | Yes (to be released in 2025) |
| Hungary | 2021 | No |
| Poland | No | No |
| Portugal | 2019 | Yes (in progres) |
| Slovenia | 2023 | No |
| Spain | 2020 | Yes (started at the end of 2024) |

LTS proces in selected countries

7 silver bullets of LTS revision preparation

- 1. Enact a national climate law (with LTS inside).
- 2. Create working group on climate action between ministries.
- 3. Build common expert base from various stakeholders.
- 4. Accept a clear vision for climate policy.
- 5. Organise public consultation with broad range of stakeholders.
- 6. Report the consultation outcomes.
- 7. Coordinate (or work jointly) with NECP preparation.

Introduction

Ten years ago, a milestone in international climate change negotiations was reached with the adoption of the Paris Agreement, which set the goal of keeping the global temperature increase in this century well below 2°C above pre-industrial levels, and to continue efforts to limit the temperature increase even further to 1.5°C. Exceeding the 1.5°C temperature threshold would have serious consequences, such as more frequent and extreme heat waves, rainfall and droughts, or hurricane-force winds, not to mention temperature rises above 2°C.

However, the world is now far from avoiding the worst impacts of climate change, with existing pledges pointing to a temperature rise of 2.5-2.9°C in this century, according to the latest UNEP Emissions Gap Report¹ (see Box 1). To put the world back on track to meet the climate target, which is still technically possible, countries urgently need to revise and strengthen their climate and energy policies.

Medium- and long-term policy planning is essential for any country truly aiming to contribute its fair share to deliver a fair and just transition towards climate neutrality and achieve the Paris Agreement objectives. The European Union does have such a toolbox. Regulation (EU) 2018/1999 of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action (the Governance Regulation), adopted in 2018, requires Member States to submit National Energy and Climate Plans (NECPs) with an outlook towards 2030; and **national Long-Term Strategies, or LTS, with an outlook towards 2050, by when the EU is bound to achieve climate neutrality**. According to the Governance Regulation, each NECP has to be revised every five years, while the LTS has to be revised every ten years, or every five years "if necessary". As of April 2025, NECPs should have already been updated, and some countries are taking steps to revise their national LTS. It is therefore important to summarise the experience of the process of preparing the latter.

To contribute its fair share under the Paris Agreement, the EU should actually aim to achieve climate neutrality a decade earlier than is set today, as highlighted in Box 1. This is an ambitious but feasible action. In order to achieve it, however, it is essential that Member States step up their long-term planning – and LTS could be a critical tool to do so.

BOX 1: ARE THE EU'S CLIMATE TARGETS AMBITIOUS ENOUGH?

There is still a significant ambition gap between the EU's climate commitments and the necessary emissions reductions to limit global warming to 1.5°C, calculated according to the Paris Agreement Compatible scenario (PAC)*.

The PAC scenario is a science-based, civil society-led scenario that describes a transition pathway for the EU to ensure its fair share under the Paris Agreement. Under this scenario, and taking into account the principles of equity and ability to act, the EU should reduce its emissions by 73% by 2030 (compared to 1990 levels) and achieve climate neutrality by 2040. This view is confirmed by other scientists, with for example the worrying suggestion that if the rest of the world matched the EU's current approach towards 2030, the world would be condemned to 2-3 degrees of global heating by the end of this century^{**}.

Source: DI Armstrong, McKay, A Staal, JF Abrams... Exceeding 1.5oC global warming could trigger climate tipping points. - Science, 2022

Based on the PAC scenario, CAN Europe's position is to achieve 65% gross emission

* https://www.pac-scenarios.eu/

** See Climate Action Tracker: EU Country Profile, November 2024 (consulted: 10 April 2025): https://climateactiontracker.org/countries/eu/

Article 15 and Annex IV of the Governance Regulation **set out the general framework for LTS**. In terms of content, key elements to be included in the strategies for the 2050 timeframe are:

- (1) projected greenhouse gas emission reductions and enhanced removals,
- (2) the share of renewable energy in final energy consumption, to the extent possible,
- (3) estimated projected energy consumption,
- (4) sector-specific projected emissions and reduction potential, notably for the energy

system, transport, industry and agriculture and land use,

(5) projected financial inputs needed to achieve the set goals.

In terms of process, the Governance Regulation requires, among others, that LTS:

are renewed every 10 years from the initial deadline of 1 January 2020 and, if necessary, updated every five years (Article 15). According to WWF, which surveyed the state of play of LTS revision across 17 EU countries, only two countries have already adopted revised documents, i.e. Ireland and Lithuania, while eight have started or are considering a revision process (Cyprus, Czechia, Italy, Latvia, Netherlands, Portugal, Slovakia, Spain). The remaining countries either do

not intend to start the revision process at the moment or have not responded to the question asked.² This is regrettable, given the significant changes in the EU's regulatory framework since the submission of the first LTS. These changes include policy packages such as 'Next Generation EU', 'Fit for 55' and 'REPowerEU', as well as the adoption of the European Climate Law, which sets a binding climate neutrality target by 2050 and a 55% net GHG reduction target by 2030, compared to 1990 levels. Legislative work is currently underway to set an EU climate target for 2040 and to prepare an underpinning legislative package.

- be developed with the broad participation of the public. The Governance Regulation requires that the public is given early and effective opportunities to participate in the preparation of national LTS. Member States have to organise meaningful consultation processes when preparing these documents. In addition, long-term scenarios for energy and climate policies need to be discussed as part of national Multilevel Climate and Energy Dialogues gathering stakeholders from the business community, investors, local authorities, civil society, the general public and any other relevant actors.
- **be aligned with NECPs**, which is essential for coherent climate action.

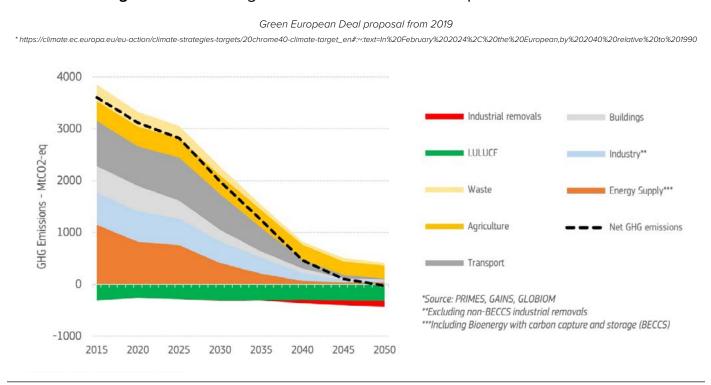


Fig. 1 Greenhouse gasses emission in EU in the period 2015 – 2050*

2. chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://wwfeu.awsassets.panda.org/ downloads/update-of-national-long-term-strategies.pdf This report evaluates the process of preparing national Long-Term Strategies, and provides a set of recommendations to improve it in the future to maximise national and EU climate efforts. It does so by looking at the LTS drafting and (where applicable) revision processes of 10 EU countries: Belgium, Croatia, Czechia, Estonia, France, Hungary, Poland, Portugal, Slovenia and Spain. The ten national civil society organisations involved notably looked into:

- The overall state of play of LTS drafting and revision processes.
- The quality of public participation processes.
- The alignment of the LTS with national legislation and the NECPs planning process.

A summary of the main findings, together with some key recommendations, are provided at the end of the report.

1. What does the situation with LTS look like?

According to the information available, four of the countries analysed have started to prepare an updated version of the LTS, but are at different stages of progress. These are France, Spain, Portugal and Czechia. Five countries, on the other hand, do not currently plan to implement the first edition of the LTS. These are Estonia, Slovenia, Croatia, Hungary and Belgium. Poland is the only country that has not yet submitted an LTS in the first edition. A peculiarity of the preparation of LTS in many of the countries assessed is the difficulty of integrating them into the planning system. Some countries have long-term development strategies, including sectoral strategies, and the link to the LTS is not clear. This is compounded by the formal process of preparing and updating (NECPs) up to 2030. Below is a summary of the situation in each country.

| Country | The situation regarding LTS, in particular regarding its update process | |
|---------|---|--|
| Belgium | The LTS was adopted in 2020, but it has not been revised. | |
| Croatia | After a public consultation process for the Low Carbon Development Strategy by 2030 with the overview to 2050, the final version of the Strategy entered into force on June 2nd 2021. After that, there were no other updates nor newer versions of the Strategy. | |
| Czechia | The original LTS was approved in 2017. The update process started in early 2023 with the definition of main assumptions for the scenarios, which would be used in the updated NECP, LTS, and State Energy Pol- icy. In early 2024, the draft LTS was submitted for the official inter-min- isterial consultation process and then finalized in July 2024 together with the final NECP and State Energy Policy. Following a media back- lash about ETS2 just a few days before the documents were supposed to be approved, the government decided to postpone the approval indefinitely. In the end, a political agreement was made to approve the final NECP and to cancel the update of both the LTS and State Energy Policy. Possibly, the Ministry of Environment might adopt the new LTS as a lower-level action plan, but this remains uncertain. | |
| Estonia | The LTS in Estonia consists of several different documents. Mainly the General Principles of Climate Policy (KPP), which was created in 2017, up- dated 2023. However, the KPP is a general text document, in the updated version there is only one numbered target - the 2050 climate neutrality target. The updated version is only in Estonian and has not been presented to the Commission. A few numerical targets are in the "Estonia 2035" long-term development strategy and its action plan, which the Ministry of Climate considers also part of LTS. All of Estonia's targets in climate, energy, and environment are summarized in the NECP. | |

| France | The LTS was adopted in 2020 as a national low-carbon strategy. This strategy is being revised and a new release will be published in 2025. |
|----------|--|
| Hungary | Hungary has adopted its LTS in 2021. It has not been revised since then. |
| Poland | Work on LTS has been ongoing in Poland for several years, but so far not even a working document has been presented. |
| Portugal | The Roadmap for Carbon Neutrality 2050 (RNC2050) was published by Council of Ministers Resolution no. 107/2019 of 1 July. This docu- ment constitutes the long-term strategy for the carbon neutrality of the Portuguese economy until 2050, which was submitted to the UNFCCC on 20 September 2019. It is currently being revised, to be in line with the NECP, which has anticipated carbon neutrality to 2045. |
| Slovenia | The LTS was adopted by the Slovenian Parliament on 13th July 2023, published in the Official Journal of the Republic of Slovenia on 20th July, and entered into force one month after its official publication. The Slovenian LTS has not yet been revised, its revision process has been postponed. It is not currently clear if the revision process will take place after the adoption of a Climate law (not yet adopted in Slovenia). |
| Spain | Spain adopted its LTS in November 2020. In December 2024, the Min- istry launched a first public consultation to gather observations from stakeholders on the priorities for the updating process of the LTS that will be soon undertaken. |

2. Institutions responsible for preparing the document

A conspicuous problem in selected countries is **the lack of political support for the LTS and climate policy in general**, which causes significant perturbations in its preparation or updating. LTS are largely ignored in most ongoing planning processes. LTS should be treated as a key starting point, and this would probably require the introduction of legally binding targets for 2040/2050 in the first place. Otherwise, they will remain empty documents unable to steer policy (e.g.: Belgium, Czechia, Poland).

In each of the countries analyzed, the responsible ministries have been those dealing with climate or environment (Belgium, Czechia, Estonia, Portugal, Slovenia) or those dealing with development strategy and/or energy (Poland, Hungary). Interestingly, three countries have established ministries of ecological or green transition, covering at the same time environment and climate, and they are responsible for preparing the LTS (Croatia, France, Spain).

The preparation of the LTS document preceeded in different ways in the analyzed countries. Thus:

- (a) The document was prepared inside the ministry responsible for its implementation with consultation with other ministries without external support (Estonia).
- (b) Prepared within the framework of cooperation of the responsible ministry with scientific or expert units without public consultation but prepared together with other long-term strategic documents (Croatia, Poland).
- (c) Prepared inside the responsible ministry with consultation with other ministries with external support and public consultation (Czechia, France, Slovenia, Hungary).
- (d) Prepared inside the ministry responsible for its implementation with consultation with other ministries and external expert support, and opened to a public consultation of civil society and other stakeholders in different stages of the drafting process. Following the development of the LTS and the NECP, other related strategies and roadmaps have been prepared³ (Spain).
- (e) Prepared inside the ministry responsible for its implementation with an extensive public consultation process at various stages of the document's preparation, and held workshops to better model the various sectors (Portugal).

The importance of the involvement of expert institutions and universities was emphasized by respondents, as was the inclusion of modeling in the preparation process, although its results are often not accepted for political reasons.

^{3.} Spain has developed: a hydrogen roadmap, an energy storage strategy, a self-consumption roadmap, an offshore wind and marine energy roadmap, a biogas roadmap and a sustainable mineral resources management roadmap.

Another aspect was highlighted in the evaluation from Portugal where the LTS team had some flexibility or latitude to say "no" to certain things in the face of external pressure (for example, they said "no" to the use of carbon credits to achieve carbon neutrality). Civil society organisations highlighted the transparency of the team responsible for developing the LTS and their confidence in the quality of the work.

3. Public participation

Public consultations were held in various formats and at various stages of the LTS drafting process. This also implies the need to **raise the level of awareness about climate change**, as well as mitigation and adaptation to it, as it is still inadequate, which affects the level of public discussion on the subject (Hungary).

In some countries, consultations started even before the drafting phase. For example:

- a) Working groups from 5 different sectors were organized and met 3-4 times to create a vision document. Nearly 80 interest groups (including experts, associations, companies, researchers) participated (Estonia).
- (b) A short period of public consultation was opened before the document was prepared. As a result, only 46 comments were collected from various stakeholders. This was followed by a more important second consultation process based on the LTS draft document, in which 78 entities participated, most of them companies (with a total of 20) and business associations (25). Additionally, 10 environmental associations and NGOs, 6 confederations, 6 Public Administrations, 3 professional associations, 3 individuals and 2 foundations. The main conclusion was that the responses received show a high level of diversity, of which only some have been incorporated into the final text (Spain).

Public consultations took place also during the preparation of the document, in different formats: group consultations (Estonia, Portugal), online (Croatia, Czechia, Slovenia, Hungary, Spain), stakeholder meetings and public hearings (Croatia, Slovenia, Spain (not enough), Hungary), technical workshops and regional meetings (Portugal), advisory councils and bilateral meetings (Belgium), and roundtable (Czechia). In Poland, there was no public consultation during the preparation of the document. Attention was drawn to the disproportion between industry and civil society involvement in the consultation process with the dominance of the former. It becomes important to create equal conditions of participation for different stakeholder groups (Estonia).

In some countries, the results of the consultations were reflected in the final version of the LTS (Portugal, Czechia, Spain). It is good practice to prepare a report and conduct a roundtable on the course of consultations, which is all that has been done in the case of Czechia, where most of the comments seemed to have been discussed constructively, but the final LTS was then not approved. However, in others, the results of the consultation were not satisfactorily taken into account (Croatia, Estonia, Slovenia, Hungary). For example, this was the case with proposals for inappropriate forest management in Estonia. In Hungary, a survey on the state of the environment and climate change was conducted, but its results were rather neglected. In Slovenia, a long-term energy use scenario that quietly com-

mits to nuclear energy was added to the LTS, due to pressure from government coalition parties and without having been discussed earlier in public consultations. In Croatia, workshops or working groups were held, but it is questionable how much of the input provided by participating organizations is taken into account in the final version of the document.

The evaluation of the documents carried out highlighted the distance in time of the 2050 target, which should lead to different scenarios for its achievement depending on changing circumstances. Good communication and dissemination of possible long-term scenarios is crucial to promote participation and debate/acceptance around the LTS. For countries that are large or highly decentralised, it is important to consider climate action in LTS in the context of regions and municipalities.

4. Linking the LTS to the NECP, and the legal basis

According to the Governance Regulation, EU countries are responsible for preparing and updating both NECP and LTS. However, in some countries, these processes are carried out at different times and are not always integrated (Estonia). In other cases, they are developed by the same institutions and have the same expert basis, but the drafting of LTS only begins after the NECP revision process, as if the long-term document were in some sense subordinate to the short-term one (Croatia, France, Slovenia).

The Portuguese assessment sees the desirability of developing a single integrated document combining the NECP and LTS. The approach would have both advantages and disadvantages. On the one hand, it would create a longer, denser document that would require more time to develop and monitor, with a risk of delaying the implementation of policies and measures. Another risk is that action is diluted less transparently towards 2050, without clear mid-term objectives (e.g. in 2030 or 2040). On the other hand, advantages include a long-term vision that would be ideally aligned with short- and medium-term goals and priorities for action. In France, for example, the LTS and the NECP were combined into a national low-emission strategy, so it is worth ensuring their coherence. This is not a view accepted in other assessments, which rather see two documents interlinked with each other, where the LTS sets the strategic goal for the mid-21st century and the NECPs, updated every five years, fill this path with short-term actions updated to the changing context (Belgium, Czechia and Poland).

In other cases, the preparation of the two documents proceeded in parallel or the updating process has been sequential. For example, once the updated NECP was finally approved, Spain started to update its LTS. Hungary and Spain developed an integrated approach whereby the LTS is an extension of the trends recorded in the NECP. Logically, the level of detail available for the NECP (with a time horizon to 2030) is much greater than for the LTS (with a time horizon to 2050), as uncertainty increases with a longer time horizon. Such an integrated approach was not applied in all countries, despite the two documents being developed at about the same time. In Portugal, the two documents were coordinated by different teams that did not initially communicate with each other, thus they were completely different processes. Then, an institution was appointed to integrate the two documents. In Poland, the work on the documents was separated: the NECP was prepared in time and now the updating work is underway, while the work on the LTS has not yet been completed. Similarly, in Belgium, the processes were not integrated and no coordinating and integrating institution was designated. Czechia, the LTS and NECP update processes were closely coordinated, but while the NECP was approved in December 2024, the government refused to approve the updated LTS, although the same institutions and actors were involved, and it seems the document is now postponed indefinitely.

Spain's LTS, on the other hand, was developed in perfect alignment with the NECP, given its consistency with medium- and long-term climate and energy policies. In fact, the country's LTS is based on the NECP target scenario and uses the same modeling to estimate global and sectoral projections to 2030 and to 2050. The expected contribution of each sector to achieving net zero emissions is clearly stated.

Five of the countries analyzed have a climate law. In Croatia, the need to develop an LTS is recorded but there is no obligation to revise it. France has a climate law and has set itself the target of achieving climate neutrality by 2050. In Hungary, the LTS is referred to together with climate neutrality, but there is no provision for its revision. (The Hungarian climate law that contains the national climate neutrality commitment by 2050 and the NECP targets was adopted in 2020, not yet revised.) In the Spanish climate law, a 90% reduction target and the achievement of climate neutrality by 2050 are included, and the LTS is to be reviewed every 5 years. In Portugal there is a provision for the development of the LTS and its revision every 5 years, but it is not binding. In Slovenia, it is in the process of being developed and there is a provision on climate neutrality. In Estonia, the climate law is in development, and the draft law includes the climate neutrality target by 2050, which is included in both the LTS and the NEPC. In Belgium and Poland, there is no climate law, no target for 2050 and no reference to the LTS. In Czechia there is a target of "heading towards climate neutrality in 2050" and a reference to the (unapproved) LTS in the NECP, but nothing in any national legal document (NECPs are not really referred to in any national legislation).

A major shortcoming is the emphasis on emission reductions beyond 2030, resulting in steep, unrealistic emission reductions between 2030 and 2050, with very little guidance for various sectors to implement this pathway. The revised LTS should also include more detailed pathways and specific sectoral measures (Slovenia). The main risk of the lack of an integrated approach to LTS and NECP development is that there could be significant policy gaps that would make LTS trajectories unrealistic, leaving the greatest progress in greenhouse gas reductions and climate neutrality to be achieved by 2030–2050.

Looking at the compatibility of the LTS preparation process with relevant national policies, evaluators indicated an average of 3.5 on a response scale of 1 to 5.

Analysis on Hungary points to a fundamental change from 2020 in aspects such as technical, economic, and geopolitical. Both documents are now in need of thorough revision and renewal. A similar opinion was expressed in the Spanish situation. It was pointed out emphatically in the Belgian opinion that the LTS is mostly ignored, and in the meantime, the NECP is being updated and modified. A similar situation exists in Poland. The LTS has been largely ignored in recent years, while the NECP has been modified. The situation is different in Czechia where the NECP, LTS and state energy policy updates were prepared in a single process, and the new draft LTS is much better aligned with other relevant strategies.

Looking at the satisfaction rating of the LTS preparation process, evaluators indicated an average of 3.1 on a response scale of 1 to 5.

5. Summary and recommendations for Member States

Summarising the analyses from 10 countries, the preparation process is very diverse, despite being led by ministries dealing with climate or development. The method of public participation is also diverse, ranging from its virtual absence to a broad process of its inclusion. In all countries analysed, NECPs are politically more relevant than LTS, which are considered a less important document as they concern the distant future. This often leads to a lack of integration between their drafting processes, as well as the content and actions included in the documents, which hinders the credibility of achieving the goal of climate neutrality in the mid-21st century.

The study includes the result of an analysis of the process of developing and updating Long-Term Strategies in 10 EU Member States. While large differences exist among national contexts, some common gaps exist, as well as a few examples of good practices. **Based on our findings, we have identified a set of recommendations** Member States should take into consideration when updating or developing their Long-Term Strategies:

- a) The starting point should be a strong climate law that includes the strategic binding goal to be achieved in 2050 or earlier as well as intermediate goals (2030, 2035, 2040, 2045), which would allow better monitoring of the implementation process and setting updates in five-year periods.
- b) Create a permanent working group in charge of preparing, monitoring and updating strategic documents dealing with climate action and the energy transition, including LTS, to ensure better harmonisation. The working group should include representatives of different ministries (Climate, Energy, Finances, Environment, Industry, Agriculture, Transport, Housing etc.)
- c) Build a common expert base consisting of representatives of research institutes, universities, think tanks, NGOs or consulting companies with professional and scientific knowledge, in particular regarding modeling energy and climate scenarios. Ideally, independent expert committees should be established, and given sufficient government resources to develop scientific reports and recommendations.
- d) Prepare or update the LTS with **a clear vision** that is at least aligned with EU goals and can provide a clear direction of travel and be used as a reference point for future climate action.
- e) Share this vision in public consultations, which should include a wide range of involved stakeholders: entrepreneurs, local government officials, civil society organizations, think tanks and scientific experts. In order for the discussion on the vision to be productive, it also seems advisable to facilitate in an accessible way all available previous data and information and start with workshops addressing the science and risks of climate change, the need for mitigation and adaptation policies, and a range of feasible sectoral measures. The consultation stage should

be concluded with a report presenting the submitted comments or proposals, the way they were taken into account, or the justification for why they were not taken into account.

- f) The revision of the LTS should be divided into several stages, each of them subject to a round of public consultations, preferably in the form of working groups. At this stage, the content of the LTS should be harmonised and integrated with the NECP, as the latter constitutes a practical specification of the first ten-year period recorded in the LTS. The prevailing view is that the work on the NECP and LTS documents should be carried out jointly, especially as the future NECPs will deal with a timeframe that is increasingly closer to 2050. It would be more beneficial if all strategic and planning documents were interrelated and aligned. When several strategic and planning documents are being prepared that deal with climate, they are being updated at different rates. Consequently, their content and objectives are not linked, and it is often questionable which one should be considered more relevant. According to the Spanish assessment, the long-term strategy should start with the NECP and go beyond it, following the consistency of the trajectory.g) Once the LTS update begins, preparation for an environmental impact forecast should start as well, as part of the SEA procedure. In parallel a methodology for monitoring the implementation of LTS provisions should also be developed.
- h) Once the LTS is finalised, a broad public consultation should be organised to present the final draft. This can also take place in the form of roundtable meetings to discuss most sensitive issues. The consultation stage should be concluded with a report, presenting the submitted comments or proposals, how they were taken into account, or a justification for why they were not taken into account.
- i) **Preparation of a communication strategy** for the solutions and directions of action contained in the LTS will be of great support for the public awareness of the long-term vision.
- j) The final stage is the adoption of the document by the government or parliament and then forwarding it to the European Commission as the fulfilment of the obligation arising from the Governance Regulation.
- k) During the implementation of the document, it is necessary to monitor progress as a basis for its update and, for example, issue a progress report every two years and update the document every 5 years.









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