



QUALITATIVE TOOL TO ASSESS FINAL NATIONAL ENERGY AND CLIMATE PLANS



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Qualitative tool to assess final National Climate and Energy Plans

Further Information

Goksen Sahin and Mathias Claeys Bouuaert

CLIMATE ACTION NETWORK (CAN) EUROPE

goksen@caneurope.org and mathias@caneurope.org



INTRODUCTION

The Governance Regulation sets out the main planning and reporting requirements on energy and climate targets for all Member States. The main instruments used by the Governance Regulation to ensure Member States set out their targets and policies are the National Energy and Climate Plans (NECPs). In these plans, each Member State has to describe, in an integrated manner, its climate and energy objectives, targets, policies and measures for the period running from 2021 to 2030, ensuring that the EU's 2030 targets for greenhouse gas emission reductions, renewable energy and energy savings will be met. These plans are therefore vital documents for determining and checking on national climate and energy policies – with a focus on 2030 and with a view towards 2050. The NECPs are thus also directly relevant to Europe's ability to contribute to the long-term objectives of the Paris Agreement to limit the global temperature rise to 1.5°C and move forward with the necessary transformation to a decarbonised society. Member States had to submit their draft NECPs to the European Commission by 31st December 2018, while the final version had to be prepared by the 31st December 2019.

The minimum ambition level the NECPs are required to deliver is set by the EU's sectoral climate and energy legislation including the Effort Sharing Regulation, the Renewable Energy Directive and the Energy Efficiency Directive. This means that Member States need to show how they will deliver their national binding greenhouse gas emission reduction targets for sectors not included in the EU Emissions Trading System (such as transport, buildings, waste, agriculture) and contribute to the EU's energy targets of at least 32% renewable energy and 32.5% energy efficiency by 2030. However, there is no limitation on Member States to design more ambitious plans. As none of the agreed 2030 targets are adequate for the EU to deliver on its commitments under the Paris Agreement. Therefore, Member States should use their NECPs to go beyond what is required to meet the current overall EU climate and energy targets for 2030.

In June 2019, the European Commission assessed the draft NECPs submitted by the Member States, and identified a gap between the national ambition levels and the EU's 2030 targets for energy efficiency and renewable energy. The gap stems from the insufficient ambition of national energy contributions for 2030 and the lack of informed policies and measures to scale up renewable energy, boost energy savings and phase out fossil fuel subsidies. Also, in many cases commitments to phase out coal are missing, even though these are crucial to provide proper support for the just transition of the regions and communities affected by the energy transformation. The assessment also included country specific recommendations, providing guidance to Member States on which improvements they need to make in their plans. Following this assessment, in their final NECPs, Member States have to show how the European Commission's recommendations have been taken into account.

Within its [Communication regarding the European Green Deal](#), the European Commission also committed to assess the ambition of the final NECPs, and the need for additional measures, if the level of ambition remains insufficient, by June 2020.

In this context, this document includes a set of questions and background information which intends to help national stakeholders in their efforts to perform their own analysis of the final NECPs,

including a comparison with the draft NECPs. It will serve as a tool that will be used to identify missed opportunities as well as possible good practices related to higher climate ambition and the transition of the energy system towards 100% renewable energy.

METHODOLOGY

What do NECPs look like?

The [Governance Regulation](#) contains an Annex with a detailed document structure that should be used as a mandatory template for the NECPs, with the following structure:

1. a summary section of the NECP
2. a section on the main national targets relevant to the NECP;
3. details on the main policies to reach the respective targets, including financing;
4. a section presenting relevant data, specifically information on the status quo and projections into the future with existing policies and
5. an assessment of the impact of planned policies.

This structure also takes into account the 5 dimensions of the Energy Union, which was [established in 2015](#). The five dimensions which are Decarbonisation (including greenhouse gas emissions and renewable energy), Energy Efficiency, Energy Security, Internal Energy Market and Research, Innovation and Competitiveness are used as subparagraphs and are repeated throughout the NECP template .

How is the tool structured in this report ?

Already in May 2018, CAN Europe , with the support of its members, and Ecologic Institute identified a set of 5 pillars that the development of the NECPs should take into account in order for these plans to be able to truly drive transformational change. These pillars are:

- 2030 Energy and Climate Ambition,
- Long term Paris Check,
- Consistency,
- Credibility
- Transparency.

This qualitative tool which is also structured on the basis of this 5-pillar approach is meant to help national stakeholders in their efforts to perform their own analysis of the final NECPs.

Similar approaches have been used to assess draft NECPs by other organisations and projects. The Ecologic and Climact report "[PLANNING FOR NET ZERO: ASSESSING THE DRAFT NATIONAL ENERGY AND CLIMATE PLANS](#)" and "[Fit to succeed?](#)" Reports by PlanUp are some examples.

Under each pillar, there are a number of specific issues that are analysed, based on the information Member States must provide in their NECPs. For each of these, a short summary is presented

explaining why it is important to analyse information contained in the NECPs and to check if Member States have included what is required. Indicative references and background information are also provided to help facilitate the assessment (e.g. CAN Europe recommendations, reports or information from existing analysis on the draft NECPs). Comparing the information included in the final NECP to the draft NECP, or to established national demands and priorities, will help identify whether there have been any improvements on each issue or whether the situation is far from ideal. This comparison should also take into account whether there are other recommendations; or relevant analysis previously published for each issue from the European Commission.

The different issues are broken down into individual evaluation questions for further targeted directions on what one should look for or check in each of them. The list of questions is not exhaustive but will provide as to what extent national stakeholders could do an informative evaluation of the quality and the ambition of the final NECPs. All questions can also be found in [this Excel Table](#).

1. PRIORITY PILLAR I: 2030 CLIMATE AND ENERGY AMBITION

The pillar “2030 CLIMATE AND ENERGY AMBITION” is essentially about the targets and objectives that are being set through the NECP, with a focus on the climate target and those for renewables and energy efficiency. Communicating these targets (in an overall climate and energy policy context) is a key function of the NECPs.

1.1 National 2030 greenhouse gas (GHG) targets

1.1.1 National 2030 economy-wide greenhouse gas targets

Why it matters:

An economy-wide national climate target serves an important purpose as it can define the objective for any country to undertake a certain degree of climate action, while providing information about the greenhouse gas emission reductions which is directly comparable to the EU-wide climate target. The EU’s 2030 emission reduction target also serves as its Nationally Determined Contribution (NDC) which is submitted to the United Nations Framework Convention on Climate Change (UNFCCC), as the bloc’s commitment under the Paris Agreement.

What Member States are required to report in the final NECP:

The EU’s current economy-wide climate target is at least 40% domestic greenhouse gas emissions reduction by 2030 compared to 1990 levels, which is not sufficient to achieve the 1.5°C objective of the Paris Agreement.

The EU’s economy-wide domestic emission reductions target of [at least 40% by 2030](#) compared to 1990 level is split into:

- a 43% emission reduction compared to 2005 to be delivered by the sectors covered by the European Emission Trading System (ETS)[1]
- a 30% emission reduction compared to 2005 to be delivered by the non-ETS sectors under the Effort Sharing Regulation. [2] The EU non-ETS target is broken down in national targets which are established individually.

While the ETS is an EU wide market instrument, the focus on NECPs is on the delivery of the emission reductions in the non- ETS sectors (such as agriculture, transport, buildings and waste) , which mostly requires the implementation of measures at national level. As such, there is no specific requirement for Member States to identify an economy-wide national climate target. However, in the NECP template of the Governance Regulation, there is a dedicated space for entering additional national objectives. Therefore, it is also possible for Member States to do so.

Indicative references that could be used to facilitate the assessment of ambition of the overall greenhouse emission reductions in the final NECPs

CAN Europe recommendations

As mentioned above, the EU's current economy wide target of at least 40% domestic emissions cuts needs to be significantly increased as it is not a sufficient contribution of Europe to the objectives of the Paris Agreement. **CAN Europe is [calling for an economy - wide EU climate target of at least 65% greenhouse gas emission reductions by 2030](#) compared to 1990 levels.** This position reflects the social and economic opportunities of the zero carbon transition and the growing evidence of extreme impacts of climate change.

Own national demands and priorities, underpinned by national studies (if available)

CAN Europe's demand towards the EU to achieve at least 65% economy-wide emission reductions by 2030 can serve as a general benchmark, but since there are no legal requirements determining the level of national economy-wide targets, their ambition level can only be assessed on a case-by-case basis. This should also take into account the respective Member State's ability to achieve the above mentioned EU average target.

Own national demands and priorities, eg if a specific political demand for a national emission reduction target for 2030 has been established, should also be used as a benchmark for assessing the overall level of ambition of greenhouse gas emission reductions included in the final NECP. If available, national studies which show what the country's contribution to the Paris Agreement goals should be or that current national commitments are not sufficient could also help to this end.

Currently several Member States have set economy-wide targets for 2030 such as the Netherlands, the Czech Republic, Germany, Hungary, Latvia, Portugal and Spain. Since the draft NECPs have been submitted, Denmark also adopted an economy-wide GHG reduction target of -70% for 2030 which is reflected in its final NECP.

ISSUE	INDICATOR	EVALUATION QUESTION
National greenhouse gas emission targets	National 2030 economy-wide greenhouse gas target	Is there an economy-wide national climate target for 2030 in the final NECP? If yes, what is the level of ambition of this target?
		<p>Has the final NECP improved compared to the draft NECP or not?</p> <p>Has the country moved from not having an economy - wide target to having a target? Or has the country increased the ambition level of its economy wide climate target in the final NECP compared to the draft?</p>
		Have there been Commission recommendations on this issue and have they been sufficiently addressed in the final NECP?
		What would in your opinion be the ideal level of ambition of economy-wide emission reductions for your country, taking into account that the EU needs to reduce its emissions by 65% by 2030 in order to stay in line with the Paris Agreement goals? Please develop this part based on your positions and priorities. It would be ideal to include references to back your opinion.
		Are there any missed opportunities related to the level of ambition of the overall greenhouse gas emission reduction target included in the final NECP? If yes, which do you think are the most important ones (max. 3) and why?

		<p>Does the final NECP present projections of economy-wide emission reductions either with existing (WEM) or additional measures (WAM) that show that the target will be met or even overachieved?</p> <p>Has the final NECP improved compared to the draft NECP or not (the projections on reductions have been elaborated and presented more clearly)?</p>
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1.1.2 National 2030 Non-ETS targets

Why it matters:

The Effort Sharing Regulation (ESR, sometimes also called the Climate Action Regulation - CAR), adopted in May 2018, defines national binding greenhouse gas emission reduction targets for non-ETS sectors (such as transport, buildings, waste management, or agriculture) for 2030. Providing information on this issue in the NECPs allows for better understanding of each Member State's efforts to reduce emissions in these so called "effort sharing" sectors and its contribution in achieving the EU target.

What Member States are required to report in the final NECP:

Every Member State is required to include its national non-ETS target in their NECP, as well as an overview of objectives, policies and measures in the context of these targets. There should be plenty of additional information included, such as emission trends and projections (with existing and with additional measures) up to 2040.

Furthermore, Member States are required to report on whether or not they intend to use any loopholes to reduce the level of emission reductions they have to deliver under their national non-ETS target. The use of loopholes which can severely water down the overall ambition level of Member States' efforts is currently allowed by the Effort Sharing Regulation (ESR). The most important ones are:

- Offsetting from land use, land use change and forestry (LULUCF) activities
- One-off use of ETS permits for compliance
- 'Safety reserve' giving certain Member States the option of using pre-2020 surplus to achieve their 2030 targets
- Lower income Member States have the option to receive emission reductions achieved by other Member States, if the 2030 targets should be overachieved

Indicative references that could be used to facilitate the assessment of ambition of the non-ETS greenhouse emission reductions in the final NECPs

CAN Europe recommendations

While the current 2030 national non-ETS targets imply reductions for all Member States, they are still based on the overall EU target of at least 40% domestic emissions cuts, which is not sufficient for the EU as a contribution to the Paris Agreement goals. The increase of the EU's overall GHG emission reduction target also means an upwards revision for the overall target for the ETS and the non-ETS emission reduction targets.

Furthermore, Member states should formulate a non-ETS target implementation plan that does not make use of any loopholes. Instead, targets should be reached through increased efforts in policies and measures that create lasting emission reductions through structural transformation.

CAN Europe's [position on the Effort Sharing Regulation](#) and [CAN Europe's briefing](#) provide a comprehensive overview of loopholes that Member States might use to achieve their non-ETS targets.

Own national demands and priorities, underpinned by national studies (if available)

As for the overall emission reductions, own national demands and priorities and information included in available national studies should also be used as a benchmark for assessing the overall level of ambition of the non-ETS GHG emission reductions included in the final NECP.

Available analysis of draft NECPs

Countries such as Luxembourg and Sweden have explicitly set a higher national 2030 target for emission reductions in the non-ETS sectors compared to their binding target under EU law. Spain also has a higher non-ETS target but the country's overall emission reduction target for 2030 is still only 20%, which is only half of the already insufficient EU objective of reducing emissions by at least 40%. Countries such as Greece or Croatia kept their national binding non-ETS target but projections of emission reductions with both existing and additional measures indicate that emissions in 2030 will be much lower than what their set targets require.

In its June 2019 assessment, the Commission made recommendations for different Member States on how they could further elaborate the measures needed to achieve their GHG emission reductions in the sectors not covered by the ETS. These included countries such as Cyprus, Denmark, Estonia, Germany, Ireland, Malta, Poland and Slovenia. Furthermore, some countries provided projections of emission reductions with existing measures only, while information on the impact of their planned policies and measures was missing.

ISSUE	INDICATOR	EVALUATION QUESTION
National greenhouse gas emission targets	National 2030 Non-ETS GHG targets	<p>What is the level of ambition of the 2030 target for the non-ETS sectors? Is the ambition of the 2030 target for the Non-ETS sectors at the level required by the Effort Sharing Regulation or is it even more ambitious?</p>
		<p>Is the non-ETS target higher than the one of the draft NECP?</p>
		<p>What would in your opinion be the ideal level of ambition for emission reductions in the non-ETS sectors in your country by 2030, taking into account the EU needs to reduce its greenhouse gas emissions by 65% by 2030 in order to stay in line with the Paris Agreement goals? Please develop this part based on your positions and priorities. It would be ideal to include references to back your opinion.</p>
		<p>Are there any missed opportunities related to the level of ambition of the non-ETS greenhouse gas emission reduction target included in the final NECP? If yes, which do you think are the most important ones (max. 3) and why ?</p>
	Use of loopholes in target accounting	<p>Does the country plan to use loopholes to reduce the level of ambition of the non-ETS target? Please develop this part based on the reference documents shared with you above and your position.</p>

	Projections on non-ETS emission reductions	Does the final NECP present projections of emission reductions in the non-ETS sectors as a whole with existing (WEM) and additional measures (WAM)?
		Will these existing (WEM) or additional measures (WAM) show that the target will be met or even overachieved (more emissions reductions foreseen than what is required under the non-ETS target)?
		Has the final NECP improved compared to the draft NECP or not (the projections on reductions have been elaborated and presented more clearly)?
		Have there been Commission recommendations either on the non-ETS target or on the non-ETS emission projections? Have these recommendations been sufficiently addressed in the final NECP?

1.2 Renewable energy

1.2.1 National 2030 Renewable Energy (RES) contribution

Why it matters:

The current renewables target of at least 32% for 2030 is included in the revised Renewable Energy Directive (RED) of 2018 and is binding at the EU level. However, the directive does not include binding national targets anymore. Instead, Member States will set their own, non-legally binding “contributions” to the overarching EU goal. In some Member States, overall or sector specific renewables targets for 2030 may already exist – in others, this obligation will trigger such a process. This process allows the Commission and relevant stakeholders to assess if national contributions add up to the binding EU target, when all final NECPs are submitted and propose additional action, especially if the summing-up of individual national targets will not reach the overall EU target of 32% renewable energy share.

What Member States are required to report in the final NECP:

Countries are asked to communicate their contribution to the EU-wide renewables target for 2030. Member States are required to provide additional detail on how they plan to achieve their RES target, by providing trajectories and projections for the RES increase per sector and per technology. They are also required to provide trajectories on bioenergy demand and biomass supply. Member states are asked - where applicable - to add other national trajectories and details such as on renewable energy produced by cities, renewable energy communities and renewable self-consumers.

Indicative references that could be used to facilitate the assessment of ambition of the renewable energy contribution in the final NECPs:

CAN Europe recommendations

During the revision of the Renewable Energy Directive, CAN Europe has been advocating for an EU renewable energy target of at least 45% by 2030. The national contributions should not only add up to the current EU renewable energy target but contribute to a level of ambition which will facilitate the transition to 100% renewable energy system by 2040 and help the EU stick to its commitment to achieving the goals of the Paris Agreement.

Own national demands and priorities, underpinned by national studies (if available)

Own national demands and priorities and information should also be used as a benchmark for assessing the overall level of ambition of the national renewable energy contribution included in the final NECP. National research and studies, if available, that provide information regarding the renewable energy potentials in the country could also help identify a sufficient level of ambition.

Available analysis of draft NECPs

On the basis of the EU 2030 renewable energy target of at least 32%, the European Commission provided national renewable energy benchmarks to all Member States, which are [publicly available](#).

According to the European Commission's assessment from June 2019, under the draft plans submitted, the share of renewable energy would reach between 30.4% and 31.9% in the EU by 2030 instead of at least 32%. Based on the same analysis, 15 countries need to increase their renewable energy contribution in line with the benchmarks indicated.

In any case, as the current 2030 climate and energy targets are not enough to help the EU stick to its engagement under the Paris Agreement to limit temperature rise to 1.5°C, these national renewable energy benchmarks can only be a starting point. Member States should go beyond these levels.

ISSUE	INDICATOR	EVALUATION QUESTION
Renewable energy	National 2030 Renewable Energy contribution	What is the level of ambition of the national 2030 renewable energy contribution in the final NECP?
		Is it above or below the benchmark estimated by the Commission according to the formula included in the Governance Regulation ?
		Has the final NECP improved compared to the draft NECP or not ? (Is the contribution set higher in the final NECP compared to the one in the draft NECP?)
		Have there been Commission recommendations regarding the renewable energy contribution and have they been sufficiently addressed in the final NECP?
		What is in your opinion the ideal level of ambition for the 2030 renewable energy contribution in your country? In this context, are there any missed opportunities related to the ambition level of the renewable energy contribution included in the final NECP? if yes, which do you think are the most important ones (max. 3) and why?
	Sustainable use of biomass	<p>Regarding the use of biomass as a renewable energy source, have countries added estimated trajectories on biomass demand?</p> <p>Did they include trajectories on the supply by feedstocks and origin?</p> <p>Have they made an assessment of the source and impact on the LULUCF sink in case forest biomass is proposed?</p>

		<p>Has the final NECP improved compared to the draft NECP or not?</p>
		<p>Have there been Commission recommendations on the proposed use of biomass and have they been sufficiently addressed in the final NECP?</p>
		<p>What is in your opinion the ideal situation on the sustainable use of biomass? In this context are there missed opportunities related to the use of biomass foreseen in final NECP? If yes, which do you think are the most important ones (max 3) and why?</p>
	<p>Energy communities</p>	<p>Did Member States include concrete trajectories and objectives with regards to renewable energy communities and renewables self-consumers?</p>
		<p>Has the final NECP improved compared to the draft NECP or not? If yes, in which aspects and were they sufficient?</p>
		<p>Have there been Commission recommendations regarding the energy communities and have they been sufficiently addressed in the final NECP?</p> <p>Please develop this part based on your positions and priorities. It would be ideal to include references to back your opinion.</p>
		<p>What is in your opinion the ideal situation with regards to enabling the creation of energy communities in your country? In this context, are there any missed opportunities related to how this issue is addressed in the final NECP? If yes, which do you think are the most important ones (max. 3) and why?</p>

1.3 Energy Efficiency

1.3.1 National 2030 Energy Efficiency (EE) contributions

Why it matters:

In 2018, parallel to the Renewable Energy Directive, the EU institutions adopted the revised Energy Efficiency Directive (EED), which includes a headline energy efficiency target of at least 32.5% for the EU for 2030. Since there are no binding targets for Member States, it becomes even more important to ensure that each country delivers enough energy savings. Available information on the national contributions to the overall EU 2030 energy efficiency target provides a clear indication for the level of ambition on energy savings of each country. Same as for the renewable energy contributions, it also allows the Commission to assess if national contributions add up to the EU target, when all final NECPs are submitted and propose additional action, if needed.

What Member States are required to report in the final NECP:

Within the NECP framework each Member State has to outline its energy efficiency targets with a trajectory to 2030. Each Member State should set a 2030 target within their NECP, expressing it in both primary and final energy, taking into consideration the EU target. The template also requires details on how the target has been set, including on national circumstances affecting the energy consumption such as GDP evolution and forecasts that may have been taking into account.

Indicative references that could be used to facilitate the assessment of ambition of the energy efficiency contributions in the final NECPs

CAN Europe recommendations

During the Energy Efficiency Directive negotiations, CAN Europe has been advocating for an EU energy efficiency target of at least 40% by 2030. Reducing energy demand across sectors is the most direct way to reduce greenhouse gas emissions. Improving energy efficiency also offers other benefits such as a reduction in energy poverty, lower dependency on energy imports, job creation and improved health. As in the case of renewable energy, the national contributions should add up to an EU target which contributes to achieving the Paris Agreement goals.

Own national demands and priorities, underpinned by national studies (if available)

The assessment of the ambition of the national energy efficiency contributions should be supported by national studies and modelling of bottom-up energy efficiency potentials that better fit national circumstances as well as own national demands and priorities regarding the reduction of energy demand and the improvement of energy efficiency.

Available analysis of draft NECPs

Unfortunately as the energy efficiency target was always a non-binding target, currently there is no agreed methodology that is broadly accepted to calculate benchmarks on the national energy efficiency contributions.

[According to the European Commission](#), the aggregate assessment of the draft NECPs for the EU-28 showed a substantial gap to the EU 2030 energy efficiency target for both primary and final energy consumption. For primary energy consumption, the aggregated level of ambition was equivalent to a target of 26.3 % to 30.2 %, while for final energy consumption the level of ambition corresponded to a target of 26.5% to 30.7 %, instead of the EU set energy efficiency target of at least 32.5 %. This means that most Member States needed to review and increase one or both of their national energy efficiency contributions to at least achieve the EU’s 2030 energy efficiency target, not to mention going beyond that mark.

ISSUE	INDICATOR	EVALUATION QUESTION
Energy efficiency	National 2030 Energy Efficiency contributions	What is the level of ambition of the national 2030 energy efficiency contributions in the final NECP (in % and in absolute terms both for primary and final energy)?
		Has the national energy efficiency contribution in final NECP improved compared to the draft NECP (has the contribution been set higher in terms of primary energy only, final energy only, both in terms of primary and final energy), or not?
		<p>Have there been Commission recommendations on the level of ambition of the energy efficiency contribution(s) and have they been sufficiently addressed in the final NECP?</p> <p>Please develop this part based on your positions and priorities. It would be ideal to include references to back your opinion.</p>

		What is in your opinion the ideal level of ambition for the 2030 energy efficiency contribution(s) in your country? In this context, are there any missed opportunities related to the ambition level of the energy efficiency contribution(s) included in the final NECP? If yes, which do you think are the most important ones (max. 3) and why?
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2. PRIORITY PILLAR II: LONG-TERM PARIS CHECK

The Paris Agreement establishes the long-term objectives of keeping global temperature rise well below 2°C and pursue efforts to limit it to 1.5°C above pre-industrial levels. This should set the basis for the direction of any national climate action. The pillar “LONG TERM PARIS CHECK” thus focuses on whether the NECPs are in line with the long-term ambition adopted in the Paris Agreement.

2.1 National long term greenhouse gas (GHG) emission reduction target and pathways

Why it matters:

Each country needs a clear long-term greenhouse emission reduction target in line with the Paris Agreement goal. This long-term perspective should not only specify the emission reduction trajectories of key emitting sectors, but also sectors covering the enhancement of removals such as carbon sinks (eg. LULUCF and agriculture), with an outlook to achieving a balance between emissions and removals in accordance with the Paris Agreement.

Without such an emission reduction target to indicate at least a gradual pathway of the emission reductions needed for each sector separately in the longer term, it will become increasingly difficult to address climate change effectively and trigger the necessary shift from incremental to structural change in a timely manner. In short, the NECPs that do not include a sufficient long-term perspective, run the risk of undermining the Paris Agreement objective of limiting the global temperature increase to 1.5°C and of failing to tackle the climate crisis.

What Member States are required to report in the final NECP:

The primary document for detailing long-term emission trajectories and targets are the national long-term strategies, which Member States have to develop and submit to the European Commission alongside their NECPs, according to the Governance Regulation[4]. Member States are not required to establish national targets beyond 2030 in their NECPs, but coherence with long-term strategies is required.

Indicative references that could be used to facilitate the assessment of the long term ambition with regards to the Paris Agreement goals

CAN Europe recommendations

Given the climate emergency and its capacity and responsibility to act, the EU must go for net zero greenhouse gas emissions by 2040.

Existing long term climate targets and other considerations

At EU level, the European Council adopted a long term greenhouse gas emission target in December 2019, with the endorsement of achieving climate neutrality in the EU by 2050. [5]

In April 2019, the CAN Europe report [“Time to pick up the pace”](#)[6] , which made an initial assessment of 24 draft NECPs, highlighted that at that time countries such as Sweden, Portugal, Denmark, the Netherlands and France had a long-term target to reach net-zero emissions by 2045 or 2050 at the latest, going beyond the minimum requirements of the Governance Regulation. In the meantime, Finland has announced to achieve climate neutrality by 2035. It is important to note that all countries should set such targets and that many have expressed their intentions at the national level.

If a country already has a national long term target that has remained unchanged since COP 21 in Paris, there may be grounds to request for a review. This might mean a need for an update both in terms of timing and ambition based on the recently adopted EU climate neutrality goal and the Paris Agreement.

It is also critical to analyse expected enhancement of national carbon removals, for example under the reporting requirements related to the land-use, land change and forestry sector (LULUCF) and to assess whether these natural sinks will actually be accounted domestically to achieve climate-neutrality or will be used to offset domestic emissions by 2030 (see assessment of the use of loopholes in section 1.1.2).

ISSUE	INDICATOR	EVALUATION QUESTION
Long-term goals	National long-term greenhouse emission reduction target and pathways	Does the final NECP contain a specific national climate objective beyond 2030 and if yes which is its level of ambition? Is there an explicit reference to coherence with the European climate neutrality goal? Is there a clear commitment to the Paris Agreement and its objectives, particularly the 1.5°C target?
		Has the final NECP improved in terms of including a specific national climate objective

		beyond 2030 compared to the draft NECP or not? If yes, please explain and quantify the improvements.
		In December 2019, Member States agreed to achieve net zero emissions by 2050. NGOs are calling the EU to achieve net zero emissions by 2040. In this context, are there missed opportunities related to the long term perspective of the final NECP? If yes, which do you think are the most important ones (max 3) and why?

3. PRIORITY PILLAR III: TRANSPARENCY

The pillar “TRANSPARENCY ” is focused on whether Member states facilitated public participation while all options were still open and whether citizens- were able to input into the development of the NECPs. This is essential for meaningful and effective consultation.

3.1 Effective stakeholder participation

Why it matters:

Stakeholder participation in the NECP’s preparation and development processes is intended to provide opportunities to communicate asks and insights about the future direction of national energy and climate policy to decision-makers. Different EU Member States have different practices on the degree and manner they allow for such public consultations. However, there are certain legal standards that Member States are obliged to follow, from draft to final phase of the NECPs. Going forward, understanding and analysing how Member States lived up to their obligations is important for improving the conditions for real and effective public participation in future climate and energy policy processes.

What Member States are required to report in the final NECP:

Article 10 of the Governance Regulation requires Member States to provide for early participation in the preparation process well before the final NECP is adopted and submitted to the European Commission. When submitting the final NECP, Member States will have to attach a summary of the views and inputs they have received from the public. Also, Article 11 requires that a permanent Multilevel Climate and Energy Dialogue is created (if no such platform already exists).

Indicative references that could be used to facilitate the assessment of the public participation process

[Background on the legal basis](#)

Participation in the preparation of plans such as NECPs is required by Article 7 of the Aarhus Convention (an international treaty on Access to Information, Public Participation and Access to Justice in environmental matters). Article 10 of the Governance Regulation implements this obligation in EU law as regards the NECPs.

Article 7 of the Aarhus Convention determines standards for participation in the preparation of plans: Each party has to adopt rules that give the public an opportunity to access information about the planning process early on, to have sufficient time to form an opinion and to express its views, and to be heard by decision-makers. The Maastricht Recommendations on Public Participation in Decision-making of 2015 provide further guidance on what that means in [practice](#) (see especially pages 46-51).

The Governance Regulation contains specific provisions on public consultation in the preparation of NECPs in Article 10. The provision implements Article 7 Aarhus Convention – as the EU itself is also Party. It also provides some guidance on when public participation should take place during the process of NECP preparation, that is divided in different phases. All Member States have to make sure that the rules they have adopted for participation in the preparation of plans to implement Article 7 Aarhus Convention also apply to the preparation of NECPs. In addition, they have to comply with the requirements in Article 10 Governance Regulation, although it is somewhat weaker. But the stronger requirements from Aarhus should still be something you can request to be implemented instead, since they are legal obligations your country has committed to.

A specific article in the Governance Regulation was dedicated to the creation of a Multilevel Climate and Energy Dialogue (Art 11). Member States need to establish such a dialogue in which different stakeholders are able actively to engage and discuss the different scenarios envisaged for energy and climate policies and review progress, if such a structure does not exist yet. These dialogues may also be used for discussion on the NECPs.

Available analysis of draft NECPs

The analysis of the European Commission on each draft NECP indicates whether a public consultation had happened by the time the draft NECPs were submitted. In any case, Member States should have ensured a full participation of stakeholder throughout the process, for both draft and final NECPs.

ISSUE	INDICATOR	EVALUATION QUESTION
Effective stakeholder participation	Participating in the NECP preparation processes	Was there a consultation process on either the draft NECP, the final NECP or both?

		<p>Was the public participation open to everyone or was it limited and only certain stakeholders were able to comment?</p> <p>If the first, how much time did the stakeholders have to prepare and submit their comments on the draft and/or final NECP: (a) two weeks or less, (b) one month or less (c) longer than one month.</p> <p>If the second, which stakeholders were invited to participate (NGOs, academia, research institutions, industry..)?</p>
		<p>Has the final NECP been made public when submitted at the national level?</p>
		<p>Has there been a comprehensive report accompanying or being part of the final NECP on how the comments of the stakeholders participating in the public consultation have been taken into account?</p>
		<p>Have there been Commission recommendations on the public consultation process regarding the preparation of the draft NECP and have they been sufficiently addressed in the final NECP?</p>
		<p>What is in your opinion the ideal situation regarding the process of stakeholders' involvement in the development of the NECP in your country ? In this context, are there missed opportunities related to the process followed in your country? If yes, which do you think are the most important ones (max 3) and why?</p>
		<p>What is in your opinion the ideal situation on stakeholders' involvement in monitoring the implementation of the NECPs?</p>

	Preparing for the NECP implementation processes	Has your country used the opportunity of the NECP process to set up structures that will further enable the multilevel climate and energy dialogue?
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4. PRIORITY PILLAR IV: CONSISTENCY

To reach the targets and milestones set out and truly embark on a decarbonisation pathway to achieve the Paris Agreement goals, it is crucial to have a consistency among targets across sectors and policy areas and to avert and eliminate direct barriers to reaching the established targets. The pillar “CONSISTENCY” is focused on checking whether countries are missing alignment between different policies and strategies. Two main examples are used, infrastructure planning and coal phase out. This pillar also intends to identify whether both mitigation and adaptation measures are included in the plans.

4.1 Consistency with relevant national strategies and goals

4.1.1 Relevant national strategies and commitments on coal phase out and infrastructure

Why it matters:

The NECPs should work well together with other national sectoral plans and strategies to achieve consistent decarbonisation pathways and targets. NECPs can build upon existing strategies, if these go towards the right direction, for example on coal phase out or infrastructure development and planning needs regarding further deployment of renewables or update others that are not in line with the set climate and energy objectives and the Paris Agreement goals.

What Member States are required to report in the final NECP:

In the NECPs, Member States directly refer to various policies which can involve different sectors and are strongly linked to climate and energy issues in different sections and dimensions. For example, Member States had to report on elements regarding infrastructure in more than one section of the NECPs, including energy efficiency, energy security and the internal market. Thus, energy infrastructure is covered in a cross-cutting manner across a number of chapters in NECPs.

Indicative references that could be used to facilitate the assessment of the consistency between different policies and strategies related to infrastructure and coal phase out

CAN Europe recommendations

Coal phase out

CAN Europe calls for a coal phase out in Europe by 2030. Therefore, the effort to reduce reliance on coal needs to be evident within the NECPs with the aim of phasing it out completely by 2030 at the

latest. This should be conditional for receiving funds for the just transition, in particular those channelled via the Coal Regions on the Transition Platform and from all 3 pillars of the Just Transition Mechanism.

Infrastructure

The EU and Member States' policies consider energy infrastructure mainly as a tool to enhance cross-border transmission and trading, and to protect against supply disruptions and black-outs. But more importantly, the energy transition also requires rethinking the EU's energy infrastructure in line with the Paris Agreement goals. In order to achieve its net-zero emission target, the EU has to reduce its energy consumption and switch to a 100% renewable energy supply. Therefore planned infrastructure projects in the NECPs or in other dedicated strategies, should neither become a bottleneck hindering renewables, nor should they deepen Europe's dependency on fossil fuels. Priority should be given to clean energy solutions which will trigger the transition needed to modernise Europe's energy system and meet the EU's climate objectives. This should be done in a coherent way throughout all strategic plans such as the NECPs and other strategies dedicated to infrastructure.

The NECPs should assess future infrastructure needs against efficiency gains. If Member States do not take them into account, they risk stranded assets, e.g. underused gas networks. Furthermore, Member States stop planning infrastructure for fossil fuel extraction and imports and develop adaptation strategies for their energy infrastructure to increase renewable energy shares. Finally, the NECPs foresee sufficient electricity interconnector capacities to increase the share of variable renewables and that they develop flexibility options beyond interconnectors that simplify integration of renewables.

Available analysis of draft NECPs

Coal phase out – In [their initial draft NECPs](#), some countries, namely: France, Denmark, Ireland, Italy, Netherlands, Finland and Portugal put forward much needed goals to phase out coal in the power sector by 2030 at the latest. Since then, three more Member States committed to phasing out coal in the power sector by 2030 in public statements by their Heads of State or Government, these are: Greece (by 2028), Hungary (by 2030) and Slovakia (by 2023). If only the current public coal phase out commitments are confirmed in the final NECPs, the vast majority of the remaining coal in 2030 will be located in just five Member States: Bulgaria, Czechia, Germany, Romania and Poland.

Infrastructure - The energy infrastructure information included in the draft NECPs considerably varies between Member States, ranging from extensive descriptions of interconnector projects and specific targets to simple no information at all.

The detailed CAN Europe briefing "Assessing energy infrastructure in the NECPs" shared with its members in July 2019 gives an overview of the energy infrastructure elements in all draft NECPs. The potential improvements in final NECPs thus can easily be analysed with the help of this previous assessment.

ISSUE	INDICATOR	EVALUATION QUESTION
Consistency with other relevant national strategies and goals	Fossil fuel phase out	Is there consistency between the targets and objectives in the final NECP and other relevant national strategies for the fossil fuels phase out, eg oil shale?
		<p>What is in your opinion the ideal situation in 2030 regarding the development of a strategy to phase out fossil fuels and the consistency with the NECP, taking into account that Europe should become climate neutral by 2040?</p> <p>In this context, are there missed opportunities related to national commitments and/or action taken related to eg. coal (see below), oil shale or fossil gas phase out ? If yes, which do you think are the most important ones (max. 3) and why?</p>
	Coal phase out date by 2030	Does the NECP foresee coal phase out by 2030? If yes, what is the established year for it? If not, what is the projected coal capacity or capacity of oil shale origin in 2030 (if there is a lack of data on the coal capacity (in GW), data of electricity production from coal (in TWh)? In this case, does the country foresee a coal phase out date after 2030?
		Is there any progress regarding the pace of phasing out coal in comparison to the draft NECP?

		<p>If a coal phase out date is not foreseen by 2030, which do you think are the most important missed opportunities in this context (max 3) and why?</p>
	<p>Energy infrastructure aligned with the Paris Agreement</p>	<p>Compared to the draft NECP, are proposed infrastructure investments aligned with the long-term climate goals i.e. national, European (if they are different) and Paris Agreement compatible long-term goals?</p> <p>Are there missed opportunities related to infrastructure investments and planning as foreseen in the final NECP? If yes, which do you think are the most important ones (max. 3) and why?</p>
	<p>Efficient use of energy infrastructure</p>	<p>Does the NECP explain how existing energy infrastructure will be used in a more efficient way? Does the NECP anticipate potentially stranded assets in energy infrastructure, e.g. fossil gas networks that would not be needed anymore? Is there any improvement compared to the draft NECP? Please develop and explain this part based on your positions and priorities. It would be ideal to include references to back your opinion.</p>

	Energy infrastructure supporting energy security	Does the NECP lay out adaption strategies, investment needs, time frames and detailed measures for energy infrastructure that will help to increase the shares of domestic renewable energy and thus to reduce import dependencies? Is the NECP suggesting a higher fossil gas consumption to diversify or to increase imports, e.g. through additional gas interconnectors? Is there any improvement compared to the draft NECP?
	Energy infrastructure enhancing internal markets	Does the NECP foresee sufficient electricity interconnector capacity to increase the share of variable renewables (solar and wind power)? Does the NECP cover any other flexibility options beyond interconnectors that can simplify the integration of renewables, e.g. giving renewable self-consumers more responsibility, deploying demand response schemes, improving the interplay of transmission and distribution grid operators? Is there any improvement compared to the draft NECP? If any please specify.

4.1.2 Adaptation

Why it matters:

Addressing and reporting on adaptation through the NECPs has a number of benefits for increasing overall climate ambition at national and European level: it makes a direct link between EU and national mitigation requirements and projected adaptation needs; it operationalises the concept of adaptation mainstreaming into the relevant sectors covered by the Energy Union; and it will help to ensure that energy infrastructure and the internal energy market is resilient to future climate impacts.

Through the 2013 EU Adaptation Strategy the Commission encourages all Member States to adopt comprehensive adaptation strategies and provides funding to help them build up their adaptation capacities and take action.

What Member States are required to report in the final NECP:

Even though the references to adaptation in the NECP template are not very strong, there are still some references to adaptation within the Governance Regulation text such as in articles 4 and 19. The NECP template refers to adaptation in the section on greenhouse gas emission reduction targets, linking the adaptation goals with the mitigation goal.

What Member States should report in the final NECP: In the Paris Agreement, countries established an adaptation goal which aims to enhance “adaptive capacity, strengthening resilience and reducing vulnerability to climate change” (Art. 7, Paris Agreement). The adaptation goal of the Paris Agreement requires governments to submit information, including on climate change impacts and adaptation at least every two years. The Paris Agreement also calls for countries to develop regular Adaptation Communications which can include priorities, implementation and support needs in relation to national adaptation.

Based on the EU’s commitments to the Paris Agreement, the NECPs should ideally report on how **country-wide adaptation vulnerabilities, measures and National Adaptation Plans (NAP)** are being implemented by governments and regional or local authorities. Doing this poses little additional burden to Member State governments; instead, it would help to better align adaptation needs with medium-term mitigation planning. Moreover, it should help facilitate a timely pathway correction by relevant authorities, to reduce the loss and damage.

The information that should be included in the NECPs as referred to in Article 19 Governance Regulation could help to bring a proper assessment on the adaptation issue, especially as regards to those adverse effects of climate change related to energy security. Any adaptation assessment in NECPs should take into account the following key points: (a) the main goals, objectives and institutional framework for adaptation; (b) climate change projections including weather extremes, climate-change impacts, assessment of climate vulnerability and risks and key climate hazards; (c) adaptive capacity; (d) adaptation plans and strategies; (e) monitoring and evaluation framework; (f) progress made in implementation, including good practices and changes to governance. Doing so should help to determine the potential role of adaptation solutions within NECPs, thereby facilitating a strategic framework for adaptation implementation through the NECPs.

Indicative references that could be used to facilitate the assessment of the information on adaptation

[CAN Europe recommendations](#)

In its [adaptation position, CAN Europe](#) calls for the next EU Adaptation Strategy to guarantee that all authorities and actors are adequately equipped to limit their vulnerability to climate impacts; for

example, through including prevention and preparedness measures within policies and investment plans. In addition, the next EU Adaptation Strategy should also ensure that exposed actors have both the support and capacity to implement the appropriate services to deal with any climate related events and impacts that occur; in particular, more vulnerable sectors and communities across EU member states.

Existing national priorities and strategies

The NECPs should at least help governments to disclose information on their respective adaptation needs, their adaptation goal (if and when it is established), including whether the goal is economy-wide or not, as well as the envisaged or existing plans to help achieve that goal. Member States should also state how their adaptation goal contributes to the implementation of the Global Commission on Adaptation’s Action Tracks, particularly those Member States that are leading specific Action Tracks. Providing information through the NECPs makes a clear connection between meeting the commitments to the Paris Agreement goals on adaptation and the national efforts in the context of climate and energy action.

Available analysis of draft NECPs

To date, no NECPs assessment have been published specifically focused on this issue that enables an overview of the adaptation' s role inside the plans. Likewise, the European Commission in its Recommendations to the Member States makes no concrete mention of this issue. Indeed, NECPs are mainly a mitigation tool to propose measures aimed to anticipate climate change impacts by reducing its origin sources. However, these need to be complemented with additional measures aimed to give resilience against climate change.

ISSUE	INDICATOR	EVALUATION QUESTION
Consistency with other relevant national strategies and goals	Adaptation measures and National Adaptation Plans	Is adaptation (vulnerabilities and measures) adequately reflected in the final NECP? Does the NECP take the National Adaptation Plan (NAP) into account? Are mitigation targets in NECP coherent with adaptation targets in NAP? Does the NECP goals complement the NAP goals?
		Does the NECP adaptation plan outline how they contribute to the Paris Agreement’s adaptation goals?

		Has there been an improvement in the final NECP compared to the draft NECP or not? Please explain.
		Have there been Commission recommendations on this issue and have they been sufficiently addressed in the final NECP?
		What is in your opinion the ideal situation on supporting adaptation and its benefits for increasing overall climate ambition at national and European level? Are there missed opportunities related to the issue of adaptation as covered in the final NECP? If yes, which do you think are the most important ones (max 3) and why?
Enhancements of removals by carbon sinks		Is the enhancements of removals adequately reflected in the final NECP? Does the NECP mention the importance of CO2 removals by carbon sinks in relevant sectors such as LULUCF and agriculture? Does the NECP include additional measures on adaptation for strategic activities such as forestry, croplands and grasslands?
		Has there been an improvement in the final NECP compared to the draft NECP or not?
		Have there been Commission recommendations on this issue and have they been sufficiently addressed in the final NECP? Please explain.
		What is in your opinion, the ideal situation on supporting removals and its benefits for increasing overall climate ambition at national and European level? Are there missed opportunities related to the issue of adaptation as covered in the final NECP? If yes, which do you think are the most important ones (max 3) and why?

5. PRIORITY PILLAR V: CREDIBILITY

The success of the NECPs in driving transformational change depends on the credibility of the policies designed to deliver on the targets and objectives set out. More broadly speaking, for example, if adequate funding for these policies is not foreseen and/or if fossil fuel subsidies are still handed out by the government, there is a lack of credibility in the overall efforts to pursue the targets.

5.1 Credibility of efforts to pursue the targets set

5.1.1 Fossil fuel subsidies

Why it matters:

Direct and indirect fossil fuel subsidies encourage wasteful consumption, distort markets, impede investment in clean energy sources, and undermine climate change policies. Including objectives and measures to phase out fossil fuel subsidies in the NECPs is thus a prerequisite, if the NECPs are meant to be transformational.

What Member States are required to report in the final NECP:

Member States have to provide a description of energy subsidies, including those for fossil fuels. They are also required to list, if applicable, national policies, timelines and measures planned to phase out harmful energy subsidies, in particular for fossil fuel. Note that the qualifier “if applicable” does not excuse any Member State from not including phase-out efforts in its NECPs, as all EU Member States have committed to phasing out fossil fuel subsidies by 2020. However, some Member States might still claim they are free of fossil fuel subsidies, choosing a restrictive definition (they are legally allowed to do that) allowing them to hide their public fossil fuels support.

Indicative references that could be used to facilitate the assessment of the information provided on fossil fuel subsidies

Available analysis of draft NECPs

None of the draft NECPs submitted provides a comprehensive overview of the country’s fossil fuel subsidies together with a comprehensive plan on how a proper phase-out will happen. Therefore, the Commission made the same recommendation to almost all Member States. In the final NECPs, they will need to provide a list of all energy subsidies, as well as actions undertaken and planned to phase them out, in particular for fossil fuels. According to the European Commission, only three Member States - Estonia, Ireland and Italy - have provided information on energy subsidies in their draft NECPs. They have received a recommendation only on the need to list the actions undertaken and planned to phase them out, in particular those for fossil fuels.

CAN Europe report: ‘[Fossil fuel subsidies in draft EU National Energy and Climate Plans](#)’ provides for a comprehensive overview of fossil fuel subsidies in Member States; data provided in this report serve as a benchmark for the final assessment.

ISSUE	INDICATOR	EVALUATION QUESTION
Credibility of efforts to pursue the targets	Fossil fuel subsidies	Are there fossil fuel support policies in your country that would run counter to the objectives and targets in the final NECP?
		Are all - direct or indirect - fossil fuel subsidies reported in the final NECP? If so, is there a comprehensive fossil fuel subsidies phase out plan reported in the final NECP ?
		Has the final NECP improved compared to the draft NECP or not?
		Have there been Commission recommendations on this issue and have they been sufficiently addressed in the final NECP? Please explain.
		What is in your opinion the ideal situation on phasing out fossil fuel subsidies? In this context, are there missed opportunities related to what is foreseen about fossil fuel subsidies in the final NECP? If yes, which do you think are the most important ones (max 3) and why?

5.1.2 Finance measures for climate and energy targets – EU funds

Why it matters:

The implementation of the measures foreseen in the NECPs is linked to the still ongoing planning of EU funds post-2020. All Member States will receive financial support from the EU budget's Cohesion Policy funds. In particular the so called 'less developed regions' in Central, Eastern and South Europe will significantly benefit from those EU funds. In addition some Member States will receive funding from the newly-established Just Transition Fund, the Modernisation Fund, the Innovation Fund or other sources of the EU budget. Member States will also apply for EU financing for energy and transport projects under the EU budget 'Connecting Europe Facility' or the 'InvestEU' fund. It is paramount that the NECPs provide information on the total investment needs and the role of the EU funds to tackle them. Furthermore, all the EU funds should be used to support increased ambition. Through the NECPs acting as a strategic framework to adequately pose the upcoming development of EU funds spending plans, i.e. Partnership Agreements, Operational Programmes and Territorial

Just Transition Plans, it is important to stress that potential weaknesses and gaps in the NECPs should be alleviated with the helpful support of EU funds.

What Member States are required to report in the final NECP:

Member States are required to report not only on the investments needs under the impact of policies and measures section but also on Union funds planned to be used for objectives linked to the different dimension of the NECP i.e. greenhouse gas emission reductions and removals, promotion of the production and use of energy from renewable sources in electricity, heating and cooling, and transport, energy efficiency, energy security, energy transmission infrastructure, electricity infrastructure and research, and innovation and competitiveness.

Indicative references that could be used to facilitate the assessment of the information provided on investment needs and the use of EU funds

Available analysis on the use of EU funds

In the current EU budget period from 2014 -2020, Member States are only using a fraction of their available EU regional development funding to finance measures falling under the scope of NECPs. CAN Europe report '[Recommendations to increase the climate ambition of the next EU budget](#)' shows that on average only 10% of all European Regional Development Fund and Cohesion Fund are planned to be spent on Renewable Energy Sources, on Energy Efficiency, on electricity infrastructure like transmission, distribution, storage or 'smart grids', and research & innovation and technology transfer and cooperation in enterprises focusing on the low-carbon economy. Thus the EU funds allocated to the measures that will help deliver the clean and just energy transition need to highly increase, targeting at least to double.

Final NECPs are going to be the basis strategic framework for planning and allocating EU funds in the area of climate and energy for the period 2021-2027. The accordant process of developing national and regional EU funds spending plans, so called 'Programming', would need to refer to objectives and measures set out in NECPs. In case final NECPs still show 'ambition gaps', lack 'financial needs assessments', include a respectively 'planned EU funds allocations' that appear to be low (e.g. compared to the current period), the investment planning for upcoming EU funds (programming) could still address potential insufficiencies in climate and energy planning.

ISSUE	INDICATOR	EVALUATION QUESTION
Credibility of efforts to pursue the targets	Finance measures for climate and energy targets – EU funds	Does the final NECP contain sufficient and robust information on the additional climate and energy-related investments required and their potential sources?

		Do EU funds visibly and significantly contribute to achieving the climate and energy targets? Could they lead to higher ambition?
		Has the final NECP improved compared to the draft NECP or not? If yes, please explain.
		Have there been Commission recommendations on this issue and have they been sufficiently addressed in the final NECP?
		What is in your opinion the ideal situation on reporting and taking action on this issue? In this context, are there missed opportunities related to this issue the final NECP? If yes, which do you think are the most important ones (max.3) and why?

5.1.3 Policies and Measures (PAMs) for achieving targets

Why it matters:

The details on concrete policies and measures (PAMs) in the plans are a key benchmark for the solidity and credibility of the NECPs and the targets they aim to achieve. PAMs must be implemented using robust human rights, gender-responsive and environmental criteria, to ensure that PAMs do not create or lead to adverse conditions that impact the livelihoods of local communities or prevent communities from becoming truly net-zero economies and climate resilient.

What Member States are required to report in the final NECP:

NECPs need to provide details on the impact of the existing and planned PAMs for the achievement of greenhouse gas emission reduction, renewable energy and energy efficiency targets specifically.

Indicative references that could be used to facilitate the assessment of the adequacy of policies and measures

Own national demands and priorities, underpinned by national studies (if available)

There is no harmonised benchmark on assessing the adequacy of policies and measures. So their assessment should be based on expert opinion, national information and studies that are available as well as national demands and priorities on policies and measures that are required to increase ambition and deliver the established targets. In principle, the planned policies and measures in the

final NECPs need to be comprehensive, gender-responsive, credible, quantified and based on up-to-date information. All the background data and underlying methodologies need to be publicly available in order to allow for proper analysis.

Available analysis of draft NECPs

The final NECPs need to include strong policies and measures that will bolster the delivery of the EU 2030 targets. This crucial element had to be further developed for most Member States, as either clear and quantified measures or detailed elaboration on proposed policies and measures are often missing from the draft plans.

ISSUE	INDICATOR	EVALUATION QUESTION
Credibility of efforts to pursue the targets	Description and impact assessment of Policies and Measures (PAMs) for the non-ETS target	Does the final NECP include policies and measures to reduce emissions in all required sectors?
		Does the final NECP provide a clear description on existing and planned policies and measures which relate to the emission reductions in the non-ETS sectors (eg. clear presentation of measures and additional information, such as time frame, implementing body etc)? Please specify.
		Does the final NECP provide a clear impact assessment of existing and planned policies and measures (PAMs) which relate to emission reductions in the non-ETS sectors (eg. quantified information on emission reductions achieved per measure?)
		Are the existing and planned policies likely to be sufficient to achieve the national non-ETS target and even go beyond?
		Have there been Commission recommendations on the existing and planned policies and measures related to reducing emissions in the non-ETS sectors and have they been sufficiently addressed in the final NECP?

		<p>What is in your opinion the ideal situation on the ambition, presentation, adoption and implementation of policies and measures regarding the non-ETS sectors? In this context, are there missed opportunities regarding the policies and measures related to the non-ETS emission reductions, as presented in the final NECP? If yes, which do you think are the most important ones (max 3) and why?</p>
	<p>Description and impact assessment of Policies and Measures (PAMs) for RES</p>	<p>Does the final NECP include policies and measures to increase the penetration of renewable energy in the most relevant sectors?</p>
		<p>Does the final NECP provide a clear description details on existing and planned policies and measures to increase the penetration of renewable energy (eg. clear presentation of measures and additional information, such as time frame, implementing body, etc)?</p>
		<p>Does the final NECP provide a clear impact assessment of existing and planned policies and measures (PAMs) related to increasing the penetration of renewable energy?</p>
		<p>Are the existing and planned policies likely sufficient to achieve the national renewable energy contribution and even go beyond? Please provide your opinion backed up by scientific research or your positions when possible.</p>
		<p>Have there been Commission recommendations on existing and planned policies and measures related to renewable energy penetration and have they been sufficiently addressed in the final NECP?</p>

		<p>What is in your opinion the ideal situation on the ambition, presentation, adoption and implementation of policies and measures regarding the increase of penetration of renewable energy in the most relevant sectors? In this context, are there missed opportunities regarding the policies and measures related to renewable energy as presented in the final NECP? If yes, which do you think are the most important ones (max 3) and why?</p>
	<p>Description and impact assessment of Policies and Measures (PAMs) for energy efficiency</p>	<p>Does the final NECP include policies and measures to increase energy savings and reduce energy demand in the most relevant sectors?</p>
		<p>Does the final NECP provide a clear description on existing and planned policies and measures to increase energy savings and reduce energy demand (eg. clear presentation of measures and additional information, such as time frame, implementing body etc)? Please specify what the NECP refers to.</p>
		<p>Does the final NECP provide a clear impact assessment of existing and planned policies and measures (PAMs) related to increasing energy savings and reducing energy demand?</p>
		<p>Are the existing and planned policies likely to be sufficient to achieve the national energy efficiency contribution or even go beyond it?</p>
		<p>Have there been Commission recommendations on existing and planned policies and measures related to increasing energy savings and reducing energy demand and have they been sufficiently addressed in the final NECP?</p>

		<p>What is in your opinion the ideal situation on the ambition, presentation, adoption and implementation of policies and measures regarding the increase of energy savings and the reduction of energy demand?</p> <p>In this context, are there missed opportunities regarding the policies and measures related to energy efficiency, as presented in the final NECP? If yes, which do you think are the most important ones (max 3) and why?</p>
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FOOTNOTES:

[1] The ETS limits emissions from more than 11,000 heavy energy-using installations (power stations & industrial plants) and airlines operating between these countries. https://ec.europa.eu/clima/policies/ets_en

Industry however enjoys numerous and generous exemptions.

[2] Sectors not covered by the ETS such as transport, buildings, waste and agriculture

[3] Primary energy consumption measures the total energy demand. It covers consumption of the energy sector itself, losses during transformation and distribution of energy, and the final consumption by end users. It excludes non-energy uses. Final energy consumption is the total energy consumed by end users, such as industry, transport, households, services and agriculture. It is the energy which reaches the final consumer's door and excludes energy used by the energy sector itself.

https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Category:Energy_glossary

[4] National long-term strategies and the specific reporting requirements are covered by Article 15 of the Governance Regulation.

[5] European Council conclusions, December 2019. <https://www.consilium.europa.eu/media/41768/12-euco-final-conclusions-en.pdf>

[6] CAN Europe (2019). Time to Pick up the Pace Report. <http://www.caneurope.org/publications/reports-and-briefings/1760-report-time-to-pick-up-the-pace-insights-into-the-draft-national-energy-and-climate-plans>

List of available resources

[Governance Regulation and Annex for the NECP template](#)

[Commission webpage on NECPs](#)

[Commission assessment of the draft NECPs](#) : please click on the “open or close table” to see the list of Member States

CAN Europe report: '[Fossil fuel subsidies in draft EU National Energy and Climate Plans](#)'

CAN Europe report: '[Recommendations to increase the climate ambition of the next EU budget](#)'

[PLANUP project reports on NECPs](#)

[Planning For Net Zero: Assessing The Draft National Energy And Climate Plans](#) Report

[Not \(yet\) a missed opportunity. Influencing the 2021- 2030 NECPs through early Public Participation Briefing](#) from ClientEarth

[Europe's National Energy and Climate Plans to 2030: Are they fit for purpose? Report from FERN](#)

[Unleashing the power of community renewable energy](#) from Friends of the Earth Europe

Are Member States planning for energy communities? A critical analysis of Member States' draft National Energy and Climate Plans

http://foeeurope.org/sites/default/files/climate_justice/2019/executive_summary_-_are_member_states_planning_for_renewable_energy_communities.pdf

Keeping the lights on: Which EU countries are taking action on energy poverty?

<https://righttoenergy.files.wordpress.com/2019/05/keeping-the-lights-on--energy-poverty-in-necps-1.pdf>