

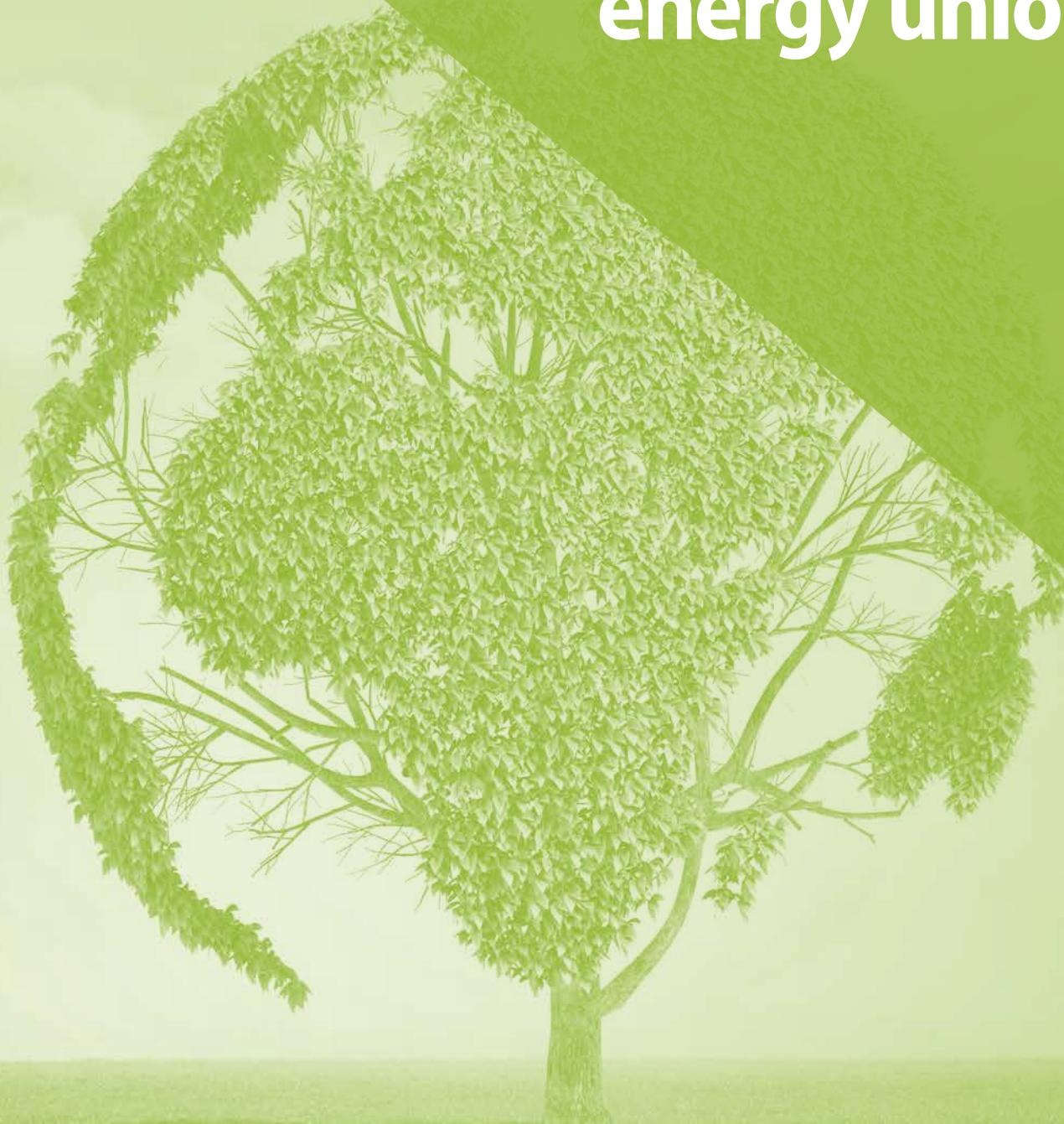


European Committee
of the Regions

Commission for
the Environment,
Climate Change and Energy

ENVE

Local and regional authorities in the governance of the energy union



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Catalogue number: QG-07-23-344-EN-N ISBN: 978-92-895-2911-2 DOI: 10.2863/314352

This report was written by Mariya Gancheva, Panagiota Pavlou, Laura Vona, Berkay Akbaba, Laurine Tertre, Isa Vroom (Milieu Consulting SRL)

It does not represent the official views of the European Committee of the Regions.

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List of abbreviations

CEMR	Council of European Municipalities and Regions
CSO	Civil Society Organisation
CoR	Committee of the Regions
ETS	Emissions Trading System
GHG	Greenhouse Gas
LRAs	Local and regional authorities
LULUCF	EU rules on land use, land use change and forestry
MCED	Multi-level Climate and Energy Dialogue
Mtoe	Millions of tonnes of oil equivalent
n.d.	no date
NAP	National Adaptation Plan
NAPCP	National Air Pollution Control Programme
NAS	National Adaptation Strategy
NECP	National Energy and Climate Plan
NGO	Non-governmental organisation
RES	Renewable Energy Sources
R&I	Research and Innovation
RRF	Recovery and Resilience Facility
RRP	Recovery and Resilience Plan
SDGs	Sustainable Development Goals
SECAP	Sustainable Energy and Climate Action Plan
SUMP	Sustainable Urban Mobility Plan

Summary

The Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999 asks Member States to develop National Energy and Climate Plans (NECPs) that define their targets, strategies and measures for achieving the EU's mid-term (2030) and long-term (2050) decarbonisation objectives. In addition, it requires Member States to establish multilevel climate and energy dialogues (MCEDs), which involve local and regional authorities (LRAs), civil society organisations (CSOs), business community and other relevant stakeholders and provide opportunities for the stakeholders to discuss the NECPs. Member States submitted their first NECPs in 2020 and are currently working on their updates, which will be assessed by the European Commission before being finalised. In this context, the main objective of this study is to examine how LRAs are currently participating in the NECPs process and how the establishment of MCEDs is being implemented, identifying areas for improvement. This is based on a review of existing assessments of the countries' 2020 NECPs and a five-week survey among LRAs and other stakeholders.

The general findings of the study indicate that, overall, some forms of MCED or at least broad public consultations on the NECPs or related climate/energy policies have been established in all Member States. Nevertheless, the quality of these consultations differs and the outcome remains unclear in most cases, the existing practices can be considered a form of MCED. For instance, many of the survey respondents representing LRAs or their associations consider that the quality of MCEDs in their countries is not satisfactory. While most assessments as well as many of the survey respondents indicate that NECPs are generally well integrated with other relevant national policy documents, such integration with subnational climate and energy policies is more limited or missing in some cases.

In light of this, the following recommendations are proposed to Member States and European policy-makers:

- Enhance the effectiveness and implementation of the MCED;
- Ensure the active participation of LRAs throughout all stages of the NECP process;
- Harness the potential of LRAs to foster the participation of citizens and the general public;
- Provide sufficient financial and technical support to LRAs;
- Strengthen subnational integration of targets and objectives in the NECPs;
- Incorporate the energy and climate investments from emergency-related instruments and reforms into the updated NECPs;
- Improve the alignment of NECPs with other strategic documents.

1. Introduction

The European Green Deal¹, published in 2019, sets the objective for Europe to become the first climate neutral continent by 2050 and introduced several legislative and non-legislative initiatives to achieve this political objective. This also means alignment of existing initiatives such as the Clean Energy Package², in order to ensure the European energy system delivers the objectives of the European Green Deal. The Governance of the Energy Union and Climate Action Regulation (EU) 2018/1999 (in short ‘Energy Governance Regulation’)³, one of the main pillars of the Clean Energy Package, is considered to be the core mechanism for the implementation of the EU energy policies. To meet the EU’s climate and energy targets, the Member States are required to establish National Energy and Climate Plans (NECPs) and multilevel climate and energy dialogues (MCEDs). Member States submitted their NECPs in 2019 and are currently working on their updates, which will be shared for an assessment by the European Commission by June 2023. The final updated versions of the NECPs are thus expected by June 2024.

The main objective of this study is to examine how local and regional authorities (LRAs) are currently participating in the NECPs process and how Article 11 of the Governance Regulation on the establishment of MCEDs is being implemented, identifying areas for improvement. The study would be incorporated into any advisory work on the management of the Energy Union and the European Committee of the Region’s (CoR) reflection on the Future of the Green Deal.

The study is organised as follows: Chapter 1 provides an overview of the study objectives and methodology. Chapter 2 provides information on the role of NECPs and the importance of MCED in this context. Chapters 3 and 4 provide, respectively, a list of country fiches covering all the 27 EU Member States and the results from the survey conducted concerning the NECP process and LRAs’ involvement. Finally, Chapter 5 provides policy recommendations emerging from our analysis. The study concludes with a list of references and an annex.

¹ European Commission, The European Green Deal, COM/2019/640 final, <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1576150542719&uri=COM%3A2019%3A640%3AFIN>.

² European Commission, Clean Energy for all Europeans, n.d., https://energy.ec.europa.eu/topics/energy-strategy/clean-energy-all-europeans-package_en.

³ Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02018R1999-20230516>.

Objectives

The specific objectives of the study are to assess:

- the implementation of the MCED and its effectiveness in terms of engagement of LRAs and citizens,
- the connection between the NECPs and subnational plans in the field of climate and energy,
- the connection between NECPs and other relevant national plans in the field of the European Green Deal or Sustainable Development Goals (SDGs),
- the connection between the revision of NECPs and emergency-related instruments such as the Recovery and Resilience Facility (RRF) and RePowerEU.

Methodological approach

The study relies on two main sources of evidence: desk research and a stakeholder consultation.

The desk research was mostly based on literature review of relevant publications, as well as quantitative data from secondary sources. For the information on the role of NECPs and the importance of MCED (Chapter 2), as well as for the drafting of the country fiche covering all 27 EU Member States (Chapter 3), the main sources used were the 2020 NECPs submitted by the Member States, along with the Individual Assessments provided by the European Commission for each of the NECPs. Additional literature sources used include reports devoted to the assessment of the NECPs, the role of LRAs in the process, along with reports on good practices and examples across the EU Member States compiled by stakeholders and EU-funded projects. Lastly, the national Recovery and Resilience Plans (RRPs), along with their assessment by the European Commission, were also screened.

In addition, an EU-level survey was conducted in cooperation with the CoR and a network of LRAs (Council of European Municipalities and Regions - CEMR). Targeted stakeholders that could potentially provide information related to the implementation of the MCEDs and NECPs (or equivalent documents) in their respective Member State were contacted through the networks of the CoR and the CEMR and invited to complete the online questionnaire. The survey included 29 questions covering the main research areas of the study (see under objectives). The results collected from its launch on 2 May 2023 until 19 June 2023 (in total 52 responses) were included in the analysis for this study. Overall, responses came from 23 different Member States and 46 LRAs or associations representing LRAs. Specific findings from the survey were integrated into the 27 country fiche

(Chapter 3), while general results are presented in Chapter 4. The survey questionnaire can be consulted in Annex 1.

2. The role of NECPs and the importance of MCED

Regulation (EU) 2018/1999 introduces in its Article 3 the notion of integrated NECPs. The national plans consist of several main sections, including a description of national objectives, targets and contributions relating to the dimensions of the Energy Union. In other words, the NECPs outline how Member States intend to address the five dimensions of the energy union, which are:

- decarbonisation, including targets for reduction of greenhouse gas (GHG) emissions and Member States' shares of energy from renewable sources in gross final energy consumption in 2030;
- energy efficiency, including Member States' contribution to achieving the Union's energy efficiency targets of at least 32.5 % in 2030, based on either primary or final energy consumption (usually expressed in million tonnes of oil Equivalent (Mtoe)), primary or final energy savings, or energy intensity;
- energy security, including diversification of energy sources and supply from third countries, flexibility and resilience of the national energy system;
- internal energy market, related to the level of electricity interconnectivity, key electricity and gas transmission infrastructure projects; and
- research, innovation and competitiveness, related to national objectives and funding targets for public private research and innovation (R&I) relating to the Energy Union.

Full implementation of these plans would put Europe on track to surpass its current 2030 targets for GHG emissions' reduction and renewable energy⁴.

The NECP approach requires a coordination of purpose across all government departments and it provides a level of planning that is aimed to ease public and private investment⁵. The Energy Governance Regulation requires not only to involve all the national competent authorities, but also local and regional authorities and other stakeholders. This is enshrined in Article 11 of the Regulation, according to which each Member State has to establish an MCED in which local authorities, civil society organisations (CSOs), business community, investors and other relevant stakeholders and the general public are actively able to engage and discuss the different scenarios envisaged for energy and climate policies, including for the long term, and review progress. NECPs can thus be

⁴ European Commission, 2020, National Energy and Climate Plans: Member State contributions to the EU's 2030 climate ambition, https://commission.europa.eu/document/download/2cec89f9-77b6-4f2e-a2d5-126255988902_en.

⁵ European Commission, n.d., National energy and climate plans, https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en.

discussed within the framework of such a dialogue, which may take place by means of any national structure, such as a website, public consultation platform or another interactive communication tool. The MCED is particularly important for a consistent drafting and useful implementation of the NECP, given the closeness of LRAs to the territory and – thus – their ability to bring forward more concrete measures and solutions that can be implemented directly on the ground. This dialogue is also crucial for upholding the subsidiarity and proportionality principles⁶. Moreover, it promotes collaborative decision-making, inclusiveness, and the effective use of resources and expertise across different levels and sectors of governments and society⁷. However, the first draft versions of the NECPs (submitted in 2019) along with the feedback received by members of the CoR highlighted a deficiency in the implementation of the above-mentioned Article 11 of the Regulation.

Overall, MCEDs are not explicitly mentioned in the 2020 versions of the NECPs and in its assessments of nearly all Member States the European Commission made a general recommendation that dialogues with different stakeholders are important and the potential of MCED should be exploited further⁸. Nevertheless, all Member States carried out some consultation activities in relation to the NECP and/or documents underpinning the plans. **Although the quality of these consultations differs and the outcome remains unclear in most cases, the existing practices can be considered a form of MCED.** Furthermore, some countries such as Estonia, France, Ireland or Luxembourg have interesting processes in place that ensure involvement of LRAs in the climate/energy governance more generally and can thus be considered as good practice examples (for details see Chapter 3).

In terms of **coordination/coherence between the NECP and similar plans at the regional or local level, the experience varies significantly across Member States.** One explanation is that governance structures of Member States vary and LRAs have different responsibilities in different policy areas. Another explanation could be that the NECPs are not explicitly making references to responsibilities or actions taken by LRAs (even if such may exist). Nonetheless, the majority of NECPs mention to some extent actions or measures that will be implemented by LRAs, existing practices, plans or participation of cities and regions in international initiatives that promote climate action. For example, an

⁶ European Committee of the Regions, 2019, Implementing the Clean Energy Package: the NECPs as a tool for local and territorial governance approach to climate, active and passive energy, Opinion COR-2019-00618, p. 7.

⁷ Energy Cities, 2023, LIFE NECPlatform - Policy briefs: Multi-Level Governance in EU Energy and Climate Policy – First findings from NECPlatform.

⁸ Based on the individual assessments for each Member State available at European Commission, National energy and climate plans website, https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en.

assessment of the NECPs by Energy Cities⁹ found that four Member States explicitly mention good practices by cities¹⁰, ten countries explicitly mention the Covenant of Mayors initiative¹¹, and one country (Luxembourg) mentions the European Energy Award. In addition, LRAs' role in the implementation of the low-carbon transition is recognised in the NECPs of 12 Member States¹². This relates primarily to reinforcing LRAs' capacities (technical and financial) and defining LRAs' roles in implementing certain measures (mainly linked to district heating and cooling; electric mobility for public transport; local energy communities; energy efficiency in public buildings; energy poverty).

The NECPs of most Member States appear to be coherent with other related national policies and planning, albeit to a varying extent. A common recommendation from the European Commission to all Member States was to ensure that all investments implementing the NECPs were aligned with the National Air Pollution Control Programmes (NAPCPs) and relevant national or subnational air quality management plans¹³. Moreover, in its 2021 analysis of the national RRP^s, the Commission noticed, for the majority of the Member States, that the reforms and investments expected under the RRP^s seem in line with the NECPs, and the RRP^s' measures are expected to effectively contribute to the green transition and support decarbonisation¹⁴ (for details see Chapter 3).

⁹ Energy Cities, 2020, Is the key role of local authorities acknowledged?.

¹⁰ Belgium, Latvia, Italy and Romania.

¹¹ Belgium, Croatia, Cyprus, Czechia, Estonia, Greece, Italy, Latvia, Lithuania and Romania.

¹² Belgium, Bulgaria, Czechia, Greece, Italy, Latvia, Lithuania, Luxembourg, Ireland, the Netherlands, Portugal and Spain.

¹³ Based on the individual assessments for each Member State available at European Commission, National energy and climate plans website: https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en.

¹⁴ Based on the analysis of the recovery and resilience plans of the Member States, available for each Member State at European Commission, Country pages website, https://commission.europa.eu/business-economy-euro/economic-recovery/recovery-and-resilience-facility/country-pages_en.

3. Country fiche on the implementation of MCED and on the integration of NECPs in policy planning

The following sections or ‘country fiche’ provide a brief overview per Member State of the main features of the NECPs, MCEDs and links between the NECPs and other sub- and national planning documents. The main sources for the following country fiche are the 2020 versions of the NECPs, the European Commission’s assessments of these versions and other publicly available assessments of the NECPs or related processes. Additional details coming from the survey results are integrated where relevant (for overall results from the survey see Chapter 4). It should be noted, however, that links between the NECPs and emergency-related instruments such as the RRF or RePowerEU are examined to a limited extent as they were introduced after the preparation of the 2020 NECPs. The main source for links with the RRF is the Commission’s assessments of each Member State’s RRP while the main source for any links with RePowerEU is the survey.

3.1 Austria

Overview of the plan

The box below summarizes the content of the 2020 Austrian NECP¹⁵.

TOPIC	AUSTRIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	36 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	46-50 % of gross final energy consumption in 2030.
<i>Energy efficiency target</i>	28.7-30.8 Mtoe for primary energy and 24.0-25.6 Mtoe for final energy consumption (as a primary energy intensity range).
<i>Energy security and internal energy market</i>	100 % renewable electricity. The NECP keeps the interconnection level of the internal energy market dimension at 15 %.
<i>Research, innovation and competitiveness</i>	By 2030 , the NECP anticipates that public investments in energy research initiatives will stimulate private investments of between EUR 2 and EUR 2.5 billion in Austria's energy and mobility innovation . These objectives and targets are part of Austria's "#mission2030" and "2050" energy research and innovation plan embracing the full field of energy transition and related fields.
<i>Additional measures</i>	The Austrian NECP includes a scenario, with additional measures such as a 'decarbonisation' of the tax system and/or an extension of emissions trading to new sectors.

Analysis of MCED process

Austria launched a public consultation for the NECP. The public consultation consisted of an **online public consultation** and **multiple round table events** as well as a **parliamentary enquiry**. The key stakeholders involved in the round tables were the relevant ministries, political parties, provinces, social partners, associations, NGOs, and scientific community representatives¹⁶. The results of the survey show that **LAs have been involved at a rather late stage**, when the NECP was nearly finished. According to the respondents they were aware of the existence of the NECP and its objectives, but not of how they should be involved in drafting it.

Connection of NECP with subnational planning

The NECP takes into account several subnational energy and climate policies, namely: Regional climate and energy plan; Regional adaptation plan; Regional sustainable transport plan¹⁷. Furthermore, the NECP mentions relevant subnational climate and energy initiatives such as:

- **E5 Programme:** The e5 programme supports municipalities in adopting efficient and eco-friendly energy practices, with around 220 Austrian

¹⁵ Sources: European Commission, Assessment of the final national energy and climate plan of Austria, SWD(2020) 919 final, and Integrated National Energy and Climate for Austria, 2019.

¹⁶ Austrian NECP, p. 55.

¹⁷ Austrian NECP, p. 56; Survey respondent.

municipalities already involved. An e5 community consists of multiple stakeholders, such as residents, experts, representatives of environmental groups, companies, municipalities¹⁸.

- **Climate and Energy Model Regions:** The Climate and Energy Fund's programme helps regions use local renewable energy resources, promote energy savings, and sustain their economies¹⁹.
- **Renewable Energy Communities:** The Renewable Energy Expansion Act enables the formation of renewable energy communities, facilitating bilateral supply contracts and cooperative structures for generating and supplying renewable electricity. This promotes local grid development and enhances supply security and system resilience²⁰.

The NECP also mentions specific topics where LRA involvement is expected. For instance, local authorities are mentioned in relation to mobility. The NECP aims to support local authorities in the area of mobility management and the action plan ‘Pioneering Austria – Clean Mobility 2030’ would include instruments to increase the competences of local authorities in their political decision-making. Alongside this, the local authorities are also expected to contribute by investing in cycling measures as “investment totaling around EUR 2.2 billion between 2020-2030 will be necessary from all local authorities to develop cycling in Austria” as part of the Federal Government’s Cycling Masterplan 2015-2025. Lastly, the NECP highlights the role of Austrian local authorities in the EU mission on “climate neutral and smart cities”²¹. In addition, a local initiative has taken place in Vienna, where one aim has been to ensure rent increases are fully balanced by energy savings to achieve housing cost neutrality following renovations²².

Nevertheless, the survey results indicate that there was no recognition of regional or local needs in the NECP, divergence between national and regional or local climate and energy goals, and conflict regarding application of the NECP on social and environmental impact of the measures²³.

Integration of NECP in the national planning

The NECP in Austria was connected to other national plans, namely:

- the National Adaptation Strategy (NAS),
- National Adaptation Plan (NAP),
- National Sustainable Development Strategy,
- National Transport Strategy.

¹⁸ <https://www.e5-gemeinden.at/english/en/e5-programme>.

¹⁹ <https://www.klimaundenergiemodellregionen.at/>.

²⁰ https://climate-laws.org/documents/renewable-energy-expansion-act_a7d3.

²¹ Austrian NECP, p. 106, p. 126.

²² Eurocities, 2021, Build better for climate neutral cities.

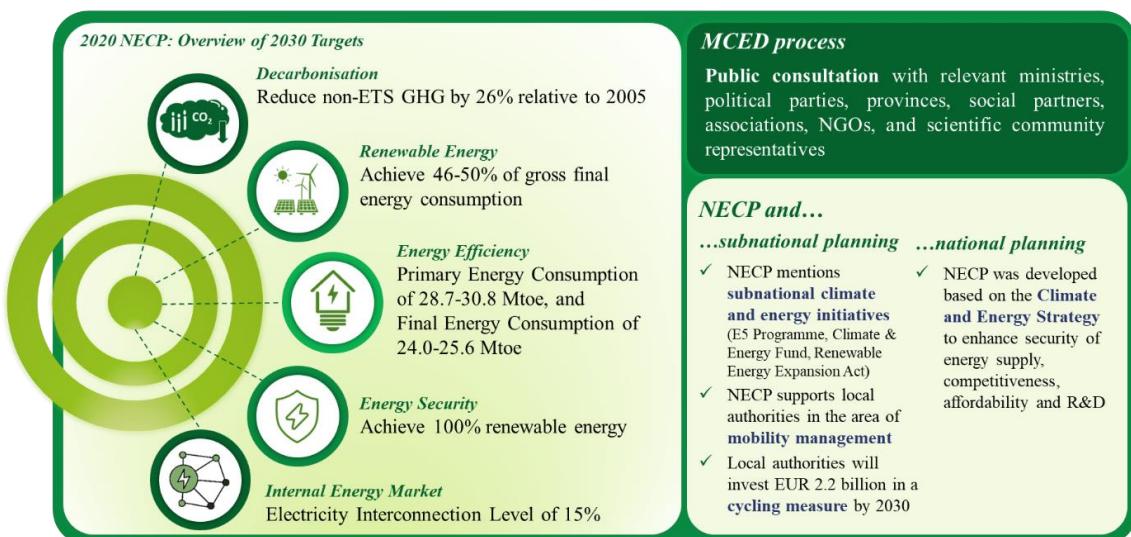
²³ Survey results.

Austria has a Climate and Energy Strategy, adopted in May 2018. This strategy includes a wide range of measures in different sectors, and mentions the instruments used (e.g. laws). Its policy goals include security of energy supply, competitiveness, affordability (including budgetary sustainability considerations) and research and development and serve as a basis for the development of the NECP²⁴.

Summary



Austria



²⁴ Austrian NECP, p. 8.

3.2 Belgium

Overview of the plan

The box below summarizes the main targets of the 2020 Belgian NECP²⁵.

TOPIC	BELGIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	30 % compared to 2005 for non-ETS sectors by 2030 (with further projected reductions of 85-87% by 2050).
<i>Renewable energy target</i>	17.5 % of gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Belgium's contribution to the EU target amounts to 42.7 Mtoe for primary energy consumption and 35.2 Mtoe for final energy consumption by 2030.
<i>Energy security and internal energy market</i>	Target of 33 % electricity interconnection level by 2030. Other energy security objectives are not quantified and specific objectives and measures on the internal energy market are missing.
<i>Research, innovation and competitiveness</i>	The NECP outlines explicit objectives and funding targets for several energy and climate-related programmes within federal and regional entities, although it lacks aggregate targets encompassing all entities and a national-level perspective. Belgium has committed to achieve the target of investing at least 3% of GDP in R&I. Public authorities will account for 1%, whilst the private sector will cover 2% of R&I funding.

Analysis of MCED process

Belgium conducted a **national consultation on the Interfederal Energy Pact in May and June 2017, which served as a basis for the preparation of the NECP**. This consultation involved 129 key stakeholders (although it is not specified what types) who provided their perspectives on the development of Belgium's energy market by 2050²⁶. In addition to this, a **public consultation on the NECP itself** took place at national level in June and July 2019. **Regional consultations were also carried out**. In the Walloon Region, local authorities were consulted separately, while in the Flemish Region opinions were heard through the 'Advisory Councils and Electricity Groups.' At the Federal State level, local authorities were not consulted, but the 'draft regional plans, parliamentary resolutions, and the items raised in those documents' were considered by the federal authorities in the drafting of the NECP²⁷. **However, due to the division of competences inherent in Belgium's political system, the European Commission has highlighted in its 2020 assessment an absence of an integrated and well-structured final NECP²⁸**. Belgium refrained from providing a summary of the consultations; however, according to the

²⁵ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Belgium, SWD(2020) 900 final, pp. 2-4, and Belgian Integrated National Energy and Climate Plan 2021-2030, Part A, 2019, pp. 3-23.

²⁶ Belgian Integrated National Energy and Climate Plan 2021-2030 Part A, 2019, p.31.

²⁷ Ibid., p. 30.

²⁸ Assessment of the final national energy and climate plan of Belgium, SWD(2020) 900 final, pp. 4-5.

Commission, the detailed results have been made available online²⁹.

Connection of NECP with subnational planning

The Belgian NECP is the sum of regional energy climate plans and the result of a compromise in consultation committees bringing together the federated authorities³⁰. Belgium is **one the 12 EU Member States that acknowledges the efforts of LRAs in driving the energy and climate transition in the final NECP**³¹. The City of Ghent, which offers opportunities through an ‘energy coaching project’ to support smaller companies in implementing energy audit recommendations, is mentioned as a good practice of the Belgian NECP³². Additionally, Belgium is also **among the 10 Member States that recognise the role of the Covenant of Mayors initiative**. A significant majority of Belgian local councils, including almost 90% of Flemish towns and municipalities, have pledged their commitment and undertaken various initiatives within the Covenant 2020-2030 framework. As a result, the NECP affirms that the Flemish Government will **encourage local authorities to cooperate and work towards meeting the 2030 target of the Covenant of Mayors**³³. In this respect, the ‘Flemish Climate Pact,’ although not directly mentioned in the NECP, is recognised as another good practice by the NECPlatform project³⁴. Endorsed by 293 Belgian local authorities, it encompasses ten targets for climate adaptation and mitigation, with a focus on sustainable energy and mobility. The Pact introduces various projects such as collaborative renewable energy initiatives, the development of electric vehicle charging infrastructure, and improved access to shared mobility solutions³⁵.

Although Belgium stands out among one of the few countries that consistently underlines the key role of LRAs in its NECP³⁶, the European Commission expresses concerns about the ‘lack of coherence between elements provided by the federated entities’ in the NECP. For instance, specific targets for funding energy and climate research and innovation have been set for only two regions and at the federal level. Another inconsistency lies in the absence of national sectoral targets for renewable energy, although they will be ‘over-achieved by the sum of the data provided by the regions’. The Commission provides several additional examples of these inconsistencies in its 2020 assessment, regretting the lack of a common vision between the various authorities³⁷.

²⁹ Ibid, p.4.

³⁰ Survey respondent.

³¹ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.5.

³² Belgian Integrated National Energy and Climate Plan 2021-2030 Part A, 2019, p.279.

³³ Ibid, p.117.

³⁴ https://netzerocities.app/_content/files/knowledge/3191/2022_como_casestudy_flanders_en.pdf.

³⁵ Energy Cities, LIFE NECPlatform – Best practices: Belgium, n.d., <https://energy-cities.eu/project/necplatform-best-practices/>.

³⁶ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.5.

³⁷ Assessment of the final national energy and climate plan of Belgium, SWD(2020) 900 final, p.13.

Integration of NECP in the national planning

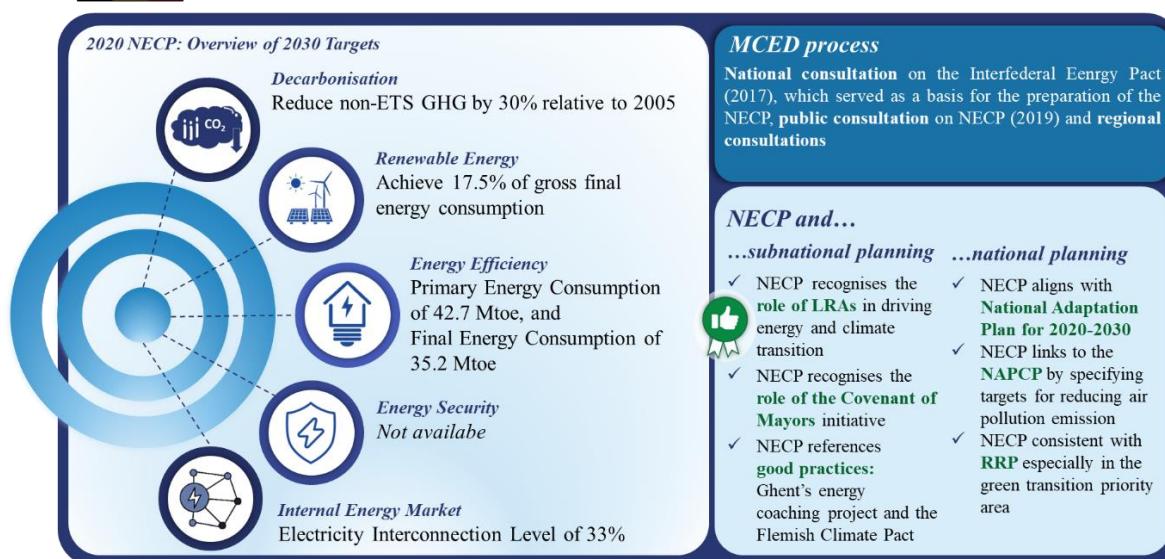
The NECP aligns well with the Belgian National Adaptation Plan for 2020-2030, acknowledging the need to ensure the energy sector is resilient to climate change risks³⁸. The NECP is also designed to align with the National Sustainable Development Strategy and the National Circular Economy Plan³⁹. It also establishes specific targets for reducing air pollution emissions in Wallonia and the Brussels Capital Region, demonstrating a clear connection with the NAPCP. Both the NECP and the NAPCP recognizes the air pollution challenges associated with bioenergy, which is positively acknowledged by the European Commission. Additionally, the Commission's 2020 assessment highlights the consistency of the models and assumptions used for air and GHG projections⁴⁰.

Furthermore, the alignment between the RRP and the NECP is evident, particularly in the priority area of the green transition, where over half of the RRP 'components' are relevant to the NECP (10 out of 17). It is expected that the measures specified in the RRP will contribute to the NECP objectives in areas such as renovating and constructing energy-efficient buildings, promoting emerging energy technologies, and advancing sustainable mobility solutions. Moreover, it is anticipated that the renovation and reforms outlined in the RRP will contribute, to a certain degree, to achieving the NECP's emissions' reduction target of 41 % for the respective sector⁴¹.

Summary



Belgium



³⁸ Belgian Integrated National Energy and Climate Plan 2021-2030 Part A, 2019, p.50.

³⁹ Survey results.

⁴⁰ Assessment of the final national energy and climate plan of Belgium, SWD(2020) 900 final, p.15.

⁴¹ European Commission, 2021, Analysis of the recovery and resilience plan of Belgium Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Belgium, SWD/2021/165 final, pp. 31-32.

3.3 Bulgaria

Overview of the plan

The box below summarizes the content of the 2020 Bulgarian NECP⁴².

TOPIC	BULGARIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	0 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	Share of 27.09 % for 2030 of energy from renewable sources in the gross final energy consumption.
<i>Energy efficiency target</i>	Bulgaria's contribution to the EU's 2030 target is 17.5 Mtoe for primary energy consumption and 10.3 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	Several objectives are set: to diversify the supply of energy resources; to make the national energy system more flexible; to make regional and national energy systems more resilient; and to improve network and information security.
<i>Research, innovation and competitiveness</i>	Bulgaria is committed to promoting scientific progress in the area of innovative energy technologies, including clean power generation.

Analysis of MCED process

Regarding the drafting of the NECP, the plan refers to **several conferences, round tables and forums with the relevant stakeholders**, including NGOs, private and government energy companies, industrial associations and economic institutes, LRAs and research and academic institution; Bulgaria has also **submitted to the Commission a summary of how the final plan reflects the public's views**⁴³. In the survey, the respondents rated citizens' engagement as 'Poor' but explained this by there not being much interest shown by citizens⁴⁴. Regarding the implementation of the NECP, Bulgaria explicitly recognises the role of local authorities' actions in some sectors. However, the contribution and involvement of local authorities seem to be restricted and mainly focused on specific areas, such as the development of renewable energy and electric mobility in the country⁴⁵.

Connection of NECP with subnational planning

The NECP states that the **contribution of the local authorities to higher penetration of renewable energy and the creation of conditions for renewable self-consumption** and consumption of renewable energy has a pivotal role and

⁴² Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Bulgaria, SWD(2020) 901 final, pp. 2-3, and Integrated energy and climate plan of the Republic of Bulgaria 2021-2030, pp. 16-18.

⁴³ Assessment of the final national energy and climate plan of Bulgaria, SWD(2020) 901 final, p.4. See also Integrated energy and climate plan of the Republic of Bulgaria 2021-2030, 2020, p.35 et seq. Confirmed in the survey.

⁴⁴ Survey results.

⁴⁵ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.9. See also Energy Cities, LIFE NECPlatform - Countries: Bulgaria, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

‘is essential’ for the development of renewable energy in the country⁴⁶. Local authorities will be actively engaged in the implementation of government policy by developing long-term and short-term municipal programmes for the promotion of the use of energy from renewable energy sources (RES) and biofuels within each municipality (so-called ‘renewable energy communities’). The use of RES should also be considered when planning, designing, building and renovating urban infrastructure so that LRAs ‘lead by example’ (by meeting the standards for housing buildings with zero consumption of energy or allowing third parties to install renewable energy generation units on the roofs of these buildings)⁴⁷.

Concerning **the role of LRAs in developing e-mobility**, the NECP seems to have a top-down perception of the role of local authorities by imposing obligations to them to promote and deploy electric mobility⁴⁸. More specifically, they will have to introduce measures within their short- and long-term programmes to enhance the attractiveness of using electric transportation, such as tax reliefs, simplified access to and provision of a minimum number of parking places⁴⁹. In the survey, there are inconsistent replies regarding the consideration by the NECP of subnational energy and climate plans as a basis for the national plan: one respondent considers the connection poor, while according to another one there is a satisfactory connection with local energy plans, which are mandatory according to the national legislation⁵⁰. The respondents agree on the fact that the NECP provides technical support and financial support (from national and EU funds) for the implementation, at local or regional level, of the measures included in the plan; however, while for one respondent the financial resources allocated to LRAs match the responsibilities of the local level to meet the targets, the other respondent considers these resources insufficient⁵¹.

Integration of NECP in the national planning

The NECP states its compliance with the main strategic documents at EU and national level, relevant in the field of the Green Deal and SDGs⁵². It also describes the consultations and active involvement of other ministries competent for other plans and/or strategies⁵³. For instance, the Ministry of Transport, Information Technology and Communications has provided input on the plans and policy measures provided in the NECP for the transport sector, considering that the principal development guidelines and the strategic goals of the national transport system for the period until 2030 are set out in a dedicated Integrated Transport

⁴⁶ Integrated energy and climate plan of the Republic of Bulgaria 2021-2030, 2020, p.104.

⁴⁷ Ibid.

⁴⁸ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.9.

⁴⁹ Integrated energy and climate plan of the Republic of Bulgaria 2021-2030, 2020, p.110.

⁵⁰ Survey results.

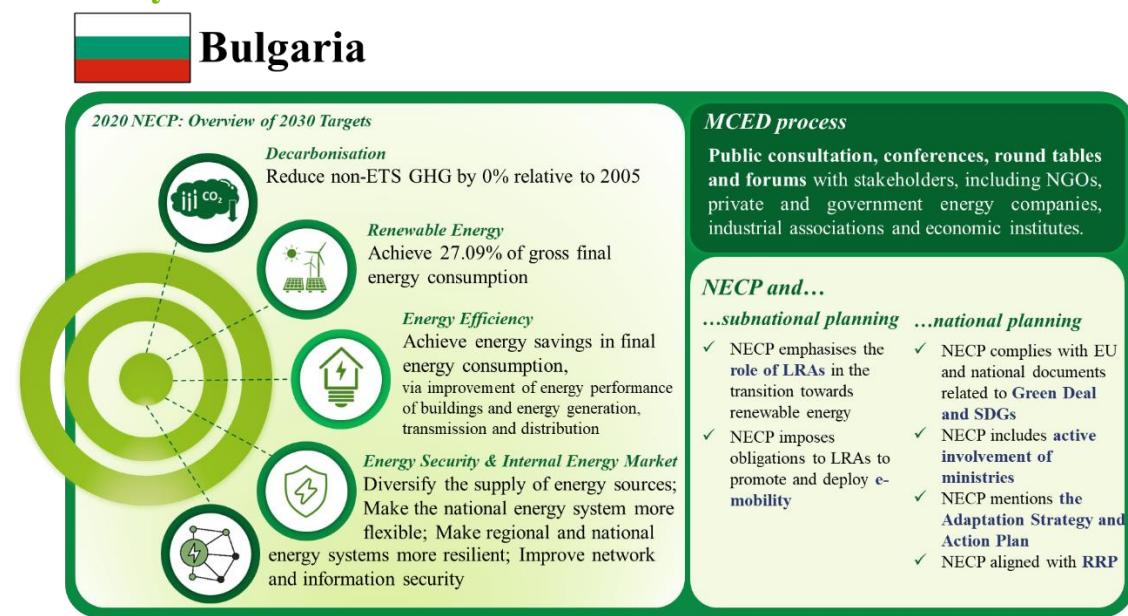
⁵¹ Ibid.

⁵² Integrated energy and climate plan of the Republic of Bulgaria 2021-2030, 2020, p. 14.

⁵³ An overview is available in Integrated energy and climate plan of the Republic of Bulgaria 2021-2030, 2020, p. 36 et seq.

Strategy with the same time horizon⁵⁴. The NECP also describes the NAS and NAP, as well as the country's objectives and priorities for enhancing adaptation capacity at national and sectoral levels up to 2030. However, several sources mention that the statement of the goals is not supported by any description of the implementing measures and remains too vague⁵⁵. The policies and measures that go beyond 2020 are very inconsistent and described vaguely, the financial framework is largely missing and there are some strong contradictions between the NECP and other strategies such as the Long-term Renovation Strategy⁵⁶. According to the survey results, there are synergies between the NECP and the national sustainable development and circular economy policies⁵⁷. Finally, the reforms and investments expected under the RRP seem fairly in line with the NECP since the measures in the RRP are expected to effectively contribute to the green transition and support the decarbonisation and energy transition⁵⁸. According to a PlanUP Report, the RRP measures for transport are quite consistent with those under the NECP while those for buildings are only partially consistent⁵⁹. A respondent to the survey, rates as 'satisfactory' the connection between the revision of the NECP and the implementation of RePowerEU⁶⁰.

Summary



⁵⁴ Integrated energy and climate plan of the Republic of Bulgaria 2021-2030, 2020, p. 36.

⁵⁵ Assessment of the final national energy and climate plan of Bulgaria, SWD(2020) 901 final, p.9 and Energy Cities, LIFE NECPlatform - Countries: Bulgaria, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

⁵⁶ Energy Cities, LIFE NECPlatform - Countries: Bulgaria, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

⁵⁷ Survey results.

⁵⁸ European Commission, 2021, Analysis of the recovery and resilience plan of Bulgaria Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Bulgaria, SWD(2022) 106 final, See also LIFE NECPlatform, 2023, Report on good practices and interactive good practices map, p.11.

⁵⁹ LIFE PlanUp, 2021, Webinar on "How green are the national recovery plans?": A cross-check of 10 draft National Recovery and Resilience Plans and National Energy & Climate Plans, p. 7.

⁶⁰ Survey results.

3.4 Croatia

Overview of the plan

The box below summarizes the content of the 2020 Croatian NECP⁶¹.

TOPIC	CROATIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	7 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	36.4 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Contribution to the EU target on energy efficiency amounting to 8.2 Mtoe for primary energy consumption and 6.9 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	In terms of the internal energy market, Croatia already exceeds the current EU target of electricity interconnection with a capacity of 30 % . The plan also sets other objectives and measures in this area, with a focus on gas infrastructure to ensure security of supply and storage.
<i>Research, innovation and competitiveness</i>	Croatia's is committed to boost investments in identified areas such as renewable energy and power systems technologies, advanced energy storage and carbon capture.
<i>Additional measures</i>	The NECP focuses on the development of an energy efficiency obligation system, with specific measures to facilitate its implementation and expansion. It also includes an annual renovation target to increase its rate from 0.7 % per year to 3 % between 2021 and 2030.

Analysis of MCED process

The Croatian NECP underwent a consultation process that placed significant emphasis on involving LRAs. They played an active role in shaping the initial plan and contributing to the crucial strategic documents that formed its basis. In particular, the LRAs participated in consultative workshops and online consultations for Croatia's Low-Carbon Development Strategy to 2030 and Energy Development Strategy to 2030. LRAs were also directly involved in the preparation of the draft NECP, undergoing an initial e-consultation between November and December 2018⁶². Consultative workshops followed in July 2019, and in October 2019, a meeting of representatives of the Regional Energy Agencies finalised the draft plan, which was then re-submitted for e-consultation. This inclusive e-consultation process welcomed participation from diverse stakeholders, including representatives from local and regional entities⁶³.

However, the plan lacks a summary of the public feedback and fails to address how these opinions were considered⁶⁴.

⁶¹ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Croatia, SWD(2020) 901 final, pp.2-3, and Integrated National Energy and Climate Plan for the Republic of Croatia for the period 2021-2030, 2019, pp.7-15.

⁶² Survey respondent.

⁶³ Integrated National Energy and Climate Plan for the Republic of Croatia for the period 2021-2030, 2019, pp.47-48.

⁶⁴ Assessment of the final national energy and climate plan of Croatia, SWD(2020) 910 final, p.4.

In more recent developments, **the ministry responsible for the NECP, in cooperation with a regional energy agency, has set up an MCED process involving a wide range of stakeholders**, which will last approximately one year. During this period, at least six meetings are planned, as well as additional focus groups and workshops if deemed necessary⁶⁵.

Connection of NECP with subnational planning

As a centralised country, Croatia primarily implements its energy and climate policy by enforcing national regulations and plans in a top-down manner at the local level⁶⁶. **Obligations imposed on counties and larger cities include the adoption of three-year Action Plans and Annual Energy Efficiency Plans.** However, the NECP indicates a push for growing involvement of LRAs in shaping Croatia's energy and climate policy at the local level. This is illustrated by the increased responsibilities given to cities under the NECP, such as the definition of spatial planning guidelines for RES and the promotion of intelligent transport as part of the 'ongoing creation and implementation of Sustainable Mobility plans in cities'⁶⁷.

Additionally, Croatia, **along with nine other EU Member States, acknowledges the significance of the Covenant of Mayors**⁶⁸. By endorsing the Covenant of Mayors, 82 Croatian cities and municipalities unite under a shared vision to accelerate the decarbonisation of their territories by 2050, representing a collective population of over two million Croatian citizens⁶⁹. Furthermore, Croatia has successfully implemented the PentaHelix approach, acknowledged as a good practice by the NECPlatform project, to **support municipalities in developing their Sustainable Energy and Climate Action Plans (SECAPs) under the Covenant of Mayors**⁷⁰. This approach involves key stakeholders from the public, private and academic sectors, NGOs and citizens in drafting the SECAP of each municipality from the outset, to avoid it being drawn up solely by external consultants with limited interaction with the local level. This approach, facilitated by a task force, is now also used for other local and regional strategic documents⁷¹.

Integration of NECP in the national planning

The NECP of Croatia acknowledges the ongoing efforts towards adopting the draft NAS and highlights the adaptation objectives and priorities outlined in the

⁶⁵ Survey respondent

⁶⁶ Energy Cities, 2020, Is the key role of local authorities acknowledged, p.9. Survey respondent.

⁶⁷ Energy Cities, LIFE NECPlatform - Countries: Croatia, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

⁶⁸ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.5.

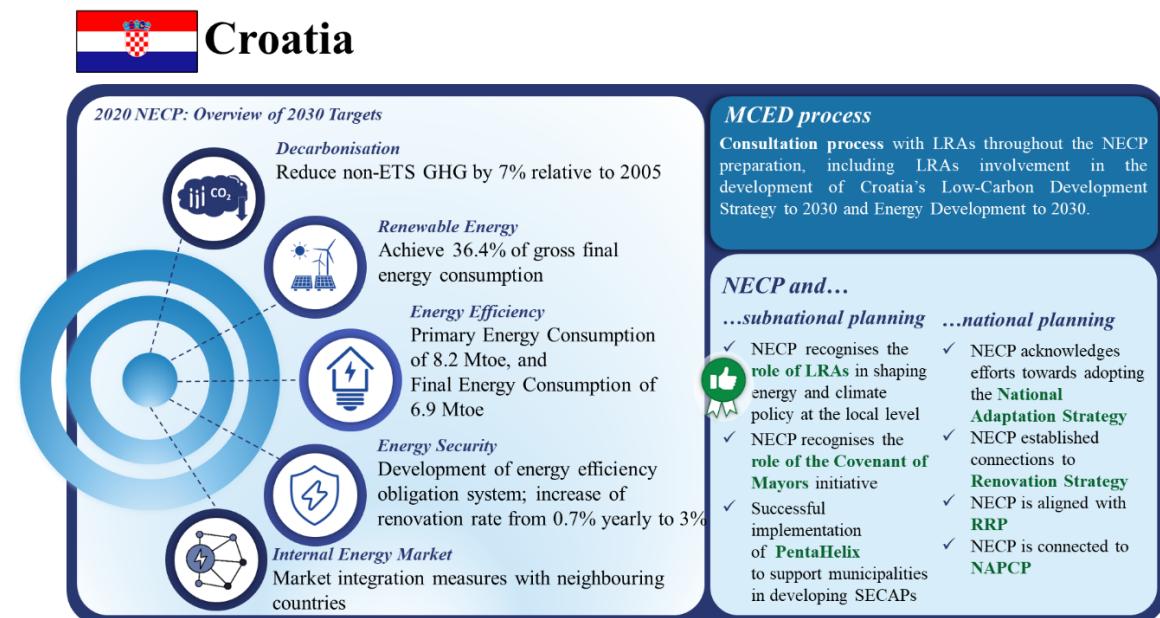
⁶⁹ Integrated National Energy and Climate Plan for the Republic of Croatia for the period 2021-2030, 2019, p.22.

⁷⁰ PentaHelix brief, <https://pentahelix.eu/objectives/project-brief/>.

⁷¹ Energy Cities, LIFE NECPlatform – Best practices: Croatia, n.d., <https://energy-cities.eu/project/necplatform-best-practices/>.

draft strategy⁷². Additionally, it establishes connections to Croatia's long-term Renovation Strategy, which encompasses a comprehensive set of measures and indicators for 2030, 2040, and 2050, in alignment with Croatia's National Energy Development Strategy⁷³. Moreover, the RRP is expected to make significant contributions to reducing final and primary energy consumption, aligning with the objectives of the NECP and the 2030 energy efficiency targets. Energy efficiency measures in building renovation and industrial processes will support these efforts, although the specific quantification of energy savings from these measures is currently unavailable. The NAPCP also establishes connections with the NECP. However, the European Commission raised concerns about the NECP's lack of explanation regarding the methodology employed and the specific measures expected to yield clean air benefits compared to others. In its 2020 assessment, the Commission encouraged Croatia to explore further opportunities presented by the Clean Energy for EU Islands Initiative, with the aim of further advancing the transition to clean energy on Croatian islands⁷⁴.

Summary



⁷² Integrated National Energy and Climate Plan for the Republic of Croatia for the period 2021-2030, 2019, p.10.

⁷³ Ibid, p.12.

⁷⁴ Assessment of the final national energy and climate plan of Croatia, SWD(2020) 910 final, p.19.

3.5 Cyprus

Overview of the plan

The box below summarizes the content of the 2020 Cypriot NECP⁷⁵.

TOPIC	CYPRIOT NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	21 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	22.9 % of renewable energy in gross final energy consumption by 2030. Regarding the increase of RES in the electricity and transport sector, this will highly depend on the electricity interconnection of Cyprus.
<i>Energy efficiency target</i>	The Cypriot contribution to the EU-level target for 2030 amounts to 2.0 Mtoe of final energy consumption and 2.4 Mtoe of primary energy consumption in 2030 .
<i>Energy security and internal energy market</i>	Energy security is expected to be achieved through liquefied-natural-gas (LNG) imports and electricity interconnections with Greece and Israel. Cyprus is currently not interconnected with any other country. Once the planned undersea cable is commissioned, its interconnecting capacity will be 2 000 MW, i.e. 200 % of the current peak load.
<i>Research, innovation and competitiveness</i>	Investments in research and innovation are expected to rise up to 1.5 % of GDP by 2023, thus an annual spending of EUR 395 million is envisaged, as set in the national target in “Innovate Cyprus”.

Analysis of MCED process

Cyprus organised **a public consultation on the NECP with the national parliament** (June 2019) **and with local communities** (October 2019). The consultation of LRAs in the drafting of the NECP was conducted through traditional stakeholder consultation, i.e. LRAs have been involved through written comments or an online questionnaire; **however, it is to be noted that the MCED/consultation was carried out at a later stage, when the NECP was nearly finalised**⁷⁶. In general, no particular changes, in terms of progress in the involvement of LRAs in the mechanisms for the drafting of the NECP, were reported compared to the previous consultation phase (2019)⁷⁷.

Cyprus has not submitted a summary of the public’s view, nor has it submitted a summary of how those views were taken into account in the NECP. However, the main outcomes of these consultations are briefly described in the final NECP⁷⁸. In general, the NECP aims to support and further engage LRAs in energy and climate policies; however, there is no particular guidance on that⁷⁹. In the NECP, the Covenant of Mayors is mentioned as an initiative that can support local

⁷⁵ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Cyprus, SWD(2020) 912 final, p.3, and Cyprus’ Integrated National Energy and Climate Plan, 2020, p. 18.

⁷⁶ Survey respondent.

⁷⁷ Survey respondent.

⁷⁸ Assessment of the final national energy and climate plan of Cyprus, SWD(2020) 912 final, p.5.

⁷⁹ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 9.

authorities and municipalities to develop their own SECAPs⁸⁰. Cyprus is **among the 10 Member States that acknowledge the importance of the Covenant of Mayors in their NECPs**⁸¹.

Connection of NECP with subnational planning

The following subnational initiatives could be identified in the NECP:

- Supporting Scheme for **promoting energy efficiency in municipalities** and communities through European Structural and Investment Funds (Programming Period 2021-2027)⁸².
- The project «SYNERGEIN» aims for the development of a common approach concerning **the design, implementation and monitoring of energy efficiency measures/projects in municipal buildings** with a vision of applying this approach to all municipalities in the area⁸³.

According to the NECP, further engagement of local authorities in building renovation is planned to be examined up to the next revision of the NECP⁸⁴.

The NECP does not provide any reporting system by LRAs. Moreover, the NECP does not provide any support for the implementation, at local or regional level, of the measures included in the plan and financial resources are considered sufficient⁸⁵.

Integration of NECP in the national planning

Cyprus has a NAS and NAP to Climate Change, which is mentioned in the NECP. Measures to promote RES have already been launched in the framework of the National Solid Waste Management Plan and will be intensified in the period 2021-2030, as national planning is currently being revised under the new package of directives on waste⁸⁶. The RRP of Cyprus is aligned with the NECP⁸⁷. Most of the priority areas of the NECP overlap with those of the RRF, regarding the green transition. These include the building renovation and affordable, energy-efficient housing, deployment of renewables, sustainable transport, energy system integration, dealing with negative externalities, energy efficiency measures, clean industry, other clean energy technologies, and including environmental impacts (i.e. on natural resources and biodiversity)⁸⁸.

⁸⁰ Ibid, p.9.

⁸¹ Ibid, p. 5.

⁸² National Energy & Climate Plan 2021-2030 (Cyprus), 2020, pp. 129, 134.

⁸³ Ibid, p. 140; <https://anel.com.cy/european-regional-development-fund-3/>.

⁸⁴ National Energy & Climate Plan 2021-2030 (Cyprus), 2020, pp. 77-78.

⁸⁵ Survey respondent.

⁸⁶ National Energy & Climate Plan 2021-2030 (Cyprus), 2020, p. 105.

⁸⁷ European Commission, 2021, Summary of the assessment of the Cypriot recovery and resilience plan, p.4.

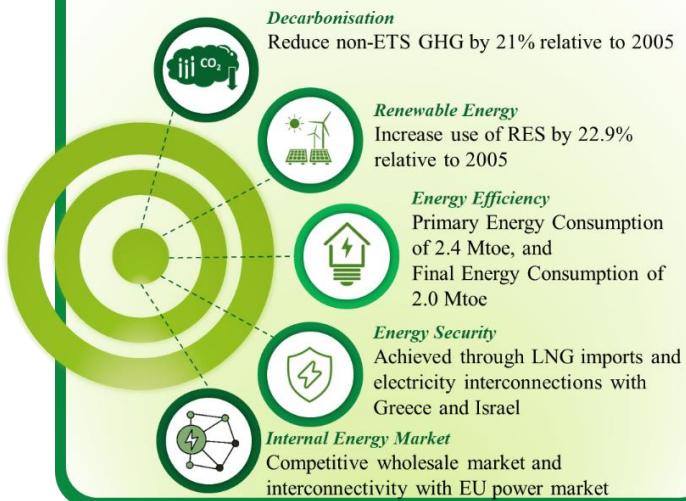
⁸⁸ European Commission, 2021, Analysis of the recovery and resilience plan of Cyprus Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Cyprus, SWD(2021) 196 final, p.30.

Summary



Cyprus

2020 NECP: Overview of 2030 Targets



MCED process

Public consultations with the national parliament and with local communities

NECP and...

...subnational planning ...national planning

- ✓ NECP recognises the role of LRAs in shaping energy and climate policy at the local level
- ✓ NECP recognises the role of the Covenant of Mayors initiative
- ✓ NECP references the Supporting Scheme for promoting energy efficiency and the project SYNERGEIN
- ✓ NECP references the National Adaptation Strategy and Adaptation Plan to Climate Change
- ✓ NECP aligned with RRP

3.6 Czechia

Overview of the plan

The box below summarizes the content of the 2020 Czech NECP⁸⁹.

TOPIC	CZECH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	14 % compared to 2005 for non-ETS sectors (30% for total GHG emissions) by 2030. The national long-term GHG reduction objective is 80 % in 2050.
<i>Renewable energy target</i>	22 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Czechia's contribution to the EU target translates into energy consumption levels of 41.4 Mtoe (primary energy consumption) and 23.7 Mtoe (final energy consumption) .
<i>Energy security and internal energy market</i>	Czechia has set objectives for energy security to maintain import dependency of no more than 65 % by 2030 and 70 % by 2040. It aims to maintain the import/export capacity of the transmission system, among other things, for 2030 in proportion to the maximum load of at least 30-35 %, which corresponds to the 15 % target in terms of installation performance.
<i>Research, innovation and competitiveness</i>	As for research and innovation, Czechia has not set any specific quantifiable targets. Research areas relating to energy and climate are covered in the overall national research priorities.

Analysis of MCED process

A public consultation on the final NCEP was launched in 2019 by publishing the plan on the website of the Ministry of Industry and Trade. A summary of the public's views or explanation of how they have been taken into account in the final plan has not been provided; however, Czechia states that the material is available on request⁹⁰.

Connection of NECP with subnational planning

According to the NECP, **national legislation obliges the regions and Prague Capital City to prepare a regional energy strategy and to regularly assess it**. Apart from that, regions and municipalities above a certain size carry out energy audits or introduce an energy management system⁹¹. In general, as indicated in the NECP, supporting local authorities in fields of energy and climate policies is among the five basic policy objectives of the Multiannual Financial Framework of Czechia⁹². Lastly, Czechia is **one of the 12 Member States that recognise local authorities' independent actions and ambitions in the implementation of the energy and climate transition in their final NECPs⁹³**.

⁸⁹ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Czechia, SWD(2020) 902 final, pp.3-4, and National Energy & Climate Plan (Czechia), 2019, pp.2-4.

⁹⁰ Ibid, p.6.

⁹¹ National Energy & Climate Plan (Czechia), 2019, p.121.

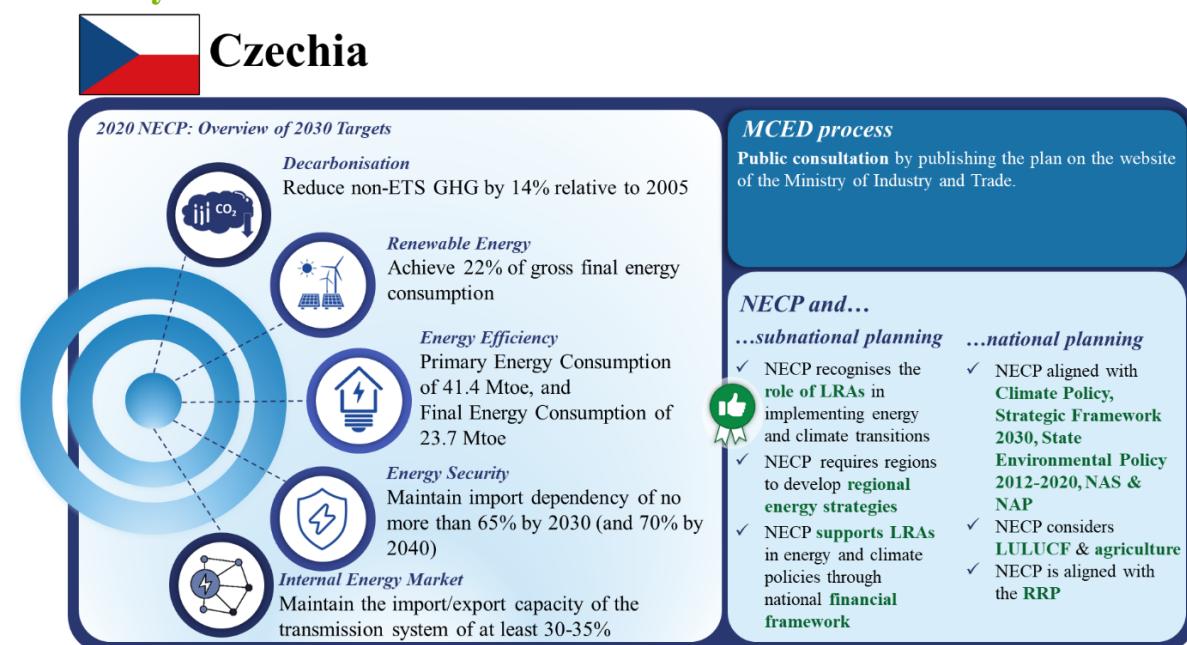
⁹² Ibid, pp.330-331.

⁹³ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 4.

Integration of NECP in the national planning

The basic strategic documents in the field of climate protection and reduction of pollutant emissions, as indicated in the NECP, include the Climate Policy in Czechia, the Strategic Framework 2030, the State Environmental Policy 2012–2020, the NAS and NAP, and the National Emission Reduction Programme⁹⁴. In particular, the Strategic Framework Czech Republic 2030 is the overarching strategy covering all five dimensions of the Energy Union⁹⁵. The NECP also considers EU rules on land use, land use change and forestry (LULUCF) and agriculture in Czechia, including policies and measures in the two sectors⁹⁶. The Czech RRP is in line with the strategic principles of the NECP and contributes to its objectives. In particular, the RRP includes investments covering all five dimensions of the NECP, focusing on the reduction of GHG emissions, the efforts to promote the RES use and increase energy efficiency⁹⁷.

Summary



⁹⁴ National Energy & Climate Plan (Czechia), 2019, p.22.

⁹⁵ Ibid, pp.12-13.

⁹⁶ Assessment of the final national energy and climate plan of Czechia, SWD(2020) 902 final, p.10.

⁹⁷ European Commission, 2021, Analysis of the recovery and resilience plan of Czechia Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Czechia, SWD(2021) 211 final, p.62.

3.7 Denmark

Overview of the plan

The box below summarizes the content of the 2020 Danish NECP⁹⁸.

TOPIC	DANISH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	39 % compared to 2005 for non-ETS sectors (70% for total GHG emissions) by 2030.
<i>Renewable energy target</i>	55 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Denmark aims to contribute to the collective 2030 EU target with 18.3 Mtoe for primary energy consumption and 15.8 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	There is a high level of energy security and Denmark plans to ensure it by relying on imports for both electricity (from the United Kingdom, Germany and Scandinavia) and gas (from Germany, Sweden and Norway). Denmark aims to improve its (already high) interconnectivity level of 51% .
<i>Research, innovation and competitiveness</i>	The importance of funding for research and innovation is recognised, but the plan does not include a quantitative objective for 2030; finally, the country's main objective regarding competitiveness is to provide green solutions to the fast-growing global market.

Analysis of MCED process

During the drafting of the NECP there was not a broad consultation of stakeholders and LRAs; however, the draft was submitted to the EU Special Committee (which consists of some selected stakeholders), the Local Government Denmark (the organisation representing the municipalities) and the Danish Regions (the organisation representing the different regions). The Danish Government affirmed that the comments made by stakeholders and LRAs during the drafting of the NECP are taken into consideration in the country's national climate action plan⁹⁹. The survey results show that stakeholders are aware of the existence of the NECP and its objectives, but not of how they should be involved in drafting it with one respondent rating the quality of the MCED process as 'poor'¹⁰⁰.

Connection of NECP with subnational planning

Only a few mentions of subnational planning are made in the NECP. The **municipalities are responsible for climate adaptation and the NECP affirms that they adopt their local plans in line with the NAP**¹⁰¹. Since the NECP takes into account the national adaptation measures, a connection between NECP and

⁹⁸ Sources: Denmark's Integrated National Energy and Climate Plan under the Regulation of the European Parliament and of the Council on the Governance of the Energy Union and Climate Action, p. 6-7, and European Commission, 2020, Assessment of the final national energy and climate plan of Denmark, SWD(2020) 903 final, p. 2-3.

⁹⁹ Assessment of the final national energy and climate plan of Denmark, SWD(2020) 903 final, p. 4.

¹⁰⁰ Survey results.

¹⁰¹ Denmark's Integrated National Energy and Climate Plan, p.31-33.

subnational adaptation plans is in place (at least partial and/or indirect). However, survey respondents report that there is not bottom-up planning, i.e. the NECP does not sufficiently consider subnational energy and climate planning as a basis for the national plan, leading to inconsistent targets¹⁰².

The project DK2020 can be considered a good practice, but it only developed properly after the submission of the NECP¹⁰³. This project aims to adapt the Climate Action Planning Framework developed by the C40 cities network¹⁰⁴ to the Danish context, to achieve net CO₂ neutrality by 2050¹⁰⁵. A key success factor of the project is the development of peer-to-peer training and advice between municipal staff and mayors from similar cities; this could foster dialogue between the mayors who could also encourage each other to take climate-related actions¹⁰⁶.

Regarding the implementation of the NECP, there seems to be little mention of LRAs and municipalities in the plan¹⁰⁷. More precisely, **they are mentioned in relation to the dissemination of information and provision of grants**. For instance, regarding new construction or renovation of buildings, the NECP mentions that LRAs are encouraged to use specific types of public/private partnership contracts¹⁰⁸. These projects are supported by standard contracts and manuals, which have been developed by the national government for local authorities; moreover, the government is disseminating information about the use of the model in conjunction with energy performance contracting as a tool to improve energy efficiency in buildings owned by LRAs¹⁰⁹. **More active participation of LRAs can be found in relation to the Climate Atlas**. It shows the areas where storm surges and cloudbursts are most likely to occur and provides important climate data¹¹⁰. Since in Denmark the municipalities are responsible for climate adaptation, the Climate Atlas is developed in collaboration with them¹¹¹. According to survey respondents under existing national climate and energy policies, the financial resources allocated to LRAs do not match the responsibilities of the local level to meet the targets. One respondent specifies that for both climate adaptation and mitigation measures the costs placed on LRAs are extensive and significant, facing high up-front capital investments which are not

¹⁰² Survey respondents.

¹⁰³ <https://www.realdania.org/whatwedo/grants-and-projects/dk2020>.

¹⁰⁴ C40 is a global network of nearly 100 mayors of the world's leading cities that are united in action to confront the climate crisis. See C40Cities, n.d., <https://www.c40.org/about-c40/>.

¹⁰⁵ LIFE NECPlatform, 2023, Report on good practices and interactive good practices map, p. 45.

¹⁰⁶ Ibid. See also: Concito, n.d., DK2020 – Climate plans for Denmark, <https://concito.dk/en/projekter/dk2020-klimaplaner-hele-danmark> and Realdania, n.d., DK2020, <https://www.realdania.org/whatwedo/grants-and-projects/dk2020>.

¹⁰⁷ See, for instance, few citations mentioned in Energy Cities, 2020, Is the key role of local authorities acknowledged?.

¹⁰⁸ Denmark's Integrated National Energy and Climate Plan, 2019, p. 103.

¹⁰⁹ Ibid.

¹¹⁰ Ibid., p. 32.

¹¹¹ Ibid., p. 33.

fully covered by allocated financial resources¹¹².

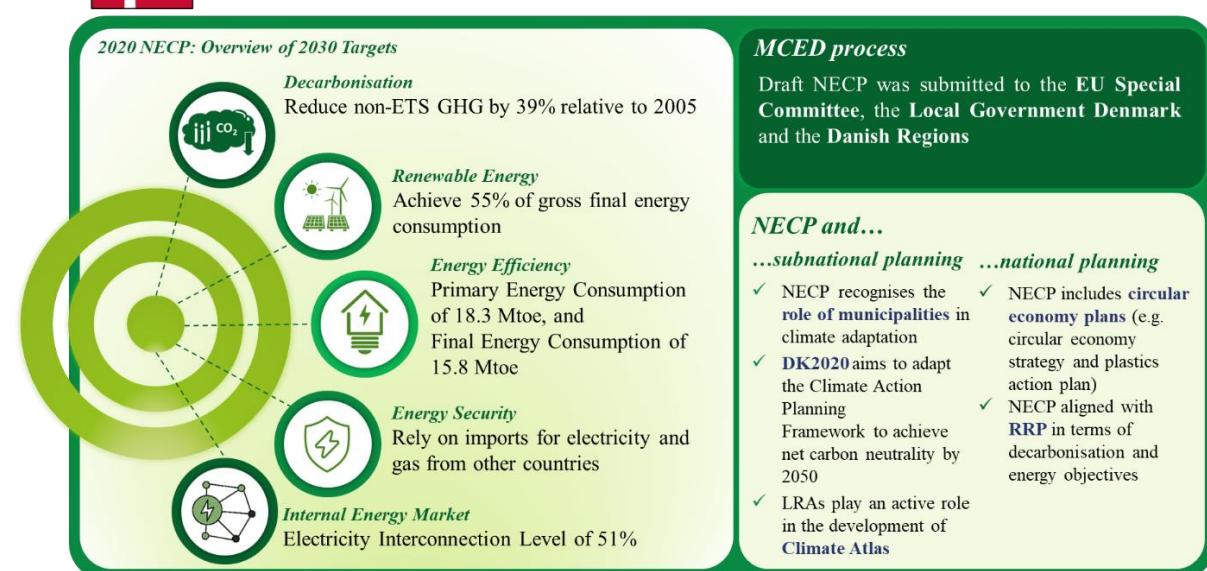
Integration of NECP in the national planning

In its 2020 assessment, the Commission criticised the very limited references to the integration of energy/climate and air quality policies and the lack of descriptions of synergies and trade-offs with air pollution measures¹¹³. A LIFE project affirmed that clear mismatches are identified between the 2030 targets set in the NECP and climate neutrality targets set in the Climate Law¹¹⁴. The NECP also describes its circular economy plans, such as the circular economy strategy and the plastics' action plan¹¹⁵. However, in its 2020 assessment, the Commission suggests that the potential of these plans for emissions' reduction could be better acknowledged and quantified¹¹⁶. Finally, the RRP has been considered to support Denmark's decarbonisation and energy objectives, as set out in the NECP, since the RRP measures are well aligned with the objectives and targets of the NECP¹¹⁷.

Summary



Denmark



¹¹² Survey results.

¹¹³ Assessment of the final national energy and climate plan of Denmark, SWD(2020) 903 final, p. 3.

¹¹⁴ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 10.

¹¹⁵ Denmark's Integrated National Energy and Climate Plan, p. 33.

¹¹⁶ Assessment of the final national energy and climate plan of Denmark, SWD(2020) 903 final, p. 13.

¹¹⁷ European Commission, 2021, Analysis of the recovery and resilience plan of Denmark Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Denmark, SWD/2021/154 final.

3.8 Estonia

Overview of the plan

The box below summarizes the content of the 2020 Estonian NECP¹¹⁸.

TOPIC	ESTONIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	13 % compared to 2005 for non-ETS sectors (70% for total GHG emissions) by 2030. The national long-term target is to achieve reduction of GHG emissions by 80 % by 2050.
<i>Renewable energy target</i>	42 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Estonia's contributions to the 2030 EU target for primary energy consumption amount to 5.4 Mtoe , and for final energy consumption amount to 2.9 Mtoe .
<i>Energy security and internal energy market</i>	Estonia is keeping the rate of dependency on imported energy as low as possible by using local fuels, including increasing the use of fuel-free energy sources, developing biomethane production and potential uses. Estonia is increasing the capacity towards Latvia, along with synchronising the power grid with the Central European frequency band by 2025. The current level of electricity interconnections is 63 % .
<i>Research, innovation and competitiveness</i>	National objectives and funding targets related to research, innovation and competitiveness are not set specifically for the energy sector.

Analysis of MCED process

Estonia's NECP explains that the Energy Council of the Ministry of Economic Affairs and Communications is considered the MCED¹¹⁹. The Association of Estonian Cities and Municipalities, which is the organisation representing local government in Estonia, is a member of the Energy Council¹²⁰. In Estonia, the draft NECP was available for public consultation. Estonia has submitted, along with the final NECP, a summary of the comments received from organisations, companies and other interested parties and how they were taken into account in the final plan¹²¹. **Regional authorities, regional energy agencies, consumer organisations, business/industry organisations, non-governmental organisations (NGOs) and research and academic institutions are among the stakeholders that are involved in the MCED in Estonia.** In general, stakeholders are involved through traditional consultation, i.e. through written comments or an online questionnaire, as well as through the organisation of events, including workshops, seminars, roundtables, etc. The MCED/consultation is carried out either at an early preparatory stage or mid-way, when a first draft of the NECP is available¹²².

¹¹⁸ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Estonia, SWD(2020) 905 final, p.3 and National Energy & Climate Plan 2030 (Estonia), 2019, pp.8-9.

¹¹⁹ National Energy & Climate Plan 2030 (Estonia), 2019, p.18.

¹²⁰ Ibid, p.17.

¹²¹ Assessment of the final national energy and climate plan of Estonia, SWD(2020) 905 final, p.5.

¹²² Survey results.

Moreover, Estonia is considered **a good example in cooperation and sharing responsibilities among the leading institution within the public authority in charge of climate policy** and the other entities with key roles in the governance framework. The development of the 2050 General Principles of Climate Policy was coordinated by the Ministry of Environment but it shared responsibilities with several other Ministries and provided national bodies and the Estonian Parliament with key functions involving them in the Steering Committee that provided strategic counsel on the overall process.¹²³. Furthermore, in the drafting of the 2050 strategy, stakeholders participated directly through the format of five sectoral working groups. The consultation was open, transparent and fully documented throughout its duration¹²⁴. Additionally, progress has been reported in the current involvement of LRAs in the mechanisms for revising the NECP, compared to what happened with the first draft in 2018-19, since there is stronger involvement in the revision process. As to the involvement of citizens in the process of designing and implementing the NECP, this is carried out through public consultation with all types of stakeholders, meetings with interest groups and workshops¹²⁵.

Connection of NECP with subnational planning

Estonia's NECP does not provide information about specific subnational plans but states that more than 9 200 cities have joined the Covenant of Mayors¹²⁶. Estonia is **among the 10 Member States that acknowledge the importance of the Covenant of Mayors in their NECPs**¹²⁷. As stated by relevant stakeholders, the NECP in Estonia does not take into account subnational energy and climate planning as the basis of the national plan but **financial support (EU funds) along with opportunities for capacity-building are provided** to support the implementation of the plan at local or regional level¹²⁸.

Integration of NECP in the national planning

Estonia's NECP targets and measures are based on its national long-term targets for decarbonisation and climate neutrality¹²⁹. Moreover, the fundamental elements of Estonia's climate policy for 2050 include Estonia's energy development plan to 2030, the plan for climate change adaptation by 2030, the 2021-2030 transport development plan, the 2021-2030 forestry development plan, the 2014-2020 national waste management plan, and the Estonian rural affairs development plan¹³⁰. Estonia's RRP supports the objectives set in the NECP,

¹²³ LIFE PlanUp, 2019, Report on Good Practices in Energy and Climate Governance, p. 91.

¹²⁴ Ibid., pp. 64, 94.

¹²⁵ Survey results.

¹²⁶ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 10.

¹²⁷ Ibid., p. 5.

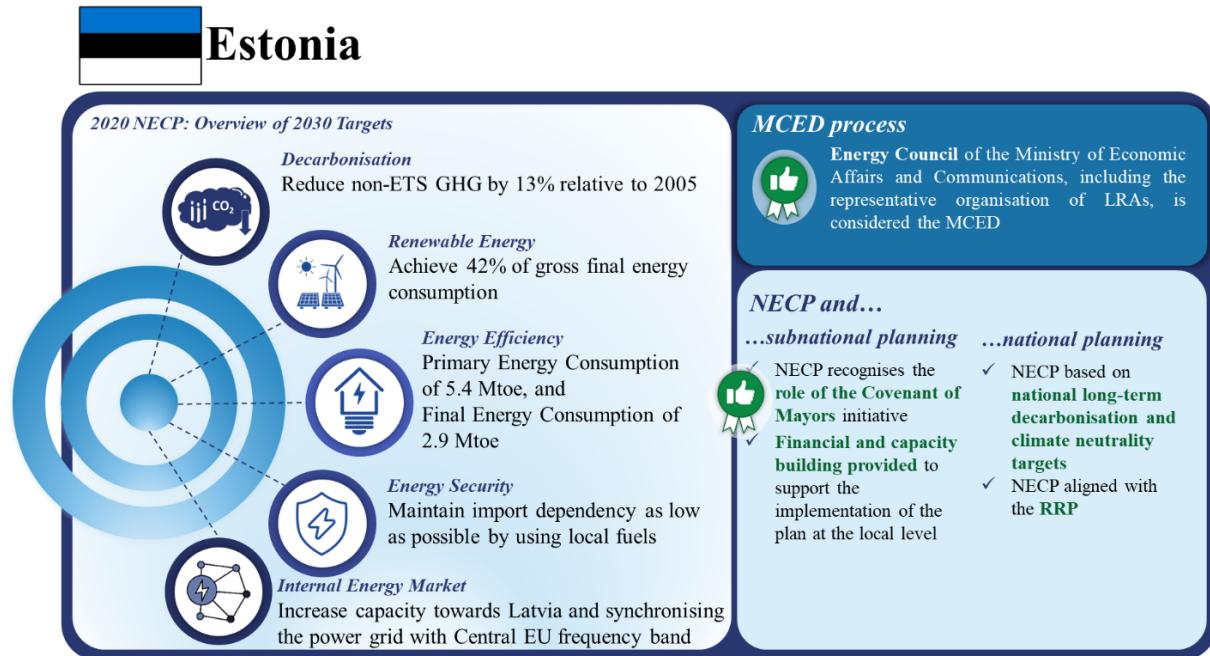
¹²⁸ Survey results.

¹²⁹ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, pp.22-23.

¹³⁰ National Energy & Climate Plan 2030 (Estonia), 2019, p.5.

including decarbonisation and energy transition, and is expected to contribute to the achievement of Estonia's 2030 and 2050 climate and energy targets through interconnected measures¹³¹. The revision of Estonia's NECP is connected with the implementation of the RePowerEU¹³².

Summary



¹³¹ European Commission, 2021, Analysis of the recovery and resilience plan of Estonia Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Estonia, SWD(2021) 285 final, p.4, p.21, p.61.

¹³² Survey respondents.

3.9 Finland

Overview of the plan

The box below summarizes the content of the 2020 Finnish NECP¹³³.

TOPIC	FINNISH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	39 % compared to 2005 for non-ETS sectors by 2030. The long-term objective is to reduce GHG emissions by 80-95 % by 2035.
<i>Renewable energy target</i>	51 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Finland's contribution to the EU target amounts to 25 Mtoe of final energy consumption , translating into 34.8 Mtoe of primary energy consumption .
<i>Energy security and internal energy market</i>	Finland aims to improve energy security further through a well-functioning domestic and regional electricity market, setting a national target of 55 % for energy self-sufficiency . The target for 2030 is to keep the electricity interconnection level above 15% .
<i>Research, innovation and competitiveness</i>	The NECP mentions a general objective of raising investment in research, development and innovation to 4 % of GDP, but it misses detailed information on implementing measures.

Analysis of MCED process

Although LRAs are mentioned in the NECP, there is no specific and structured reference to the MCED. The plan states that ‘the Association of Finnish Local and Regional Authorities has represented local and regional authorities in the consultations’¹³⁴ but it misses a clear description of the consultations. However, it should be noted that **the NECP is based on the National Energy and Climate Strategy for 2030 and the Medium-term Climate Change Policy Plan for 2030, therefore its targets and policy measures have already been in public consultation when preparing these other two strategic documents**¹³⁵. More precisely, for several years, an extensive engagement process with stakeholders was put in place. LRAs and their associations and civil society organisations, as well as citizens, were able to provide input through workshops, seminars, online surveys and public conferences. Regional energy agencies, business/industry organisations and NGOs are also involved in the MCED in Finland¹³⁶. Moreover, their contributions were summarised on a public website and, according to the government, were taken into account during the drafting of the preceding plans¹³⁷. In general, the relevant stakeholders were involved through traditional stakeholder consultations, i.e. though written comments or an online

¹³³ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Finland, SWD(2020) 925 final, pp. 2-3, and Finland’s Integrated Energy and Climate Plan, Abstract, and Finland’s Integrated Energy and Climate Plan, 2019.

¹³⁴ Finland’s Integrated Energy and Climate Plan, 2019, p.31.

¹³⁵ Ibid.

¹³⁶ Survey respondents.

¹³⁷ LIFE PlanUp, 2019, Fit to lead? An assessment of selected draft EU energy and climate plans, pp. 6-7.

questionnaire at a later stage of the NECP preparation process, i.e. when the NECP was nearly finished, which makes it difficult to have a substantial impact on the content of the NECP¹³⁸.

Connection of NECP with subnational planning

There is a connection between the NECP and the Voluntary Energy Efficiency Agreements, which are drawn up between the Government and industrial/municipal associations to improve energy saving and energy efficiency¹³⁹. They play an important role in the achievement of Finland's cumulative energy saving targets set for 2021–2030 by setting quantitative targets to improve energy efficiency and implement specific actions in order to reach the targets¹⁴⁰. In the NECP it is also stated that Finland participates in the campaign to promote the more flexible use of power plants and electric transport between cities (Pilot City Programme)¹⁴¹. A PlanUP Report recommends Finland to make a better and bigger use of existing local energy and climate initiatives, such as the Covenant of Mayors, to gather the potential contribution of LRAs to the NECP¹⁴². However, according to the survey responses, the different governance levels have their own plans and programmes and the dialogue among the different authorities is considered rather limited. Financial support from national funds and opportunities for capacity-building are provided for the implementation of the plan's measures at local or regional level, but the financial support to LRA's does not meet the scale of the activities funded by the LRA's themselves¹⁴³.

Integration of NECP in the national planning

The targets and policy measures of the NECP are based and interconnected with the NAP¹⁴⁴, the National Energy and Climate Strategy and the Medium-term Climate Change Policy Plan¹⁴⁵. According to the NECP, its update (to be submitted in 2023) will be based on the new Medium-term Climate Policy Plan, the revised Climate and Energy Strategy and the Climate Programme for the land use sector, to fully reflect the climate and energy objectives and targets in the Government Programme¹⁴⁶. The Commission added in its assessment that the Finnish NECP considers links between energy security issues and the emergency plans for gas, electricity and oil, provided for by the applicable sectoral rules, including the regional dimension¹⁴⁷. Finally, the reforms and investments planned under the RRP are expected to make a significant contribution to advance the

¹³⁸ Survey respondents.

¹³⁹ Finland's Integrated Energy and Climate Plan, 2019, p.104.

¹⁴⁰ Ibid.

¹⁴¹ Finland's Integrated Energy and Climate Plan, 2019, p.127.

¹⁴² LIFE PlanUp, 2019, Fit to lead? An assessment of selected draft EU energy and climate plans, p. 7.

¹⁴³ Survey respondents.

¹⁴⁴ Survey respondent.

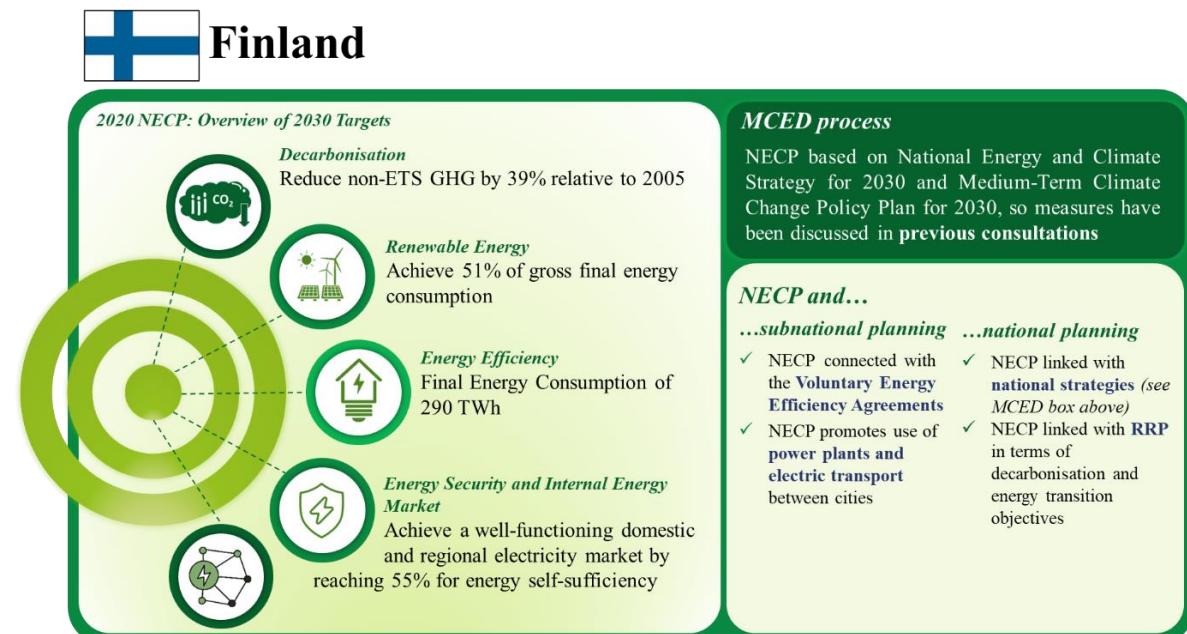
¹⁴⁵ Finland's Integrated Energy and Climate Plan, 2019, p.31.

¹⁴⁶ Ibid., p.13.

¹⁴⁷ Assessment of the final national energy and climate plan of Finland, SWD(2020) 925 final, p.11.

decarbonisation and energy transition objectives of Finland as set out in the NECP 2030, thereby contributing to the Union's climate target¹⁴⁸.

Summary



¹⁴⁸ European Commission, 2021, Summary of the assessment of the Finnish recovery and resilience plan.

3.10 France

Overview of the plan

The box below summarizes the content of the 2020 French NECP¹⁴⁹.

TOPIC	FRENCH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	40 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	36.4 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	France aims to contribute to the collective 2030 EU target with 120.9 Mtoe for final energy consumption and 202.2 Mtoe for primary energy consumption .
<i>Energy security and internal energy market</i>	To boost energy security , France plans to (i) diversify supply through crucial infrastructure projects and reduce dependence on energy imports, and (ii) enhance the flexibility of the energy system. Regarding the internal energy market , France aims to expand electrical interconnections with its neighbours, promote decentralised electricity generation, and facilitate synergies between electricity, gas, and heat systems for optimised operation and cost efficiency. By 2030, the level of interconnection is projected to reach 26 GW, accounting for approximately 16.5 % of the total .
<i>Research, innovation and competitiveness</i>	France has put forward policies, plans, and roadmaps to foster research, innovation, and competitiveness. In the NECP it recalls that the trend over recent years has been to increase the funding of public research in new energy technologies; however, specific objectives and targets are not explicitly quantified in the plan.

Analysis of MCED process

A comprehensive consultation process for the NECP was conducted with a wide range of stakeholders, involving LRAs within France and its overseas territories. A public debate was first organised between March and June 2018 via various channels, including an online questionnaire, thematic workshops, expert hearings, a citizens' forum and regional initiatives¹⁵⁰. In a second phase, France conducted a focused consultation involving LRAs, which encompassed the organisation of 86 'local debates' on the NECP and presentations of the draft in several regions¹⁵¹. However, the NECP does not specify to which extent the contributions of stakeholders were considered in its revised version. Consultations were also held in 2019 with the neighbouring countries of France that have interconnected energy systems¹⁵². In its 2020 assessment of the French NECP¹⁵³, the European Commission praises the extensive nature of the consultation.

¹⁴⁹ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of France, SWD(2020) 909 final, pp.2-3, and Integrated National Energy and Climate Plan for France, 2020, pp.43-45, and Integrated National Energy and Climate Plan for France, 2020, p.44-45.

¹⁵⁰ Integrated National Energy and Climate Plan for France, 2020, p.44.

¹⁵¹ Ibid, p.45.

¹⁵² Assessment of the final national energy and climate plan of France, SWD(2020) 909 final, p.5.

¹⁵³ Ibid, pp.4-5.

In addition, to develop the 2015 Energy Transition Law for Green Growth, a **National Debate was organised to shape the energy and climate policies in France**. The primary objective of this debate was to foster a ‘collective vision for the transition to a low-carbon economy’. Despite being a government-led initiative, it is a good practice that engaged stakeholders at various levels of governance and culminated in the formulation of recommendations that served as the fundamental building blocks for the law¹⁵⁴. Another good practice of effective engagement of LRAs is through the National Council for Ecological Transition. Functioning as a stakeholder committee to foster coherence in national, regional, and local climate and energy strategies, the Council offers recommendations, informs Ministries, and actively contributes to international environmental policy negotiations, drawing upon the perspectives of local, regional, and non-governmental stakeholders¹⁵⁵.

Connection of NECP with subnational planning

France has seen a favourable shift towards greater involvement of LRAs in climate and energy policymaking through the introduction of Territorial and Regional Energy Climate Plans (Grenelle laws 2009 and 2010). Moreover, the Energy Transition Law for Green Growth enacted in 2015 has reinforced the significance of regional plans for spatial planning and sustainable development and enhanced the role of inter-municipalities¹⁵⁶ in shaping local climate and energy policies. As a result, regions have authority over climate, energy, planning, biodiversity, and air quality policies, as well as the coordination of local authorities¹⁵⁷.

Nevertheless, the NECP is not very specific on the role of LRAs. While consultation processes for the NECP have involved LRAs, their primary focus was on planning rather than anticipating the integration and implementation of national measures at local and regional levels¹⁵⁸. **The role of LRAs is only sporadically addressed for specific sectors of the NECP, such as heating and cooling, for which the ‘local level is viewed as the most pertinent to integrate renewable and recovered energy’¹⁵⁹** with no mention of related plans or initiatives. The PlanUP project recommends that France makes greater use of city-led initiatives such as the Covenant of Mayors and sets an objective of 15 % for decentralised renewable energy coming from citizens, small businesses and local

¹⁵⁴ LIFE PlanUp, 2019, Report on Good Practices in Energy and Climate Governance, p.14.

¹⁵⁵ Energy Cities, LIFE NECPlatform – Best practices: France, n.d., <https://energy-cities.eu/project/necplatform-best-practices/>.

¹⁵⁶ In France, inter-municipality refers to all the bodies and organisations that cooperate to bring together all or some of the municipalities to exercise some of their powers.

¹⁵⁷ Energy Cities, LIFE NECPlatform – Countries: France, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

¹⁵⁸ Ibid, p.4.

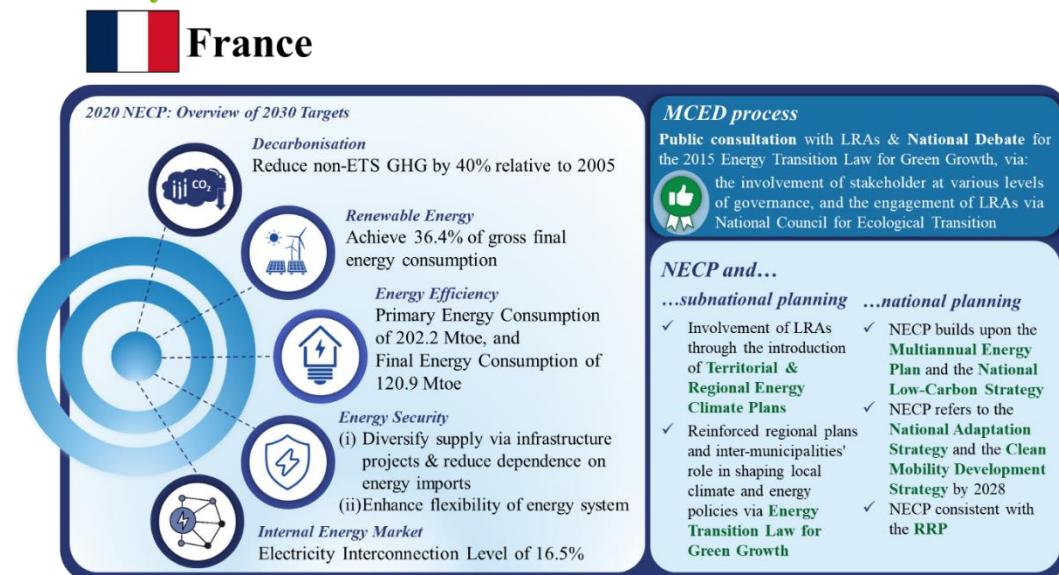
¹⁵⁹ Ibid, p.2.

authorities by 2030¹⁶⁰.

Integration of NECP in the national planning

The French NECP builds upon two national documents that address the ‘governance and programming’ of energy and climate priorities: the Multiannual Energy Plan (outlining the main initiatives in the energy sector for the next ten years), and the National Low-Carbon Strategy (i.e. the roadmap for mitigating climate change by 2050)¹⁶¹. Additionally, the plan refers to the NAS and acknowledges the significance of France’s LULUCF policies, by integrating actions to support forest adaptation to climate change in its NECP¹⁶². The plan also makes reference to France’s Clean Mobility Development Strategy by 2028, which includes components that are highly compatible with the NECP, such as ‘supporting alternative mobility services, managing demand for mobility, supporting low-emission vehicles, including alternative fuel infrastructure and supporting a modal shift’¹⁶³. Moreover, the RRP is also consistent with the NECP, with significant overlap in priority areas such as building renovation, biodiversity, circular economy, agriculture and forestry, green infrastructure and mobility, and green technologies¹⁶⁴. However, the relationship between the NECP and the NAPCP is not clearly outlined and the European Commission recommends that links with air emissions policy are strengthened¹⁶⁵.

Summary



¹⁶⁰ LIFE PlanUp, 2019, Fit to lead? An assessment of selected draft EU energy and climate plans, p.13, p.11.

¹⁶¹ Integrated National Energy and Climate Plan for France, 2020, p.4.

¹⁶² Ibid. p.108.

¹⁶³ Ibid. p.110.

¹⁶⁴ European Commission, 2021, Analysis of the recovery and resilience plan of France Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for France, SWD/2021/165 final, pp. 23-24.

¹⁶⁵ Assessment of the final national energy and climate plan of France, SWD(2020) 909 final, p.14.

3.11 Germany

Overview of the plan

The box below summarizes the content of the 2020 German NECP¹⁶⁶.

TOPIC	GERMAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	38 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	30 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	On energy efficiency it totals 216 Mtoe for primary energy consumption and 185 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	Although there is a commitment to achieve a 15 % interconnection target , the plan lacks a comprehensive set of data regarding the desired level of electricity interconnection by 2030 and it also lacks specific policy objectives and supporting measures on the internal energy market.
<i>Research, innovation and competitiveness</i>	The goals primarily concern the strengthening of energy-related research and innovation by 2030. Germany aims to spend EUR 1.3 billion per year from 2020 to 2022 on research, innovation and competitiveness.

Analysis of MCED process

For the 2050 Climate Action Plan of Germany, stakeholder consultation was extensive, taking place over the course of 1.5 years and different formats and phases¹⁶⁷. However, **the consultation for the NECP appears to be insufficient**. For the draft version of the NECP, no stakeholder consultation took place. According to a report of CAN and WWF, unofficial sources have mentioned the public participation for the NECP is planned for the end of 2024, whereas official notification is lacking. Also, other existing structures that consist of multilevel stakeholders do not expect to feed into the NECP process¹⁶⁸. The NECP states¹⁶⁹ that the municipalities (with the Federal Government and the federal states) have a role to play in implementing the energy transition and climate protection measures. The role of the municipalities, however, is not elaborated further. According to the survey respondents the general public's knowledge of the NECP is limited and there is very low public awareness, let alone involvement. Respondents did not know about permanent mechanisms in place for MCED¹⁷⁰.

Connection of NECP with subnational planning

The NECP describes policies and measures to promote energy services in the public sector. Related to LRAs, this includes **municipality-level energy**

¹⁶⁶ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Germany, SWD(2020) 904 final, p. 2, and Germany's Integrated Energy and Climate Plan.

¹⁶⁷ LIFE PlanUp, 2019, Report on Good Practices in Energy and Climate Governance.

¹⁶⁸ Didi, R., Mascolo, F. And Laugier, R. 2023, Public participation in National Energy and Climate Plans, Evidence of weak & uneven compliance in Member States, Report by CAN Europe and WWF EPO.

¹⁶⁹ German NECP, p. 26.

¹⁷⁰ Survey respondents.

efficiency and resource efficiency networks¹⁷¹. This means that municipalities can set up a network to improve their energy and/or resource efficiency. They will identify and implement savings potential with the aid of a network team that the municipalities can set up themselves. This can be done through a **funding programme of the federal government**, which is aimed at funding energy performance contract consulting within the framework of energy consulting for non-residential buildings owned by municipalities/charitable organisations.

Integration of NECP in the national planning

Germany has introduced the Climate Action Programme 2030 as a comprehensive strategy to attain its climate objectives by the year 2030. The measures taken in this Action Programme are taken into consideration in this NECP, for example measures on GHG emissions, on renewable energy expansion and energy efficiency improvements. The NECP is following up on actions taken by the Climate Action Programme 2030 or boosting up measures from the aforementioned ‘Energy consulting for residential buildings’. Another part of the plan is the implementation of a national emissions’ trading system specifically targeting the heating and transport sectors, which are not currently covered by the existing European emissions’ trading system. This is also included in the Fuel Emissions Trading Act¹⁷². The German RPP supports the NECP¹⁷³, as measures in the RRP are aligned with the German Climate Action Plan 2050 and in many instances also explicitly with the German NECP for 2021-2030. Examples of this are the commitment to reduce GHG emissions by 38 % compared to 2005, to increase the energy efficiency (i.e. a 30 % reduction in primary energy consumption), and an increase of 30 % of renewable energy consumption.

Summary

¹⁷¹ German NECP, p. 90.

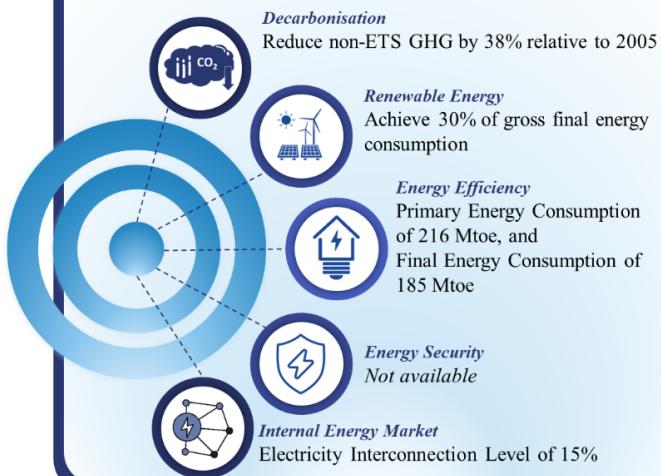
¹⁷² German NECP.

¹⁷³ European Commission, 2021, Analysis of the recovery and resilience plan of Germany p. 56.



Germany

2020 NECP: Overview of 2030 Targets



MCED process

Public consultation for the 2050 Climate Action Plan of Germany but limited consultation on the NECP

NECP and...

...subnational planning

- ✓ NECP describes role of LRAs to set up energy efficiency and resource efficiency networks

- ✓ A federal funding programme is available for energy performance contract consulting for non-residential buildings owned by municipalities

...national planning

- ✓ NECP based on the Climate Action Programme 2030
- ✓ NECP aligned with the RRP

3.12 Greece

Overview of the plan

The box below summarizes the content of the 2020 Greek NECP¹⁷⁴.

TOPIC	GREEK NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	16 % compared to 2005 for non-ETS sectors by 2030. In the long term, the strategy sets out a GHG reduction target of about 95 % by 2050 compared with 1990 (for the 1.5 degrees Celsius target scenario) or of about 85 % (for the 2 degrees Celsius target scenario).
<i>Renewable energy target</i>	35 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Greece aims to achieve energy consumption levels of 20.6 Mtoe for primary energy consumption and 16.5 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	The objectives for energy security and internal energy market are strongly interlinked. Greece aims to reach an electricity interconnectivity target of 21 % by 2030 and to expand its cross-border infrastructure with neighbouring countries for both electricity and gas to this end. Under the plan, this target should already be met by 2025.
<i>Research, innovation and competitiveness</i>	Research and innovation activities relate to the improvement of the energy efficiency of buildings, while research and innovation actions focus on renewables' technologies. The plan indicates energy networks, digitalisation and development of smart grids as priority areas for research and innovation. Actions on energy storage are also planned.
<i>Additional measures</i>	A key objective in this context is to reduce the share of lignite in power generation, i.e. the so-called lignite phase-out, by implementing a relevant front-loaded programme in the following decade and putting a complete end to the use of lignite for power generation in Greece by 2028. The NECP also sets out the timeframe for shutting down the lignite-fired power plants that are currently in operation, which will be completed by 2023.

Analysis of MCED process

In the NECP of Greece there is no mention of MCED specifically. However, a **public consultation on the draft NECP was held** from November to December 2018. The annex of the plan and additional documents explain how Greece considered the feedback from the public consultation¹⁷⁵. The Commission assessment for Greece states that several actions have been undertaken to **reinforce regional dialogues**, especially across the Mediterranean; however, there is limited information regarding future goals and specific action to intensify cooperation in order to deliver the plan¹⁷⁶. Regional authorities, local authorities and local energy agencies, research and academic institutions, business/industry organisations, NGOs and citizens are among the stakeholders that are involved in the MCED in Greece. The relevant stakeholders were consulted mainly through

¹⁷⁴ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Greece, SWD(2020) 907 final, pp.3-6, and National Energy & Climate Plan (Greece), 2019, p.5.

¹⁷⁵ Ibid, pp.5-6.

¹⁷⁶ Ibid, p.7.

traditional stakeholder consultations, including through written comments or an online questionnaire, as well as with regional/local plans, under the coordination or with the support of the national authority¹⁷⁷. The promotion of electric mobility and the collaboration between the municipality/regional authority of south Aegean and the government are among the good examples mentioned by relevant stakeholders in the survey¹⁷⁸.

Connection of NECP with subnational planning

Greece is one of the 12 Member States that recognise local authorities' actions in the implementation of the energy and climate transition and mention the Covenant of Mayors initiative in their final NECPs¹⁷⁹. The NECP explains that an ever-increasing number of local authorities have started developing local adaptation plans¹⁸⁰ and that more than 50 Greek cities have joined the Covenant of Mayors, to make their respective areas more resilient to climate change¹⁸¹. As to energy efficiency of public buildings, the NECP refers to the additional contribution through the implementation of the Action Plans for Sustainable Energy and the Action Plans for Energy Efficiency of Buildings, which must be drawn up by regions and municipalities, supported by targeted financing programmes¹⁸². Inconsistencies were noticed in the survey responses regarding the connection of the NECP with subnational energy and climate planning¹⁸³. Furthermore, it is considered that Greece's NECP does not provide support, including sufficient financial resources, for the implementation, at local or regional level, of the measures included in the plan¹⁸⁴.

Integration of NECP in the national planning

Greece has a national adaptation strategy and a national adaptation plan, which includes measures for the energy sector¹⁸⁵. However, the NECP does not specify Greece's adaptation goals and only refers to the existing strategy¹⁸⁶. Although there were inconsistencies in the survey responses, it is mentioned that, in addition to the above, Greece's NECP is connected to the National Sustainable Development Strategy, the National Circular Economy Plan and the National Transport Strategy¹⁸⁷. Waste management is also an integral part of the NECP¹⁸⁸. The development of the Just Development Transition Master Plan is also

¹⁷⁷ Survey respondents.

¹⁷⁸ Survey respondent.

¹⁷⁹ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 4.

¹⁸⁰ Ibid, p. 12.

¹⁸¹ National Energy & Climate Plan (Greece), 2019, pp.100-101.

¹⁸² Ibid, p.155.

¹⁸³ Survey respondent.

¹⁸⁴ National Energy & Climate Plan (Greece), 2019, p.155.

¹⁸⁵ Ibid, p.4.,

¹⁸⁶ Assessment of the final national energy and climate plan of Greece, SWD(2020) 907 final, pp.3, 13.

¹⁸⁷ Survey respondents.

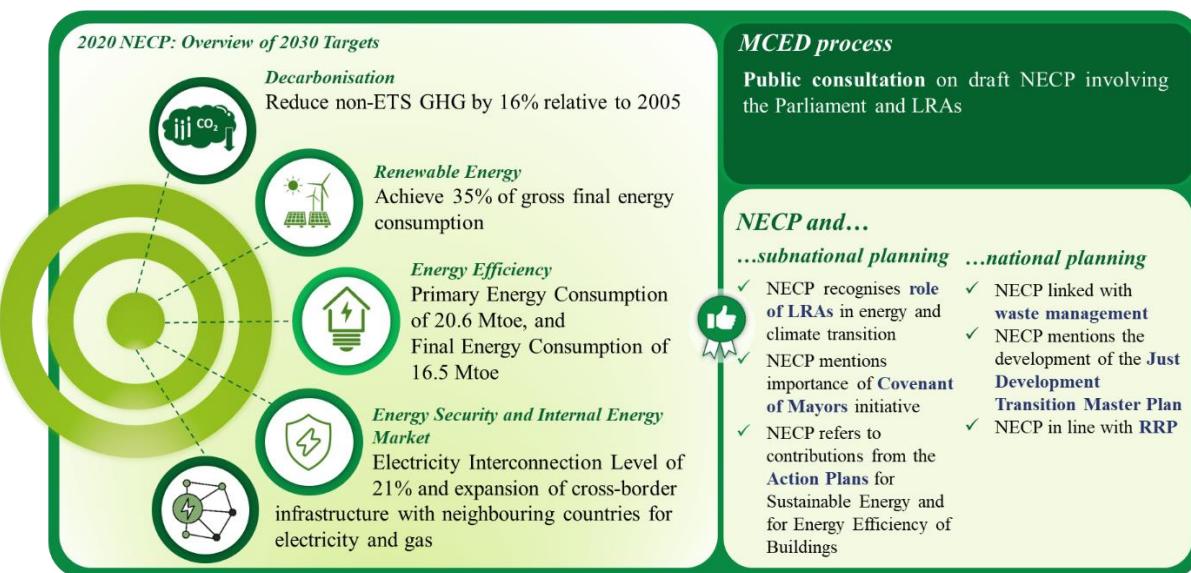
¹⁸⁸ National Energy & Climate Plan (Greece), 2019, p.4.

mentioned in Greece's NECP¹⁸⁹. Overall, the RRP is in line with the strategic priorities of Greece's NECP and particularly Greece's ambitious plan for the phase-out of its lignite plants¹⁹⁰.

Summary



Greece



¹⁸⁹ European Commission, 2021, Analysis of the recovery and resilience plan of Greece Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for approval, SWD(2021) 155 final, p.97.

¹⁹⁰ Ibid, pp.68-69.

3.13 Hungary

Overview of the plan

The box below summarizes the content of the 2020 Hungarian NECP¹⁹¹.

TOPIC	HUNGARIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	7 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	21 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	The country's contribution to the EU's energy efficiency amounts to 18.8 Mtoe of final energy consumption (translating into 30.7 Mtoe of primary energy consumption) by 2030.
<i>Energy security and internal energy market</i>	The NECP mentions the need to maintain flexible power generation assets and outlines ongoing initiatives to diversify natural gas supply routes and sources.
<i>Research, innovation and competitiveness</i>	Hungary plans to align its national goals and funding targets for research, innovation, and competitiveness with other dimensions. However, there is a lack of specific numbers and timelines. As a quantified target, Hungary aims to carry out at least 20 pilot innovation projects and register a minimum of 10 patents by 2030.

Analysis of MCED process

During the drafting of the NECP, **a public consultation was held**: the draft plan was available on the government's website, **workshops were organised and questionnaires were also sent out to stakeholders** (these public consultation activities included, inter alia, industrial associations, industrial/sectoral operators, civil society organisations, higher education institutions, research institutes, consulting firms and individual experts); there was overall more engagement with local authorities in the consultation process than with other stakeholders¹⁹². However, survey respondents stated that the quality of the consultation process is ‘poor’ for several reasons: it is carried out at an advanced stage, i.e. when the NECP is nearly finalised; the contribution of LRAs were scarcely taken into consideration; and there was no meaningful citizen engagement¹⁹³.

Connection of NECP with subnational planning

However, when it comes to the implementation of the NECP, there is a top-down perception of the role of the LRAs and examples and/or good practices of effective dialogues are missing¹⁹⁴. **LRAs are mentioned only in relation to specific projects and there is little description of their active involvement in the implementation of the NECP's measures**. For instance, LRAs are mentioned in

¹⁹¹ Sources: National Energy and Climate Plan (Hungary), p. 25 et seq, and European Commission, 2020, Assessment of the final national energy and climate plan of Hungary, SWD(2020) 916 final, p. 2-3.

¹⁹² Assessment of the final national energy and climate plan of Hungary, SWD(2020) 916 final, p. 4 and LIFE PlanUp, 2020, Planning for 2030 – EU and Member States' experiences with the first NECP cycle, p. 8.

¹⁹³ Survey respondents.

¹⁹⁴ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 12

relation to renewable energy, where the NECP affirms that measures will be planned to ensure the expansion of energy self-consumption and the role of renewable energy communities in developing decentralised, local renewable energy¹⁹⁵. Hungary states in the NECP that the concept of energy community (interpreted as a separate consumer-producer unit and settled entity) should be clearly defined in a regulation, which would also define a community metering point¹⁹⁶. Other goals to add in future national law are laying the groundwork for establishing communities within the transformer zones and managing ‘village heating plants’ as energy communities¹⁹⁷. The NECP adds that for Hungary the support of developing energy communities is a priority, but there is no more detailed information about this¹⁹⁸. Another example is the Green Bus Programme¹⁹⁹. The NECP mentions this already-adopted project as a tool to promote public transport and freight transport by rail, which is designed to shift local public transport to low-carbon vehicles, while still allowing the use of (compressed) natural gas²⁰⁰. This programme remains a tool adopted by the Government²⁰¹, and the role of LRAs seems mainly passive. A respondent to the survey affirmed that even though the NECP provides technical support and opportunities for EU exchanges and peer learning at EU level for the implementation of the plan at local or regional level, the financial resources allocated to LRAs do not match the responsibilities of the local level to meet the targets²⁰².

Integration of NECP in the national planning

In the NECP it is affirmed that (during its drafting) it took into account other national plans, measures and policies and in particular the National Energy Strategy and the Second National Climate Change Strategy (which includes the National Adaptation Strategy)²⁰³. However, in its 2020 assessment, the Commission affirmed that the interlinks between the NECP and the National Adaptation Strategy are not always clear²⁰⁴. It is also difficult to assess the integration of the NECP with the waste and circular economy policies, since the plan does not deal with the waste hierarchy or issues relating to the circular economy²⁰⁵. The measures included in the RRP are expected to contribute to the decarbonisation and energy objectives as identified in the NECP; this is, for

¹⁹⁵ Assessment of the final national energy and climate plan of Hungary, SWD(2020) 916 final, p. 21.

¹⁹⁶ National Energy and Climate Plan (Hungary), 2020, p. 79.

¹⁹⁷ Ibid.

¹⁹⁸ Ibid.

¹⁹⁹ <https://www.themayor.eu/en/a/view/green-bus-programme-launched-in-hungary-5647>.

²⁰⁰ Assessment of the final national energy and climate plan of Hungary, SWD(2020) 916 final, p. 7 and National Energy and Climate Plan (Hungary), 2020, p. 82.

²⁰¹ National Energy and Climate Plan (Hungary), 2020, p. 82: “Within the framework of the Green Bus Programme adopted by the Government (...”).

²⁰² Survey results.

²⁰³ National Energy and Climate Plan (Hungary), 2020, p. 25, 33 and 71. Confirmed in the survey.

²⁰⁴ Assessment of the final national energy and climate plan of Hungary, SWD(2020) 916 final, p. 11.

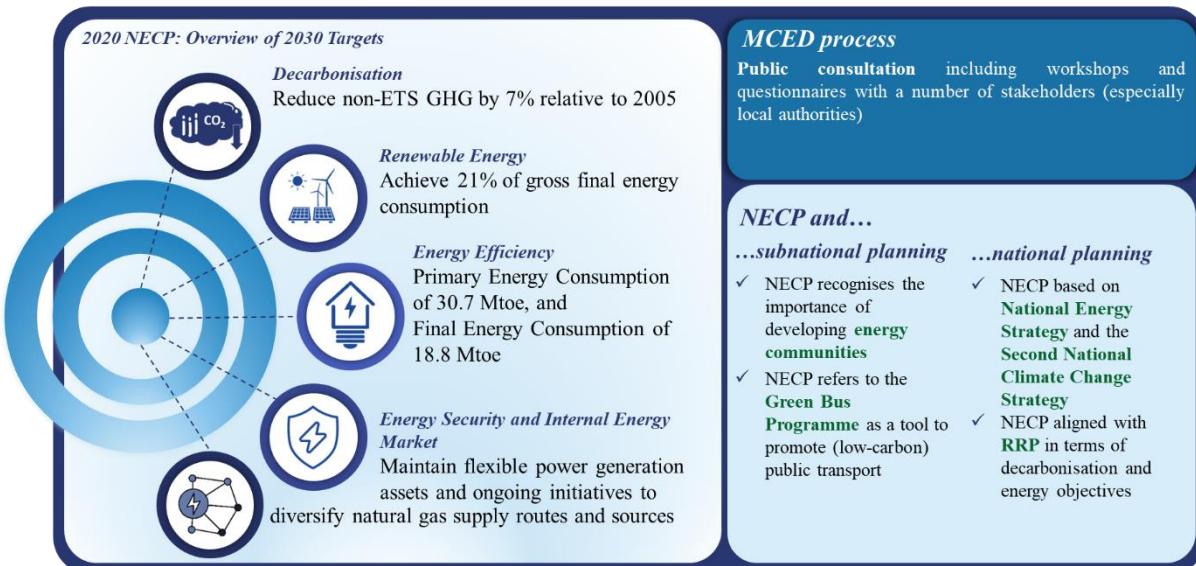
²⁰⁵ Ibid., p. 7.

instance, the case for the measures aiming to increase energy efficiency and renewable energy consumption of, among others, schools and higher education institutions and social housing²⁰⁶. According to the survey, the connection between the revision of the NECP and the implementation of RePowerEU is ‘satisfactory’²⁰⁷.

Summary



Hungary



²⁰⁶ European Commission, 2022, European Commission, 2022, Analysis of the recovery and resilience plan of Hungary Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Hungary, SWD/2022/686 final.

²⁰⁷ Survey results.

3.14 Ireland

Overview of the plan

The box below summarizes the content of the 2020 Irish NECP²⁰⁸.

TOPIC	IRISH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	30 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	34.1% of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	The national contribution to the 2030 EU-wide energy efficiency target is 13.7 Mtoe for primary energy consumption , and 11.2 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	In the context of energy security , Ireland has set several high-level targets, including measures related to improving energy infrastructure, network flexibility and cyber security. Ireland's national objective concerning the EU internal energy market is to further deepen the integration of the Irish wholesale electricity market .
<i>Research, innovation and competitiveness</i>	Ireland's objective is to boost investment in research and development to match the growth rates of its GNP. The country heavily depends on funding from the EU.

Analysis of MCED process

According to an Energy Cities Study, **Ireland fully understands the key role of LRAs in designing and implementing the NECP**²⁰⁹. The NECP states clearly that '*Ireland's Local Authorities play a pivotal role in their local communities and can act to demonstrate public sector leadership on climate action in their areas as well as key mobilisers of change*',²¹⁰. Ireland has had **a multi-level governance tool in place since 2017, the National Dialogue on Climate Action**, which was essential during the drafting of the NECP because it was used to consult the general public and reach out to citizens and stakeholders that are usually not engaged in energy and climate issues²¹¹. The tool aims to '*build long-term societal consensus, community engagement and public support to enable the achievement of Ireland's national transition objective*'²¹². It is led at national level by the Irish Department of Communications, Climate Action and Environment, but LRAs are deeply involved in the process because the Government relies on them to organise the regional gatherings (one-day meetings of roundtable discussions on different climate and energy topics, presentations and workshop activities)²¹³. This tool has been considered a best practice by the PlanUP project, since this format effectively engages and involves stakeholders and citizens and

²⁰⁸ Sources: National Energy & Climate Plan 2021-2030 (Ireland), pp. 11-17, and European Commission, 2020, Assessment of the final national energy and climate plan of Ireland, SWD(2020) 906 final, pp. 2-3.

²⁰⁹ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 5.

²¹⁰ National Energy & Climate Plan 2021-2030 (Ireland), 2019, p. 22.

²¹¹ LIFE PlanUp, 2019, Report on Good Practices in Energy and Climate Governance, p. 48.

²¹² Ibid.

²¹³ Ibid., pp. 50-51.

allows for the co-creation of energy and climate policies²¹⁴. Regarding the implementation of the NECP, local authorities play a key role in meeting Ireland's energy targets, particularly for climate change and energy efficiency²¹⁵. The NECP made and will make use of the Climate Action Regional Offices, key structures established to assist the local authority sector in building capacity to engage effectively on climate change²¹⁶. LRAs are expected to play a central role also with regard to the building sector, especially for planned policies such as the retrofitting of the social housing stock²¹⁷.

Connection of NECP with subnational planning

As stated above, the LRAs' role is well recognised in the Irish NECP, which affirms that a deep level of collaboration between the national government, local authorities and agencies is necessary to deliver and implement the range of policies and measures necessary to achieve energy and climate goals²¹⁸. Consequently, **there is a connection between the NECP and subnational planning**. For instance, under the National Adaptation Framework (strictly linked and connected with the NECP), the **31 local authorities in Ireland have developed their own adaptation strategies²¹⁹**. On wind energy, the Government is closely working with LRAs on developing the most suitable approach to noise monitoring and enforcement; this could include a regional structure that emulates the 'shared services' strategy used by local governments in other domains, like waste management and climate adaptation²²⁰. Regarding the building sector, the NECP states that it is vital for LRAs to **ensure electric vehicle charging through local development plans**, since the cost of retrofitting charging infrastructure can be a barrier to its installation and therefore to the transition to electric vehicles²²¹.

Integration of NECP in the national planning

Ireland has a national adaptation framework, which describes the national approach for adapting measures to various sectors and how LRAs should modify policies in their administrative areas; the overall goals and actions in the national adaptation framework are consistent with the NECP²²². It should be added that the national adaptation framework identifies the critical role to be played by local authorities in addressing climate change adaptation²²³. The NECP also states that

²¹⁴ Ibid., p. 92.

²¹⁵ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 12.

²¹⁶ National Energy & Climate Plan 2021-2030 (Ireland), 2019, p. 28.

²¹⁷ Assessment of the final national energy and climate plan of Ireland, SWD(2020) 906 final, p. 11.

²¹⁸ National Energy & Climate Plan 2021-2030 (Ireland), 2019, p. 26.

²¹⁹ Ibid., p. 99.

²²⁰ Ibid., p. 88. Shared services can be defined as 'the consolidation of corporate services into a shared services centre administered by the Public Service, to enable increased standardisation, efficiency, purchasing power, service quality, automation, and control'.

²²¹ National Energy & Climate Plan 2021-2030 (Ireland), 2019, p. 115.

²²² Assessment of the final national energy and climate plan of Ireland, SWD(2020) 906 final, pp. 4-5-10.

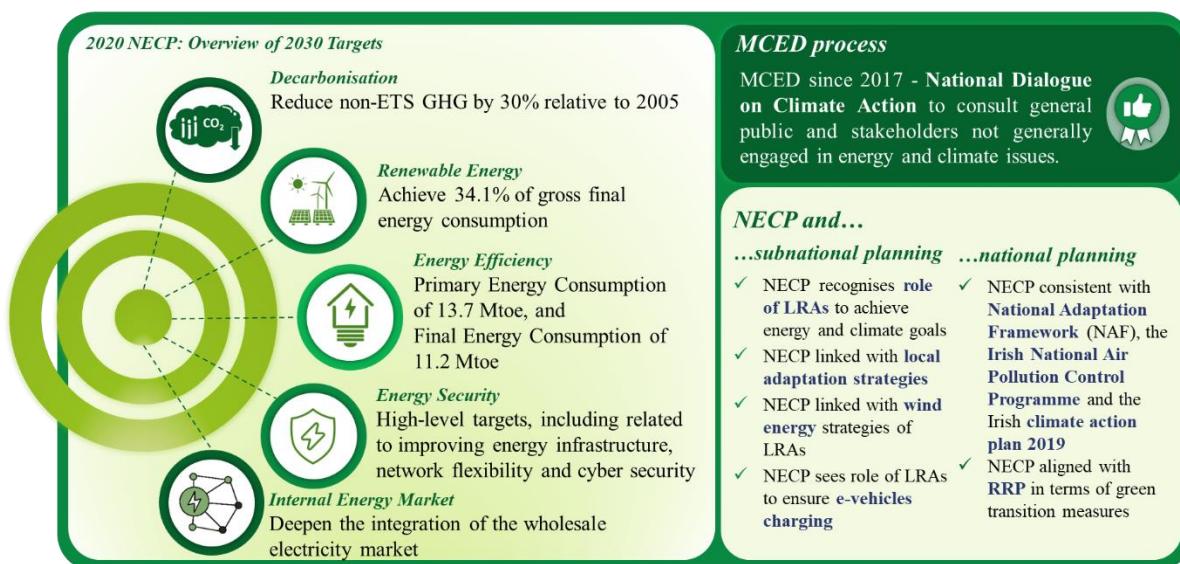
²²³ National Energy & Climate Plan 2021-2030 (Ireland), 2019, p. 104.

the Irish National Air Pollution Control Programme is being updated to reflect the policies and measures set out in the NECP²²⁴; the NECP provides information on the interactions with air quality and air emissions' policy and on synergies and trade-offs induced by some of its measures²²⁵. The NECP is also based on and in line with the Irish climate action plan 2019, since both coherently identify how Ireland will achieve its long-term goal of climate neutrality²²⁶. Regarding the RRP, its green transition measures (such as including key climate targets in national legislation, strengthen the climate governance framework and disincentivise the use of fossil fuels through carbon taxation) are aligned with the NECP and are expected to contribute directly to the EU's 2030 climate targets and 2050 climate neutrality²²⁷.

Summary



Ireland



²²⁴ Ibid., p. 37.

²²⁵ Assessment of the final national energy and climate plan of Ireland, SWD(2020) 906 final, p. 3.

²²⁶ Ibid., p. 8

²²⁷ European Commission, 2021, Analysis of the recovery and resilience plan of Ireland Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Ireland, SWD/2021/205 final.

3.15 Italy

Overview of the plan

The box below summarizes the content of the 2020 Italian NECP²²⁸.

TOPIC	ITALIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	33 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	30 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Italy contributes to the collective 2030 EU target with 125.1 Mtoe for primary energy consumption and 103.8 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	The Italian plan also sets objectives for energy security (reducing the level of dependency, diversifying sources of supply, setting out levels for additional storage) and the internal energy market (removing price distortions or including measures to ensure the non-discriminatory participation of new market participants).
<i>Research, innovation and competitiveness</i>	The NECP sets targets related to research, innovation and competitiveness, such as doubling the public funds for research into clean energy. The overall R&I target is a 1.53% of GDP by 2020.

Analysis of MCED process

Regarding the drafting of the NECP, Italy organised **an online public consultation** that ran from 20 March to 5 May 2019, which is open to any stakeholders (included, inter alia: regional authorities; local authorities; regional energy agencies; local energy agencies; consumer organisations; business/industry organisations; NGOs; citizens; research and academic institutions)²²⁹. A respondent to the survey considered the involvement of LRAs was weaker compared with the first draft in 2018-2019, since at that time there was a specific contact person for each region in the national working group²³⁰. In its 2020 evaluation, the Commission criticised the lack of a summary of how the comments were considered²³¹, and a PlanUP report pointed out that **two months is too short a period to adequately inform the public and give them sufficient time to express their views** on a highly strategic and complex document such as the NECP²³².

Even though the NECP mentions several times the role of LRAs, the Commission stated in its 2020 assessment that Italy should better exploit the potential of the

²²⁸ Sources: Integrated National Energy and Climate Plan - Italy, p. 4 et seq. and European Commission, 2020, Assessment of the final national energy and climate plan of Italy, SWD(2020) 911 final, p.1.

²²⁹ Integrated National Energy and Climate Plan - Italy, 2019 and confirmed in the survey. It should be noted that one respondent rated as ‘poor’ the quality of the consultation process (without giving any further details) and another one as ‘satisfactory’, considering the online consultation a good and extensive approach.

²³⁰ Survey respondent.

²³¹ Assessment of the final national energy and climate plan of Italy, SWD(2020) 911 final, p. 4.

²³² LIFE PlanUp, 2021, Fit for Flop/55: Lessons from the National Energy and Climate Plans to achieve a climate-neutral Europe, p. 9.

MCED²³³. The State itself recognised this; for instance, in the NECP, it is stated: ‘In light of the objectives for 2030, and then for 2050, it is also necessary to encourage a more active role by those local and regional bodies that are closest to citizens’²³⁴. Moreover, in a PlanUP Ministry officials’ virtual roundtable, Italy stated that the multi-level governance has to be sped up significantly and better exchanges should also exist with the private sector stakeholders²³⁵.

A tool of interest is the creation of the Italian NECP Observatory (which should be set up soon) whose aim is to provide a forum (for national authorities and LRAs) for advanced technical discussion of the actual implementation of the Plan and the monitoring of its execution. The Observatory will draw up each year an implementation report that will be sent to, *inter alia*, the State-Regions Conference²³⁶.

Connection of NECP with subnational planning

Italy recognises the importance of local authorities’ actions in the implementation of the NECP, considering that LRAs are well-placed to tackle various issues on energy and climate²³⁷. For instance, regarding **transport**, a compulsory requirement is envisaged for local authorities to ensure that at the time of their renewal, their fleet of cars, buses and public service vehicles is made up of at least 25 % electric vehicles or vehicles fueled with liquefied natural gas or compressed natural gas²³⁸. More generally, cities and municipalities will have to trigger a **cultural change** towards the use of bicycles, public transport, shared and electric mobility and vehicles that use alternative fuels²³⁹. Regarding the heating sector, the contributions of municipalities towards investment in the field of **energy efficiency and sustainable local development** are considered fundamental to meet the mandatory national target²⁴⁰. A respondent to the survey affirmed that even though the NECP provides financial support for the implementation of measures at local or regional level, it is still not clear if the financial resources allocated to LRAs match the responsibilities of the local level to meet the targets and that such an assessment could be done only once the final plan will be finalised²⁴¹.

A couple of best practices concerning the connection with subnational planning could be identified in the NECP. For instance, **all metropolitan cities and bodies covering extensive areas will have to prepare Sustainable Urban Mobility**

²³³ Assessment of the final national energy and climate plan of Italy, SWD(2020) 911 final, p. 16.

²³⁴ Integrated National Energy and Climate Plan - Italy, 2019, p.43.

²³⁵ LIFE PlanUp, 2020, Planning for 2030 – EU and Member States’ experiences with the first NECP cycle, p. 6.

²³⁶ Integrated National Energy and Climate Plan - Italy, 2019, p. 44.

²³⁷ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 4 and 14.

²³⁸ Integrated National Energy and Climate Plan - Italy, 2019, p.26.

²³⁹ Ibid., p.28.

²⁴⁰ Ibid., p.156.

²⁴¹ Survey respondent.

Plans (SUMPs), to harmonise existing measures within the framework of the NECP, which include: the replacement of the current local public transport, sustainable mobility and the optimisation of the management of the movement of goods and people²⁴². Another good example is the setting up of the ‘**Green Italy**’ programme to encourage initiatives for the sustainable management of Italian cities and the spreading of good practices²⁴³. However, some sources highlighted the mismatch that exists between national policies and the tools that mayors have to implement NECP measures (such as transport service for local mobility) and a general need for better involvement of LRAs in the definition of the final Italian NECP²⁴⁴. The idea would be to build the NECP on the local strategic documents (such as Action Plans for Sustainable Energy and Action Plans for Sustainable Energy and the Climate), to use the data gathered at local level more efficiently for these plans and to improve networking between the different competent authorities at local level and between the local and national level²⁴⁵.

Integration of NECP in the national planning

In its 2020 assessment, the European Commission finds several synergies between the NECP and other national planning. The NECP seems consistent with the national adaptation strategy; for instance, it details – regarding the energy security dimension – how the energy sector could be affected by climate change and includes the measures that could be taken to address such risks²⁴⁶. In addition, the Italian energy research and innovation objectives are increasingly aligned with the R&I priorities identified in the Strategic Energy Technology Plan²⁴⁷. Respondents to the survey also consider satisfactory the synergies with the National Sustainable Development Strategy²⁴⁸. Finally, the Commission considered that the RRP will allow Italy to accelerate progress towards the 2030 energy and climate objectives as enshrined in the NECP²⁴⁹. For instance, Mission 2 of the RRP (green revolution and ecological transition) includes interventions that are key to supporting the swift implementation of the NECP in some sectors (e.g. the circular economy, renewable energy, sustainable mobility, hydrogen, energy efficiency of private and public buildings)²⁵⁰.

²⁴² Ibid., p. 189 and A chance for a greener future, p. 12.

²⁴³ Integrated National Energy and Climate Plan - Italy, 2019, p.142.

²⁴⁴ Energy Cities, LIFE NECPlatform - Countries: Italy, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

²⁴⁵ Ibid. and Integrated National Energy and Climate Plan - Italy, 2019, p.36.

²⁴⁶ Assessment of the final national energy and climate plan of Italy, SWD(2020) 911 final, p. 7, 8 and 12; confirmed in the survey.

²⁴⁷ Ibid., p. 11.

²⁴⁸ Survey respondents.

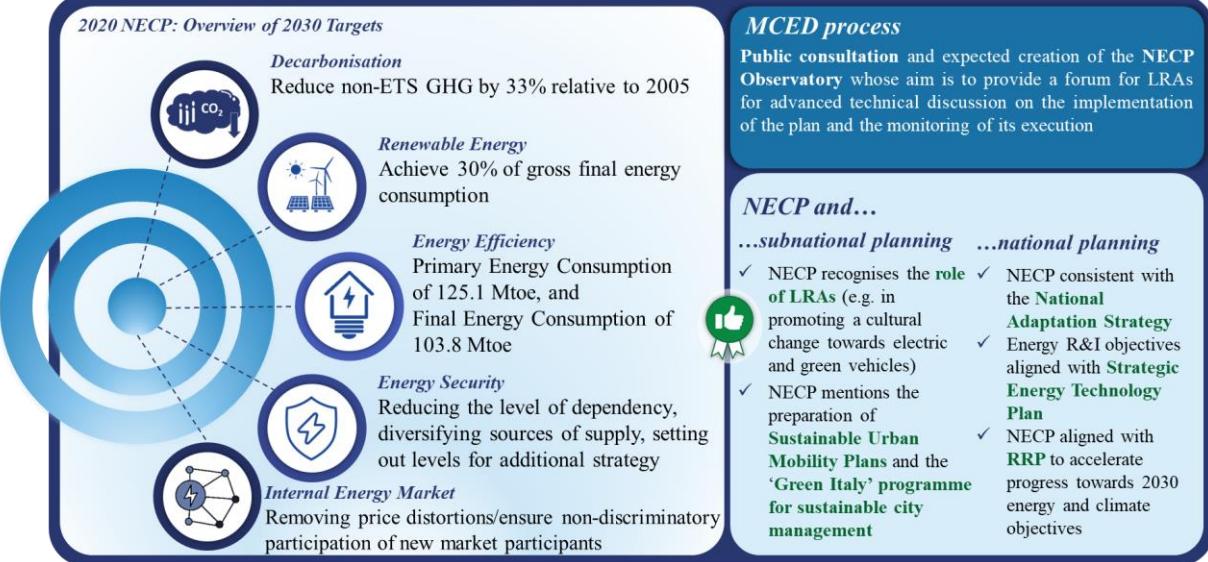
²⁴⁹ European Commission, 2021, Summary of the assessment of the Italian recovery and resilience plan. Confirmed in the survey.

²⁵⁰ European Commission, 2021, Analysis of the recovery and resilience plan of Italy Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Italy, SWD/2021/187 final.

Summary



Italy



3.16 Latvia

Overview of the plan

The box below summarizes the content of the 2020 Latvian NECP²⁵¹.

TOPIC	LATVIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	6 % compared to 2005 for non-ETS sectors (65% for total GHG emissions compared to 1990) by 2030.
<i>Renewable energy target</i>	50 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Latvia's contribution to the 2030 EU-level target amounts to 4.1 Mtoe of primary energy consumption and 3.6 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	Latvia is planning to increase energy security mainly through the increase of renewables (including biofuels in the transport sector), diversification of energy resources and supply routes, and also through energy efficiency measures. Regarding the internal energy market , the NECP refers to the recently liberalised domestic electricity and gas markets and presents targets and objectives for the rollout of smart meters in electricity. The electricity interconnection level is expected to be at least 60 % by 2030 .
<i>Research, innovation and competitiveness</i>	The national goals for research, innovation, and competitiveness are to allocate 2% of the GDP, with a sub-target of 25% for decarbonisation efforts. However, there are no specific policy measures in place to support this 2% target.

Analysis of MCED process

In the NECP of Latvia there is no mention of MCED specifically. However, **a public consultation with a wide range of stakeholders took place** until October 2019²⁵². In particular, there were consultations with undertakings and sectoral associations from various sectors regarding the proposed measures for achieving the targets in the draft NECP²⁵³. Business/industry organisations, NGOs and research and academic institutions are among the stakeholders that are involved in the MCED in Latvia, usually through traditional stakeholder consultation such as the provision of written comments or an online questionnaire, organisation of events, workshops, seminars, roundtables, etc.²⁵⁴.

Connection of NECP with subnational planning

Latvia is one of the four EU Member States²⁵⁵ that explicitly mention at least one good practice by local authorities in their final NECPs: the City of Riga

²⁵¹ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Latvia, SWD(2020) 913 final, pp.3-4, and National Energy & Climate Plan 2021-2030 (Latvia), 2020.

²⁵² Ibid, p.5.

²⁵³ National Energy & Climate Plan 2021-2030 (Latvia), 2020, p.20.

²⁵⁴ Survey respondents.

²⁵⁵ With Belgium, Italy and Romania.

within the scope of the Horizon 2020 project C-Track 50²⁵⁶. Additionally, improving the energy efficiency of buildings and businesses is among the good examples mentioned in Latvia's NECP²⁵⁷. Latvia is also one of Member States that recognise local authorities' role in the implementation of the energy and climate transition, including the need to promote understanding among the administrations' employees, and the importance of the Covenant of Mayors in their NECPs²⁵⁸. According to the survey respondents, Latvia's NECP provides support for the local or regional implementation of the measures, including financial support from EU funds and opportunities for capacity-building²⁵⁹.

Integration of NECP in the national planning

Latvia's NECP refers to the 2030 national climate adaptation plan; however, it does not include any adaptation measures for the period up to 2030²⁶⁰. Latvia has also introduced a Strategy for the Achievement of Climate Neutrality by 2050²⁶¹. Latvia's NECP is highly interlinked to the RRP which supports Latvia's decarbonisation and energy transition objectives through investments focusing on green and energy transition²⁶². Latvia's NECP is also connected to the National Sustainable Development Strategy, as indicated by one of the survey respondents²⁶³.

Summary

²⁵⁶ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 4.

²⁵⁷ LIFE PlanUp, 2021, Webinar on “How green are the national recovery plans?”: A cross-check of 10 draft National Recovery and Resilience Plans and National Energy & Climate Plans, p. 7.

²⁵⁸ Energy Cities, 2020, Is the key role of local authorities acknowledged?, pp. 4-5.

²⁵⁹ Survey respondent.

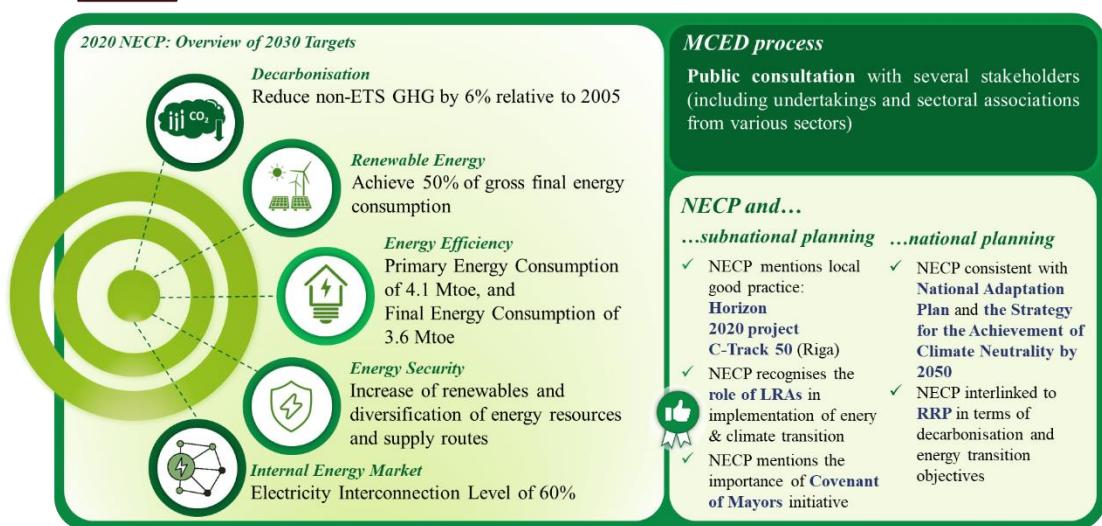
²⁶⁰ Assessment of the final national energy and climate plan of Latvia, SWD(2020) 913 final, p.8.

²⁶¹ European Commission, 2021, Analysis of the recovery and resilience plan of Latvia Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Latvia, SWD(2021) 162 final, p.48.

²⁶² Ibid, pp.48-49.

²⁶³ Ibid, pp.48-49.

Latvia



3.17 Lithuania

Overview of the plan

The box below summarizes the content of the 2020 Lithuanian NECP²⁶⁴.

TOPIC	LITHUANIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	21% compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	45 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Lithuania energy efficiency contribution to the EU target translates into 5.5 Mtoe for primary energy and 4.5 Mtoe for final energy consumption by 2030.
<i>Energy security and internal energy market</i>	The NECP also sets objectives for energy security (diversifying sources, renewables and energy efficiency promotion) and the internal energy market (phase-out of retail price regulation, non-discriminatory participation of new market participants and promotion of different flexibility sources).
<i>Research, innovation and competitiveness</i>	The NECP sets targets related to research, innovation and competitiveness, in particular on national energy independence and smart specialisation strategies.

Analysis of MCED process

During the preparation of the plan, LRAs, **the general public and stakeholders (including citizens, LRAs, NGOs, research and academic institutions, social partners and social organisations in each sector) have been regularly involved in consultations**, through written comments, online consultations and events²⁶⁵. Regarding the implementation of the plan, Lithuania recognises the role of local authorities' actions²⁶⁶. The NECP states that '*Municipalities make an important contribution to reducing greenhouse gas emissions through the establishment of sustainable urban mobility plans, their participation in the implementation of the Covenant of Mayors, and their contribution to achieving the RES targets set out in the specific plans for district heating*'²⁶⁷.

Connection of NECP with subnational planning

The NECP mentions municipalities as entities responsible for implementation of certain policies and measures linked to sustainable transport and RES. For instance, municipalities will implement sustainable urban mobility plans that will promote walking, cycling, public transport and the use of alternative fuels²⁶⁸. It adds that many municipalities in Lithuania have

²⁶⁴ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Lithuania, SWD(2020) 914 final, p.2; National Energy and Climate Action Plan of the Republic of Lithuania for 2021-2030, 2019, p.11-12.

²⁶⁵ Assessment of the final national energy and climate plan of Lithuania, SWD(2020) 914 final, p.4 and National Energy and Climate Action Plan of the Republic of Lithuania for 2021-2030, 2019, p. 20.

²⁶⁶ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 4.

²⁶⁷ National Energy and Climate Action Plan of the Republic of Lithuania for 2021-2030, 2019, p. 19.

²⁶⁸ Ibid, p. 56.

provided electric car recharging points in their existing or future plans for sustainable urban mobility²⁶⁹. Regarding the contribution of LRAs to the RES targets, the active participation of local communities in making investments for co-ownership of RES installations will be encouraged: the aim is to promote active electricity consumers who can use the electricity generated for their own needs and receive market-based compensation for the surplus power supplied to the grid²⁷⁰. A potential connection with LRAs planning can also be found in relation to climate change mitigation and adaptation. The NECP recognises that the contribution of municipal authorities to the fight against climate change is necessary and essential because the impact of climate change is felt locally²⁷¹. Consequently, municipalities are sometimes the best placed entities to find the most appropriate response to the challenges they face, because it is easier to build close communities where good examples of climate change mitigation or adaptation can be shared and promoted²⁷². A respondent to the survey affirmed that the connection between the NECP and subnational plans is ‘excellent’ because the subnational plans’ objectives are in line with the national ones and the national objectives defined in the NECP are adapted to the local strategic documents²⁷³.

Integration of NECP in the national planning

In its 2020 assessment, the Commission considers that the adaptation measures described in the NECP are in line with the national adaptation strategy²⁷⁴. Moreover, the NECP measures described to reach Lithuania’s national objective to go from being an energy technology importer to an exporter are coherent with those described under the national energy independence strategy and the smart specialisation strategy and generate ‘credible efforts’ to reach this objective²⁷⁵. On the contrary, links with the national air pollution control programme, although present, should be made clearer²⁷⁶. Finally, the NECP mentions the sustainable development strategy and the national waste prevention programme several times, therefore integrating (at least partially) the NECP into these plans. For instance, the NECP stresses the Importance of the introduction of the latest technologies distinguished for efficient use of resources and cleaner production methods, which replies to the point raised in the sustainable development strategy according to which companies use obsolete technologies and substances that are hazardous to human health²⁷⁷. A respondent to the survey affirmed that the connection between the NECP and different national plans (NAS; NAP; National Sustainable

²⁶⁹ Ibid., p. 55.

²⁷⁰ Ibid., p. 31.

²⁷¹ Ibid. p.93.

²⁷² Ibid.

²⁷³ Survey results.

²⁷⁴ Assessment of the final national energy and climate plan of Lithuania, SWD(2020) 914 final, p. 8.

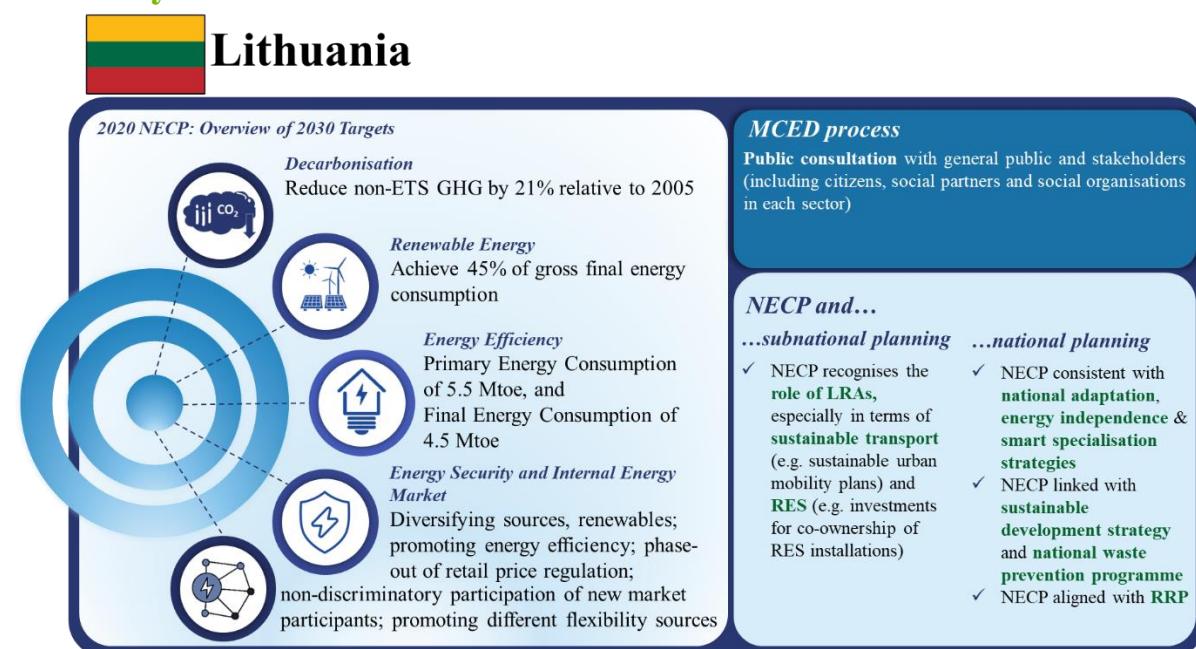
²⁷⁵ Ibid., p. 12.

²⁷⁶ Ibid., p. 13.

²⁷⁷ National Energy and Climate Action Plan of the Republic of Lithuania for 2021-2030, 2019, pp. 50 and 68.

Development Strategy; National Circular Economy Plan; National Transport Strategy) is ‘excellent’ because the NECP includes sectorial measures which are planned to implement (and are thus in line with) the other sectorial strategic documents²⁷⁸. Regarding the connection with the RRP, the Commission stated in its assessment of the RRP that the green pillar of the plan contributes to a large extent to the green transition and supports Lithuania’s decarbonisation and energy transition objectives, as set out in the NECP²⁷⁹. More specifically, the Commission states that the RRP’s implementation is expected to lead to at least 301.9 MW of additional electricity generation capacity from RES and that the RRP investments aimed at accelerating the renovation of buildings will result in primary energy savings and reduction of GHG emissions²⁸⁰.

Summary



²⁷⁸ Survey results.

²⁷⁹ European Commission, 2021, Analysis of the recovery and resilience plan of Lithuania Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Lithuania, SWD/2021/187 final.

²⁸⁰ Ibid.

3.18 Luxembourg

Overview of the plan

The box below summarizes the content of the 2020 Luxembourgish NECP²⁸¹.

TOPIC	LUXEMBOURGISH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	55 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	25 % of renewable energy in gross final energy consumption by 2030 (reached by consistently developing wind and solar energy and heat pumps).
<i>Energy efficiency target</i>	The plan identifies energy efficiency as a top priority and sets a target of a 40-44 % reduction in final energy consumption by 2030.
<i>Energy security and internal energy market</i>	The objectives for energy security consist of: (i) developing more local renewable energy production; (ii) energy efficiency measures in buildings and transport; (iii) free and better public transport; and (iv) strong electrification efforts in transport. Concerning the internal energy market , the final plan provides an overview of the development of the various sources of flexibility needed to integrate the increasing share of renewable energy into the system.
<i>Research, innovation and competitiveness</i>	The NECP sets ambitious national objectives and funding targets for research, innovation and competitiveness (e.g. becoming an attractive location for climate solution providers and start-ups).

Analysis of MCED process

Stakeholders and the public were allowed to participate in the preparation of the NECP at an early stage. The draft NECP was presented in a **one-day workshop** on 21 May 2019 and discussed with several stakeholders (representatives of civil society, social partners, business, academia) and relevant ministries and local authorities; the national government also considered students' input by organising **four regional workshops in lyceums** in May 2019²⁸². The draft final NECP was submitted to **another round of public consultation** from February to March 2020²⁸³. However, one survey respondent criticised the consultation process by stating that it does not offer real participation and that very few recommendations from the Citizens' panel have been considered²⁸⁴.

Connection of NECP with subnational planning

Luxembourg fully understands the key role of local authorities across all aspects of the energy and climate transition²⁸⁵ such as building renovation²⁸⁶.

²⁸¹ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Luxembourg, SWD(2020) 915 final, p. 2-3, and Luxembourg's Integrated National Energy and Climate Plan for 2021-2030, p. 9-13.

²⁸² Luxembourg's Integrated National Energy and Climate Plan for 2021-2030, 2019, p.18-19.

²⁸³ Ibid., p. 21.

²⁸⁴ Survey respondent.

²⁸⁵ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.1 and 5.

²⁸⁶ Luxembourg's Integrated National Energy and Climate Plan for 2021-2030, 2019, p.104.

A good practice linked to the plan is the Climate Pact. Launched in 2012, and recently relaunched with the name **Climate Pact 2.0, it is a pact concluded between the Luxembourgish Government and all its municipalities and used as a wide-ranging instrument for orienting and shaping communal climate and energy policies**²⁸⁷. It supports the municipalities in introducing an integrated climate action and energy management system and achieving certification with the ‘European Energy Award’, which is considered a key flagship initiative behind the country’s Climate Pact itself²⁸⁸. The NECP states clearly that the overall aim is to anchor Climate Pact 2.0 even more firmly as a key implementation tool for national energy and climate policy at local level²⁸⁹.

Climate Pact 2.0 is a good practice of multi-level governance and integration with subnational planning. The municipalities become a strategic partner in the efforts to reach the national GHG emissions’ reduction target: they all voluntarily commit to take action to reduce their GHG emissions and track their progress through the European Energy Award quality management and certification system, in return for crucial financial and technical support from the national government²⁹⁰. There is, therefore, a clear division of responsibilities and connections between the national and the subnational plans, since the competent Ministry provides political leadership, the national energy agency ‘MyEnergy’ manages the overall framework, and municipalities take energy and climate action²⁹¹. Consequently, with its pending projects, sharing of best practices, and mobilisation of EUR 55.2 million in investments, Climate Pact 2.0 will pave the road for the implementation of the NECP²⁹².

Regarding the building sector, another good practice is the **Pacte Logement 2.0 (housing pact) which will help the municipalities to achieve important objectives in relation to housing** construction and to improve the quality of housing available to inhabitants; several measures have been planned (in cooperation with the municipalities) to reach these objectives, and they will focus on both the quantity and quality of housing²⁹³.

It should be noted that one respondent to the survey affirmed that even though the NECP provides financial support from national funds at local or regional level (together with technical support and opportunities for capacity-building), the

²⁸⁷ On the Climate Pact see LIFE PlanUp, 2019, Report on Good Practices in Energy and Climate Governance; <https://www.pacteclimat.lu/fr/acteur-engage>.

²⁸⁸ Luxembourg’s Integrated National Energy and Climate Plan for 2021-2030, 2019, p.17. See also Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.16, which adds, at p.5, that Luxembourg is the only country to mention the European Energy Award in its final NECP.

²⁸⁹ Luxembourg’s Integrated National Energy and Climate Plan for 2021-2030, 2019, p.62

²⁹⁰ LIFE PlanUp, 2019, Report on Good Practices in Energy and Climate Governance, p.90.

²⁹¹ Ibid., p.93.

²⁹² Assessment of the final national energy and climate plan of Luxembourg, SWD(2020) 915 final, p. 3.

²⁹³ Luxembourg’s Integrated National Energy and Climate Plan for 2021-2030, 2019, p.68-69.

financial resources allocated to LRAs do not match the responsibilities of the local level to meet the targets and they will probably not be enough²⁹⁴.

Integration of NECP in the national planning

The NECP generally refers to interactions with air policy and the NAPCP, but it lacks a precise analysis of the interactions with air quality and air emissions' policy and does not present the impacts of policies and measures on air quality²⁹⁵. There is no clear interaction with climate adaptation policies since the NECP only vaguely refers to the climate change adaptation strategy and lacks a clear and precise elaboration on goals, targets, or policies and measures related to that strategy²⁹⁶. Regarding the circular economy, the NECP underlines that other strategic aspects are laid down in the context of the 'zero waste strategy'²⁹⁷. It should be considered that this strategy has been published only after the notification of the draft final NECP, therefore more links between the two strategic documents could be potentially highlighted in the next version of the NECP.

Regarding the connections with the RRP, the Commission considered in its assessment of the RRP that the measures set out in that plan (mainly focused on sustainable mobility and renewable energy generation) are consistent with the goals of the NECP. It is expected that the RRP will contribute to the NECP objectives through measures such as development of recharging infrastructure, promotion of electromobility, improvement of energy efficiency and building renovation²⁹⁸. A respondent to the survey considers the connection between the NECP and RePowerEU as 'satisfactory', at least concerning energy efficiency and renewables²⁹⁹.

²⁹⁴ Survey respondent.

²⁹⁵ Assessment of the final national energy and climate plan of Luxembourg, SWD(2020) 915 final.

²⁹⁶ Ibid., p.13.

²⁹⁷ Luxembourg's Integrated National Energy and Climate Plan for 2021-2030, 2019, p. 71-72. To know more about this Strategy see: Ministry of the Environment, Climate and Sustainable Development, 2020, Stratégie Null Offall

Lëtzebuerg,

https://environnement.public.lu/content/dam/environnement/documents/offall_a_ressourcen/null-offall-letzebuerg/Strategie-Null-Offall-Letzebuerg.pdf.

²⁹⁸ European Commission, 2021, Analysis of the recovery and resilience plan of Luxembourg Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Luxembourg, SWD/2021/159 final.

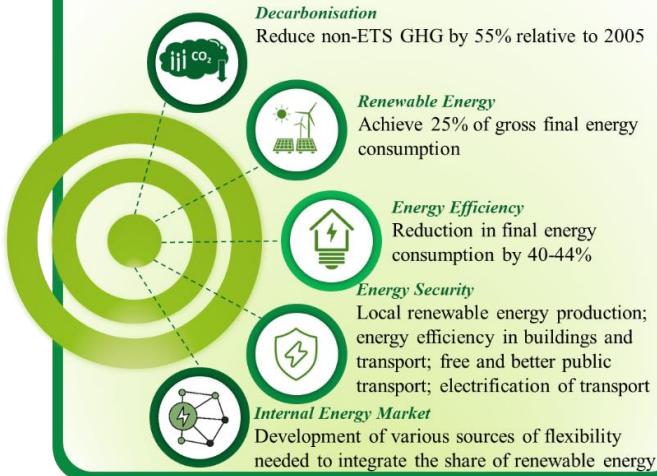
²⁹⁹ Survey respondent.

Summary



Luxembourg

2020 NECP: Overview of 2030 Targets



MCED process

Consultations and workshops with stakeholders (including representatives of civil society, social partners, business, academia, ministries and LRAs, students)

NECP and...

...subnational planning ...national planning

- ✓ NECP recognises the role of LRAs
- ✓ NECP mentions good practices: Climate Pact 2.0 for multi-level governance and integration with subnational planning; Pacte Longement 2.0 to improve housing quality
- ✓ NECP consistent with air policy, NAPCP and circular economy
- ✓ NECP linked with RRP in terms of development of recharging infrastructure, promotion of electromobility, improvement of energy efficiency

3.19 Malta

Overview of the plan

The box below summarizes the content of the 2020 Maltese NECP³⁰⁰.

TOPIC	MALTESE NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	19 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	11.5 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Malta plans to reduce its primary energy intensity to 0.07 toe/EUR by 2030 .
<i>Energy security and internal energy market</i>	Energy security will be enhanced by diversifying energy sources and suppliers, reducing dependence on imports, and implementing regular contingency plans in the event of supply disruptions. The internal energy market in Malta has set its sights on providing competitive electricity prices and maintaining the level of electricity interconnection well above the EU target of 15 %.
<i>Research, innovation and competitiveness</i>	There are no quantified objectives or funding targets yet for research, innovation and competitiveness, as the specific strategy for R&I in the field of energy and water for 2021-2030 is still being drawn up.

Analysis of MCED process

While the plan of Malta does not specifically mention the MCED, it incorporates a **comprehensive public consultation process** into its final NECP³⁰¹. During the drafting phase, early stakeholder consultations were conducted, involving licensed fuel providers, educational institutions, and business and industry stakeholders. In March and April 2019, the NECP underwent a formal online consultation, inviting written input from interested organisations and citizens, including LRAs. This stage played a crucial role in engaging local councils and enabling their active participation in shaping the plan. However, specific details about the participating councils and their feedback are lacking in the NECP³⁰². Furthermore, a public event was held on 4 April 2019, providing a platform for stakeholders to directly share their feedback on the NECP process.

More generally, local councils are represented by the Local Government Division at the Ministry for Justice, Culture and Local Government which plays an important role in assisting the Ministry in the formulation of strategies, policies and legislation as required. However, the plan emphasises that the role of the local councils is primarily administrative and their involvement in the design of climate and energy policies is limited³⁰³.

³⁰⁰ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Malta, SWD(2020) 909 final, p.4, and Malta's 2030 National Energy and Climate Plan, 2019, pp.15-18.

³⁰¹ Malta's 2030 National Energy and Climate Plan, 2019, p.15.

³⁰² Ibid, p.15.

³⁰³ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.16.

Connection of NECP with subnational planning

Although there is a limited role for local councils in subnational planning, Malta commits in its NECP to implementing new initiatives tailored to local contexts to ensure that indigenous RES are exploited³⁰⁴. Furthermore, the NECP takes into account the regional sustainable transport plan³⁰⁵ and therefore addresses mobility-related activities relevant to local authorities. As a result, Malta is currently developing its first SUMP and actively engaging with local councils in the process³⁰⁶. Furthermore, as part of the 2025 Transport Master Plan, Malta is establishing ‘local transport hubs’ to offer multi-modal transportation services as an alternative to private car usage³⁰⁷.

Integration of NECP in the national planning

The Maltese NECP is interlinked with the national sustainable development, circular economy plan and transport policies³⁰⁸. It also presents a policy background that includes the National Renewable Energy Action Plan and the National Low-Carbon Development Strategy; however, the plan lacks clarity regarding how the NECP aligns with these policies. Moreover, Malta is a signatory to the Clean Energy for EU Islands Initiative, but this is not reflected in the final plan. In its 2020 assessment, the European Commission therefore encouraged Malta to make greater use of this opportunity and enhance regional cooperation³⁰⁹. Nonetheless, the NECP establishes a connection with Malta's NAPCP thanks to ‘quantitative information on its interactions with air quality and air emissions policy’³¹⁰. The RRP is in line with the NECP, specifically reflecting its objectives for decarbonisation and the shift towards clean energy³¹¹.

³⁰⁴ Malta’s 2030 National Energy and Climate Plan, 2019, p.14.

³⁰⁵ Survey respondents.

³⁰⁶ Malta’s 2030 National Energy and Climate Plan, 2019, p.77.

³⁰⁷ Ibid, p. 74.

³⁰⁸ Survey respondents.

³⁰⁹ Assessment of the final national energy and climate plan of Malta, SWD(2020) 909 final, p.14.

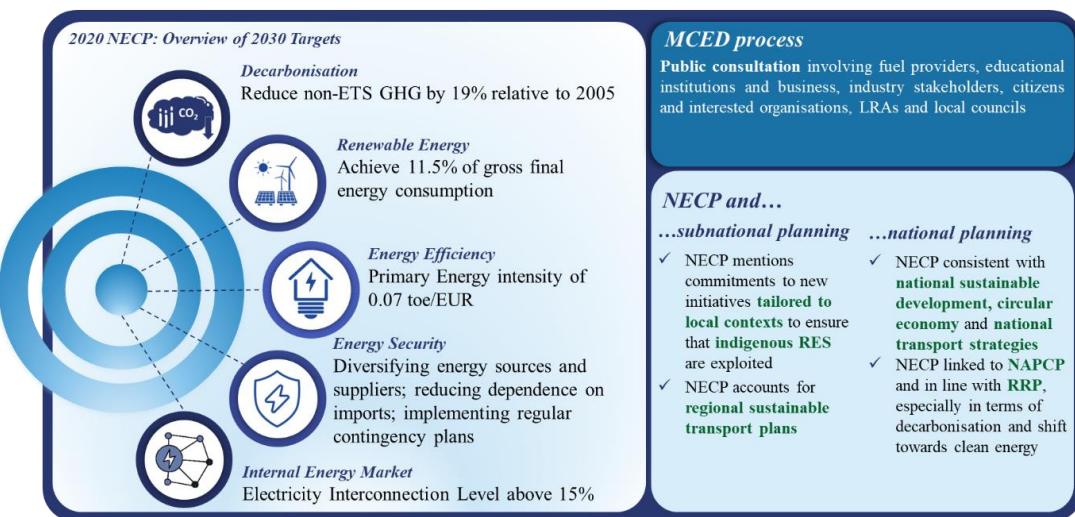
³¹⁰ Ibid, p.15.

³¹¹ European Commission, 2021, Analysis of the recovery and resilience plan of Malta Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Malta, SWD/2021/269 final.

Summary



Malta



3.20 The Netherlands

Overview of the plan

The box below summarizes the content of the 2020 Dutch NECP³¹².

TOPIC	DUTCH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	36 % compared to 2005 for non-ETS sectors (49% for total GHG emissions compared to 1990) by 2030. The NECP sets long terms goals to reduce GHG emissions by 95 % by 2050, compared to 1990, and to have electricity generation 100 % CO ₂ neutral by 2050.
<i>Renewable energy target</i>	32 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	The Netherlands' contribution to the EU target amounts to 46.6 Mtoe of primary energy consumption (which translates into 43.9 Mtoe of final energy consumption).
<i>Energy security and internal energy market</i>	The electricity interconnection level target is 37 % by 2030. On energy security , the Netherlands has set objectives for policies that are based on the principle of well-functioning energy markets.
<i>Research, innovation and competitiveness</i>	National objectives are very well aligned with climate and energy objectives, with extra funding of around EUR 95 million per year for 2020-2023. What will happen after 2023 is unclear.

Analysis of MCED process

The Climate Act and the NECP fit into a broader framework of the Climate Agreement and consultations on these documents were part of a broad social dialogue about the Climate Agreement held in the period between February 2018 and June 2019 (when the Agreement was presented). The Netherlands formed a Climate Council to coordinate the consultation process for the national Climate Agreement. Over 100 stakeholder groups were engaged through roundtables and task forces, ensuring input from local authorities and CSOs. Efforts were made to include CSOs in industrial sector discussions. The process aimed for consensus-building and prioritised transparency, inclusivity, and collaboration to shape comprehensive climate policies³¹³.

Connection of NECP with subnational planning

The NECP highlights the role of LRAs specifically for implementing a district-oriented approach for the energy transition, i.e. when phasing out gas in the energy mix. Municipalities will have a direct role in the transition to gas free districts³¹⁴. Funding programmes are implemented to provide financial support to local authorities, specifically for initiatives aimed at achieving energy savings (e.g. climate-friendly and circular products and services, including

³¹² Sources: European Commission, 2020, Assessment of the final national energy and climate plan of the Netherlands, SWD(2020) 918 final, p.2, and National Energy & Climate Plan 2021-2030 (the Netherlands), 2019.

³¹³ Ibid.

³¹⁴ National Energy & Climate Plan 2021-2030 (the Netherlands), 2019, p. 31.

renewable energy)³¹⁵. Further links between the different levels of governance revolve around the **integration of RES and the development of infrastructure for heat and electricity storage**. The responsibilities of different levels of government, such as municipalities, provinces, and central government, intersect at energy policy and spatial policy. Municipalities are primarily responsible for spatial policy and managing the physical environment, while provinces play a crucial role in connecting and coordinating regional interests. Central government sets long-term policy goals and ensures coherence between these goals. To ensure coordination, the Inter-administrative Programme includes a multi-annual programmatic national approach that incorporates comprehensive Regional Energy Strategies. These strategies serve as collaborative platforms for municipalities, provinces, water boards, grid operators, businesses, and social parties to assess and plan for renewable electricity generation, heat transition in buildings, and the necessary storage and infrastructure³¹⁶.

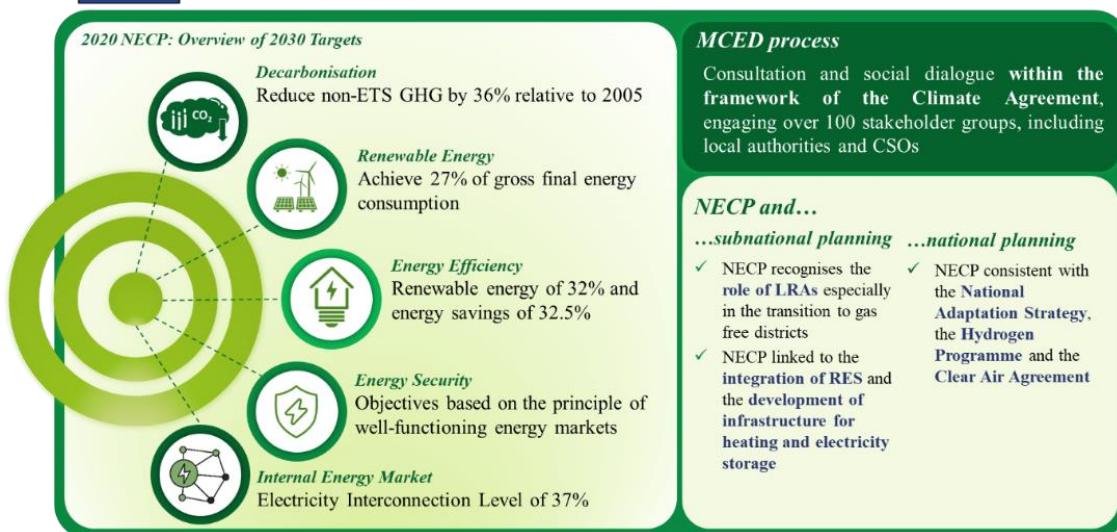
Integration of NECP in the national planning

The Dutch NECP makes links with the NAS. The Climate Agreement also mentions a Hydrogen Programme, unlocking the supply of green hydrogen, developing the necessary infrastructure and cooperating with various sector programmes, and facilitating ongoing initiatives and projects. Lastly, the Dutch government has set up a Clear Air Agreement which will be established by the government in association with LRAs and aims to achieve health gains of 50 % by 2030³¹⁷. However, integration of NECP with national plans related to emergency instruments such as the RRF and RepowerEU was not found.

Summary



Netherlands



³¹⁵ Ibid, p. 62, p.93.

³¹⁶ Ibid, p. 26.

³¹⁷ Ibid, p. 32.

3.21 Poland

Overview of the plan

The box below summarizes the content of the 2020 Polish NECP³¹⁸.

TOPIC	POLISH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	7 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	21-23 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Poland's contribution to the EU target amounts to 91.3 Mtoe of primary energy consumption and 67.1 Mtoe of final energy consumption .
<i>Energy security and internal energy market</i>	Poland's NECP introduces objectives for energy security on diversification and reduction of energy dependency. Further policy objectives for the internal energy market are introduced in the NECP to ensure (i) non-discriminatory participation for new market participants and (ii) market flexibility. The planned interconnection level for 2030 is 8.7 % .
<i>Research, innovation and competitiveness</i>	Poland's NECP sets a target to increase expenditure in research and development to 2.5 % of GDP by 2030.

Analysis of MCED process

In the NECP of Poland there is no mention of MCED specifically. **A public consultation on the NECP was carried out** between January – February 2019; however, Poland has not submitted a detailed summary of the public's views or how they have been taken into account in the NECP³¹⁹. **Since the public consultation of the current NECP was considered insufficient (it only lasted one month³²⁰) and it came as a result of society pressure³²¹**, Poland should enhance public participation following the same process used during the drafting of EU funding programmes, including a series of public hearings and inverted public hearings, in which all the pledges and all answers to them can be heard³²². LRAs and energy agencies, consumer organisations, business/industry organisations; NGOs, citizens, and research and academic institutions are among the stakeholders that are usually consulted through traditional stakeholder consultations. However, according to the survey responses, there are some inconsistencies regarding the stage of the NECP preparation where the MCED/consultation is carried out³²³.

³¹⁸ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Poland, SWD(2020) 920 final, pp.3-6, and National Energy & Climate Plan 2021-2030 (Poland), 2019.

³¹⁹ Ibid, p.6.

³²⁰ LIFE PlanUp, 2021, Fit for (Flop) 55: Lessons from the National Energy and Climate Plans to achieve a climate-neutral Europe, p.9.

³²¹ LIFE PlanUp, 2021, Webinar on “How green are the national recovery plans?”: A cross-check of 10 draft National Recovery and Resilience Plans and National Energy & Climate Plans, p. 7.

³²² LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 32.

³²³ Survey respondents.

Connection of NECP with subnational planning

The NECP provides limited links to subnational planning. According to one of the survey respondents, local and regional climate and energy plans, adaptation plans, and sustainable transport plans are among the subnational plans taken into account as a basis for Poland's NECP³²⁴. Additionally, the NECP provides information on the governmental **programme called ‘Stop Smog’**, which was launched in February 2019. The programme is intended for people who live in single-dwelling buildings that are energy inefficient. The programme is directed at all municipalities which can show that their area has poor air quality, i.e. air pollutant concentrations that are higher than EU criteria. The programme covers the replacement of heating devices or systems with those compliant with low-emission standards, the removal of heating devices or systems and connection to the district heating, electricity or gas network, and the comprehensive building thermomodernisation³²⁵.

As to regional initiatives, Silesia region leads Poland's **transition away from coal** and towards residential solar energy. The recovery funds present an opportunity to further the region's energy transition while more financial and organisational support is required³²⁶. Additionally, the region of Mazowieckie Voivodeship has introduced support programmes that both directly and indirectly support activities in line with the objectives set out in Poland's NECP, including initiatives related to climate, quality of the air, heating, drainage system, as well as investments³²⁷. Lastly, the NECP progress reports rely on the reporting provided by LRAs while financial support from EU funds is provided for the implementation of the measures at local or regional level³²⁸.

Integration of NECP in the national planning

In the effort to reduce emissions and to protect and enhance natural carbon sinks, the need to connect agricultural policies and measures with NECPs is highlighted. Other suggested policies and measures focus on the reduction of livestock farming and meat consumption as they are among the main source of GHG emissions from the sector in Poland³²⁹. As mentioned in the NECP, a long-term renovation strategy aiming to support the renovation of the national stock of residential and commercial buildings (public and private) has also been introduced in Poland.

³²⁴ Survey respondent.

³²⁵ National Energy & Climate Plan 2021-2030 (Poland), 2019, p.121.

³²⁶ LIFE PlanUp, 2021, PlanUp Virtual Final Conference - Report, What Fit for 55 means for National Energy and Climate Plans, p. 8, LIFE PlanUp, 2021, PlanUp Virtual Final Conference - Report, What Fit for 55 means for National Energy and Climate Plans.

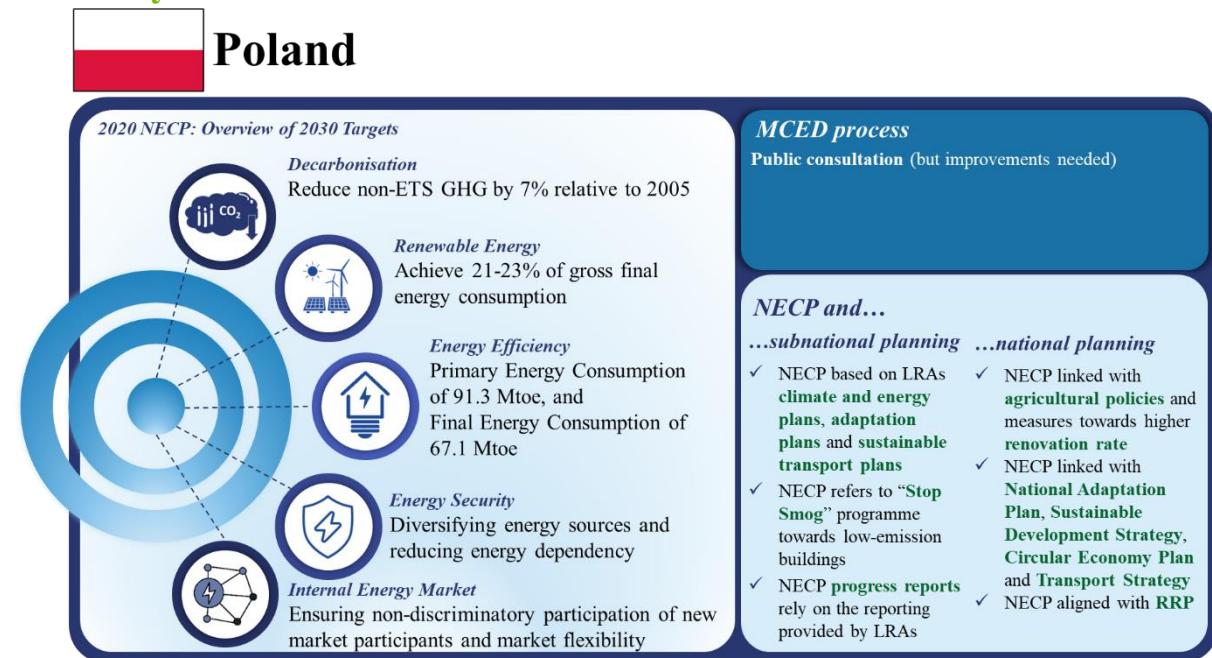
³²⁷ Survey respondent.

³²⁸ Survey respondent.

³²⁹ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 10.

Based on this strategy, the renovation rate should be 3.7 % per year by 2030³³⁰. Poland's NECP is also connected to the NAP, the sustainable development, circular economy and transport strategies³³¹. Poland's RRP builds on the 2021-2030 NECP and the national Energy Policy until 2040, an energy transition strategy adopted in February 2021³³². The RRP measures are coherent with the NECP and the Polish Energy Policy until 2040 and are expected to contribute to the decarbonisation and climate neutrality objectives³³³. The proposed measures should also contribute, *inter alia*, to meeting environmental targets for waste, pollution control and sustainable mobility³³⁴.

Summary



³³⁰ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 32; National Energy & Climate Plan 2021-2030 (Poland), 2019, p.89.

³³¹ Survey respondent.

³³² European Commission, 2021, Analysis of the recovery and resilience plan of Poland Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Poland, SWD(2022) 161 final, p.51.

³³³ Ibid, p.11, p.71.

³³⁴ Ibid, p.11.

3.22 Portugal

Overview of the plan

The box below summarizes the content of the 2020 Portuguese NECP³³⁵.

TOPIC	PORTUGUESE NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	17 % compared to 2005 for non-ETS sectors (45-55 % for total GHG emissions) by 2030.
<i>Renewable energy target</i>	47 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	The Portuguese contribution to the EU-level 2030 target amounts to 21.5 Mtoe of primary energy consumption , translating into 14.9 of final energy consumption .
<i>Energy security and internal energy market</i>	As to energy security , Portugal has set the objective of reducing energy import dependency to 65 % by 2030, which is considered a quite ambitious goal, since the current dependency amounts to 79 %. The target for interconnection level by 2030 is 15% . The focus is on implementing important infrastructure projects, particularly those considered projects of common interest, as well as reinforcing the grid to support additional capacity for renewable energy sources.
<i>Research, innovation and competitiveness</i>	Portugal's NECP sets a target to invest 3 % of its GDP in research and innovation by 2030. It has also established sub-targets for energy R&D investments of 0.2% of GDP, and water and climate R&I investments of 0.2% of GDP by 2030.

Analysis of MCED process

A public consultation of the NECP took place in May-June 2019; however, a summary of the public views from the consultations is not provided in the NECP. Moreover, Portugal failed to involve multiple stakeholders, including the general public in the drafting of the NECP³³⁶. Nonetheless, promoting dialogue and debate on national and local level is among the actions included in Portugal's NECP. According to the survey results, all kinds of stakeholders, including LRAs and citizens, are involved in the MCED through traditional stakeholder consultation. Stronger involvement of LRAs in revising the NECP is indicated by the survey respondents, compared to what happened with the first draft in 2018-19³³⁷.

An initiative called Adapt.local including a network of municipalities for local adaptation to climate change was introduced in December 2016 as a result of the ClimAdaPT Local project³³⁸. Promoting the creation of the Portuguese National Energy Council and leveraging the role of Local Energy and Climate Agencies are among the measures introduced in Portugal's NECP³³⁹. The

³³⁵ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Portugal, SWD(2020) 921 final, pp.3-4, and National Energy & Climate Plan 2021-2030 (Portugal), 2019.

³³⁶ LIFE PlanUp, 2019, Fit to lead? An assessment of selected 5 draft National Energy and Climate Plans, p.2.

³³⁷ Survey respondents.

³³⁸ LIFE NECPlatform, 2023, Report on good practices and interactive good practices map, p.35.

³³⁹ National Energy & Climate Plan 2021-2030 (Portugal), 2019, p.73.

NECPlatform project is expected to support six EU Member States, including Portugal, in setting up and managing permanent MCED Platforms, as mandated by Article 11 of the Climate and Energy Governance Regulation³⁴⁰.

Connection of NECP with subnational planning

Portugal's NECP promotes the role of Local Energy and Climate Agencies, since they are close to local agents and citizens, and are considered essential entities for promoting sustainable development in the area(s) where they are located³⁴¹. In particular, Portugal's NECP includes measures relevant to the involvement of municipalities including the **promotion of distributed energy generation and self-consumption, the decarbonisation of the local public building stock, the role of local energy and climate agencies, and the implementation of the National Strategy for Active Mobility 2020-2030**³⁴². However, the survey participants indicated that there is no connection between the NECP and subnational planning and that there is conflict between national government and LRAs with regard to the application of the NECP at political level regarding the social and the environmental impact of the measures³⁴³.

On another note, the NECP promotes a long-term strategy to fight **energy poverty**, along with local strategies on the same topic³⁴⁴. Additionally, Portugal is one of the 12 Member States that recognise local authorities' actions in the implementation of the energy and climate transition in their final NECPs³⁴⁵. However, in order to effectively participate in the national discussion of energy and climate policies, local authorities must overcome numerous obstacles. The absence of resources, technical expertise and training, intermunicipal communication, financial resources, and platforms for municipalities are among them. Additionally, they experience considerable instability due to the possibility that their political stances could alter over time³⁴⁶.

Since the adoption of the NECP, some municipalities have adopted their own municipal climate change **adaptation** plans (e.g. Aveiro, Maia, Leiria, among others) in line with the requirements of the Basic Climate Framework (Law n.º 98/2021, which sets obligations for the development of regional and municipal climate plans). Harmonisation and comparability of the Plans as well as coherence with national strategies will have to be ensured³⁴⁷.

³⁴⁰ LIFE NECPlatform, 2023, Report on good practices and interactive good practices map, p.4.

³⁴¹ National Energy & Climate Plan 2021-2030 (Portugal), 2019, p.73.

³⁴² Energy Cities, LIFE NECPlatform - Countries: Portugal, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

³⁴³ Survey respondents.

³⁴⁴ National Energy & Climate Plan 2021-2030 (Portugal), 2019, p.115-116.

³⁴⁵ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 5.

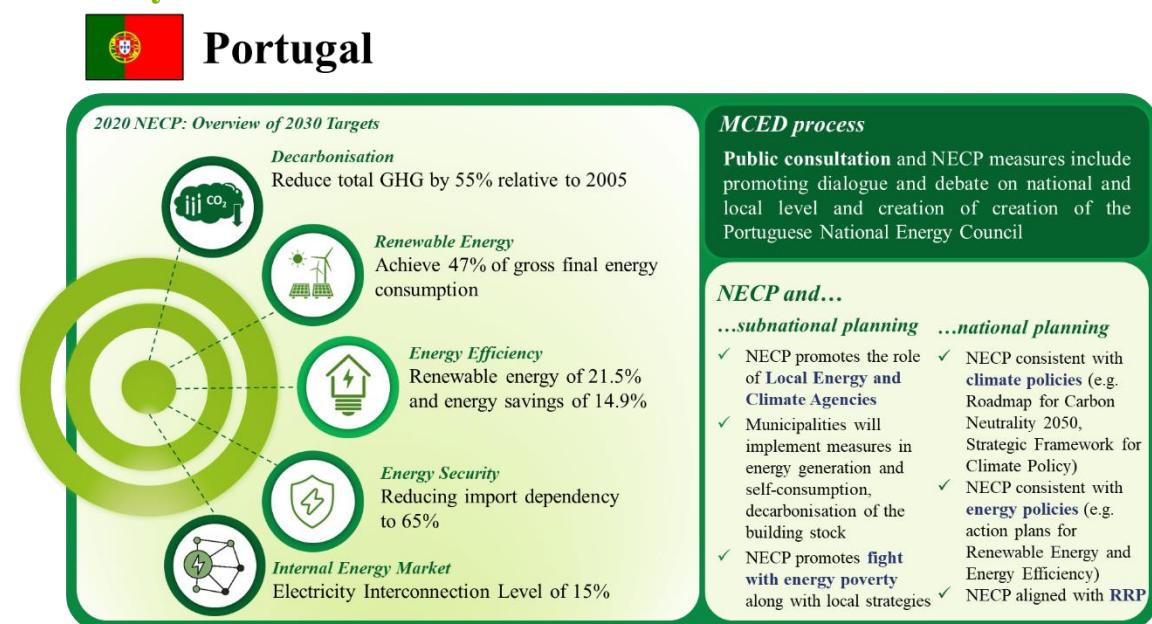
³⁴⁶ Energy Cities, LIFE NECPlatform - Countries: Portugal, n.d., <https://energy-cities.eu/project/necplatform-countries/>.

³⁴⁷ Survey results.

Integration of NECP in the national planning

Regarding the connection of the NECP with the national long-term strategy, it is considered that Portugal achieved a respectable level of consistency in its energy and climate policy, as the NECP is in line with the objectives of the country's long-term strategy³⁴⁸. The NECP was developed in cooperation with the tasks of the Roadmap for Carbon Neutrality 2050 which forms the long-term development strategy for low GHG emissions in Portugal³⁴⁹. Portugal has also introduced a Strategic Framework for Climate Policy under the 2030 Horizon, along with the National Programme on Climate Change which identifies guidelines for policies and measures capable of ensuring compliance with the new emission reduction goals for 2020 and 2030, and the National Strategy for Adaptation to Climate Change³⁵⁰. Regarding renewable energy and energy efficiency, Portugal currently has a National Action Plan for Renewable Energy and a National Action Plan for Energy Efficiency mentioned in the NECP³⁵¹. The RRP is expected to contribute to the green transition and environmental protection in Portugal as 38 % of the plan's total allocation will support objectives for decarbonisation and long-term climate neutrality³⁵². However, stakeholders found some inconsistencies between Portugal's RRP and NECP³⁵³.

Summary



³⁴⁸ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 34.

³⁴⁹ National Energy & Climate Plan 2021-2030 (Portugal), 2019, pp.23-24.

³⁵⁰ Ibid, p.24.

³⁵¹ Ibid, pp.24-25.

³⁵² European Commission, 2021, Summary of the assessment of the Portuguese recovery and resilience plan, p.2; European Commission, 2021, Analysis of the recovery and resilience plan of Portugal Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Portugal, SWD(2021) 146 final, pp.4, 44, 76-77, 78, 81.

³⁵³ LIFE PlanUp, 2021, Webinar on "How green are the national recovery plans?": A cross-check of 10 draft National Recovery and Resilience Plans and National Energy & Climate Plans, p. 9.

3.23 Romania

Overview of the plan

The box below summarizes the content of the 2020 Romanian NECP³⁵⁴.

TOPIC	ROMANIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	2 % compared to 2005 for non-ETS sectors by 2030.
<i>Renewable energy target</i>	30.7 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Romania aims to contribute to the collective 2030 EU target with 23.3 Mtoe for primary energy consumption and 25.7 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	On energy security , Romania is aiming to decrease its energy dependency to 68 % by 2030. Regarding the internal energy market , the planned interconnection level by 2030 is 15.4 %
<i>Research, innovation and competitiveness</i>	Romania does not yet have national objectives and funding targets in research, innovation and competitiveness for after 2020.

Analysis of MCED process

Romania enabled the public and stakeholders, such as LRAs, regional and local energy agencies, businesses, NGOs, and social partners³⁵⁵, **to participate in public consultations** on the draft and the final NECP (although citizen participation was weak)³⁵⁶. **However, the timeframe for public participation was very limited (ranging from 10 days to three weeks)**³⁵⁷ and LRAs have only been involved through networks of LRAs and they are asked to comment on the draft when it is ready (if at all consulted)³⁵⁸.

The PlanUP project notes that given the complexity and strategic importance of NECPs, such a short timeframe cannot be considered as reasonable to inform and allow for sufficient time for the public to participate and express its views. Holding public consultations on NECPs just before submitting them, as in the case of Romania, cannot ensure that the views of the public can be properly taken into account in the NECPs. Romania furthermore only provided a summary of the views, lacking detail on how they were taken on board in the final plan³⁵⁹. It is noted there was a general lack of transparency, without a dedicated accessible website to provide feedback and there was an absence of a multi-level dialogue³⁶⁰.

³⁵⁴ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Romania, SWD(2020) 922 final, p.3, and National Energy & Climate Plan 2021-2030 (Romania), 2021.

³⁵⁵ National Energy & Climate Plan 2021-2030 (Romania), 2021, p. 31.

³⁵⁶ Survey results.

³⁵⁷ LIFE PlanUp, 2019, Fit to succeed? An assessment of the Romanian draft energy and climate plan.

³⁵⁸ Survey results.

³⁵⁹ LIFE PlanUp, 2021, Fit for Flop/55: Lessons from the National Energy and Climate Plans to achieve a climate-neutral Europe.

³⁶⁰ LIFE PlanUp, 2019, Fit to succeed? An assessment of the Romanian draft energy and climate plan, p.2.

Connection of NECP with subnational planning

The NECP recognises the role of LRAs and cites good practices at the local level. Most of the good practices of the Romanian NECP are in the energy domain. Some Romanian cities take part in EU initiatives, such as ‘Smart Cities’ and the Covenant of Mayors³⁶¹. As a result, for example, Bucharest and Cluj-Napoca have smart city strategies with several projects focused on the production of heat from renewable sources, using photovoltaic panels, heat solar panels or biomass³⁶². In terms of waste management, a good example is given in Cluj-Napoca City, where under a pilot demonstration project under a Horizon 2020 project, the residual heat from a local factory will be recovered and introduced into the district heating system of the city to heat households, which results in substantial GHG savings³⁶³. In Bucharest, parking is free in public areas for electrical and hybrid vehicles.³⁶⁴ Furthermore, local public administrations, specifically municipalities with a population of over 5 000 inhabitants, are required to develop an annual Energy Efficiency Improvement Programme. This programme aims to enhance energy efficiency and address climate-related issues. Municipalities with over 20 000 inhabitants have additional obligations. They must develop the same Energy Efficiency Improvement Programme and enter into an energy management contract. The contract is made with a certified individual or a legal entity providing energy services as approved by the law³⁶⁵.

Integration of NECP in the national planning

The Romanian NECP is connected to the NAS, the national sustainable development and transport strategies³⁶⁶. The measures in the RRP are expected to support the decarbonisation and energy transition objectives, which is in line with the NECP. The RRP includes reforms to phase out coal and lignite power production, which is key for decarbonizing the energy sector and promoting renewable energy deployment. It also promotes sustainable transport through road decarbonisation, green taxation, incentives for zero-emission vehicles, modal shift to railways and water transport, and road safety measures. Energy efficiency in buildings is another common focus both in the RPP and NECP.

³⁶¹ Energy Cities, 2020, Is the key role of local authorities acknowledged?

³⁶² National Energy & Climate Plan 2021-2030 (Romania), 2021, p. 60.

³⁶³ Ibid, p. 84.

³⁶⁴ Ibid, p. 93.

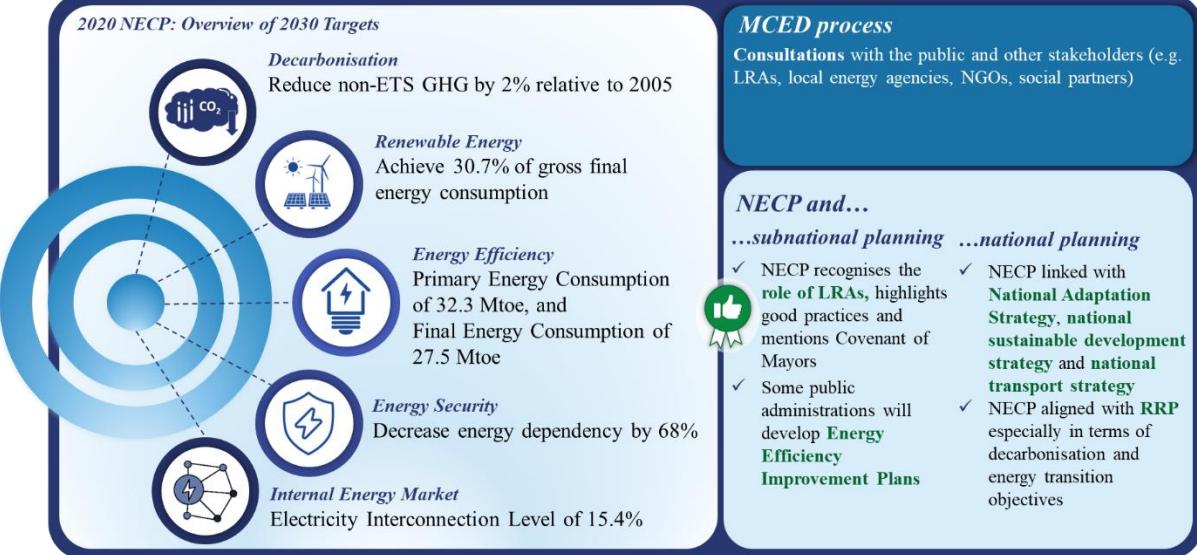
³⁶⁵ LIFE NECPlatform, 2023, Report on good practices and interactive good practices map, p. 40.

³⁶⁶ Survey results.

Summary



Romania



3.24 Slovakia

Overview of the plan

The box below summarizes the content of the 2020 Slovak NECP³⁶⁷.

TOPIC	SLOVAK NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	20 % compared to 2005 for non-ETS sectors (70% for total GHG emissions) by 2030.
<i>Renewable energy target</i>	19.2 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	Slovakia aims to contribute to the collective 2030 EU target with 15.7 Mtoe for primary energy consumption and 10.3 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	Slovakia acknowledges in its plan the importance of diversification and reducing energy dependency as critical areas to focus on, but the plan does not specify any specific objectives for energy security. Regarding the internal energy market, the NECP sets an electricity interconnection level of 52 % by 2030 .
<i>Research, innovation and competitiveness</i>	On research, innovation and competitiveness, Slovakia identifies the key funding gaps without translating them into national objectives

Analysis of MCED process

The Slovak NECP draws heavily upon its 2014 national energy policy, which outlines the energy sector's priorities until 2035³⁶⁸. During the plan's preparatory phase, the Ministry of Economy took the lead in facilitating **discussions among various government departments and engaging stakeholders**, including energy sector companies and professional associations. LRAs were invited to provide their views on the development of 'strategy papers', as well as on specific regional projects. For instance, the Upper Nitra Development Action Plan³⁶⁹, underwent a discussion process with the Trenčín self-governing region, the Association of Towns and Municipalities of Upper Nitra, and other interested regional authorities before approval by the Slovak government could be obtained³⁷⁰. In a second step, the draft NECP underwent public consultation, although Slovakia did not provide a summary of the consultation results or clarify how they were integrated into the NECP³⁷¹.

Connection of NECP with subnational plans

The Slovak NECP does not establish significant links with subnational plans in the fields of energy and climate. The challenges faced by LRAs are only

³⁶⁷ Sources: European Commission, 2020, Assessment of the final national energy and climate plan of Slovakia, SWD(2020) 924 final, p.4, and Integrated National and Climate Plan for 2021 to 2030 (Slovakia), 2019, p.18.

³⁶⁸ Assessment of the final national energy and climate plan of Slovakia, SWD (2020) 924 final, p.4.

³⁶⁹ For one of the three pilot regions of the new Platform for Coal-Mining Regions in Transformation launched by the European Commission. See Integrated National and Climate Plan for 2021 to 2030 (Slovakia), 2019, p.36.

³⁷⁰ Ibid, p.36.

³⁷¹ Assessment of the final national energy and climate plan of Slovakia, SWD (2020) 924 final, p.4.

sporadically addressed for specific sectors, such as heating and cooling, which are considered essential to achieving the renewable energy target by 2030³⁷². Nevertheless, Slovakia's final plan showcases a noteworthy example of good practice, **the 'network of regional energy centres' dedicated to sustainability**. The measure aims to promote energy efficiency and renewable energy development at various local administrative levels (e.g. in regions, districts, self-governments and higher territorial units). Regional energy managers will be responsible for monitoring energy consumption in public and state buildings and identifying opportunities for energy savings and renewable energy development³⁷³. It is recognised by the Commission as an important step towards further integration of the NECP into subnational plans³⁷⁴.

Integration of NECP in the national planning

Slovakia's plan establishes significant links between the development of its NECP and other national policies and strategies. The NECP recognises Slovakia's NAS and, although it does not currently define sectoral targets, these are expected to be defined when the relevant adaptation action plan is implemented³⁷⁵. In addition, the NECP's commitment to achieving climate neutrality is closely linked to Slovakia's Low-Carbon 2050 Strategy, approved in February 2020³⁷⁶. Furthermore, the NECP is in line with Slovakia's National Economic Policy Strategy for 2030, which acknowledges the potential of the circular economy in reducing GHG emissions. In terms of renewable energy investments, the Slovak NECP provides detailed information on investment needs related to key policy measures such as the National Action Plan for Renewable Energy³⁷⁷. The RRP aligns well with the NECP as most of the priority areas of the NECP, decarbonising industry, transport, and buildings, overlap with those of the RRP, while also integrating measures to foster climate adaptation³⁷⁸.

³⁷² Energy Cities, 2020, Is the key role of local authorities acknowledged?, p.18.

³⁷³ Integrated National and Climate Plan for 2021 to 2030 (Slovakia), 2019, p.118.

³⁷⁴ Assessment of the final national energy and climate plan of Slovakia, SWD (2020) 924 final, p.4.

³⁷⁵ Ibid, p.8.

³⁷⁶ Ibid. p.8.

³⁷⁷ Integrated National and Climate Plan for 2021 to 2030 (Slovakia), 2019, pp.84-85.

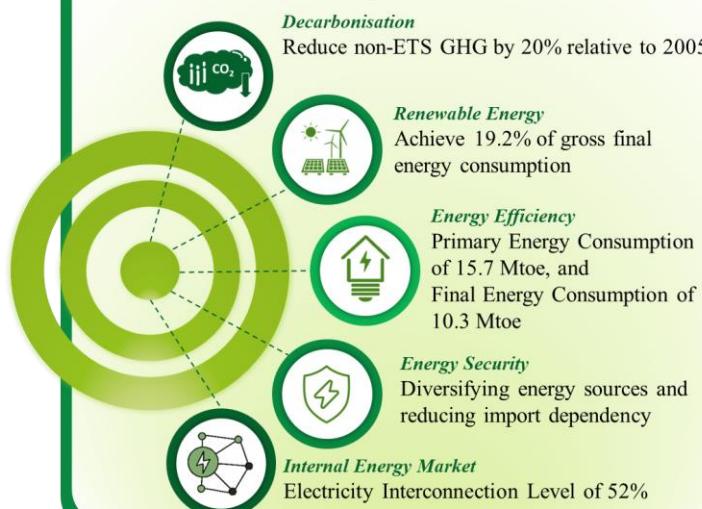
³⁷⁸ European Commission, 2021, Analysis of the recovery and resilience plan of Slovakia Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Slovakia, SWD/2021/161 final, p.46.

Summary



Slovakia

2020 NECP: Overview of 2030 Targets



MCED process

Public consultation and **discussions** among various government departments and engaging stakeholders such as energy sector companies, professional associations and LRAs

NECP and...

...subnational planning

- ✓ NECP refers to the « network of regional energy centres » dedicated to sustainability to promote energy efficiency and renewable energy development at various local administrative levels

...national planning

- ✓ NECP consistent with National Adaptation Strategy, Low-Carbon 2050 Strategy, National Economic Policy Strategy for 2030, and National Action Plan for Renewable Energy
- ✓ NECP overlap with RRP

3.25 Slovenia

Overview of the plan

The box below summarizes the content of the 2020 Slovenian NECP³⁷⁹.

TOPIC	SLOVENIAN NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	20 % compared to 2005 for non-ETS sectors (70% for total GHG emissions) by 2030.
<i>Renewable energy target</i>	27 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	The national contribution to the 2030 EU-wide energy efficiency target is of 6.4 Mtoe for primary energy consumption, and 4.7 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	Regarding the energy security objectives, Slovenia aims to produce at least 75 % of its electricity supply from national sources by 2030, and to maintain or improve the present reliability level of its electricity supply. As regards the internal energy market , Slovenia aims to improve the electricity distribution network's resilience to disruptions and support the implementation of pilot projects on the production of synthetic methane and hydrogen.
<i>Research, innovation and competitiveness</i>	Targets are set in relation to research, innovation and competitiveness, including clean energy technologies and innovation projects.

Analysis of MCED process

Regarding the drafting of the NECP, this strategic document was submitted to both **public and local communities' consultation**³⁸⁰; however, Slovenia has not submitted a summary of the public's views and of how those views have been taken into account in its final plan³⁸¹. Furthermore, Slovenia is in general invited to better exploit the potential of the MCED³⁸² and to improve the governance framework by ensuring cross-sectoral coordination and clearly defining responsibilities and accountability, since it will be crucial to ensure that climate action is properly organised and coordinated³⁸³. This is necessary also because there are restrictions affecting the introduction of energy from renewable energy sources: there are specific environmental constraints, since around 35 % of the Slovenian national territory is part of Natura 2000; in addition, some local communities, the general public and parts of the non-governmental sector oppose themselves to the continued use and new installations of hydro-electric power and

³⁷⁹ Sources: Integrated National Energy and Climate Plan of the Republic of Slovenia, p. 18-20, and European Commission, 2020, Assessment of the final national energy and climate plan of Slovenia, SWD(2020) 923 final, p. 2.

³⁸⁰ Assessment of the final national energy and climate plan of Slovenia, SWD(2020) 923 final, p. 4 and Integrated National Energy and Climate Plan of the Republic of Slovenia, 2019, p. 24.

³⁸¹ Assessment of the final national energy and climate plan of Slovenia, SWD(2020) 923 final, p. 4.

³⁸² Ibid, p. 17.

³⁸³ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 33.

wind energy projects³⁸⁴. A respondent to the survey pointed out that there should have been more effort to raise awareness among municipalities on the importance and role of the NECP and on the role of cities; however, for the consultation of the last version of the NECP, thanks to the collaboration with the Covenant of Mayors, a special meeting for municipalities will be organised for the presentation of the NECP and the collection of comments³⁸⁵.

Connection of NECP with subnational planning

Although there is an absence of reference to concrete subnational climate or energy plans, **the NECP mentions LRAs mainly concerning heating and transport and awareness-raising campaigns**³⁸⁶. For this last aspect, a good practice example is the objective to inform and raise awareness: Slovenia wants to draw up and carry out a comprehensive national promotion and literacy campaign on the importance and mode of transition to a climate-neutral society through the organisation of thematic events in schools, universities and local communities³⁸⁷. In relation to heating and cooling, the NECP aims at creating a heat map and establishing a uniform and up-to-date collection of databases and necessary tools to support local planning; establishing an information platform for building and renovation stakeholders that would significantly contribute to the successful implementation of a long-term renovation strategy and the reduction of energy poverty³⁸⁸. Regarding transport, the Slovenian NECP aims to continue and accelerate the implementation of the integrated transport planning at the local and regional level with a regional level of mobility management (an existing sustainable transport instrument that could be beneficial for the implementation of the NECP)³⁸⁹. Finally, in the ‘proposal for additional measures to promote electricity generation from RES’, Slovenia mentions establishing a scheme to promote the development of local energy communities and the willingness to provide technical and human resources’ support for the implementation of this scheme and other projects at the local level³⁹⁰.

Integration of NECP in the national planning

Apart from appropriate links done by the NECP with the electricity emergency plan³⁹¹, the NECP does not seem to be well integrated with other national plans. In its 2020 assessment, the Commission states that – notwithstanding several references to the circular economy as a concept – the NECP fails to mention the

³⁸⁴ Assessment of the final national energy and climate plan of Slovenia, SWD(2020) 923 final, p. 9 and Integrated National Energy and Climate Plan of the Republic of Slovenia, 2019, p. 43-44.

³⁸⁵ Survey respondent.

³⁸⁶ Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 18-19.

³⁸⁷ Integrated National Energy and Climate Plan of the Republic of Slovenia, 2019, p. 106 and Assessment of the final national energy and climate plan of Slovenia, SWD(2020) 923 final, p. 6.

³⁸⁸ Integrated National Energy and Climate Plan of the Republic of Slovenia, 2019, p. 104.

³⁸⁹ Ibid., p. 95.

³⁹⁰ Ibid., p. 84.

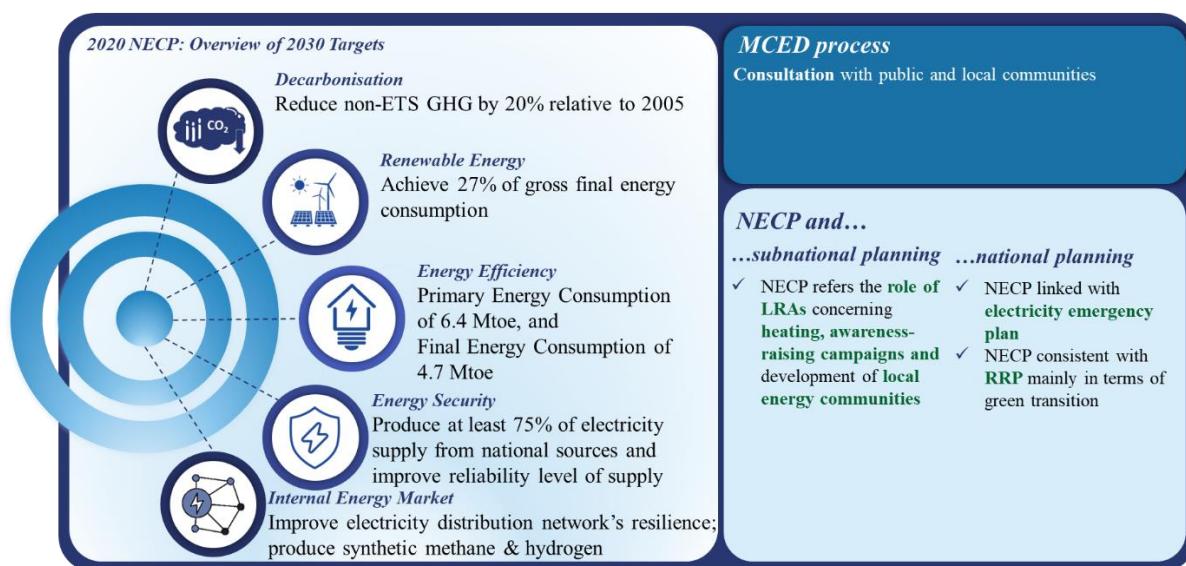
³⁹¹ Assessment of the final national energy and climate plan of Slovenia, SWD(2020) 923 final, p. 11.

national roadmap towards the circular economy or other key circular economy documents³⁹²; therefore, the integration is not clear. Moreover, it adds that the NECP has very limited information on interactions with biodiversity policies, trade-offs and synergies³⁹³. A LIFE project affirmed that clear mismatches are identified between the 2030 targets set in the NECP and climate neutrality 2050 targets set in the national long-term strategy³⁹⁴. For instance, in the transport sector, emissions are expected to increase by 12 % by 2030 in the NECP, while the national long-term strategy proposes very steep emission reductions by 2050 (90 – 99 %)³⁹⁵. Regarding the connection with the RRP, the Commission affirmed that it is consistent with the NECP, and it should contribute to the green transition and achieve the 2050 climate neutrality objective, and the 2030 energy and climate targets³⁹⁶. However, during a LIFE PlanUP Webinar, it was affirmed that the consistency between the RRP and the NECP has been found limited in transport, and partial on measures for agriculture and buildings³⁹⁷.

Summary



Slovenia



³⁹² Ibid., p. 14.

³⁹³ Ibid.

³⁹⁴ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 10.

³⁹⁵ Ibid, p. 34.

³⁹⁶ European Commission, 2021, Analysis of the recovery and resilience plan of Slovenia Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Slovenia, SWD/2021/184 final.

³⁹⁷ LIFE PlanUp, 2021, Webinar on “How green are the national recovery plans?”: A cross-check of 10 draft National Recovery and Resilience Plans and National Energy & Climate Plans, p. 9.

3.26 Spain

Overview of the plan

The box below summarizes the content of the 2020 Spanish NECP³⁹⁸.

TOPIC	SPANISH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	26 % compared to 2005 for non-ETS sectors (23% for total GHG emissions compared to 1990) by 2030.
<i>Renewable energy target</i>	42 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	The national contribution to the 2030 EU-wide energy efficiency target is set at 39.5 %, which implies a contribution of 98.5 Mtoe for primary energy consumption and 73.6 Mtoe for final energy consumption .
<i>Energy security and internal energy market</i>	In the context of energy security , Spain aims to reduce the level of foreign energy dependency from 74 % in 2017 to 61 % in 2030. Regarding the internal energy market , the NECP contains steps to address market integration (including reforming the electricity market), the development of tariff deficits in the electricity and gas sectors, and the potential impact of the NECP measures.
<i>Research, innovation and competitiveness</i>	Spain intends to substantially boost its investment in research, innovation, and competitiveness, potentially doubling it to reach 2.5% of GDP annually. The plan acknowledges important objectives in energy, climate, and transport for R&I but does not provide specific timelines or quantified targets.

Analysis of MCED process

The Spanish NECP recognises the importance of LRAs' actions in the implementation of the NECP by stating that coordination between the different level of governance will play a crucial role in the energy transition³⁹⁹. This is strictly linked to the model of distribution of competences in Spain, in which the General State Administration, the Autonomous Communities and the Local Entities share competences in different areas (including those relevant to energy and climate)⁴⁰⁰. **While the role of LRAs in the implementation of the NECP is elaborated (see below), there is limited information on how they were consulted during its preparation.** In the survey, conflicting answers were given: some affirmed that LRAs were not consulted; others that events were organised, such as seminars, roundtables, a Climate Change Policy Coordination Commission and a National Climate Council, where the Spanish Federation of Municipalities and Provinces has representation; others that LRAs contributed to the national strategy with regional/local plans, under the coordination or with the support of the national authority. Mixed replies were given also with regard to the

³⁹⁸ Sources: Plan Nacional Integrado de Energía y Clima 2021-2030 – Spain, 2020, and European Commission, 2020, Assessment of the final national energy and climate plan of Spain, SWD(2020) 908 final.

³⁹⁹ Plan Nacional Integrado de Energía y Clima 2021-2030 – Spain, 2020, p. 55. See also Energy Cities, 2020, Is the key role of local authorities acknowledged?, p. 19.

⁴⁰⁰ Plan Nacional Integrado de Energía y Clima 2021-2030 – Spain, 2020, p. 55.

quality of the consultation process, rated from ‘very poor’ so ‘satisfactory’⁴⁰¹. Although the NECP stated a willingness to establish a structured MCED for the implementation of the measures there is no information yet on progress or how the MCED would work⁴⁰².

Connection of NECP with subnational planning

The LRA’s involvement in the NECP implementation is clear throughout the document. The NECP has several tables which illustrate the actions and measures planned for specific objectives. In most of these tables, under the paragraph ‘Responsible authorities’, Autonomous Communities are mentioned together with the Ministry for Ecological Transition and Demographic Challenge⁴⁰³. A practical example can be spotted in the context of **the mobility and transport sector**. To reduce GHG emissions, the NECP aims to create low-emission zones in cities with more than 50 000 inhabitants, this measure will be included in the SUMPs and its implementation will be promoted through public support programmes to be carried out by local authorities⁴⁰⁴. However, the PlanUP project points out that not enough details were provided in the NECP especially on the development, implementation and financing of the measure⁴⁰⁵. The NECP plans also to provide instruments of support and collective financing to municipalities (to make them strategic advisors for citizens and promote associations or partnerships between municipalities and citizen groups)⁴⁰⁶ and proposes a regulatory development to **promote energy communities**⁴⁰⁷. In the survey, several respondents stated that the financial resources allocated to LRAs do not match their responsibilities to meet the targets. The specific issues raised were misalignment as obligations and objectives are assigned to local entities, but economic resources are distributed among regional governments (i.e. the Autonomous Communities), and insufficiency of the resources available⁴⁰⁸.

It should be noted that Spain is currently implementing **the project CitiES2030** (although this started after the notification of the final NECP). This **multilevel governance initiative** brings together the seven mission cities in Spain, the Ministry of the Ecological Transition, Fundacion Biodiversidad, and a number of

⁴⁰¹ Survey results.

⁴⁰² LIFE PlanUp, 2021, Fit for Flop/55: Lessons from the National Energy and Climate Plans to achieve a climate-neutral Europe, p. 11 and LIFE PlanUp, 2019, Fit to succeed? An assessment of the Spanish draft energy and climate plan, p. 14.

⁴⁰³ See, inter alia, Plan Nacional Integrado de Energía y Clima 2021-2030 – Spain, 2020, pp. 104, 115, 136, 145, 170 etc.

⁴⁰⁴ Plan Nacional Integrado de Energía y Clima 2021-2030 – Spain, 2020, p. 135.

⁴⁰⁵ LIFE PlanUp, 2021, Fit for Flop/55: Lessons from the National Energy and Climate Plans to achieve a climate-neutral Europe, p. 14.

⁴⁰⁶ Plan Nacional Integrado de Energía y Clima 2021-2030 – Spain, 2020, p. 107.

⁴⁰⁷ Assessment of the final national energy and climate plan of Spain, SWD(2020) 908 final, p. 6 and LIFE PlanUp, 2019, Fit to succeed? An assessment of the Spanish draft energy and climate plan, p. 10.

⁴⁰⁸ Survey respondents.

other cities, entities and stakeholders (similar to the Swedish Viable Cities)⁴⁰⁹. This is a platform for innovation and collaboration aimed at providing services to Spanish cities that aspire to be climate neutral by 2030⁴¹⁰. A recent LIFE project underlined the importance of having an all-government approach and a clear and coherent commitment of all levels to achieve results for ambitious climate action; in a decentralised country such as Spain, it is thus important that all Autonomous Communities approve and apply updated climate and energy laws and plans and that the revised NECP will include progress indicators for municipal action⁴¹¹.

Integration of NECP in the national planning

The NECP measures are well coordinated with air policy and have a well-established link with the NAPCP⁴¹². The NECP was drafted before the approbation of the new NAP, but it already provided detailed information on how climate change risks might affect the energy supply, in relation to the new adaptation plan⁴¹³. More details are expected in the new NECP. The NECP mentions the transition to a resource-efficient, circular and low-carbon economy and states that it is complemented by the Circular Economy Strategy adopted in 2019⁴¹⁴. The Unify project urged Spain to better align the NECP with the Strategic Plan for Agriculture, to ensure the reduction of emissions and the protection and enhancement of natural carbon sinks⁴¹⁵. Apart from this specificity, the same project considered Spain a good practice example regarding the need for joint development of key strategies and legislation. This is because, in Spain, climate and energy targets of different strategic documents (such as the NECP, the national Long-Term Strategy and the Climate Law) were approved in the same period and political context, and this has ensured good coherence between the 2030 targets, the measures envisaged to achieve them and the short- and long-term decarbonisation path⁴¹⁶. In the survey, several respondents confirmed the synergies between the NECP and other national plans on adaptation, sustainable development, circular economy and transport⁴¹⁷. Regarding the RRP, Spain has dedicated the largest share of its recovery budget to the green transition⁴¹⁸ and welcomed the opportunity to accelerate and increase the share of public

⁴⁰⁹ LIFE NECPlatform, 2023, Report on good practices and interactive good practices map, p. 50.

⁴¹⁰ Ministerio para la Transición Ecológica y el Reto Demográfico, 2022, MITECO pone en marcha una plataforma para ayudar a las ciudades españolas a avanzar hacia la neutralidad climática, https://www.miteco.gob.es/es/prensa/ultimas-noticias/detalle_noticias.aspx?tcm=30-546634#prettyPhoto.

⁴¹¹ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, pp. 37-38.

⁴¹² Assessment of the final national energy and climate plan of Spain, SWD(2020) 908 final, pp. 3 and 13.

⁴¹³ Ibid., pp. 8 and 13.

⁴¹⁴ Plan Nacional Integrado de Energía y Clima 2021-2030 - Spain, 2020, p. 22.

⁴¹⁵ LIFE Unify, 2022, Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security, p. 7.

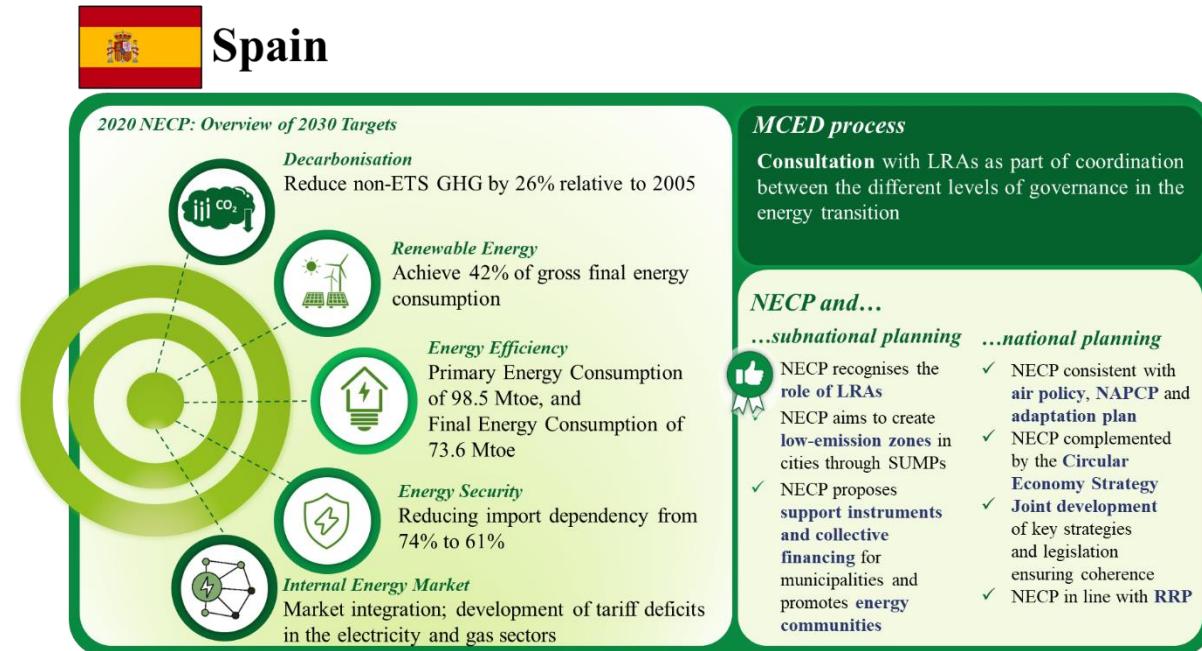
⁴¹⁶ Ibid., p. 10.

⁴¹⁷ Survey respondents.

⁴¹⁸ LIFE PlanUp, 2021, A Chance for a Greener Future: Recommendations for the post-Covid recovery plans of Italy, Spain, Hungary, Poland and Romania, p. 42.

investments in the NECP⁴¹⁹. In its RRP assessment, the Commission stated that the RRP is expected to contribute to the green transition and that it provides a detailed justification for its consistency with the NECP⁴²⁰.

Summary



⁴¹⁹ LIFE PlanUp, 2020, Planning for 2030 – EU and Member States' experiences with the first NECP cycle, p. 2.

⁴²⁰ European Commission, 2021, Analysis of the recovery and resilience plan of Spain Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Spain, SWD/2021/147 final.

3.27 Sweden

Overview of the plan

The box below summarizes the content of the 2020 Swedish NECP⁴²¹.

TOPIC	SWEDISH NECP TARGETS AND MEASURES – 2020 version
<i>GHG reduction target(s)</i>	59 % compared to 2005 for non-ETS sectors (70% for total GHG emissions) by 2030.
<i>Renewable energy target</i>	65 % of renewable energy in gross final energy consumption by 2030.
<i>Energy efficiency target</i>	The national contribution to the 2030 EU-wide energy efficiency target is 40.16 Mtoe for primary energy consumption , and 29.67 Mtoe for final energy consumption ; corresponding to a target of a 50 % improvement in primary energy intensity by 2030 compared to 2005.
<i>Energy security and internal energy market</i>	To maintain energy security , the plan focuses on well-integrated and functioning energy markets and describes measures to increase system resilience given the planned increase in renewables. Regarding the internal energy market , Sweden projects to achieve a degree of interconnectivity of 27 % in 2030.
<i>Research, innovation and competitiveness</i>	The NECP includes various funding programmes for energy and climate research up to 2027 but does not include national objectives or funding targets relating to research, innovation, and competitiveness.

Analysis of MCED process

The draft NECP was submitted to public consultation, including LRAs, business/industry organisations, NGOs, research and academic institutions, and national authorities such as the Swedish Energy Agency, the Swedish Transport Agency and the Swedish environmental protection agency⁴²². Citizens' engagement was very low, also because Sweden in general is characterised by a top-down governance⁴²³. What is most important in Sweden is that the NECP is largely based on national strategies for which extensive stakeholder consultations were held⁴²⁴. LRAs had an indirect impact on the NECP because they were strongly involved at the stage of policy planning (in particular the long-term Climate Policy Framework planning), that became the base for the NECP⁴²⁵. More precisely, the development of a proposal for the long-term Climate Policy Framework was performed by a committee involving different types of stakeholders, including citizens and LRAs⁴²⁶. Even though this framework did not specify how responsibilities between the national level and LRAs are shared for

⁴²¹ Sources: Sweden's Integrated National Energy and Climate Plan, and European Commission, 2020, Assessment of the final national energy and climate plan of Sweden, SWD(2020) 926 final.

⁴²² Assessment of the final national energy and climate plan of Sweden, SWD(2020) 926 final and Survey respondents.

⁴²³ Survey respondents.

⁴²⁴ LIFE PlanUp, 2019, Fit to lead? An assessment of selected draft EU energy and climate plans, p. 2. Confirmed in the survey.

⁴²⁵ Ibid., p. 29

⁴²⁶ See Sweden's Integrated National Energy and Climate Plan, 2020, p. 11 et seq.

its implementation, LRAs could play a key role in the overall drafting process⁴²⁷. According to survey respondents, an MCED is not necessary since the NECP is considered more as a means of communication with the Commission, compiling the national ambitions; more specific strategies and plans are submitted to consultations. In contrast, other respondents reported that the consultation process held in 2019 was very poor and lower governance levels, such as municipalities, have been engaged too little and too late in the process. Nonetheless, the consultation held for the last version of the NECP was characterised by a stronger involvement of municipalities in the revision phase, since 1 of the 21 County Administrative Boards in Sweden was appointed to design and implement a series of dialogue meetings with municipalities, regions and other relevant actors to investigate challenges and opportunities for climate transition at local and regional level⁴²⁸.

Connection of NECP with subnational planning

Regarding the implementation of the NECP, the **plan refers several times to opportunities for providing financial and technical support for local authorities**. For instance, it mentions the **Klimatkлив (Climate Leap)**, an **investment support initiative** whose funds have to be used primarily to reduce GHG emissions. This initiative helps municipalities in investing (inter alia) in charging infrastructure for electrical vehicles, switching to biofuels and district heating, cycle lanes and other cycling infrastructure⁴²⁹. Moreover, all municipalities can provide basic local energy and climate advice to households, companies, housing associations and organisations through their energy and climate advisory services; they can also sometimes run a more comprehensive energy and climate advisory service thanks to the additional financial support from the Swedish Energy Agency⁴³⁰. Survey respondents agree on the fact that the NECP provides technical support and financial support (from national and EU funds) for the implementation of measures at the local level; however, the financial resources do not match the responsibilities of the local level to meet the targets⁴³¹.

As already mentioned above, the NECP recognises the strong involvement of LRAs in contributing to policy planning⁴³². The most concerned authorities are the county councils, which are essential for the planning and implementation of the **National Climate Change Adaptation Strategy** (strongly linked with the

⁴²⁷ LIFE PlanUp, 2019, Report on Good Practices in Energy and Climate Governance, p. 33.

⁴²⁸ Survey results.

⁴²⁹ Sweden's Integrated National Energy and Climate Plan, p. 67 and Assessment of the final national energy and climate plan of Sweden, SWD(2020) 926 final, p. 13.

⁴³⁰ Sweden's Integrated National Energy and Climate Plan, pp.46 and p. 90.

⁴³¹ Survey respondents.

⁴³² LIFE PlanUp, 2019, Fit to lead? An assessment of selected draft EU energy and climate plans, p. 29.

NECP)⁴³³; more precisely, the Swedish Government gives the 21 county councils the task of initiating, supporting and monitoring climate change adaptation in their respective areas of responsibility, for example by preparing action plans⁴³⁴. The county councils also have other responsibilities that are interconnected with the NECP, such as preparing regional plans for infrastructure for electric vehicles and renewable fuels and leading and coordinating the development of new long-term regional energy and climate strategies⁴³⁵.

However, in the survey, the connection between the NECP and subnational was rated as ‘poor’ and a conflict between the national climate policies and the regional and local climate and energy goals was pointed out. This is caused, *inter alia*, by lack of environmental taxation, misguided subventions and lack of local mandate to implement local measures for the transport and energy sector⁴³⁶.

Another **subnational project** that may be important for the implementation of the NECP is **Viable Cities**⁴³⁷; however, as the NECP does not refer directly to this bottom-up programme, it is not clear how the link between this project and the NECP itself works. Following this project, each year in December Viable Cities members meet and sign a yearly contract; the project aims to set a common objective of neutrality by 2030 and come up with a comprehensive cross-sectoral, cross-area and multi-level methodology to reach it⁴³⁸. Interestingly, the European Commission designated this Swedish programme as the official pilot for the EU-wide climate neutral cities’ programme part of Horizon Europe (Cities2030)⁴³⁹, after learning about the initiative and having a similar mission-driven approach in mind⁴⁴⁰.

Integration of NECP in the national planning

Thanks to the role of the county councils mentioned above, and other competent authorities at national level, the NECP is also well integrated with the national adaptation strategy⁴⁴¹. The plan also provides good interactions with air quality and air emissions’ policy and makes links to the NAPCP⁴⁴². Sweden also provides a national framework for achieving the NECP objectives, composed of strategic policies and acts such as the Climate Act, which sets legally binding long-term

⁴³³ As stated by the Commission “The NECP does not clearly set out climate adaptation goals, but it does provide extensive information on how adaptation is factored into the action plans for different sectors and regions” – See Assessment of the final national energy and climate plan of Sweden, SWD(2020) 926 final, p. 2.

⁴³⁴ Sweden’s Integrated National Energy and Climate Plan, p. 70

⁴³⁵ Sweden’s Integrated National Energy and Climate Plan, pp. 52 and 89.

⁴³⁶ Survey respondents.

⁴³⁷ Viable cities, n.d., <https://en.viablecities.se/>.

⁴³⁸ LIFE NECPlatform, 2023, Report on good practices and interactive good practices map, p. 50.

⁴³⁹ Website of the Horizon 2020 project <https://cities2030.eu/>.

⁴⁴⁰ Ibid.

⁴⁴¹ Assessment of the final national energy and climate plan of Sweden, SWD(2020) 926 final, pp. 2 and 8.

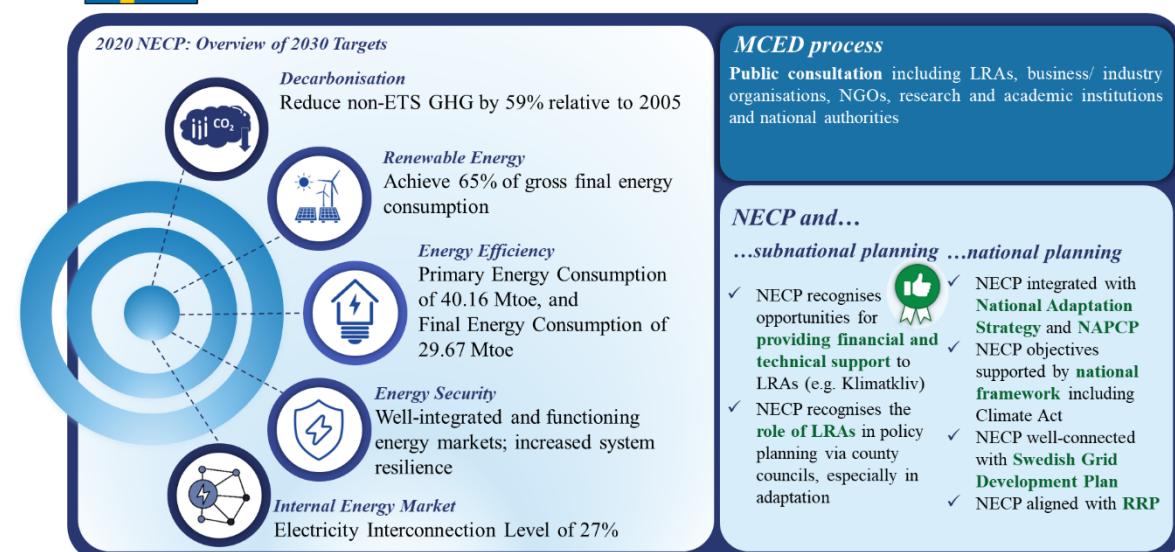
⁴⁴² Assessment of the final national energy and climate plan of Sweden, SWD(2020) 926 final, pp. 3 and 13 and Sweden’s Integrated National Energy and Climate Plan, p. 172.

targets, requires annual climate reports and sets up an independent Climate Policy Council⁴⁴³. Moreover, several assignments under the Government's national goods' transport strategy support the NECP objectives related to the transport sector⁴⁴⁴. Regarding interconnectivity, the NECP is well linked with the Swedish Grid Development Plan and mentions the North-South programme which aims to strengthen the interconnectivity network⁴⁴⁵. The NECP also refers to the establishment of a consultative body to develop a national and regional strategy for the transition to a circular and bio-based economy⁴⁴⁶. Finally, good connections can be found with the RRP. According to the 2022 Commission assessment, the reforms and investments included in the RRP can be expected to significantly contribute to the green transition and are in line with the NECP, especially regarding the industry and transport sectors⁴⁴⁷. The RRP also provides investments in local and regional projects to reduce GHG emissions, for example through the Climate Leap initiative⁴⁴⁸.

Summary



Sweden



⁴⁴³ EC ass, p. 3 and 6.

⁴⁴⁴ Sweden's Integrated National Energy and Climate Plan, p. 28.

⁴⁴⁵ Assessment of the final national energy and climate plan of Sweden, SWD(2020) 926 final, p. 10.

⁴⁴⁶ Ibid., p. 13.

⁴⁴⁷ European Commission, 2022, Analysis of the recovery and resilience plan of Sweden Accompanying the document Proposal for a COUNCIL IMPLEMENTING DECISION on the approval of the assessment of the recovery and resilience plan for Sweden, SWD/2022/102 final.

⁴⁴⁸ Ibid.

4. Results from the survey

4.1 Profile of respondents

In total, 52 responses to the online survey were analysed. The largest group that replied to the questionnaire were associations of local and/or regional authorities (26), representing 50 % of the total. The remaining stakeholders mostly replied on behalf of regional (10) and local (10) authorities/governments. Energy agencies also filled in the survey and the two ‘other’ respondents replied as an EU citizen and as a city district council. The consultation received replies from 23 Member States⁴⁴⁹. Most responses originated from Spain (6), followed by Greece (5), Croatia and Germany (4 each). An overview of the responses is provided in the following figures.

Figure 1: Responses by stakeholder type

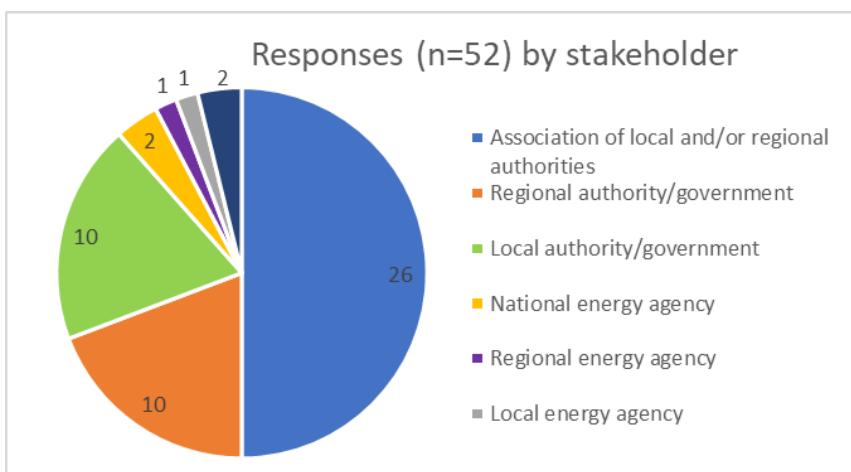
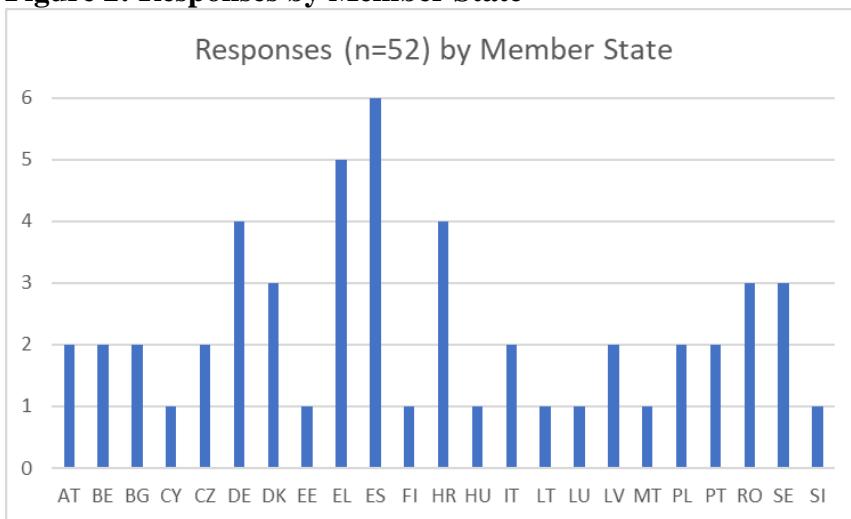


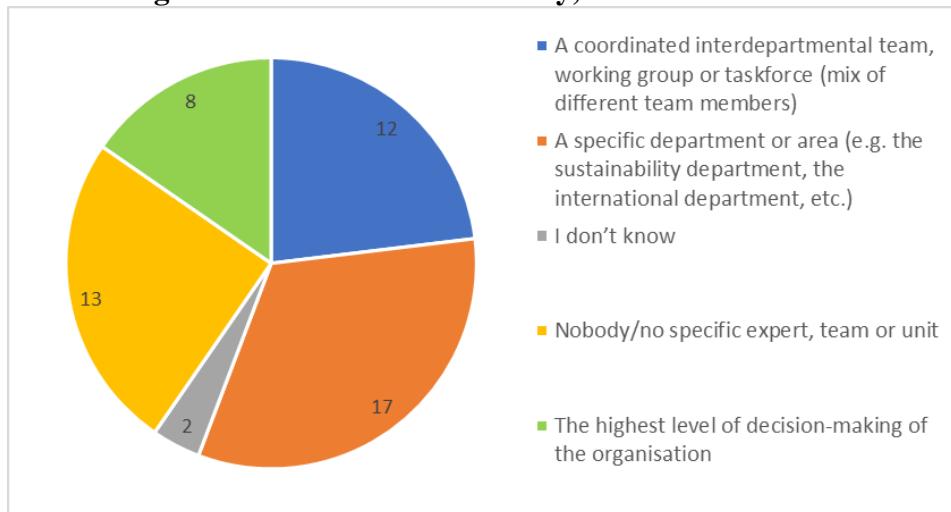
Figure 2: Responses by Member State



⁴⁴⁹ Replies were received from all Member States except France, Ireland, the Netherlands and Slovakia.

Moreover, the majority of the respondents report having a good or fairly good knowledge of the NECPs in their countries. In most cases, a specific department or a coordinated interdepartmental team is responsible for any exchanges concerning the NECPs (Figure 3).

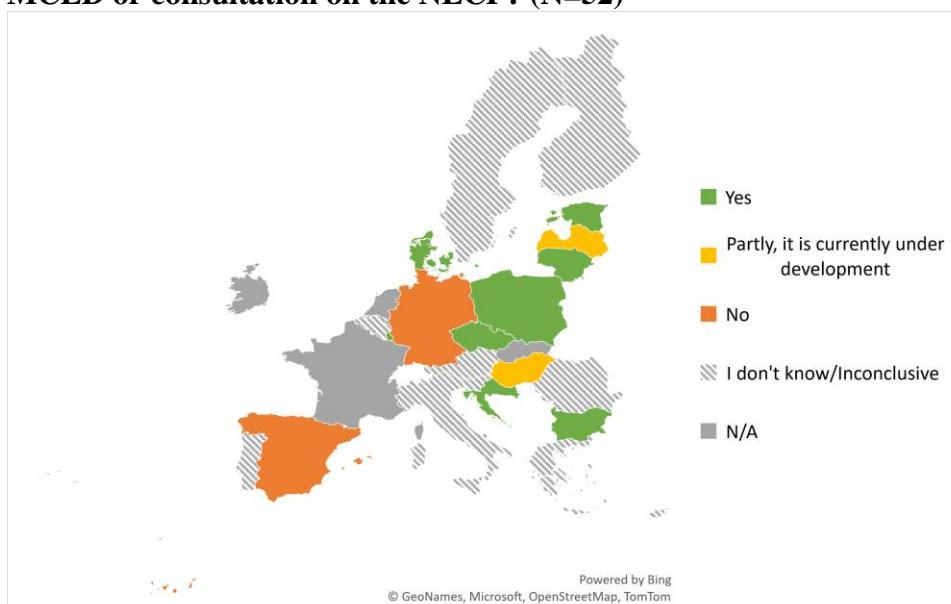
Figure 3: Within your organisation or administration, who is in charge of coordinating the exchanges with the national authority, when it comes to the NECP? (N=52)



4.2 Implementation of MCED and citizens' engagement

According to 35 % of the respondents, their national competent authority has established a permanent mechanism for MCED or consultation on the NECP. At the same time, three associations of LRAs (6 % of total) reported there to be none in their country, including Germany and Spain (Figure 4).

Figure 4: Has your national competent authority established a permanent mechanism for MCED or consultation on the NECP? (N=52)



As shown in Figure 5, when asked which stakeholders are involved in the MCED or NECP-related consultations, around half of the respondents mentioned regional authorities (52 %), local authorities (50 %), NGOs (50 %), business/industry organisations (48 %), and research and academic institutions (46 %). Regional and local energy agencies were reported to be relatively less involved with 35 % and 25 % of the responses, respectively.

Figure 5: Which stakeholders are involved in the MCED or NECP-related consultation? (N=52)

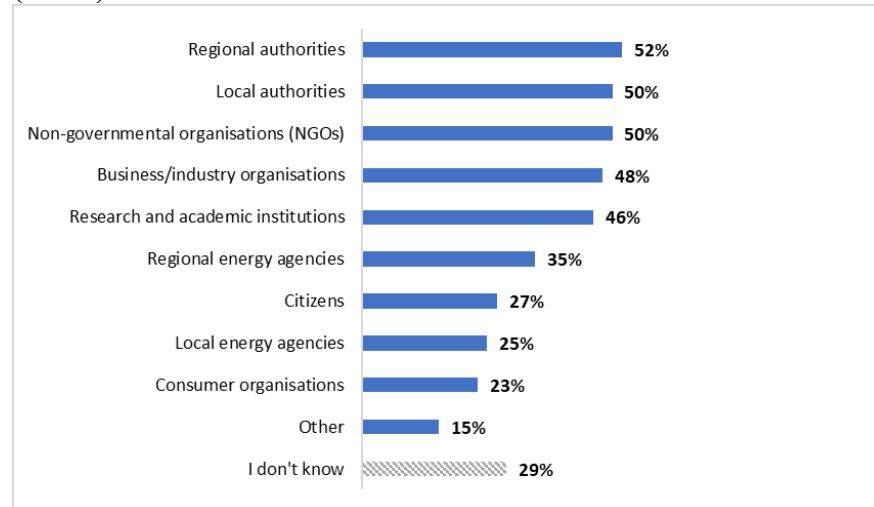
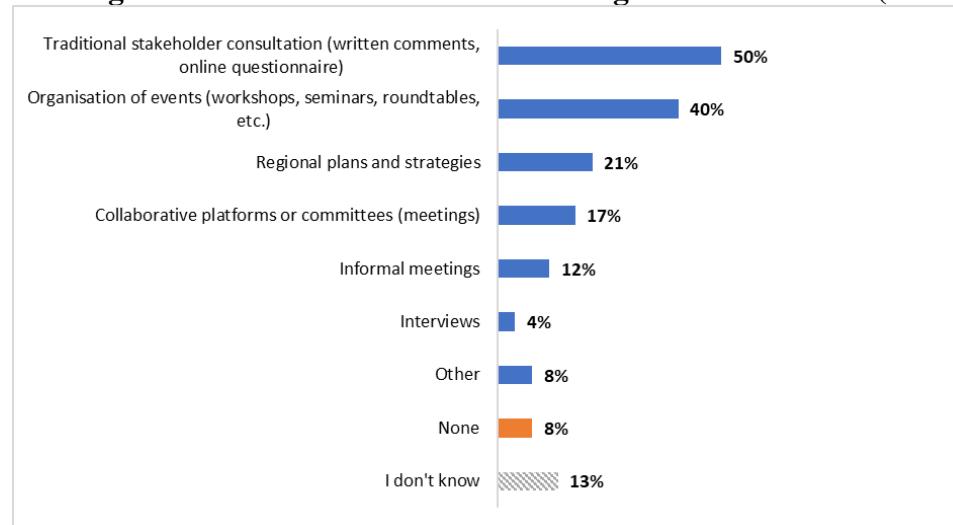


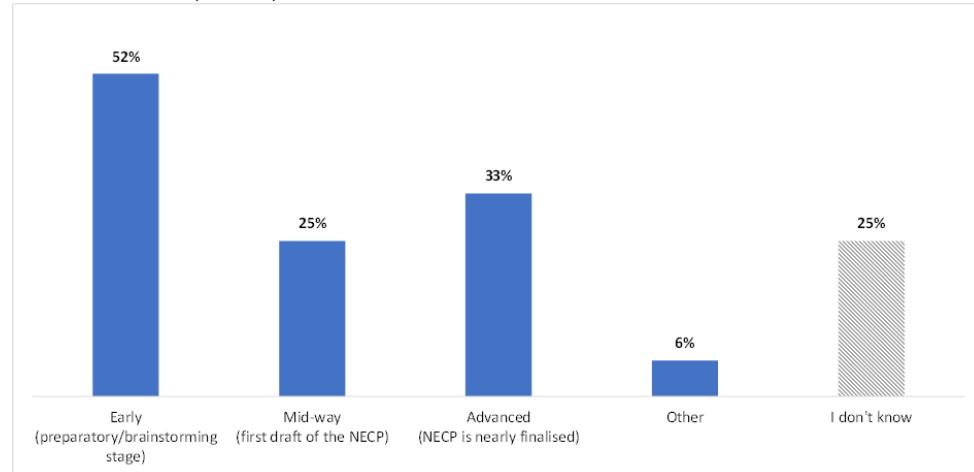
Figure 6 details the mechanism used by the national competent authority in the drafting of the NECP to consult LRAs. Traditional stakeholder consultation (such as written comments and online questionnaires) is the most used mechanism, as mentioned by half of the respondents (26). This was closely followed by organisation of events (e.g. workshops, seminars) with 40 %. Over a quarter of respondents (29 %) did not know.

Figure 6: What is the mechanism used by your national competent authority in the drafting of the NECP to consult local and regional authorities? (N=52)



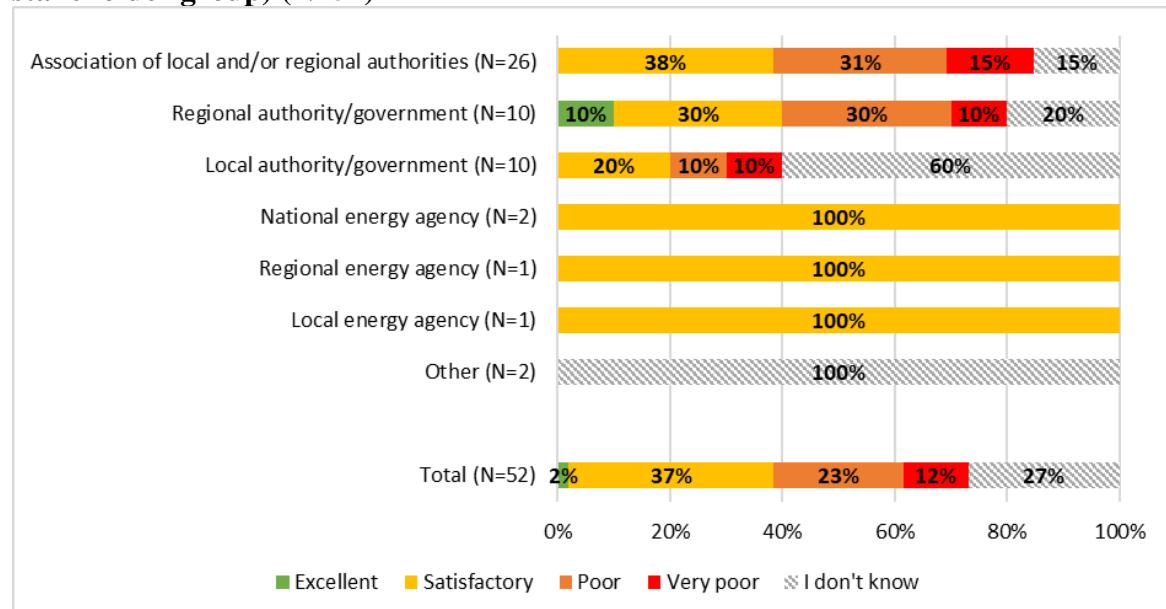
52 % of respondents said that the MCED or consultation are carried out at the early stages of the NECP preparation process, namely when preparing and brainstorming (see Figure 7). One third responded that these usually happen in the advanced stage when the NECP is nearly finalised, whereas a quarter found this happening mid-way around the first draft. Moreover, five stakeholders indicated that the consultation is possible in different stages. These stakeholders were from Croatia, Estonia, Lithuania, Portugal and Spain.

Figure 7: At which stage of the NECP preparation process is the MCED or consultation carried out? (N=52)



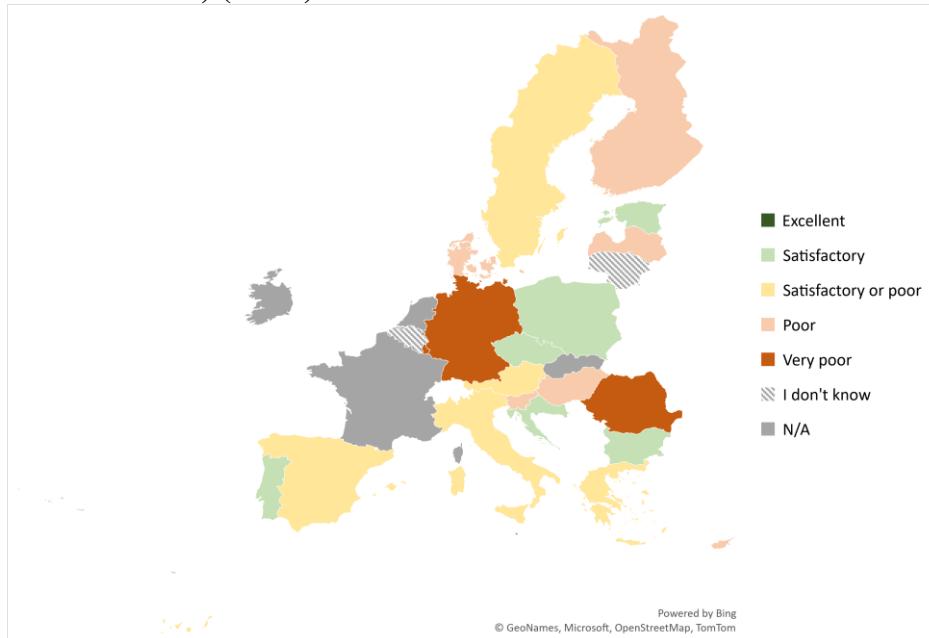
37 % of all stakeholders have rated the quality of the MCED or consultation processes as ‘Satisfactory’, which was the consensus view among energy agencies (Figure 8). However, **35 % thought they are ‘(Very) poor’**, which was mainly an opinion shared by associations of LRAs as well as regional and local authorities/governments.

Figure 8: How would you rate the quality of the MCED or consultation process? (by stakeholder group) (N=52)



Looking more closely at the differences per country (Figure 9), we find that the **respondents considered the quality of the consultation to be ‘Poor’ or ‘Very poor’ in over half of the EU Member States**, including in Germany, Luxembourg and Romania. Stakeholders from 12 Member States gave at least a ‘Satisfactory’ rating. Malta was the only country that rated it ‘Excellent’.

Figure 9: How would you rate the quality of the MCED or consultation process? (by Member State) (N=52)



When asked whether contributions of LRAs to the NECP have been taken into account (Figure 10), over half of the stakeholders (52 %) did not know. Among those that did have an opinion, it was nearly balanced. Three out of four energy agencies thought that LRA contributions were being sufficiently considered, whereas 38 % of the associations of LRAs found this not to be the case. As shown in Figure 11, only respondents from 13 of the Member States shared a clear opinion on this matter: six answered ‘Yes’, whereas seven replied ‘No’.

Figure 10: Do you feel that the contributions of LRAs to the NECP have been taken into consideration? (by stakeholder group) (N=52)

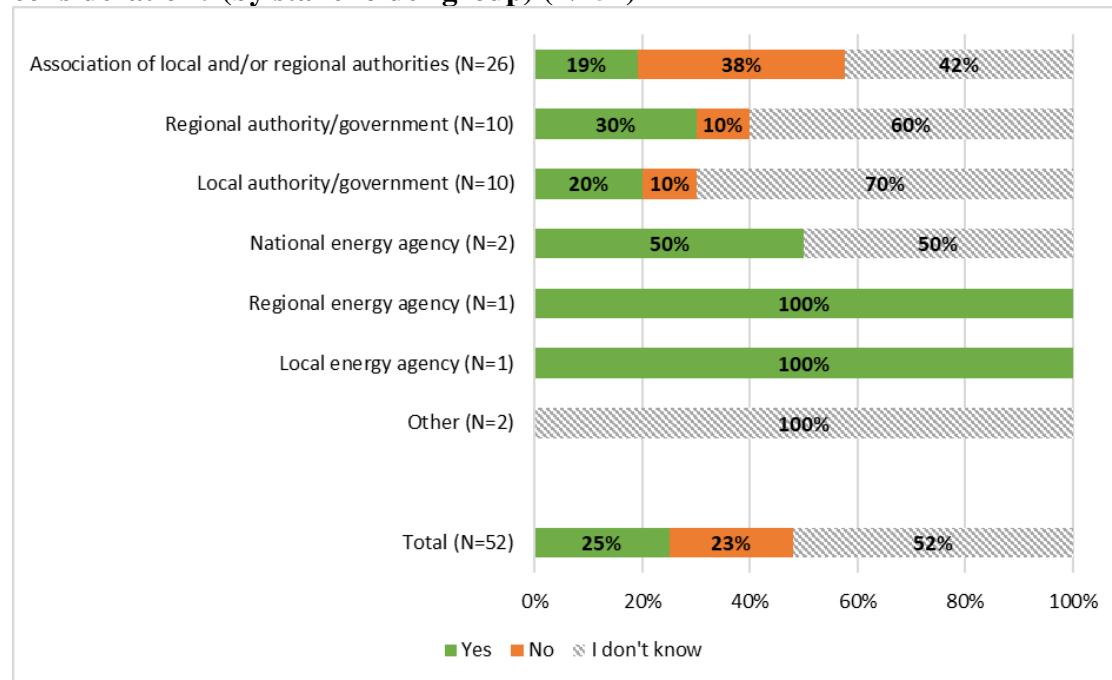
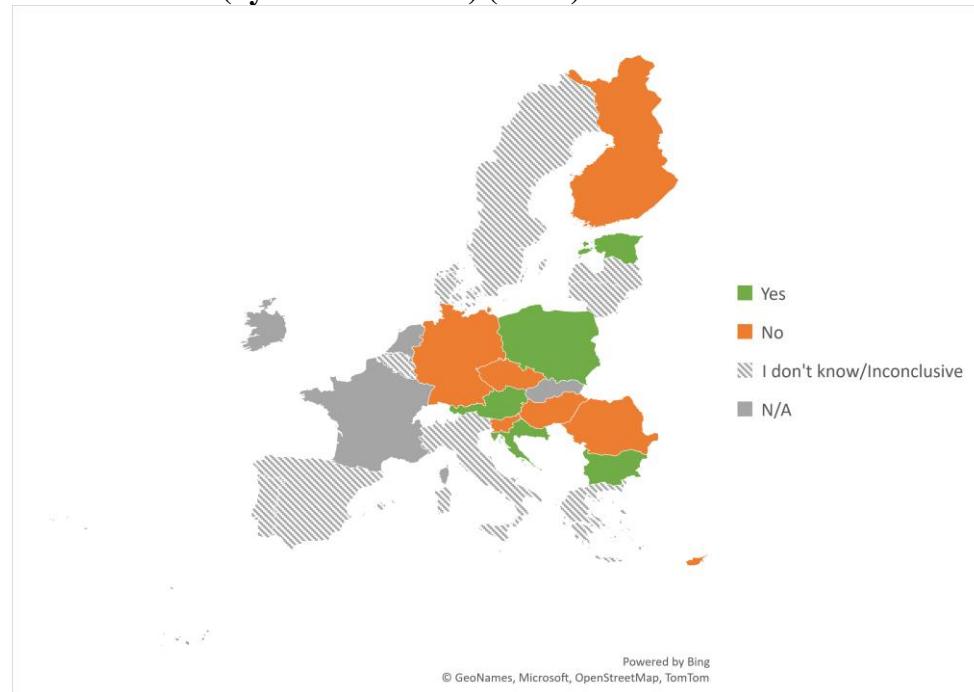
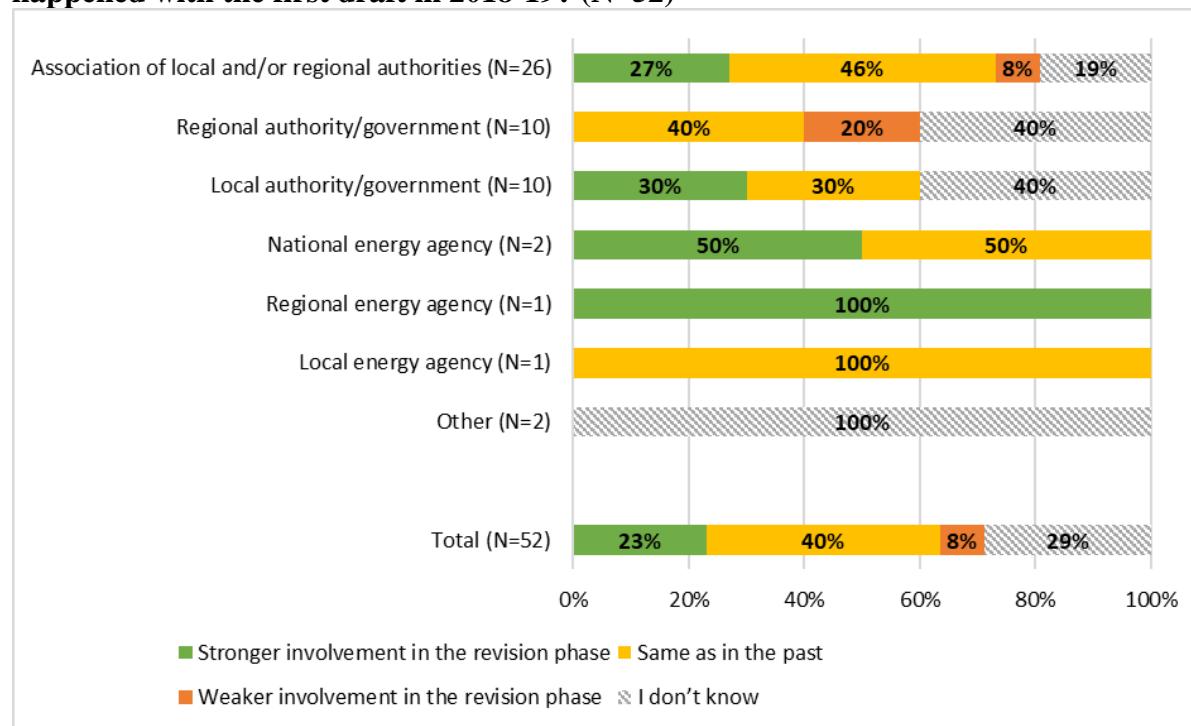


Figure 11: Do you feel that the contributions of LRAs to the NECP have been taken into consideration? (by Member State) (N=52)



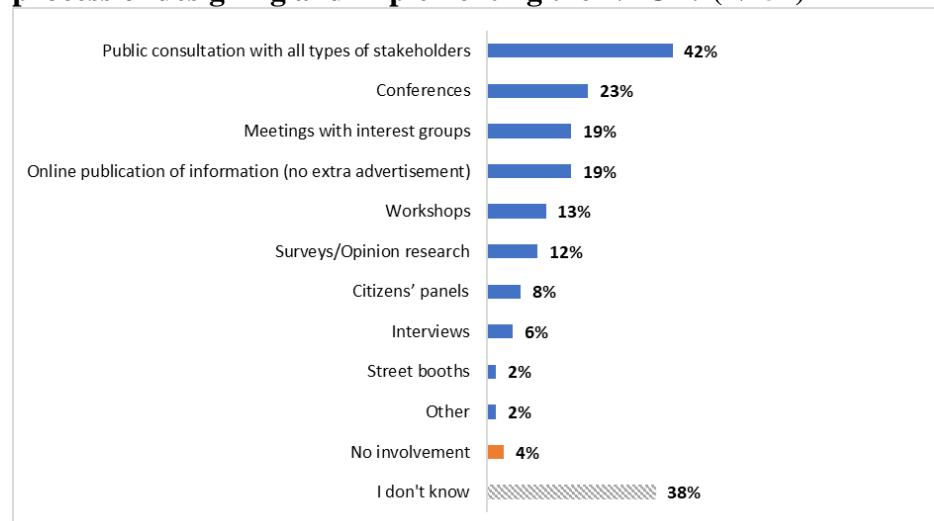
There was no clear consensus among different stakeholder groups regarding any changes experienced in their involvement in the mechanisms for revising the NECP, compared to the first draft in 2018-19 (Figure 12). 46 % of associations of LRAs believed it remained the same, whereas LRAs themselves as well as energy agencies had mixed opinions.

Figure 12: Has your organisation experienced any change (progress, setbacks) in its current involvement in the mechanisms for revising the NECP, compared to what happened with the first draft in 2018-19? (N=52)



The most popular mechanism used at national level to involve citizens in the process of designing and implementing the NECP was again public consultation with all types of stakeholders, according to 42 % of the respondents (Figure 13). At the same time, 38 % of respondents did not know. Finally, when asked how they would rate the implementation of the MCED or NECP-related consultation in terms of citizens' engagement, 34 % believed it to be '(Very) poor' and only 19 % thought it was 'Satisfactory'. Around half of the respondents (46 %) did not have an opinion.

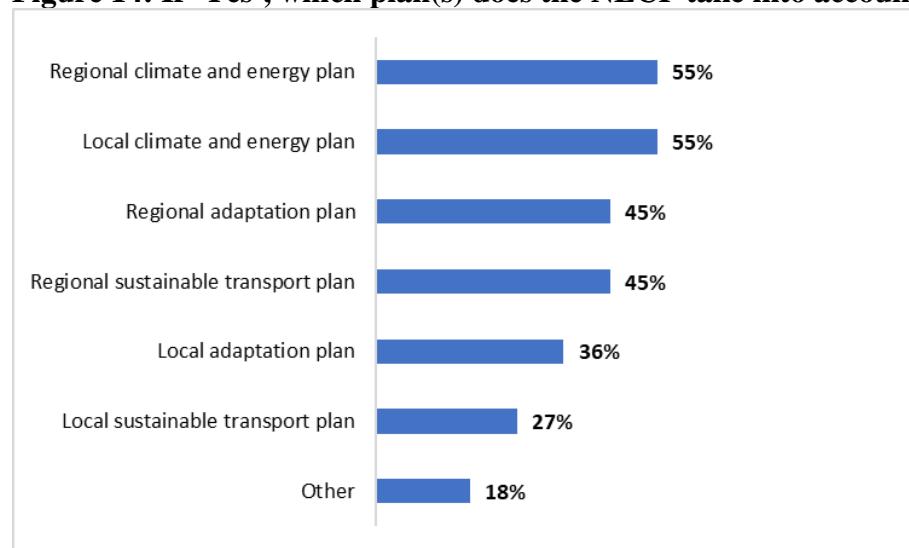
Figure 13: Which mechanisms have been used at national level to involve citizens in the process of designing and implementing the NECP? (N=52)



4.3 Relationship between NECPs and subnational plans

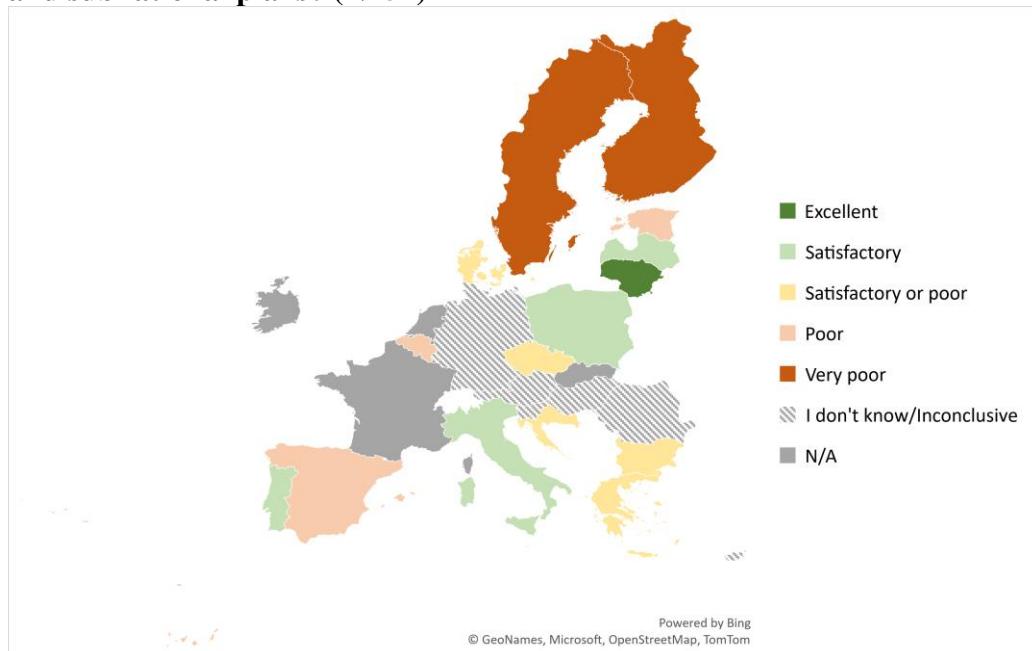
42 % of the respondents throughout the EU replied that the NECP in their Member State does not take into account subnational energy and climate planning as a basis for the national plan (i.e. bottom-up planning). This was, for instance, observed in all Nordic and Baltic countries that answered. Among the 21 % that responded ‘Yes’, which included Austria, Belgium, Malta, Poland and Romania, more than half found the NECP to take into account the regional/local climate and energy plan (Figure 14).

Figure 14: If ‘Yes’, which plan(s) does the NECP take into account? (N=11)



23 % of the respondents would rate the connection between the NECP in their Member State and subnational plans at least ‘Satisfactory’, but **33 % thought the connection to be ‘Poor’ or ‘Very poor’**. For instance, it was considered ‘Very poor’ in Finland and Sweden, whereas in Lithuania respondents rated it ‘Excellent’ (Figure 15).

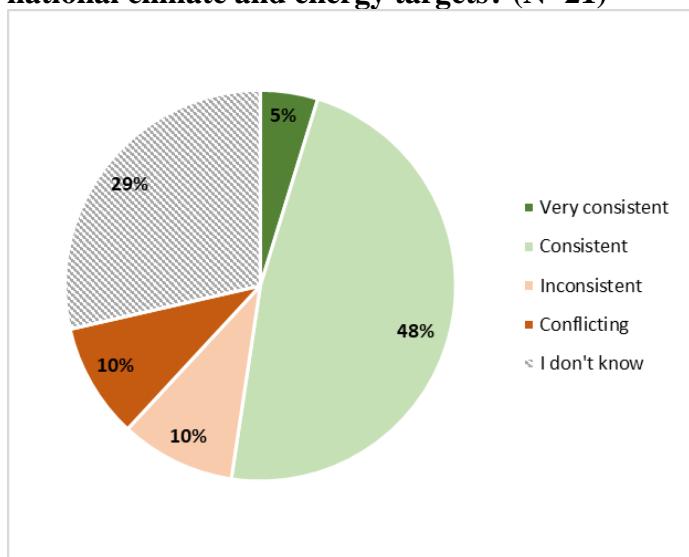
Figure 15: How would you rate the connection between the NECP in your Member State and subnational plans? (N=52)



Out of the 52 respondents, 35 % said there were no conflicts between national government and LRAs with regard to the application of the NECP. Seven stakeholders (13 %) did observe conflicts but only at the political level, including in Austria, Belgium, Czechia and Latvia. Among those that said ‘Yes’, the main reasons reported for this were the social impact (57 %) and environmental impact (43 %) of the measures. Over half of the stakeholders (52 %) did not know.

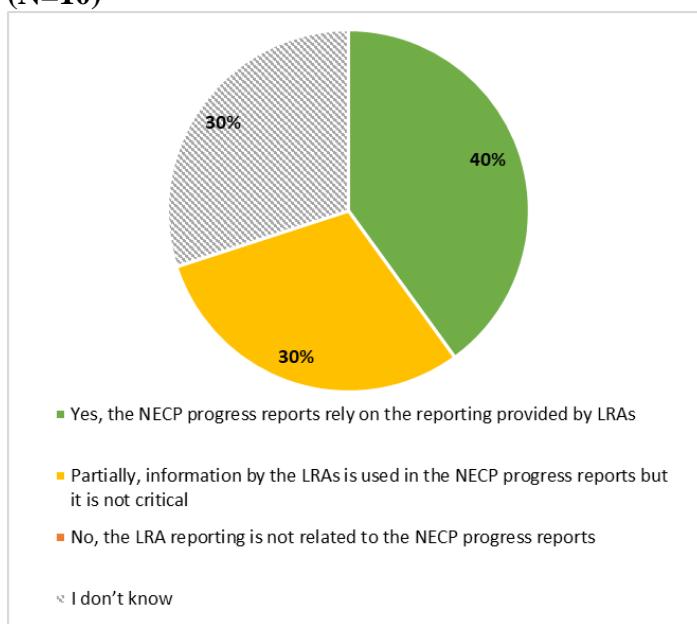
In addition, 40 % of the respondents answered that national targets are translated into subnational targets in their Member States, while 33 % said that they are not. The latter includes Estonia, Finland, Italy and Portugal. Among those that replied ‘Yes’, the majority of the respondents (53 %) rated the subnational targets as at least ‘Consistent’ or ‘Very consistent’ with the national climate and energy targets (Figure 16).

Figure 16: If 'Yes', how would you rate the consistency of the subnational targets with national climate and energy targets? (N=21)



Furthermore, almost half of the stakeholders (46 %) stated that the NECP in their Member State provided no reporting system by LRAs. Only Bulgaria, Croatia, Hungary and Poland declared there to be one. Among the respondents that said 'Yes', 70 % thought the reporting system was at least partially integrated into the overall NECP reporting Figure 17.

Figure 17: If 'Yes', is the reporting system integrated into the overall NECP reporting? (N=10)



Nearly half of the respondents to the survey (40 %) stated that the NECP in their Member State provides support for the implementation, at local or regional level, of the measures included in the plan. Financial support either from European or from national funds were among the most common responses, with 62 % and 52 % respectively (Figure 18). In this context, **40 % of the respondents indicated**

that they disagree with the following statement: “Under existing national climate and energy policies, the financial resources allocated to LRAs match the responsibilities of the local level to meet the targets.”?, whereas only 10 % of the respondents agreed with it (Figure 19).

Figure 18: If 'Yes', what kind(s) of support does the NECP provide to LRAs? (N=21)

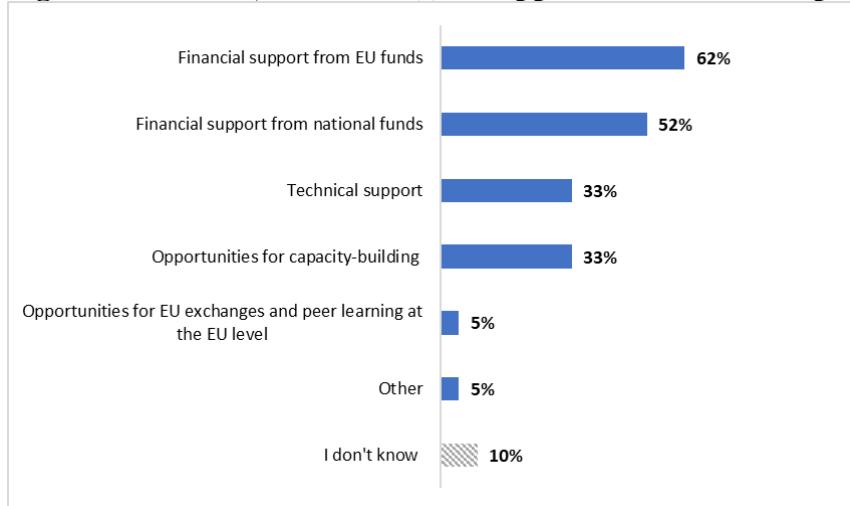
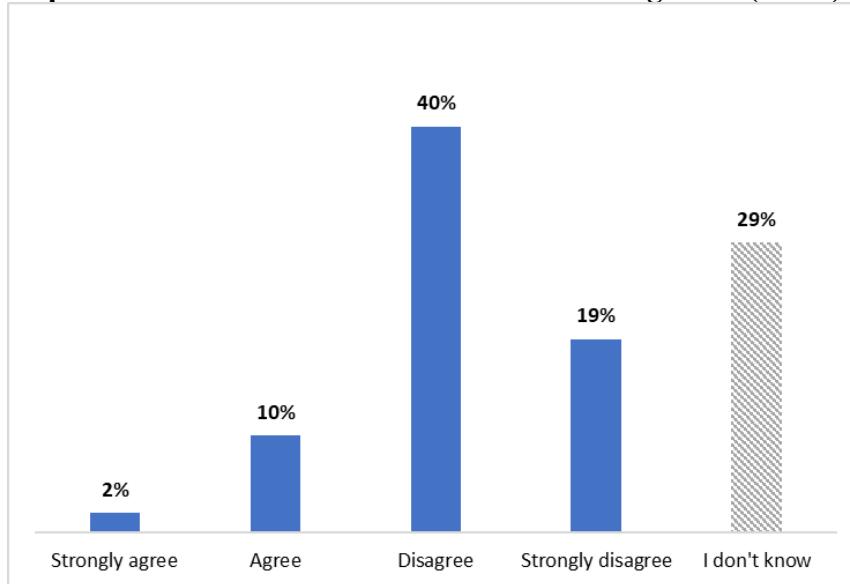


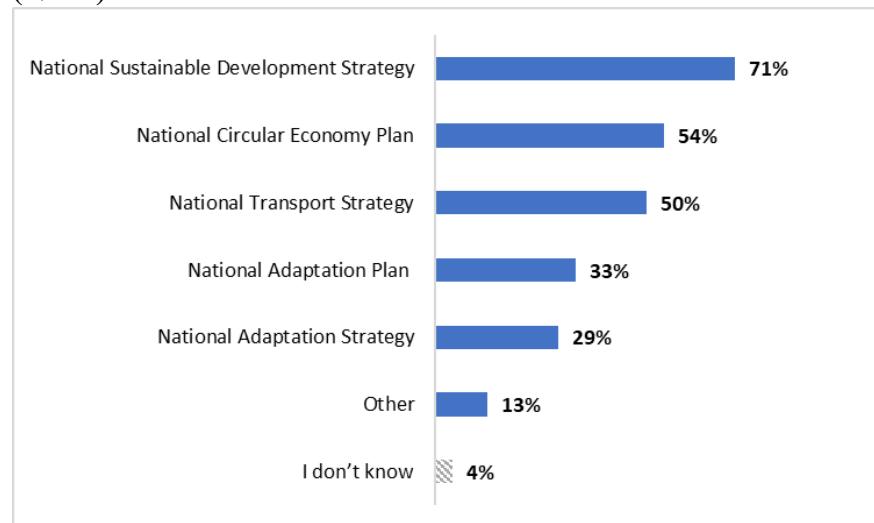
Figure 19: How would you respond to the following statement: “Under existing national climate and energy policies, the financial resources allocated to LRAs match the responsibilities of the local level to meet the targets.”? (N=52)



4.4 Connection between NECPs and other national plans

Nearly half of the respondents of the survey (46 %) indicated that the NECP in their Member State is connected to other plans covering other sectors of the European Green Deal and the SDGs. National sustainable development and circular economy strategies were among the most common national plans/policies connected to the NECP as indicated by the majority of the respondents (Figure 20). On the contrary, more than 40 % of the survey respondents indicated that they are not aware if the NECP in their Member State is connected to other plans covering other sectors of the European Green Deal and the SDGs. In the same vein, half of the survey respondents were not able to rate the connection between the NECP and other national plans in their Member States.

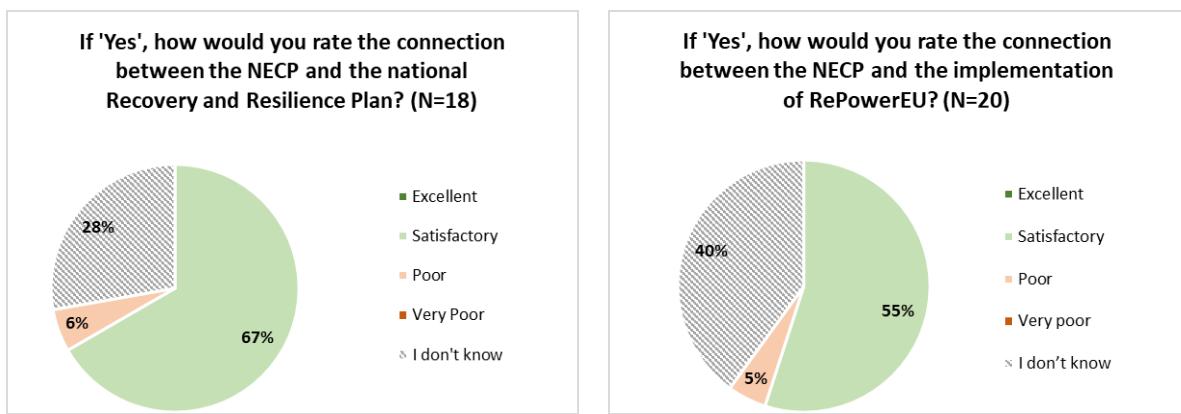
Figure 20: Which other relevant national plan(s) was/were the NECP connected to? (N=24)



4.5 Connection between the revision of NECPs and emergency-related instruments

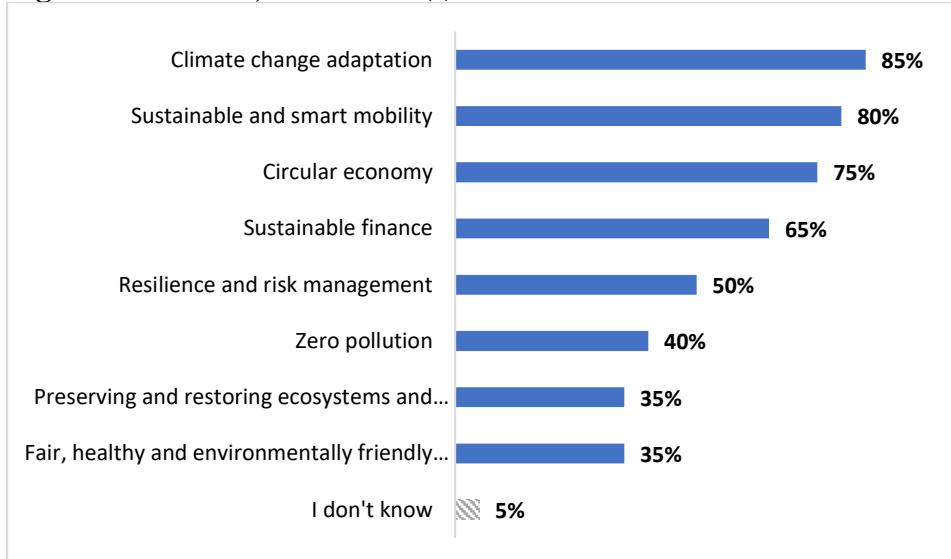
As to the connection between the revision of the NECPs and emergency-related instruments, **more than half of the respondents (54 %) indicated that they are not aware if the revision of the NECP in their Member State is connected to the national RRP.** However, 35 % of the respondents that were aware of the connection stated that they find it satisfactory (Figure 21). In the same vein, **more than half of the respondents (58 %) were not aware if the revision of the NECP in their Member State is connected with the implementation of RePowerEU.** However, 55 % of the respondents that were aware of the connection stated that they find it satisfactory (Figure 21).

Figure 21: Rating of the connection between revised NECPs and emergency-related instruments (N=18, N=20)



Lastly, although nearly half of the respondents (46 %) were not able to say whether the NECP in their Member State should be extended to cover other policy areas of the European Green Deal; 38 % of them indicated that it should be extended to cover other policy areas, mostly related to climate change adaptation and sustainable and smart mobility (Figure 22).

Figure 22: If 'Yes', which area(s) should the NECP be extended to cover? (N=20)



5. Policy recommendations towards future-proof governance of the green transition

The following sections outline recommendations for improvement of the energy and, more broadly, green transition governance based on the lessons learnt from the country fiches and existing assessments of the energy governance process as well as the results from the survey.

Improvement of the MCED process

- **Enhancing the effectiveness and implementation of the MCED**

In order to put in place an effective and functioning MCED, it is recommended to Member States to establish regular meetings and effective communication channels between national and LRAs, fostering improved cooperation and consultation on climate and energy initiatives. This will establish a steady exchange of dialogue, mitigating the risk of stagnant phases that impede progress.

Rather than use the dialogues occasionally, **Member States could prefer the creation of permanent mechanisms and platforms for consultation**. This would facilitate “co-creation processes”, i.e. a collaborative and participatory approach where LRAs, stakeholders and citizens actively engage in the development and implementation of the NECP and contribute to shaping the final plan. This inclusive approach aims to foster a sense of ownership, legitimacy, and support among stakeholders which would be beneficial for the NECP itself. For instance, the National Dialogue on Climate Action in Ireland can be an inspiration for successful and longstanding tool for outreach to citizens and stakeholders that are usually not engaged in energy and climate issues. Similarly, Estonia’s Energy Council within the Ministry of Economic Affairs and Communications can be an example for a permanent MCED. Finally, Member States should ensure the adaptability of their MCEDs with the aim of tackling unexpected climate and energy changes and challenges. This could include revision procedures and regular assessments of the evolving circumstances. This flexibility will enable the framework to steer the energy and climate transition effectively in the long term.

The European Commission should **prioritise the quality of dialogues in its evaluations and take measures to ensure their meaningful impact**. This can be achieved by evaluating the quality of the exchanges, checking the number and timing of meetings. It should also strengthen the mandatory nature of MCED involving LRAs as major contributors and emphasise to Member States the benefits and significance of these dialogues, i.e. enhanced collaboration and

improved policy coherence between all governance levels. Finally, although it is appreciated that it recalled the importance of MCEDs in the recommendations of the draft final plans, in the following assessments of the final plans it should reinforce the call for an improved implementation of Article 11 by providing specific examples and rooms of improvement for each Member States.

- **Ensuring the active participation of LRAs throughout all stages of the NECP process**

The involvement of LRAs should be strengthened through all the phases of the NECP, including the brainstorming phase, the drafting, the implementation and the review of the NECP. To achieve this, Member States should **promote transparency and openness by providing comprehensive documentation and information to LRAs and stakeholders and the general public in a timely, continuous and accessible manner**. This proactive approach allows stakeholders to have a fair opportunity to contribute their insights and perspectives, fostering trust and credibility within the framework. Member States should also facilitate synergies with existing local forums, such as the Covenant of Mayors, to ease the inclusion and consideration of LRAs' priorities and needs. Although not specifically for the NECPs, the National Debate organised in France concerning the Energy Transition Law for Green Growth can be a good approach for bringing together different levels of governance to discuss climate and energy issues. In the same context, the example of Estonia in terms of cooperation and sharing responsibilities among the leading institution within the public authority in charge of climate policy and the other entities with key roles in the governance framework could also be considered.

For its part, the Commission could maintain an oversight of national governments throughout the drafting and implementation of the NECP. In particular, it should actively engage in monitoring and evaluating the progress made by national governments in implementing their NECPs, with specific attention to LRAs' engagement, ensuring that the proposed measures are effectively executed and aligned with the overarching goals of the European Union.

- **Harnessing the potential of LRAs to foster the participation of citizens and the general public**

Member States, the European Commission and LRAs shall increase their efforts to promote dialogue about the NECP process, especially towards the general public. Better involving citizens in the NECP process ensures that decisions related to energy and climate policies are made in a democratic and inclusive manner. In this regard, **LRAs play an important role of interlocutors between national governments and citizens/ local communities**. Harnessing LRAs'

potential to engage with their local communities would be beneficial for the NECP itself, considering that citizens possess valuable knowledge and insights about their communities and the local level that could be transformed into innovative ideas and solutions to be integrated in the plan. It should also be considered that engaging citizens in the NECP process empowers them to become active participants in shaping their green transition future and provides opportunities for education, awareness-raising, and capacity-building. In other words, citizens may turn from consumers to prosumers that become active members in the NECP's implementation. Finally, if citizens have a better opportunity to participate and influence the NECP, they are more likely to support and accept the resulting policies and measures. An important first step is to ensure that citizens are generally aware of climate and energy issues, for instance, as practiced in Sweden where all municipalities can provide basic local energy and climate advice to households, companies, housing associations and organisations through their energy and climate advisory services.

In this regard, the duration of the consultations should be extended (the majority last only one or two months) to ensure a more inclusive and thorough engagement process. The Commission could define a minimum timeframe for the public consultation that establishes an adequate duration for the public to receive information, actively participate, and express their viewpoints.

Connection of NECP with subnational planning

- Providing sufficient financial and technical support to LRAs**

Member States should provide **sufficient financial and technical support to LRAs in the context of the NECPs**. This is important for several reasons. Sufficient technical support would enhance LRAs' capacity to effectively plan, develop, manage and monitor climate and energy measures, while sufficient financial support will ensure LRAs can implement projects/ measures outlined in the NECP. In this way, they will be enabled to carry out their responsibilities and contribute to achieving the set climate and energy targets. Moreover, adequate technical support that increases the LRAs' in-house competencies and skills on climate and energy issues would also increase LRAs' participation and make them more motivated to actively engage in multi-level dialogues, consultations, and decision-making. Financial support also facilitates investment in localised solutions in areas such as renewable energy projects, energy efficiency initiatives, and sustainable transportation systems, that align with the local context and contribute to the overall goals of the NECP. Finally, adequate financial support would accelerate the transition at the local and regional level, while contributing to the overall success and impact of the NECP, while sufficient internal technical capacity with the local/regional administrations will ensure that LRAs take

climate and energy actions continuously and over the long-term.

It is recommended to **directly allocate funds to support local and regional measures outlined in the NECP and provision for capacity building measures**. This allocation is crucial as it addresses budgetary constraints, empowers local and regional authorities to contribute to NECP targets, promotes local ownership and accountability, and enables tailored solutions to address regional challenges. Additionally, direct funding allocation enhances the role of LRAs in driving the energy transition, fostering sustainable development, and generating tangible benefits for the local community. The capacity building measures can strengthen the impacts of the financial resources by ensuring a development of relevant skills and knowledge within the local/regional administrations that can ensure the continuity of climate/energy projects and initiatives. For example, to ensure such aid is available, in Czechia supporting local authorities in fields of energy and climate policies is among the policy objectives of the Multiannual Financial Framework, while in Latvia the NECP includes financial and capacity-building opportunities for LRAs. In Sweden, an investment support initiative (Climate Leap) helps municipalities invest in charging infrastructure for electrical vehicles, switching to biofuels and district heating, cycle lanes and other cycling infrastructure etc.

- **Strengthening subnational integration of targets and objectives in the NECPs**

In order to enhance the integration of subnational planning into the NECPs, firstly, it is suggested to **establish well-defined sub-national climate and energy-related targets that align with the objectives and targets outlined in the NECPs**. These sub-national targets will serve as a supportive framework for effectively implementing the NECPs and ensuring their successful execution on a local level. Additionally, when formulating the NECPs, it is essential to consider the objectives set at the local and regional levels. By incorporating these objectives, the aim is to foster transparency and cooperation among the various levels of administration, facilitating seamless collaboration in climate and energy-related initiatives. This inclusive approach also enhances the monitoring of progress, enabling better evaluation and assessment of the efforts made at different administrative levels towards achieving the overall goals outlined in the NECPs. A good practice in this regard is the Climate Pact 2.0 initiative in Luxembourg, where the municipalities become a strategic partner in the efforts to reach the national GHG emissions' reduction target: they all voluntarily commit to take action to reduce their GHG emissions and track their progress through the European Energy Award quality management and certification system, in return for crucial financial and technical support from the national government. In addition, the example of Italy where all metropolitan cities and bodies covering

extensive areas will have to prepare SUMPs and harmonise existing measures within the framework of the NECP could also be considered.

Integration of NECP in the national planning

- **Incorporation of the energy and climate investments from emergency-related instruments and reforms into the updated NECPs**

It is recommended that Member States **fully integrate the energy and climate investments and reforms outlined in their national RRP**s into the updated NECPs. This alignment would be key to fulfilling the updated 2030 targets, objectives, and commitments, leveraging the RRF as a significant funding source for energy and climate policies. The integration ensures a synergistic approach to drive sustainable transitions, enhances policy consistency and long-term planning, and improves transparency and accountability in national climate and energy strategies. It should also be considered that the Commission specified that **Member States should include a specific REPowerEU chapter in their RRP**s. Thus, an incorporation of the RRP energy and climate investments and reforms into the updated NECPs would also speed up the phase out of the EU's dependence on Russian fossil fuels and foster zero-carbon sources and energy resilience.

- **Improving the alignment of NECPs with other strategic documents**

Member States should **improve the alignment of NECPs with other strategic documents**, such as national biodiversity or circular economy strategies, air pollution control programs and other policies implementing the SDGs. It ensures policy coherence by avoiding conflicting or contradictory policies and promotes efficiency and effectiveness, while enabling a more strategic allocation of resources. It could also help countries meet their international commitments and obligations thanks to a comprehensive and coordinated approach towards achieving global environmental goals, such as the Paris Agreement and the Convention on Biological Diversity. Finally, it could streamline data collection processes and facilitate comprehensive monitoring and evaluation of the implementation of various policies.

In order to effectively redesign the sub-components of the NECP, it is suggested to Member States to ensure the active involvement and inclusion of nature protection groups as well as experts specialising in various climate-related topics. By actively engaging these stakeholders, their valuable insights, expertise, and perspectives can be incorporated into the redesign process, thereby fostering a more comprehensive and holistic approach to addressing energy and climate challenges within the NECP framework. Multiple guidelines exist for guiding

Member States in setting up and implementing coherence approaches to align different policies and Member States could be encouraged to apply such approaches more consistently. For instance, the Organisation for Economic Cooperation and Development (OECD) has developed a Framework for Policy Coherence for Sustainable Development⁴⁵⁰, which outlines specific steps and advice for policy-makers to take for ensuring coherent in design, implementation and monitoring of policies. Good practices and examples of policy integration have also been compiled by the European Environment Agency (EEA)⁴⁵¹.

⁴⁵⁰ <https://www.oecd.org/gov/pcsd/pcsd-framework.htm>

⁴⁵¹ EEA, 2005: ‘Environmental policy integration in Europe, State of play and an evaluation framework’: https://www.eea.europa.eu/publications/technical_report_2005_2, and ‘Environmental policy integration in Europe, Administrative culture and practices’: https://www.eea.europa.eu/publications/technical_report_2005_5

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The infographics and figures were prepared by Milieu Consulting. The following sources were used to prepare the country fiche infographics:

- Country flags: Wikipedia, www.wikipedia.org
- Renewable energy icon: The Noun Project, <https://thenounproject.com/icon/renewable-energy-81668/>
- Energy efficiency icon: The Noun Project, <https://thenounproject.com/browse/icons/term/energy-efficient/>
- Energy security icon: Flaticon, https://www.flaticon.com/free-icon/energy_7355466
- Internal energy market icon: Dreamstime, <https://www.dreamstime.com/power-transmission-network-rgb-color-icon-power-transmission-network-rgb-color-icon-electricity-delivery-distribution-complex-image216691965>
- Decarbonisation and good practice icons: created by Milieu Consulting.

Annex 1: Survey questionnaire

Introduction

About the consultation

This online survey questionnaire aims to feed into the report on "Local and regional authorities in the governance of the energy union", commissioned by the European Committee of the Regions (CoR) Directorate for Legislative Work I – Unit B2 (ENVE commission) in collaboration with the Council of European Municipalities and Regions (CEMR). Both organisations will make use of the information collected in this questionnaire to shape their respective political positions on the revision of the governance regulation by gathering information from the actors on the ground.

The [European Green Deal](#), published in 2019, sets the objective for Europe to become the first climate-neutral continent by 2050 and introduces several legislative and non-legislative initiatives to achieve this political objective. This also means alignment of existing initiatives such as the [Clean Energy Package](#), in order to ensure that the European energy system meets the objectives of the European Green Deal.

The Governance of the Energy Union and Climate Action [Regulation \(EU\) 2018/1999](#), one of the main pillars of the Clean Energy Package, is considered to be the core mechanism for implementing the EU's energy policies. To meet the EU's climate and energy targets, the Member States are required to establish [National Energy and Climate Plans](#) (NECPs) (or any equivalent documents depending on the national context) and Multilevel Climate and Energy Dialogues (MCEDs), pursuant to Article 11 of the Regulation. Member States submitted their NECPs in 2019 and are currently working on updating them. They will be submitted to the European Commission by June 2023.

However, the first versions of the NECPs along with the feedback received by members of the CoR highlighted shortcomings in the implementation of the above-mentioned Article 11 of the Regulation. For this reason, the CoR has tasked Milieu Consulting srl to prepare a study on the role of local and regional authorities (LRAs) in the energy governance of the EU in order to assess:

- the implementation of the MCEDs and their effectiveness in terms of engagement of LRAs and citizens;
- the connection between NECPs and subnational plans in the same field;
- the connection between NECPs and other relevant national plans; and
- the connection between the revision of NECPs and emergency-related instruments such as Recovery and Resilience Plans and RePowerEU.

You have been selected as part of the targeted stakeholders because you can potentially provide information related to the implementation of the MCED and NECP (or equivalent document) in your Member State. If you have any questions regarding the survey, please contact: enve@cor.europa.eu.

We kindly ask you to fill in the questionnaire by 12 June 2023⁴⁵².

Privacy Statement

For more information on the processing of your personal data, please read the attached privacy statement [[link to document](#)].

Questionnaire

Stakeholder information and contact details

1. I am giving my contribution as a:

National authority/government

Regional authority/government

Local authority/government

National association of local and regional authorities

National energy agency

Regional energy agency

Local energy agency

Other, please specify: (mandatory)

2. Country of origin

(List of EU Member States – *default in EU Survey*)

3. Contact details

(Please note that results will be anonymised. Your contact details will only be used in case the CoR needs additional information about your replies for possible best practices or interviews.)

First name, please specify:

Last name, please specify:

Email, please specify:

Function/position, please specify:

Organisation name, please specify:

3.1 Contact with the CoR

- I would like to receive the report on "Local and regional authorities in the governance of the energy union" when it will be available.
- I agree to be contacted by the CoR for the follow-up of this survey.

⁴⁵² Please note that the survey has not been closed, this was the indicative date to allow the analysis and inclusion of results in this study. In practice, the cut-off date to include results in this study was 19 June 2023.

I agree to be contacted by the CoR about the good practices shared in question 28.

I do not wish to be contacted by the CoR and wish my answers to be anonymised before being used.

4. How do you evaluate the knowledge of the National Energy and Climate Plan (NECP) of your Member State and its objectives, within your organisation or administration?

None: We are not aware of the existence of the NECP.

Poor: Very few individuals are familiar with the NECP or are aware of its objectives.

Fair: We are aware of the existence of the NECP and its objectives, but not of how we should be involved in drafting it.

Good: We are aware of the existence of the NECP and its objectives, and we know that we need to be involved in its drafting by the Member State.

I don't know

Other, please specify: (mandatory)

5. Within your organisation or administration, who is in charge of coordinating the exchanges with the national authority, when it comes to the NECP?

A specific department or area (e.g. the sustainability department, the international department, etc.)

A coordinated interdepartmental team, working group or taskforce (mix of different team members)

The highest level of decision-making of the organisation

Nobody/no specific expert, team or unit

I don't know

Other, please specify: (mandatory)

A. Implementation of Multilevel Climate and Energy Dialogue (MCED) and citizens' engagement

The aim of this section is to assess the status of multilevel climate and energy dialogue (MCED) at national level, focusing on the established mechanisms and on the level of engagement of local/regional authorities (LRAs), relevant stakeholders and citizens in the consultation process.

6. Has your national competent authority established a permanent mechanism for MCED or consultation on the NECP?

Yes

Partly, it is currently under development

No

I don't know

6.1. If no, can you explain why? [mandatory, define character limit]

7. Which stakeholders are involved in the MCED or NECP-related consultation? (multiple answers possible)

- Regional authorities
- Local authorities
- Regional energy agencies
- Local energy agencies
- Consumer organisations
- Business and industry organisations
- Non-governmental organisations
- Citizens
- Research and academic institutions
- Other, please specify: (mandatory)
- I don't know

8. What is the mechanism used by your national competent authority in the drafting of the NECP to consult local and regional authorities? (multiple answers possible)

- None: LRAs have not yet been consulted by the national authority.
- Traditional stakeholder consultation: LRAs have been involved through written comments or an online questionnaire.
- Collaborative platforms or committees: LRAs have been involved in meetings where issues relating to enforcement and energy transition strategy were identified and discussed, and new goals were set.
- Regional plans and strategies: LRAs contributed to the national strategy with regional/local plans, under the coordination or with the support of the national authority.
- Organisation of events: LRAs have been involved through workshops, seminars, roundtables, etc.
- Interviews
- Informal meetings
- Other, please specify: (mandatory)
- I don't know

9. At which stage of the NECP preparation process is the MCED or consultation carried out? (multiple answers possible)

- Early: preparatory/brainstorming stage
- Mid-way: when a first draft of the NECP is available
- Advanced: when the NECP is nearly finalised
- Other, please specify: (mandatory)
- I don't know

10. How would you rate the quality of the MCED or consultation process?

Excellent

Satisfactory

Poor

Very Poor

I don't know

Please explain: [*optional, open, define character limit*]

11. Do you feel that the contributions of LRAs to the NECP have been taken into consideration?

Yes, already in the first draft in 2019

Yes, in the revision process

No

I don't know

11.1 If 'yes', in which stage of the process were the contributions considered?

- In the first draft in 2019
- In the revision process
- Other

12. Has your administration/organisation experienced any change (progress, setbacks) in its current involvement in the mechanisms for revising the NECP, compared to what happened with the first draft in 2018-19?

Same as in the past

Stronger involvement in the current revision phase

Weaker involvement in the current revision phase

I don't know

Please explain: [*optional, open, define character limit*]

13. Which mechanisms have been used at national level to involve citizens in the process of designing and implementing the NECP? (*multiple answers possible*)

Public consultation with all types of stakeholders

Conferences

Meetings with interest groups

Workshops

Interviews

Surveys/opinion research

Citizens' panels

Street booths

Online publication of information, with no additional advertisement

Other, please specify: (mandatory)

No involvement

I don't know

14. Were citizens informed/consulted about the local implications of implementing the NECP?

Yes

No

I don't know

14.1. If yes, how were the citizens informed? (multiple answers possible)

- Public consultation with all types of stakeholders
- Conferences
- Meetings with interest groups
- Workshops
- Interviews
- Surveys/opinion research
- Citizens' panels
- Street booths
- Online publication of information, with no additional advertisement
- Other, please specify: (mandatory)
- I don't know

15. How would you rate the implementation of the MCED or NECP-related consultation in terms of citizens' engagement?

Excellent

Satisfactory

Poor

Very Poor

I don't know

Please explain: [optional, open, define character limit]

B. Relationship between NECPs and subnational plans

The aim of this section is to assess: the connection between the NECP and other subnational plans, such as local and/or regional climate and energy plans; the potential conflicts between national government and LRAs; and the existence of support tools for the implementation of NECP measures at local or regional level.

16. Does the NECP in your Member State take into account subnational energy and climate planning as a basis for the national plan (bottom-up

planning)?

Yes

No

I don't know

16.1. If yes, which plan(s) does the NECP take into account? (multiple answers possible)

- Local climate and energy plan
- Regional climate and energy plan
- Local adaptation plan
- Regional adaptation plan
- Local sustainable transport plan
- Regional sustainable transport plan
- Other, please specify: (mandatory)
- I don't know

17. How would you rate the connection between the NECP in your Member State and subnational plans?

Excellent

Satisfactory

Poor

Very Poor

I don't know

Please explain: [optional, open, define character limit]

18. Is there any conflict between national government and LRAs with regard to the application of the NECP?

Yes, only at political level

Yes, and, as a result, legal action was taken by the competent local/regional authority

No

I don't know

Please specify: (optional)

18.1. If yes, what are the reason(s)? (multiple answers possible)

- Difficulty to adapt the provisions of the NECP to the regional or local level
- No recognition of regional or local needs in the NECP
- Divergence between national and regional or local climate and energy goals
- Social impact of the measures
- Environmental impact of the measures
- Other, please specify: (mandatory)

- I don't know

19. Are national targets translated into subnational targets?

Yes

No

I don't know

19.1 If yes, how would you rate the consistency of the subnational targets with national climate and energy targets?

Very consistent

Consistent

Inconsistent

Conflicting

I don't know

Please explain: [optional, open, define character limit]

20. Does the NECP in your Member State provide for any reporting system by LRAs?

Yes

No

I don't know

20.1 If yes, is the reporting system integrated into the overall NECP reporting?

Yes, the NECP progress reports rely on the reporting provided by LRAs

Partially, information by the LRAs is used in the NECP progress reports but it is not critical

No, the LRA reporting is not related to the NECP progress reports

Other, please specify: (mandatory)

I don't know

21. Does the NECP in your Member State provide support for the implementation, at local or regional level, of the measures included in the plan?

Yes

No

I don't know

21.1 If yes, what kind(s) of support does the NECP provide to LRAs?

(multiple answers are possible)

- Financial support from national funds
- Financial support from EU funds

- Technical support
- Opportunities for capacity-building
- Opportunities for EU exchanges and peer learning at the EU level
- Other, please specify: (mandatory)
- I don't know

22. Consider the following statement: "Under existing national climate and energy policies, the financial resources allocated to LRAs match the responsibilities of the local level to meet the targets". How would you respond to this statement?

Strongly disagree

Disagree

Agree

Strongly Agree

I don't know

Please explain: [optional, open, define character limit]

C. Connection between NECPs and other national plans

This section focuses on the connection between the NECP and other national plans, such as national adaptation strategy and/or the national adaptation plan.

23. Was the NECP in your Member State connected to other plans covering other sectors of the European Green Deal and the Sustainable Development Goals (SDGs)?

Yes

No

I don't know

23.1. If yes, which other relevant national plans was the NECP connected to?

(multiple answers possible)

- National Adaptation Strategy
- National Adaptation Plan
- National Sustainable Development Strategy
- National Circular Economy Plan
- National Transport Strategy
- Other, please specify: (mandatory)
- I don't know

24. How would you rate the connection between the NECP and the other national plans?

Excellent

Satisfactory

Poor
Very Poor
I don't know

Please explain: [optional, open, define character limit]

D. Connection between the revision of NECPs and emergency-related instruments

This section focuses on the connection between the revision of the NECP and emergency-related instruments, such as the national Recovery and Resilience Plan and the RePowerEU.

25. Is the revision of the NECP in your Member State connected to the national Recovery and Resilience Plan?

Yes
No
I don't know

25.1. If yes, how would you rate the connection between the NECP and the national Recovery and Resilience Plan?

Excellent
Satisfactory
Poor
Very Poor
I don't know

Please explain: [optional, open, define character limit]

26. Is the revision of the NECP in your Member State connected with the implementation of RePowerEU?

Yes
No
I don't know

26.1. If yes, how would you rate the connection between the NECP and the implementation of RePowerEU?

Excellent
Satisfactory
Poor
Very Poor
I don't know

Please explain: [optional, open, define character limit]

Final remarks

The aim of this section is to gather your personal view on the design of the NECPs across the Member States, as well as for you to share any examples of good practices regarding the involvement of LRAs in the governance of the NECP in your Member State.

27. Do you think the NECP in your Member State should be extended to cover other policy areas of the European Green Deal?

Yes

No

I don't know

27.1 If yes, which area(s) should the NECP be extended to cover? (multiple answers are possible)

- Climate change adaptation
- Sustainable and smart mobility
- Circular economy
- Zero pollution
- Preserving and restoring ecosystems and biodiversity
- Fair, healthy and environmentally friendly food system
- Resilience and risk management
- Sustainable finance
- Other, please specify: (mandatory)
- I don't know

28. Do you have examples of good practices to share concerning the involvement of LRAs in the governance of the NECP in your Member State? [open, define character limit]

I agree to be contacted by the CoR about the good practices shared

29. Please feel free to add in the box below any other relevant comments and observations that can help improve how EU policy is implemented.

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ISBN 978-92-895-2911-2
doi:10.2863/314352

QG-07-23-344-EN-N



Publications Office
of the European Union



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of the Regions**

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