



# PLANNING FOR NET ZERO:

ASSESSING THE DRAFT NATIONAL  
ENERGY AND CLIMATE PLANS

MAY 2019

CLIMACT



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*This report has been commissioned by the European Climate Foundation (ECF). It is part of the Net-Zero 2050 series, an initiative of the ECF with contributions from a consortium of experts and organisations. The objective of Net-Zero 2050 is to start building a vision and evidence base for the transition to net-zero emission societies in Europe and beyond, by midcentury at the latest. The Paris Agreement commits us to making this transition, and long-term strategic planning shows that many of the decisions and actions needed to get us on track must be taken without delay.*

*Reports in the series seek to enhance understanding of the implications and opportunities of moving to climate neutrality across the power, industry,*

*buildings, transport, agriculture, Land Use, Land-Use Change and Forestry (LULUCF) sectors; to shed light on some of the near-term choices and actions needed to reach this goal, and to provide a basis for discussion and engagement with stakeholders and policy-makers.*

*For reasons of the level of detail of modelling needed, this report uses different modelling tools than the CTI 2050 Roadmap Tool that has been developed and used for other analyses in this series. Care has been taken however to ensure consistency on the key parameters.*

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# FOREWORD

*European Climate Foundation*



The Net Zero 2050 series of reports aims to build a vision and evidence base for the transition to net zero emissions societies in Europe and beyond, by mid-century at the latest. While most reports in the series look in detail at the actions and transformations needed in the power, industry, buildings, transport, agriculture, forestry and land sectors, the overarching governance framework is also key to making sure that these steps are identified and taken.

This report is slightly different from others in the Net Zero 2050 series, in that it offers a real-time assessment of the draft NECPs that Member States have put forward, to see to which extent they put countries on track for the long term goal. The conclusion is that there is much work to be done: this assessment is a clear call to Member States to improve their plans by the end of the year, when final drafts are to be submitted. It is also a call on the European Commission to make clear and unambiguous recommendations to Member States by June, in line with EU 2030 package and the net zero Emissions objective for 2050.

A back-casting governance framework can be a vital part of the net zero toolbox, to help to expose where improvements are needed, and to create the processes and institutional structures to get on track for net zero. Now that it has such a framework, the EU needs to step up and use it to its full potential.




# EXECUTIVE SUMMARY





Net zero emissions economies will not come about by chance: dedicated focus and planning, with a clear eye to the end goal, will be needed. National Energy and Climate Plans (NECPs) represent an opportunity for EU Member States to chart their next steps on the road to a climate-secure future, and to reap the economic and social benefits which come with that. Clear and robust NECPs can serve as advertisement to large and small investors and engage stakeholders in implementation, as well exposing where additional efforts will be needed. However, the draft plans presented by governments at the start of 2019 are in acute need of improvement. They suffer from inadequate targets and insufficient details on the policies, investments and financing needed. Member States also need to do better at involving their national stakeholders in providing input to the plans, to benefit from their expertise and to get them on board for future policies. A number of good practice examples exist around the EU, and should serve as inspiration for the final plans. While some degree of ‘teething trouble’ is understandable for this first round of drafting, Member States should take the chance to significantly improve their plans for their final versions.



The 2019 EU Governance Regulation provides a robust planning framework for meeting the EU's 2030 climate and energy goals and the 2050 Net Zero objective. It requires Member States to prepare integrated National Energy and Climate Plans to 2030 (NECPs) and national long-term strategies to 2050 (NLTS). The near-term plans should be consistent with the long-term documents. As such, the NECPs are an opportunity for Member States to anticipate and plan for the transition in an inclusive, integrated and socially just manner, and to attract more public and private financing in clean energy infrastructure, lowering costs for its citizens and businesses.

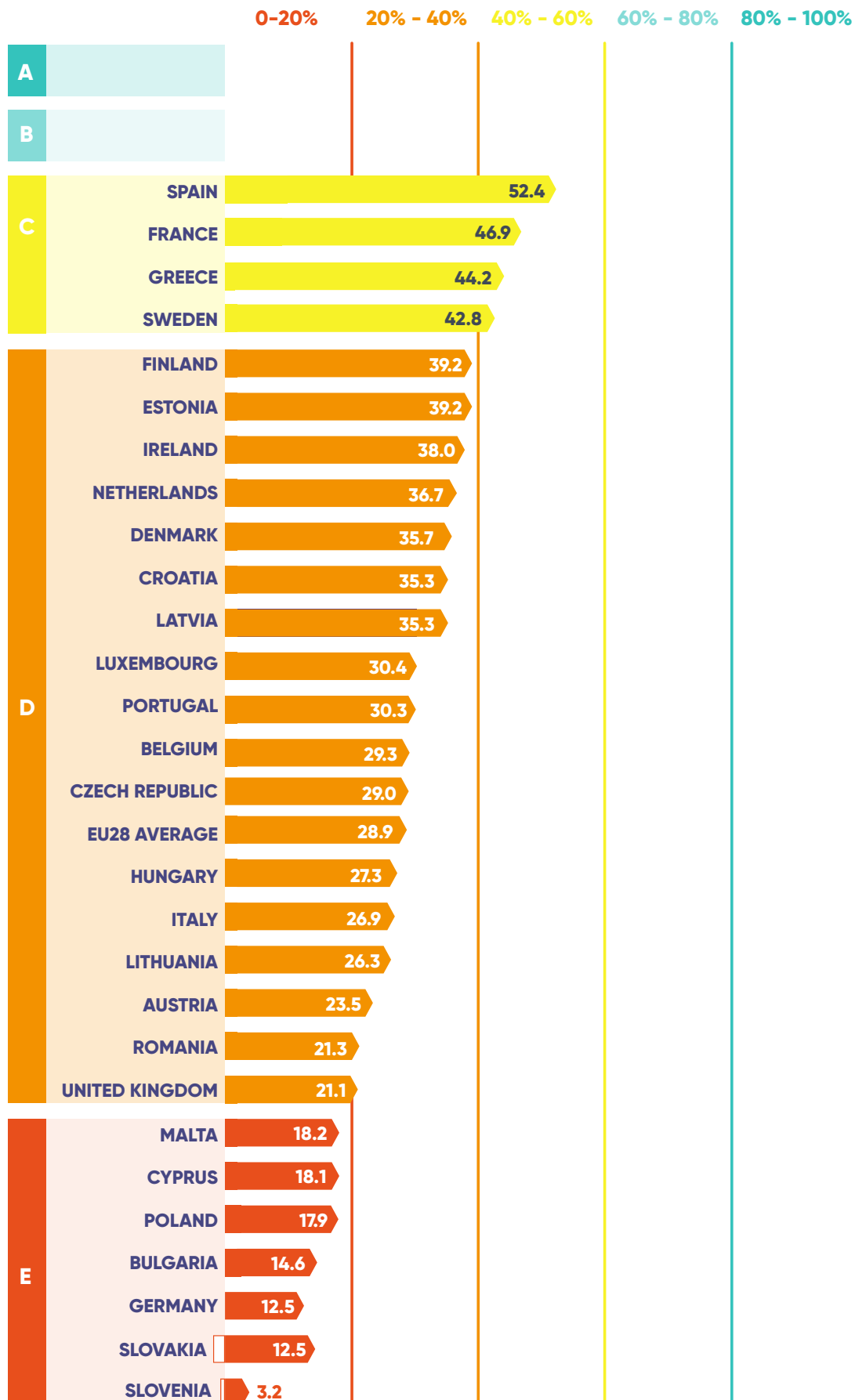
This report offers a qualitative analysis of the 28 Member States draft NECPs and assesses them according to (1) the adequacy of their national targets (in a Net Zero context), (2) the completeness and detail of the policy descriptions, and (3) the quality and inclusiveness of the drafting process. It does not evaluate the likely effectiveness of the presented policies.

**It finds that so far, the plans fall short on ambition and credibility, and do not describe a robust, Paris-compliant pathway for Europe.** The overview below shows that only one plan exceeds 50% of the available points, while the EU28 average is at less than a third. In some cases it is on ambition that plans' shortcomings are particularly marked; in other cases it is on process quality or policy detail. EU countries should take the opportunity to substantially improve the plans by the end of the year when final versions are due.

**There are, however, reasons for optimism. It is already an important step that this governance framework exists, allowing the shortcomings to be exposed. The report also identifies several good practices across the draft plans.** It will be essential for national and EU policy-makers to explore these and optimise accelerated learning. Moreover, the European Commission should consider ways to reward robust and ambitious NECPs with dedicated financial and policy support.







## NATIONAL DECISION-MAKERS SHOULD CONSIDER THE FOLLOWING RECOMMENDATIONS:



### TARGET ADEQUACY:

The 2030 climate targets should reflect the Paris-compatible objective of at least Net Zero greenhouse gas emissions by 2050. Member States have largely decided to stick to the legal obligations under the 2030 Climate Action Regulation, which are not in line with a Net Zero 2050 trajectory or the scientific findings of the Intergovernmental Panel on Climate Change (IPCC) 1.5°C Report. Similar restraint is visible on renewable energy and energy efficiency. **Member States should consider the EU targets as a minimum threshold rather than a maximum cap for national climate ambition.** Higher than the minimum legal ambition can be found in Luxembourg, Spain and Sweden, although none of these provide a 2030 target in line with the ‘Net Zero emissions by 2050’ range that was defined for this assessment.



### CREDIBLE POLICIES:


Member States risk missing out on financing and investments due to vague and incomplete descriptions of policies and measures. Few Member States have provided a coherent and credible set of policies and measures, accompanied by policy impact analyses, that are needed to win investor confidence and benefit from lower cost of capital for clean energy infrastructure financing. **It is vital that Member States identify investment needs and financing measures if they are to mobilise the necessary investments, eg for building renovations and decarbonised transport infrastructure.** Good practices can be found in the draft plans of Greece, Spain, Finland, France and Ireland.



### PUBLIC ENGAGEMENT:

Stakeholder involvement is essential to advance societal buy-in for the transition, and to capture the wealth of information available. The engagement with national actors on the draft plans has been insufficient so far, although in many cases there are promises to improve that between the draft and the final plan. Stakeholder involvement is key to developing quality final plans, with varied and meaningful opportunities for engagement. As with the other two dimensions this report assesses, the draft plans display a full array of scores, but good practices can be found in Estonia, Ireland, Greece and Latvia, for example.





The above recommendations are also relevant for the European Commission as it prepares to issue its recommendations for June. In addition, the European Commission should consider the following:

1

**Make Net Zero by 2050 the guiding principle for the NECPs.** The long-term dimension is clearly under-developed in the draft NECPs, despite the EU Governance Regulation's requirement for the 2030 plans to be consistent with the 2050 NLTS, which are also due by the end of the year. Feedback to Member States should maintain and strengthen the perspective on a Net Zero greenhouse gas objective for 2050 at the latest. While that objective is not embedded in EU legislation as a target at this point in time, it is clear that an increasing number of state and non-state actors are considering this goal as the only reasonable benchmark.

2

**Provide clear and unambiguous recommendations to Member States on all missing aspects.** The draft NECPs already contain significant amounts of information, spanning several hundred pages, but the focus is often on the status quo, with essential data on future policies and financing missing. The European Commission should signal what needs to be improved in each section of the draft plans and request additional detail and analysis.

3

**Establish a formal “helpdesk” within the European Commission,** for example in the form of an Energy Transition Support Service, that helps Member States to resolve concrete planning and implementation challenges. This function could help the Commission to follow-through on its recommendations to Member States towards final NECPs by the end of the year, as well as the finalisation of the NLTS. In the years to come it could support Member States for the progress report in 2021 and the update of the plans in 2023. It could extend the support provided in the drafting thus far and provide a much-needed resource for those facing capacity bottlenecks.

Beyond the finalisation of the draft plans, other EU policy processes can directly support an ambitious implementation at the national level. In particular, the next Multiannual Financial Framework (MFF) and the revision of the Energy Lending Policy of the European Investment Bank (EIB) could help to direct EU public funding towards clean energy and transport projects and policies. All parties involved must seize this tremendous opportunity of using public financial support to attract private investments to further the implementation of the NECPs, creating a tangible benefit for national economies.

In conclusion, while the draft NECPs show the beginnings of the next steps towards climate action by 2030, they are not yet fully formed maps to a climate-secure future and do not live up to the spirit of the Paris Agreement. With the right level of support, guidance and learning, however, European Member States have the opportunity to show their commitment to the Net Zero objective by 2050 as the direction of travel, and show the rest of the world the path towards a climate neutral future.





# INTRODUCTION







To be in line with the Paris Agreement, developed economies such as the European Union's will need to achieve net zero greenhouse gas emissions by 2050, or even earlier<sup>1</sup>. This is the goal that has been proposed by the European Commission<sup>2</sup>. This requires ambitious interim targets, thorough planning of the policies and measures to incentivise the required investments, and to have a transparent process to get people on board for the transition. All of this must be informed by a clear understanding of what needs to be in place to achieve the long term goal.



## THE GOVERNANCE REGULATION AND ITS NECPs

In December 2018, the Regulation on the Governance of the Energy Union and Climate Action, in short the “Governance Regulation” entered into force. Agreed as part of the “Clean Energy for all Europeans” package, the goals of the new regulation are manifold, but the development of strategies supporting the objectives of the Energy Union is a central element, and in particular to support the achievement of the EU’s 2030 energy and climate targets.<sup>3</sup>

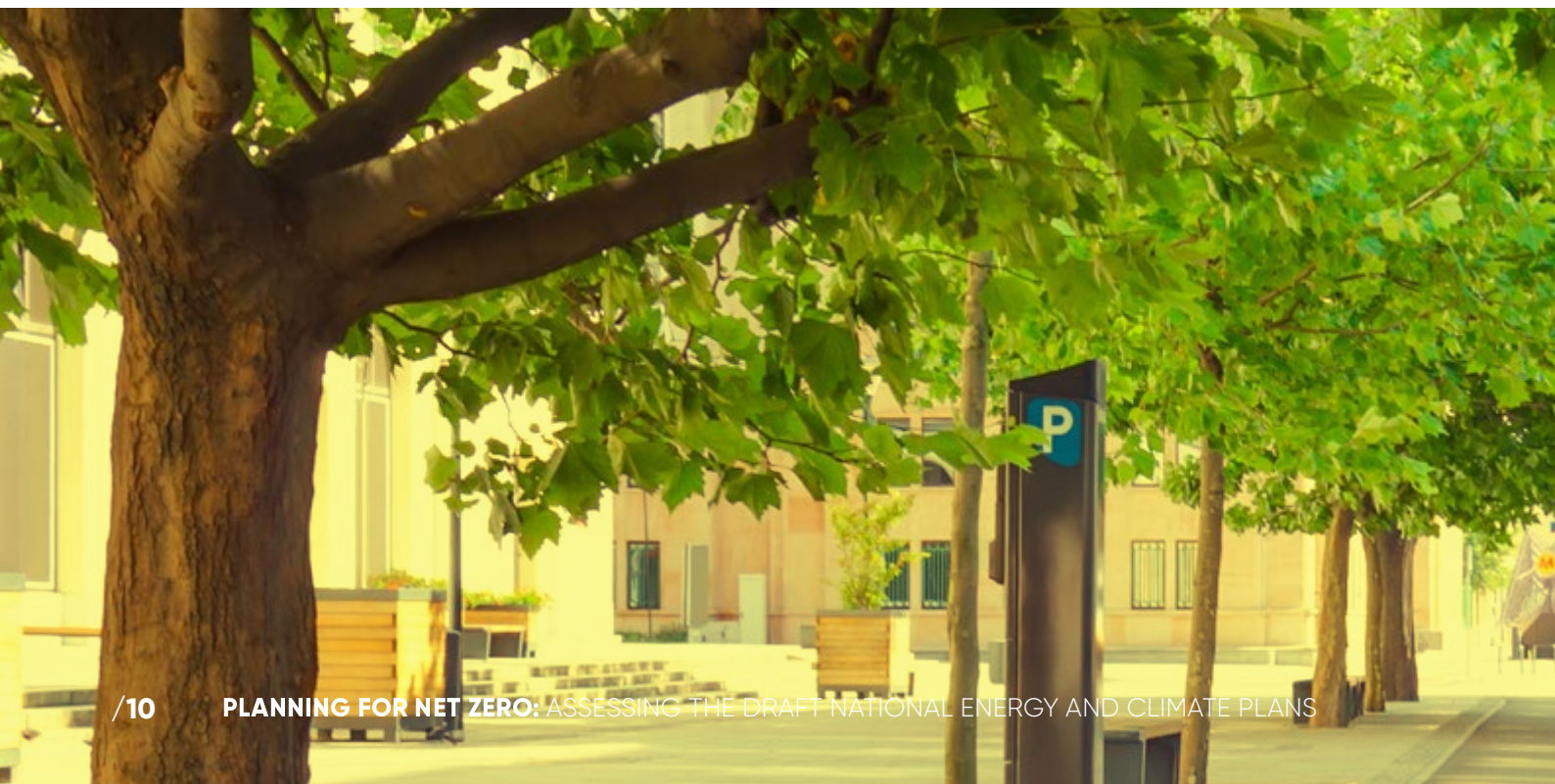
The governance mechanism is based on so-called *integrated national energy and climate plans (NECPs)*<sup>4</sup> which are meant to give a clear perspective on the ambition of the Member States up to 2030 and the measures and the means they are putting forward to reach it. The transparency and participatory nature of this governance mechanism must be ensured by early and effective public consultation on these plans.

According to the regulation, EU countries are also required to develop national long-term strategies (NLTS) by 1 January 2020, and consistency between long-term-strategies and NECPs has to be ensured.<sup>5</sup> Insights from NLTS must inform near-term policies and decisions. This further underlines the transformative nature of the plans. On the road to a Net Zero economy in Europe, the progress that has to be made by 2030 is not incremental. The decarbonisation of all sectors of the economy must be well underway by then.

NECPs are thus of critical importance for the EU’s ability to deliver on its 2030 climate and energy targets. They are also an opportunity for every Member State to consider and decide and then communicate future policy direction to national stakeholders.

Process-wise, the Regulation required each Member State to submit a draft NECP by the end of 2018, to then be assessed by the Commission. This assessment will include testing whether the combination of the national plans leads to achieving the targets at the European level. The Commission is expected to come back with comments and recommendations on these drafts by June 2019. The final NECPs must be submitted by the end of 2019. NLTS must also be submitted by this time.

For this iterative process of “1. Drafts => 2. Recommendations => 3. Final plans” to work as intended, and for the Commission to analyse their quality, draft NECPs would ideally be fully developed and substantiated strategy documents, with a high level of detail. Essentially, they should be final NECPs that still receive a quality check from an independent reviewer, to ensure they are fully fit for service.





## OBJECTIVE OF THIS REPORT

The primary objective of this assessment report is to stimulate a constructive conversation on how to improve the draft NECPs towards their final versions by the end of 2019.

The focus of this work was to assess the draft plans according to a common framework so that they can be directly compared with one another, allowing a ranking of their quality. The report looks at the information provided by MS in their draft NECPs on their targets (or: national contributions), policy details, and process quality. It is not a full impact assessment, and does not evaluate the likely effectiveness of the presented existing or additional policies, nor the accuracy of the information provided. The assessment relies almost exclusively on the draft plans, and does not consider other national policy documents or relevant literature. It also does not include an assessment of the sum of all national energy and climate target contributions to the EU wide objectives for 2030.

More precisely, the objectives of this report are to:

- provide a stimulus and point of comparison for the Commission's feedback on the draft NECPs (due in June 2019);
- enhance learning between Member States governments and other stakeholders about best practice in terms of targets, policy and process;
- provide material for national actors that may be useful to improve the dialogue with their national authorities;
- draw attention to the finalization of the NECPs in second half of the year, stimulating a call to action where NECPs fall short, and providing inspiration and encouragement by highlighting where MS are already doing well;
- put a spotlight on the value and potential of the EU Governance framework to guide the transition in a well-managed way.

Our analysis is rooted in the belief that these plans are a key piece of the puzzle, and that civil society must ensure that they reach a sufficiently high level of ambition, quality and credibility, and consistency across countries. At the same time, the process to create them must be transparent and involve a wide range of stakeholders who will ultimately need to support their implementation. This public source of information should help create greater transparency and in turn accountability of the respective national government responsible for the plans.







# METHODOLOGY

This report uses an indicator-based assessment tool that was developed in consultation with representatives of NGOs and civil society organisations, progressive business associations and research centres to score and compare Member States' draft NECPs.

The development of the tool was guided by the need for NECPs to be *transformative* and built upon a *transparent process*. A plan is transformative if it sets ambitious targets along a sustainable decarbonisation pathway in line with the Paris Agreement long-term targets, and specifies a coherent and credible set of policies to achieve them. A plan is transparent if it facilitates early and effective input for all stakeholders on an ongoing basis. These ideals were operationalized for the purposes of assessment into three key dimensions: (i) target adequacy; (ii) policy details; and (iii) process quality.



## EVALUATION OF DRAFT NECPs IN THREE DIMENSIONS

Multiple considerations and challenges were taken into account to develop the evaluation procedure of the assessment tool. First and foremost, many important NECP elements do not lend themselves to a quantitative evaluation and thus require value judgements. To lower subjectivity and enhance the reliability of the assessment across evaluators, the evaluation is based on pre-determined criteria and potential responses. Secondly, despite a common template provided in the Governance Regulation, the draft NECPs exhibit varying levels of detail and completion. The methodology reflects the various stages of completion among NECPs by marking where information is missing and using scales to account for varying degrees of detail. Annex one provides a more in-depth look at the response scales used by evaluators and the respective weight given to individual elements.

The **target adequacy** dimension consists of five main indicators that evaluate the climate and energy targets for greenhouse gas emissions, non-ETS emissions, renewable energies and energy efficiency present in each NECP.<sup>6</sup> The dimension checks each 2030 target for compliance towards the existing EU targets, as well as in light of what would be necessary with a view towards 2050, using a country-specific benchmark. This assessment is mainly quantitative. The presented targets are assessed as: *below compliance*, *compliant with EU targets*, *moderately ambitious* and *ambitious for reaching Net Zero emissions by 2050*. A fifth grouping called *Paris and 1.5°C leadership* is relevant only for emission reductions targets and covers countries that would go beyond -65% in 2030. Reference in the NECP to long-term targets for 2050 or beyond is assessed qualitatively.

The **policy details** dimension consists of six main indicators that evaluate information provided on policies and measures in the field of greenhouse gas emission reductions, renewable energies and energy efficiency, and if these policies are stated to be sufficient to reach the national targets. The dimension also checks the information provided on investment needs and for measures that hamper the

transition to Net Zero (e.g., fossil fuels subsidies). The assessment is based on a qualitative approach for most of the indicators, checking mainly for the level of detail. It does not include a full impact assessment and does not evaluate the likely effectiveness of the presented existing or additional policies, nor the accuracy of the information provided.

The **process quality** dimension consists of two main indicators, which assess how Member States implemented the process of drafting the NECP. For the purposes of assessing the level and quality of stakeholder engagement, the tool checks whether a public consultation took place and asks about its timing and format. The second indicator checks on overall compliance with the format and timely submission.




### Scoring on indicators and dimensions

The total possible score that countries can achieve is 100. The breakdown into the three dimensions reflects the importance of the different dimensions with target adequacy and policy details providing each 45 and process quality 10 (see table below for a breakdown of maximum points per indicator). For some individual answers negative scores are possible, e.g., a lack of information available in the draft plans on particularly important aspects, to indicate a “penalty” for bad practice. Annex one provides the full picture of all main and sub-indicators, possible maximum scores and related scoring of possible answers.

### County-specific output - country scorecards

The report also provides the indicator results for each country to complement the comparative analysis: the national results can be found in individual national scorecards in Annex two. In addition, the scorecards include highlights from the respective country in particular on those indicators where the respective country scored particularly well or very low - to indicate good and bad practices.

DIMENSION	# OF INDICATORS	# OF SUB-ELEMENTS	POINTS TO MAXIMUM SCORE
1: Target adequacy	5	7	45.0
2: Policy details	6	21	45.0
3: Process Quality	2	4	10.0
	14	32	100.0

DIMENSION	INDICATOR ID	INDICATOR TITLE	EVALUATION FOCUS	MAXIMUM SCORE
 <p>Dimension 1: <b>TARGET ADEQUACY</b> 45 POINTS</p>	1.1.	2030 Non-ETS GHG targets	Is the national non-ETS GHG target adequately ambitious?	15
	1.2.	National 2030 GHG target	Is there an economy-wide national climate target for 2030?	1
	1.3.	2030 Renewable Energy target	Is the national RES target adequately ambitious?	12.5
	1.4.	2030 Energy Efficiency targets	Is the national EE target adequately ambitious?	12.5
	1.5.	National 2050 target	Does the plan contain a national climate target beyond 2030? Does it reference the 2050 strategy and the Paris Agreement?	4
 <p>Dimension 2: <b>POLICY DETAILS</b> 45 POINTS</p>	2.1.	Policies for achieving the non-ETS GHG target	Are the proposed policies described in detail and are they likely to be sufficient to achieve the national non-ETS target? Does the country plan to use CAR-flexibilities - and if so, which ones?	10
	2.2.	Policies for achieving RES target	Are the proposed policies described in detail and are they likely to be sufficient to achieve the national renewable energy target?	10
	2.3.	Policies for achieving the EE targets	Are the proposed policies described in detail and are they likely to be sufficient to achieve the national energy efficiency target?	10
	2.4.	Coal use	Does the country plan to phase-out coal use for electricity generation (if they have coal in their electricity mix)?	5
	2.5.	Phase out of fossil fuel subsidies	Does the NECP name existing fossil fuel subsidies and does it present a timeline for their phase-out?	2
	2.6.	Financing	Does the plan contain (sufficient and robust) information on the additional investments required and on financing of policies?	8
 <p>Dimension 3: <b>PROCESS QUALITY</b> 10 POINTS</p>	3.1.	Effective stakeholder inputs	How are stakeholders being included in the NECP drafting?	7,5
	3.2.	Compliance	Is the draft NECP in compliance with the requirements? Was it submitted on time?	2,5
TOTAL POTENTIAL SCORE				100





## DIMENSION 1:

# TARGET ADEQUACY



## WHAT AND HOW WE EVALUATE

This dimension evaluates the target adequacy by assessing the targets that Member States have communicated in the area of greenhouse gas (GHG) emission reductions, deployment of renewable energies and improvement of energy efficiency against specifically defined benchmarks.

For GHGs, the focus of the NECPs, and therefore of our analysis, is on the sectors covered by the Climate Action Regulation (CAR) (EU/2018/842) which defines national binding 2030 GHG reduction targets for sectors not included in the EU Emissions Trading System (ETS) (such as transport, buildings, waste and agriculture - referred to as “non-ETS”).

The current 2030 targets (-40% of GHG emissions compared to 1990, improvement of energy efficiency of 32.5% compared to a reference and a share of 32% of renewable energies in gross final energy consumption) are a first step towards decarbonisation for all Member States but they are not deemed sufficient for the EU as a contribution to the objectives of the Paris Agreement<sup>7</sup>.

**Our scoring approach is directly rooted in this higher ambition:** Member States get limited points if they merely comply with these targets, and score higher only as their objectives align with the reductions deemed necessary.

To assess this, we consider three ranges beyond the current official 2030 EU targets, defined by different and increasing ranges of GHG emissions reduction levels. Then, we determine ranges for energy efficiency (EE) and renewables (RES) objectives that are in line with these GHG reduction levels, i.e. that can deliver the corresponding GHG cuts, based on the work of DG ENER on the 2030 climate and energy targets.<sup>8</sup>



The three ranges detailed hereunder are summarized in the table.

1. **Below compliance** : Countries with targets below the minimum legal compliance level (see point 2) do not receive any points .
2. **The “Minimum legal compliance” range**: this range is set between -40% and -46% GHG emissions reduction at European level compared to 1990. The lower bound for this range corresponds to the current EU target of -40% GHG/ 32.5% EE/ 32% RES. However, as widely commented, these figures are not mutually consistent as 32.5% EE and 32% RES would rather lead to a -45/46% GHG cut. Hence, we take -46% GHG/ 33% EE/ 33% RES as the upper bound of this range. The country level figures are based on the national targets under CAR as well as the work by CAN Europe for higher ambition.
3. **The “Moderate ambition” range**: this range is set between -46% and -55% GHG emissions reduction at European level compared to 1990. This is between the minimum compliance and the low range for Net Zero 2050 pathways<sup>9</sup>. To compute the EE and RES figures corresponding to -55% GHG , we use as a proxy the 45% RES/ 40% EE target that should deliver a 53.2% GHG emissions cut.
4. **A “Net Zero emissions by 2050” range**: this range is set between -55% and -65% GHG emissions reduction at European level compared to 1990. This is in line with the range identified in the original ECF Net Zero 2050 report<sup>10</sup>. To obtain the EE and RES figures coherent with the -65% GHG figure, we inflate the EE and RES figures corresponding to -55% by a factor 65/55.

A fifth level for the GHG assessment covers countries that would go beyond -65% in 2030, which would receive extra points as being in the actual “Paris and 1.5°C leadership” range. This category is not converted to a range for the assessment of the renewable energy and energy efficiency targets as no data is available that could be converted into corresponding thresholds for a country-specific assessment.

	MINIMUM LEGAL COMPLIANCE	MODERATE AMBITION	NET-ZERO BY 2050	PARIS COMPATIBLE
GHG (% reduction compared to 1990)	-40% to -46%	-46% to -55%	-55% to -65%	Above -65%
EE (% increase compared to a reference)	-32.5% to -33 %	-33% to -40%	-40% to -47.3%	n/a
RES (% share in gross final energy)	32% to 33%	33% to 45%	45% to 53.2%	n/a

The three indicators for GHG, RES and EE are assessed for their 2030 target adequacy (1.1. GHG Non-ETS; 1.3. RES; 1.4 EE) and they make up most of the scoring for this dimension with 40 out of the available 45 points. They are complemented with a view on the total GHG perspective (Indicator 1.2 on the inclusion of an Total (economy-wide) national target), as well as an indicator assessing whether these targets have been derived in connection to the long-term perspective (Indicator 1.5 on the National 2050 target), in view of the requirement for the NECPs to be putting the country on track for the long-term goal.

## GHG EMISSION REDUCTIONS (1.1 & 1.2)

The assessment of greenhouse gas emissions reductions in the draft NECPs focuses on the value put forward by Member States for their non-ETS sectors (Indicator 1.1) but adds to it the inclusion of an economy-wide national climate target (Indicator 1.2).

### INDICATOR 1.1: 2030 NON-ETS TARGET

#### Context

**Why is this important?** GHG emissions in the EU are divided between ETS and non-ETS categories. While the former is regulated at EU-level by a cap-and-trade mechanism<sup>11</sup>, the latter falls under the Effort Sharing Regulation (ESR) / Climate Action Regulation (CAR), with national binding targets for Member States. In order to reach a global -40% GHG cut at European level by 2030, the CAR set out a -30% objective below 2005 emissions for the non-ETS sectors with differentiated national targets, that are legally binding. The reduction effort is distributed among Member States mostly based on their GDP. This complements the reductions required in the context of the ETS (Emissions Trading System) for the largest emitters.

**What does the legislation require?** The Governance Regulation requires Member States to clearly set out in the NECPs their national target on non-ETS emission reductions. While the CAR does impose legally binding targets for these reductions, Member States can choose to have targets that are more ambitious than these.

**What does the indicator measure?** We compare the national ambition with the European legal requirements and the ranges required to be in line with 1.5°C. Countries receive minimal points for simple compliance and have to go beyond the current official EU targets to get more points. This indicator thus measures how Member States plan to go further than the insufficient EU targets.

#### Results

The assessment shows a general lack of ambition on the 2030 non-ETS GHG targets, which is reflected in the low average score for the EU28 of 2.2 points out of 15.

Most countries simply comply with the minimum EU requirements and therefore receive only limited points for this indicator (1.5 out of 15). This includes cases like Greece, which only commits itself to the CAR target (-16% from 2005 levels), despite actually projecting its Policies and Measures (PAMs) to deliver twice this amount of emissions reductions (31%) — a clear indication that the target itself is inadequate.

Only three countries provide more ambitious targets: Sweden (-50% vs 2005, as compared to its CAR target of -40%), Luxembourg (-50%, as compared to its CAR target of -40%) and Spain (-38%, as compared to its CAR target of -26%). However, none of them provide a target in line with the 'Net Zero emissions by 2050' range as all three fall in the 'Moderate ambition' range.

The United Kingdom did not even include its non-ETS emission reduction target for 2030 in the NECP but simply referred to the overall EU target, its national economy-wide target and to a table summarizing the key policies (which also does not include the national non-ETS target).

### INDICATOR 1.2: 2030 ECONOMY-WIDE GHG REDUCTION TARGET

#### Context

**Why is this important?** An economy-wide GHG reduction target provides a comprehensive and inclusive approach to address national GHG emission reductions. There are connections between the ETS and non-ETS sectors that cannot be overlooked at the national level (e.g., impact of the circular economy, link between power consumption and production)

**What does the legislation require?** There is no obligation included in the Governance Regulation for Member States to set out an economy-wide (ETS and non-ETS) GHG reduction target for 2030. However, the template for NECPs encourages Member States to set out targets relevant to the objectives of the Energy Union.

**What does the indicator measure:** This indicator simply checks whether the draft NECP includes a clear economy-wide national GHG reduction target for 2030. If so, the country gets an additional point.

#### Results

The analysis found that only half of the member states set out an economy-wide GHG reduction target. Croatia also states an (indicative) target for ETS GHG emissions besides the non-ETS target. Italy and Poland present economy-wide GHG projections for 2030, but these are not considered as targets.

Additionally, only 5 of the 14 countries with clear economy-wide targets have set them above -50%, with Sweden at the highest level of -63% GHG reduction vs 1990 (other countries are Romania, the UK, Latvia and Germany).



## INDICATOR 1.3: RENEWABLE ENERGY

### Context

**Why is this important?** Renewable energy is an essential element in the first dimension of the Energy Union, i.e. the decarbonisation of the economy. The Governance Regulation states that NECPs should set out the national contribution towards an EU target of a 32% share of renewable energy in gross final energy consumption. However, the renewable energy target at EU level largely falls short to comply with the Paris agreement objectives.

**What does the legislation require?** The Member States must state their national target for renewable energy as a future share in their gross final energy consumption. They are required to spell out trajectories with specifics on technologies and sectors. The plans must also contain information on the policies for the renewables target achievement, again broken down by technology and sector, with details on financing measures.

**What does the indicator measure?** This indicator measures whether Member States pursue higher ambition in terms of renewable energy compared to the EU target, and whether it reaches the penetration levels identified in other analytical work to support the Net Zero GHG objective.<sup>12</sup>

### Results

**Only 7 out of the 28 Member States set out targets beyond what is considered the minimum EU requirement.** Of these, it is worth mentioning one country who provided a RES target compatible within the “Net Zero emissions by 2050” range: Lithuania, with a 45% share for 2030 - although its significant reliance on the use of biomass somewhat undermines this. Estonia, Croatia, Denmark, Portugal, the Netherlands and Sweden also go beyond the minimum level and present targets within the ‘Moderate ambition’ range.

The general lack of ambition in terms of renewable energy is reflected in the average score of EU Member States that is only 1.7 out of 12.5 points.

Insufficient information was provided by the United Kingdom which did not provide a national renewable energy target in the required format but rather an installed capacity target, while Slovakia simply mentioned the need to contribute to the EU target without providing a specific figure.

Biomass deserves a specific note in this context as some of the countries are relying heavily on its use to reach the targets, sometimes leading to a massive reliance and pressure on national ecosystems. Estonia, Denmark, the Netherlands and Finland have been flagged as potentially being in that case, raising concerns with their NECPs. Our analysis of the content

of their draft plans shows that, with the exception of Estonia, they have limited or no information on the sustainability of its use and assume some biomass imports. High renewables targets cannot be reached at the expense of ecosystems; this will simply lead to counterproductive measures raising emissions elsewhere and harming biodiversity.

## INDICATOR 1.4: ENERGY EFFICIENCY

### Context

**Why is this important?** Energy efficiency is one of the essential elements of the first dimension of the Energy Union, i.e. the decarbonisation of the economy. In June 2018 the Commission, the Parliament and the Council reached a political agreement which includes an indicative energy efficiency target for the EU for 2030 of 32.5% taken up in the legislation, with a potential upwards revision by 2023. However, just like for the ambition of the renewable energy target, this level is not in line with the ambition required by the Paris Agreement objectives.

**What does the legislation require?** Similarly to the RES target, the Member States must state their overall target for Energy Efficiency comparing the level of consumption they plan to reach compared to the 2007 PRIMES projections. These will be added up and must reach at least an overall reduction of 32.5% at the aggregate EU level. Each Member State should therefore set a 2030 target within their NECP taking into consideration this EU target. The plans should include details on how the target has been set. Additional information to the energy efficiency targets, including the cumulative savings have to be provided. Moreover, there are several separate sections requesting specifics on policies and measures which will be assessed in Indicator 2.3.

**What does the indicator measure?** The indicator measures the ambition of Member States in terms of energy efficiency. The methodology is based on that developed by the Coalition for Energy Savings in their recent publication on the topic.<sup>13</sup> They kindly shared their analysis which is used as input in our ranking. This methodology includes readjusting the targets to the latest European Commission Reference Scenario (2016) to take into account the latest national trends. We compare both the figures in primary and final energy to the adequate ambition ranges and combine the scoring, giving them each the same weight.

## Results

While the average scores for GHG and renewable energy target adequacy are very low, the results on Energy Efficiency are even worse, with an EU average of 0.9 points out of 12.5 under the methodology applied in this assessment.

It is worth highlighting however the ambitious target of Luxembourg on final energy, which is even above the “Net Zero ambition range” (which gets the country additional points) and of the Netherlands on primary energy consumption, which is well inside that same range. They are the only ones crossing the mark of achieving 50% of the maximum score on this indicator, although they lose points by focusing on one type of efficiency only. Four other countries have targets deserving points beyond the minimum level as well: France scoring 3.9 points, Latvia and Germany 2.8 and Austria 2.2. All four fall within the moderate ambition range on final energy savings.

All other 22 countries are below the required level simply to reach the EU target. The Coalition for Energy Savings has analysed that the current contributions are not sufficient to reach the EU’s 32.5% target and are far from tapping the full 40% cost-effective energy savings potential which they have identified.<sup>14</sup>

## INDICATOR 1.5: LONG-TERM 2050 COHERENCE

### Context

**Why is this important?** The 2030 targets are only one of several steps on the path to 2050. The climate and energy transition and any decisions today need to be set in coherence with the long term objectives of the Paris Agreement. Member States should ensure the credibility of their 2030 plans in light of these longer term targets, and in particular with their national Long Term Strategy (NLTS), which can revealed insights about the level, scope and type of transformations needed that go beyond incremental steps forward. The 2050 perspective needs to inform 2030 actions, becoming a clear driver for the decisions on the near-term.

**What does the legislation require?** While the Governance Regulation does not require Member States to include a 2050 target in the NECPs, the text governing the NECPs has made a strong link to it. It asks NECPs to state whether such an objective exists, and the template requests information beyond the time frame 2030 (e.g. projections up to 2040). It also requires that the NECPs be coherent with the NLTS, the second climate and energy planning instrument inscribed in the Governance Regulation. However, the submission deadline for the NLTS is 1 January 2020, which in practice has meant that, by the end of 2018, only around half of all Member States had developed such strategies.<sup>15</sup>

**What does the indicator measure?** The indicator is a qualitative review testing three separate elements: a) whether the plan contains a specific national climate objective beyond 2030 (especially 2050) or at least connecting to the European one, b) whether the link is made to the national 2050 Long Term Strategy, and c) whether there are clear mentions of the Paris Agreement in the document.

## Results

With an average of 2.0 points out of 4, the EU shows a very mixed picture on this indicator: the scores spread from almost 0 points for Poland (0.2) to maximum points for France. More than half of the countries fail to reach 50% of the total possible points (16 countries are at 1.6 points out of 4 or below). In general, this makes a strong point that there is often a missing connection between the short term requirements and the long term vision. The fact that many countries are developing their NLTS *after* their NECP undoubtedly undermines assurance of the consistency requirement.

The best scorers not only show that they are ambitious for the long term qualitatively, but have clear 2050 targets expressed in their plans. France (top score of 4 out of 4) and Denmark (4th with 3.3 out of 4) both communicate a Net Zero target for 2050. They also explain how they make an explicit connection between the NECP and the national LTS and how these are coherent, just as Latvia and Sweden (both at 3.6 points) also do.

These high scorers also make explicit mention of the Paris Agreement and the 1.5°C target, as do Estonia, the Netherlands and Spain.

The more than average results of the 16 countries, which score below 50% of the points, highlight that the majority of the countries are not working with a clear long term view, and many do not seem to connect their Long Term Strategy to the NECP exercise. For example, the 2 lowest ranked countries for this dimension, Poland (0.2 points) and Belgium (0.7 points) rank so low because, while they have some high level reference to the Paris agreement or its objectives, they do not mention a national 2050 strategy or the need to produce one. This earns them negative points on this sub-indicator.





# OVERALL RESULTS FOR DIMENSION 1

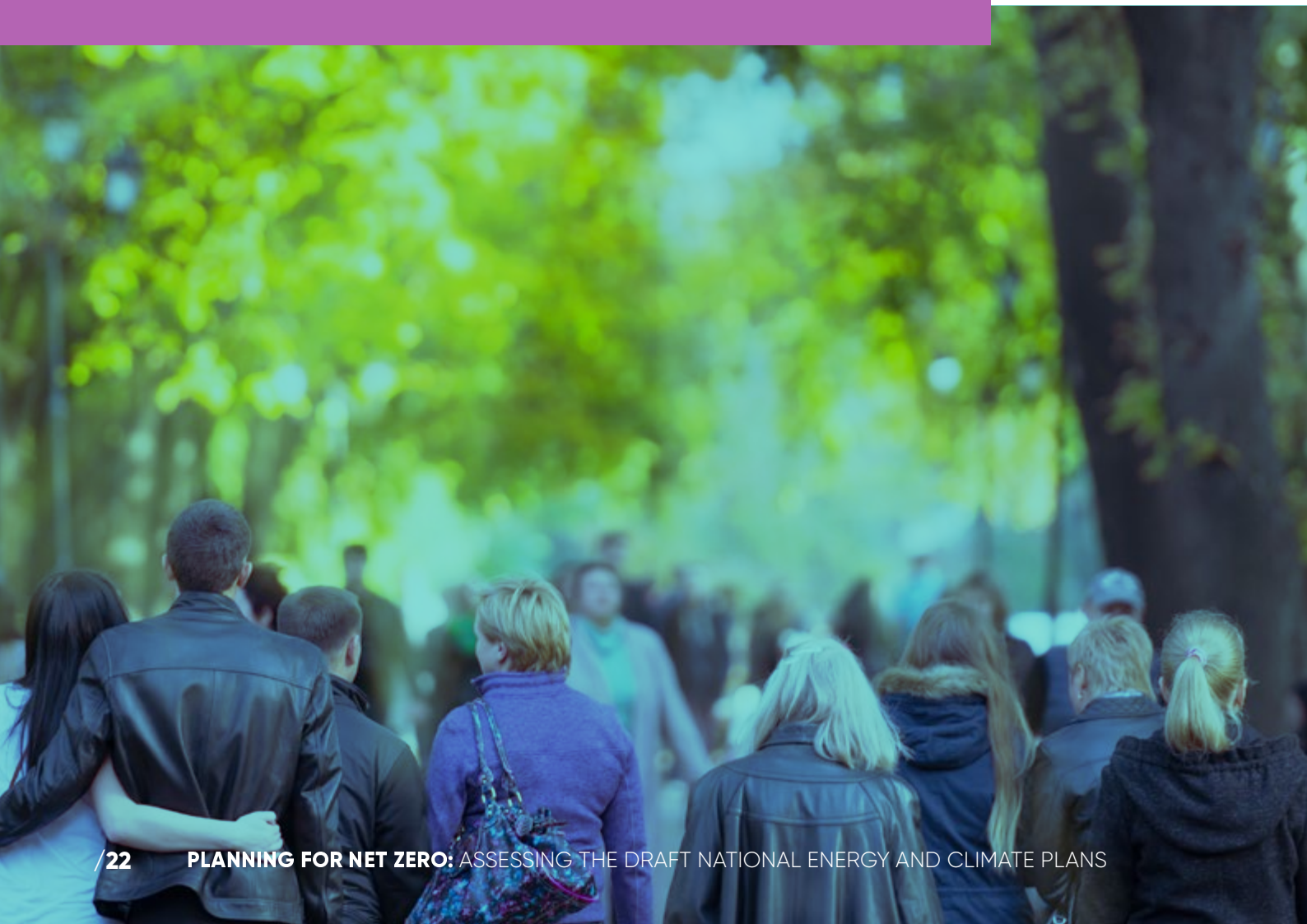


Overall, draft NECPs for the EU28 received an average of 7.1 points out of the possible maximum score of 45, equivalent to only 15.8%. The draft plans displayed a wide array of scores, ranging from Spain with the highest at 21.1 (47%) and Poland with only 1.7 points (4%).

**These figures highlight that all countries largely fail to commit to adequate target levels in line with the scale of the challenge** and therefore fall short of setting themselves on pathways which would be in line with what the science has laid out and politicians agreed to in the Paris Agreement to stabilize temperature increase to below 1°C.

- **On the GHG non-ETS dimension**, only three countries have targets above the compliance level. Sweden and Luxembourg have the highest absolute targets with -50% GHG cuts and Spain is targeting -38%. All other countries limit their ambition to the legal requirement.
- **The ambition on Renewables** again falls short of the required ambition. Estonia, Denmark, Spain and Croatia are the only ones which reach more than half of the total score, although there are concerns on the sustainable use of biomass in some of the countries with the highest targets.
- **The picture is even less positive on Energy Efficiency**, where only Luxembourg and the Netherlands reach more than half the points, and the EU average is 0.7 points out of 12.5.

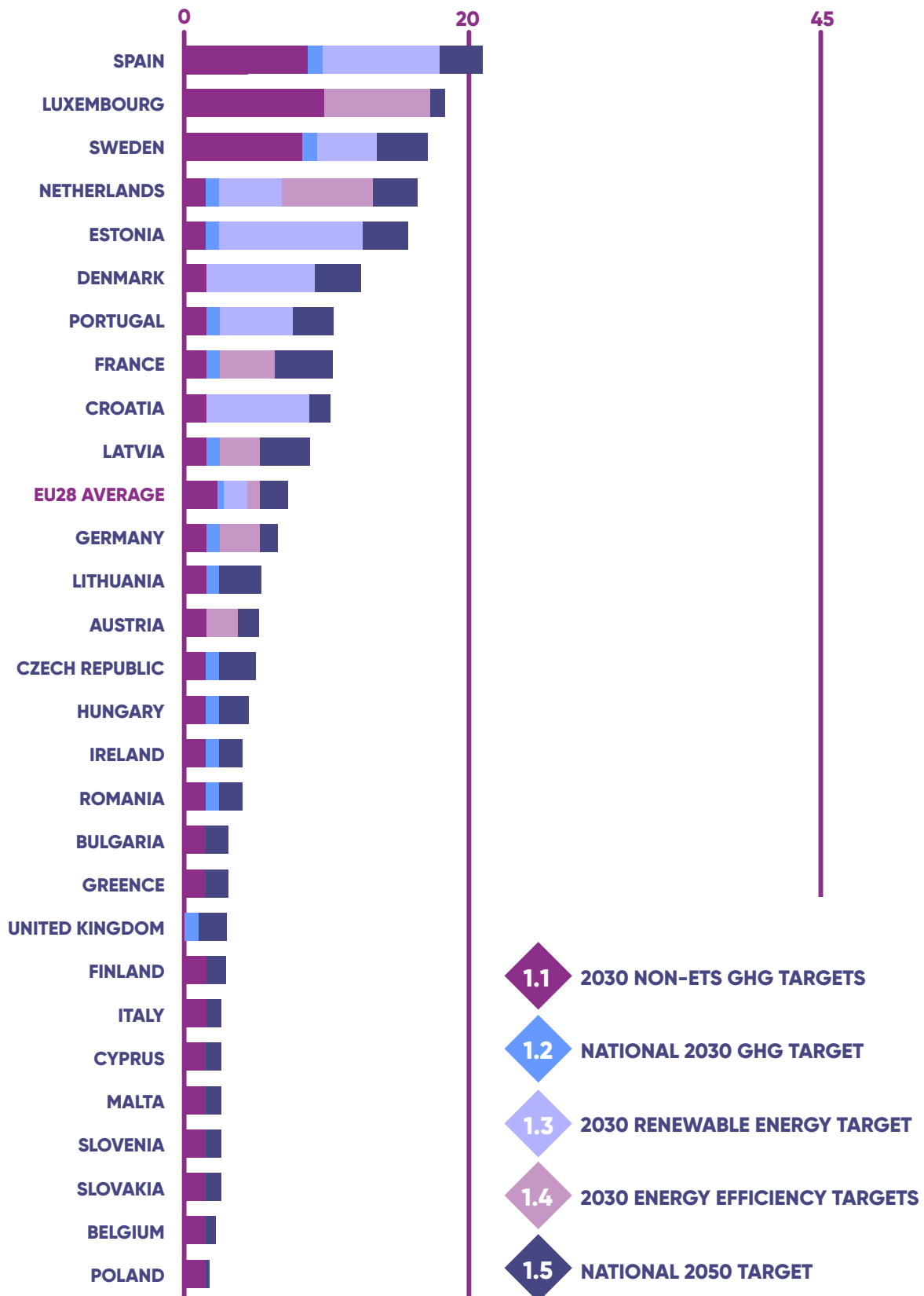
These results highlight a need for increased ambition on all three dimensions and across all countries.







# TARGET ADEQUACY BY INDICATOR



	<b>1.1</b> 2030 NON-ETS GHG TARGETS (/15.0)	<b>1.2</b> NATIONAL 2030 GHG TARGET (/1.0)	<b>1.3</b> 2030 RENEW- ABLE ENERGY TARGET (/12.5)	<b>1.4</b> 2030 ENERGY EFFICIENCY TARGETS (/12.5)	<b>1.5</b> NATIONAL 2050 TARGET (/4.0)	<b>TARGET ADEQUACY TOTAL (/45)</b>
Spain	8.7	1.0	8.3	0.0	3.1	<b>21.1</b>
Luxembourg	9.9	0.0	0.0	7.5	1.1	<b>18.5</b>
Sweden	8.3	1.0	4.3	0.0	3.6	<b>17.1</b>
Netherlands	1.5	1.0	4.5	6.4	3.1	<b>16.4</b>
Estonia	1.5	1.0	10.1	0.0	3.1	<b>15.7</b>
Denmark	1.5	0.0	7.6	0.0	3.3	<b>12.5</b>
Portugal	1.5	1.0	5.1	0.0	2.9	<b>10.5</b>
France	1.5	1.0	0.0	3.9	4.0	<b>10.4</b>
Croatia	1.5	0.0	7.3	0.0	1.6	<b>10.3</b>
Latvia	1.5	1.0	0.0	2.8	3.6	<b>8.9</b>
EU28 AVERAGE	2.2	0.5	1.7	0.9	2.0	<b>7.3</b>
Germany	1.5	1.0	0.0	2.8	1.3	<b>6.6</b>
Lithuania	1.5	1.0	0.0	0.0	2.9	<b>5.4</b>
Austria	1.5	0.0	0.0	2.2	1.6	<b>5.3</b>
Czech Republic	1.5	1.0	0.0	0.0	2.4	<b>4.9</b>
Hungary	1.5	1.0	0.0	0.0	2.0	<b>4.5</b>
Ireland	1.5	1.0	0.0	0.0	1.6	<b>4.1</b>
Romania	1.5	1.0	0.0	0.0	1.6	<b>4.1</b>
Bulgaria	1.5	0.0	0.0	0.0	1.6	<b>3.1</b>
Greece	1.5	0.0	0.0	0.0	1.6	<b>3.1</b>
United Kingdom	0.0	1.0	0.0	0.0	2.0	<b>3.0</b>
Finland	1.5	0.0	0.0	0.0	1.3	<b>2.8</b>
Italy	1.5	0.0	0.0	0.0	1.1	<b>2.6</b>
Cyprus	1.5	0.0	0.0	0.0	1.1	<b>2.6</b>
Malta	1.5	0.0	0.0	0.0	1.1	<b>2.6</b>
Slovenia	1.5	0.0	0.0	0.0	1.1	<b>2.6</b>
Slovakia	1.5	0.0	0.0	0.0	1.1	<b>2.6</b>
Belgium	1.5	0.0	0.0	0.0	0.7	<b>2.2</b>
Poland	1.5	0.0	0.0	0.0	0.2	<b>1.7</b>



## RECOMMENDATIONS

**Non-ETS GHG target:** Member States should aim at more ambitious non-ETS GHG reduction targets in order to reach, at least, the low range of the 'Net Zero emissions by 2050' scenario. This would show commitment and coherence with their signature of the Paris agreement.

**National GHG target:** Member States should all set out an economy-wide GHG reduction target in the final version of their NECP in order to demonstrate a global and ambitious climate policy. Furthermore, such a target would increase the credibility of their national LTS to be published by the end of 2019.

**RES target:** Those countries that did not set out their target in the proper format, or which did not set any target at all, should provide this information. Member States should increase their RES targets in order to be coherent with 'Net Zero by 2050' pathways.

**EE target:** Proper Energy Efficiency ambition is an essential building block to reach the GHG targets effectively, while decreasing the need for energy imports, and redirecting these funds to improve the European infrastructure. Some of the countries did not set out their target in the proper format, or did not set any target at all. Some were also only ambitious on either final or primary energy figures. They should provide this information in the final version of their NECP to comply with the Governance Regulation.

**Long term 2050 coherence:** The Governance Regulation requires coherence of the plans with the national Long Term Strategy. Evidence of this in the plans is an indication of the mindset of countries while drafting their NECPs. The results highlight that most countries are not working with a clear long term view, with large discrepancies across countries. The recommendation is clearly for countries to ensure that both exercises are fully consistent; to use the insights revealed by their Long Term Strategies to develop the necessary transformations across sectors, and to take heed of the fact that reaching Net Zero will become increasingly challenging if their ambition is too low by 2030.

# DIMENSION 2: POLICY DETAILS



## WHAT AND HOW WE EVALUATE

This dimension evaluates the information provided by Member States on their existing and planned policies, and whether these are sufficient to achieve the stated goals of the draft NECP.

The policy details dimension consists of **six main indicators**. The first three indicators (2.1-2.3) investigate the policies aimed at the non-ETS GHG emissions, renewable energy and energy efficiency targets. The indicators check for the level of detail provided for each policy area in addition to whether or not the policies are stated to be sufficient to meet the indicative national targets. For the non-ETS target, the indicator also considers a reliance on loopholes or the flexibility mechanisms provided in the Climate Action Regulation (CAR). Indicators 2.4 and 2.5 address the use and promotion of fossil fuels by checking for any foreseen plan to phase out the use of coal for electricity generation as well as fossil fuel subsidies. Indicator 2.6 addresses investment needs and measures to stimulate low-carbon investments. The evaluation is predominantly qualitative and uses predefined scales to ease comparison of the analysis of each NECP.

The policy details dimension accounts for 45 points towards the total potential score of 100. Countries can receive up to ten points for their description of existing and planned measures and their expected impact for each of the three policy areas (non-ETS, renewable energy, energy efficiency); a maximum of five for not using coal power or a clear plan to phase out its use; two for information on the phasing out of fossil fuel subsidies, and eight for good detail on investment needs and related finance measures.



## EXISTING AND PLANNED POLICIES AND MEASURES (2.1 – 2.3)

### Context

**Why is this important?** Member States should describe in detail *what* they plan to do to allow for an analysis of whether these actions are sufficient and adequate in a national context to achieve the respective climate and energy targets. Details on the target group, timeframe, implementing body and in particular the financial provisions of policies and measures (PAMs) are required for a robust assessment.

**What does the legislation require?** The Governance Regulation requires Member States to list and explain both existing and planned PAMs that are relevant to achieve the climate and energy targets in their NECPs. In addition, the effects of existing and planned policies and measures should be evaluated in the context of the target achievements. This means that the NECPs should present the estimated non-ETS GHG emissions, renewable shares and the energy consumption changes by 2030 based on the presented policy mix.

**What does the indicator measure?** The following indicators check for details provided about the policy mix for the three main target areas. The assessment relies on the level of detail of information provided in the draft plans as a means of determining the likely substantiveness of the proposed set of policies, including projections of whether they are likely to be sufficient to meet the given targets. The current assessment does not analyse individual policies, e.g., with respect to their likely effectiveness in a national context. In addition, the indicators in this section evaluate whether a country meets its targets with *existing* and/or *planned* measures. It is important to note that a higher weight is applied to the description of *planned* measures and their sufficiency to reach the target, as we view these to be most important for a transformation. Even though the sufficiency of both existing and planned measures are discussed below, only the latter actually factors into a country's score on the policy details dimension.

For achieving the non-ETS target, Member States are formally allowed to make use of so-called “flexibilities” under the CAR. Indicator 2.1 scores information provided by Member States on their intended use of such flexibilities. No similar element is included for renewables or efficiency.

## INDICATOR 2.1: NON-ETS GHG EMISSION REDUCTIONS

### Results

The information provided by Member States on their policies and measures for achieving the non-ETS emissions target, as well as target achievement, varies significantly among the Member States and whether you investigate existing or planned measures.

For **existing PAMs**, 22 Member States provided at least some detail, i.e., they provided specifics on a range of individual measures. Of these 22 Member States, 13 described their existing policies with good detail, including the target group, financial provisions, timeframe and/or implementing body. Nine Member States gave only limited explanations of their implemented measures, such as a list with instrument titles but no further details. Hungary did not provide any information at all.

Most of the Member States, however, did not clearly indicate if they can achieve their non-ETS emissions targets with existing measures. For example, four countries (Czech Republic, Slovenia, Slovakia and the United Kingdom) do not provide any information at all about 2030 non-ETS emissions, while 13 Member States only provide the non-ETS emissions in certain years (mainly 2020, 2025 and 2030) but do not relate the findings to the target. This means that at least in their draft NECP these Member States do not come to a conclusion as to whether the PAMs are sufficient or not.

Interestingly, four Member States state that they can achieve the non-ETS target already with existing measures: Ireland, Greece, Croatia and Portugal. Greece in fact projects that it will achieve twice the emissions reductions required under the Climate Action Regulation—a clear indication that the target itself is inadequate.

The information provided on **planned PAMs** is less substantial; only 15 Member States provided at least some detail and only five provided good detail on their planned measures. This includes e.g. Lithuania providing a list of policies including GHG mitigation effect, implementing authority, timeframe and the financial provisions including amount and source of finance. Six Member States did not provide any information at all: Germany, Cyprus, Hungary, Malta, Slovenia and the United Kingdom. Furthermore, more than half of all Member States do not come to a conclusion on target achievement with additional policies. This seems to be the result of a general lack of information on planned measures. Only ten Member States (including those that also indicate achievement of their target with existing policies) state that they will reach their non-ETS emission target with a set of additional measures.



In addition to national policies, Member States can also make use of **flexibilities for compliance under the CAR**. Almost all of these flexibilities (besides banking and borrowing) water down the non-ETS emission reduction effort of a country, thus a reliance on these loopholes might prevent the country from taking genuine action towards the required transformation. Possible flexibilities include: 1) transfer of emission allowances to and from other countries; 2) transfer of emission units from the EU ETS; 3) accounting for net emission removals from land use, land use change and forestry (LULUCF); and 4) the “safety reserve,” which allows for the transfer of unused emission allowances from the period 2013-2020 under very specific conditions. Member States which specifically state plans to use one or more of these flexibilities receive negative points. The same score applies to countries that mention the potential use of flexibilities but do not further provide information about which ones. Fewer, but still negative, points go to countries that do not provide any detail on the use of flexibilities, as Member States should have an understanding of and a position on their use. Full points go to countries that state that they will not make use of any flexibilities, or rely only on banking and borrowing.

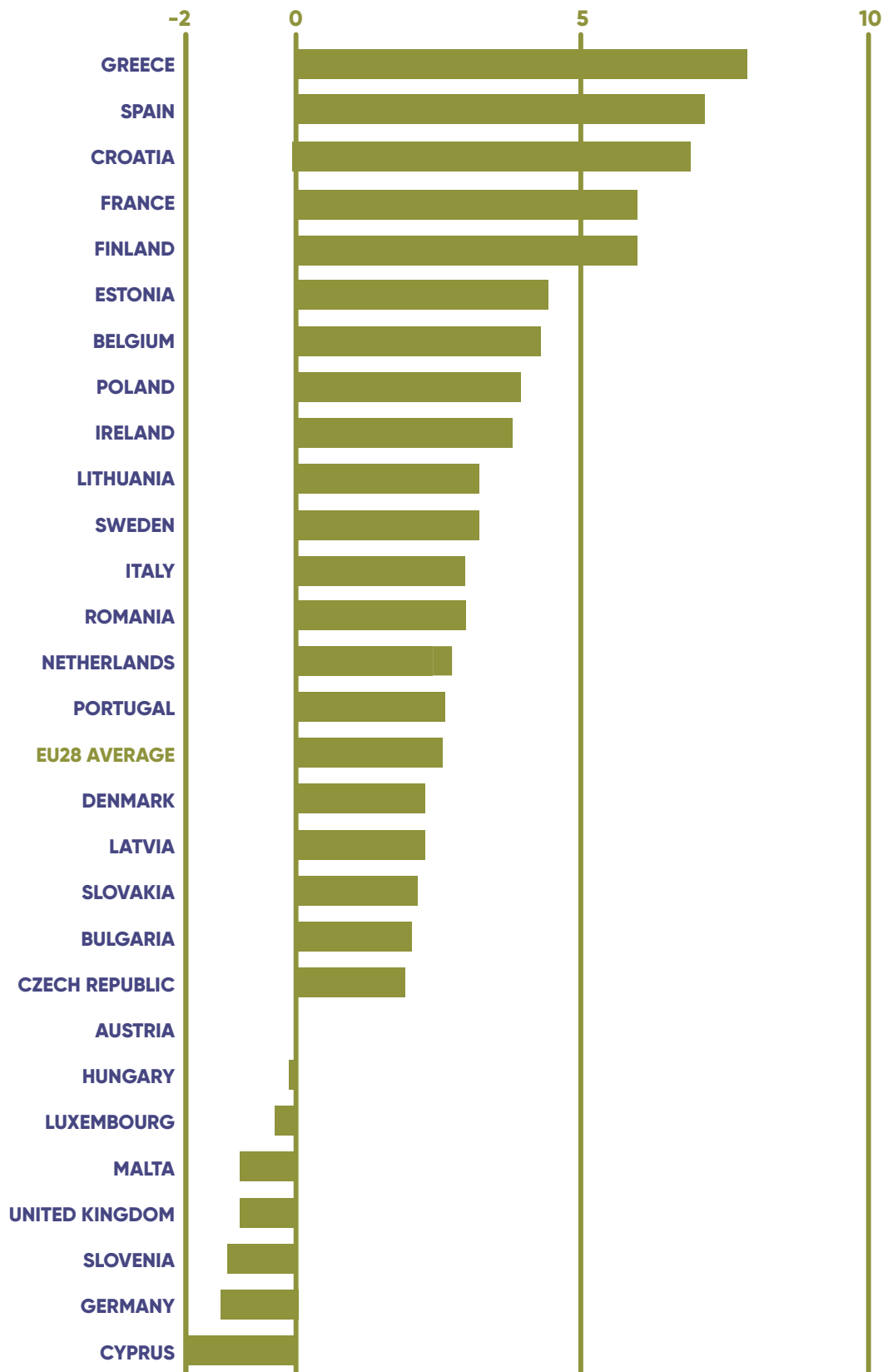
There is no country that explicitly states that it wants to avoid using the CAR flexibility mechanisms. In contrast, six Member States state that they might use one of the flexibilities without providing any further details and there are six Member States that already take into account specific flexibilities, stating this clearly in their draft plan. Unfortunately, they all plan to use one or more flexibilities that reduce the required emission reduction action: France (net removals from LULUCF), Cyprus (net removals from LULUCF and the safety reserve), Denmark (transfer, ETS allowances and net removals from LULUCF), Finland (transfer and net removals from LULUCF) and Sweden (net removals from LULUCF). Poland states that it foresees the use of all available flexibilities. The remaining 16 Member States do not provide information on the anticipated use of CAR flexibilities, although several can be expected to make use of them.

**To sum up**, the average score for the EU28 was 2.6 points out of a possible maximum score of 10 with only five Member States obtaining at least half of the potential points. As explained above, this is mainly due to most Member States providing only limited or some detail on their additional policies and not coming to a conclusion on target achievement. Six countries left out the section on additional policies entirely, which resulted in a large deduction of points for this indicator. Greece and Spain, in contrast, lead the way with 7.9 and 7.1 points, respectively for providing good information about existing and planned measures and indicating target achievement with planned measures. .





## 2.1 POLICIES FOR ACHIEVING NON-ETS GHG TARGET



## INDICATOR 2.2: RENEWABLE ENERGY

### Results

Member States listed **existing policies** for the promotion of renewables in their draft NECPs with varying levels of information, most with either “some” (12) or “good” (10) detail. Greece listed existing policies with great detail, including information on regulation, impacts and further development. In their NECPs, Lithuania and Germany included lists with a range of policies, most of which also have information on the respective implementing body, time frames and financial resources specified. On the other hand, six countries (Belgium, Cyprus, Hungary, Italy, Portugal and Romania) provided only limited information, poorly describing their existing policies. For example, the Belgian NECP mostly includes high-level and vague descriptions of policies.

Nine countries clearly outline if they can achieve their renewable target with existing policies. Of these nine, four countries (France, Latvia, Finland and Sweden) state that they can already achieve their 2030 RES target with existing measures. Most countries, a total of 15 Member States, show the renewable energy generation in 2030, yet they do not place these amounts in relation to their respective targets. Cyprus, Lithuania, Sweden and the United Kingdom do not provide adequate or helpful data on the share of or absolute amounts of energy generation from renewables in 2030. The United Kingdom, for instance, included numerous specific projections but these were not helpful for evaluating policy sufficiency.

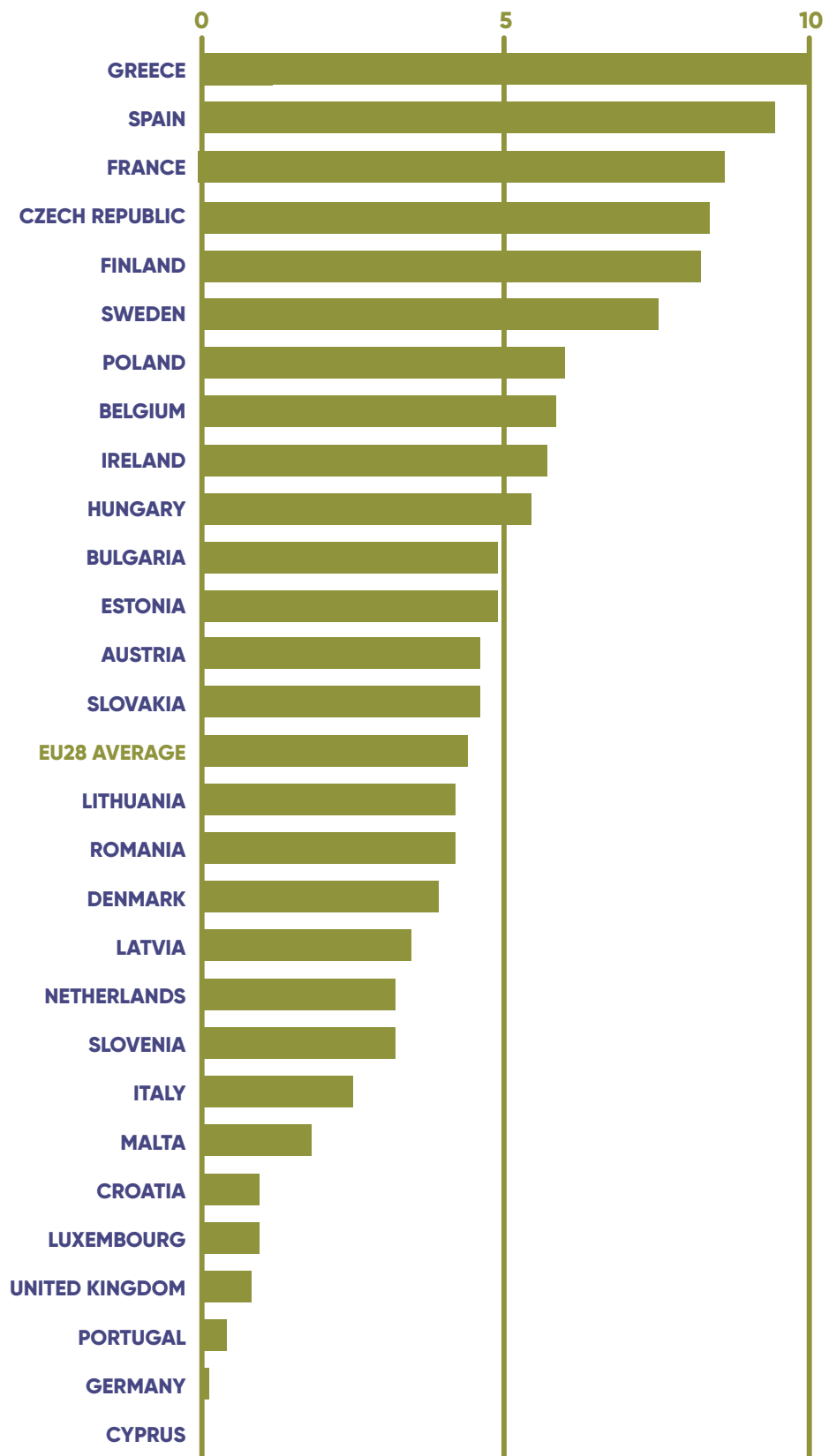
In general, less information is provided for **planned policies** than for existing ones. Only Austria, the Czech Republic, Greece, Lithuania, Slovakia and Sweden incorporate a list of planned policy instruments with clear titles and additional information, such as the actors addressed by the policy, implementation time frame and/or financial provisions. For example, the Czech Republic’s NECP includes good information about existing and planned measures including timing, actors addressed and in some cases the financial provisions. Most other countries in this category miss certain elements in their text and/or overview tables - mainly the financial provisions - but provide the information in other sections of the draft plan (e.g. Greece and Lithuania). Sweden included no summary table but provided the information in narrative form which makes it hard to follow up on all measures.

Further to the missing or limited information on planned measures, only ten countries state that they can achieve their 2030 RES target with planned policies (Belgium, Czech Republic, Greece, Spain, France, Hungary, Poland, Romania, Finland and Sweden). Ireland, Italy and Malta at least clearly outline that their planned policies will not be sufficient to reach the target. All other countries (15) did not clearly outline if they can or cannot achieve the target with planned policies.

**In summary**, the average score for the EU28 was only 4.4 points out of a possible maximum score of 10, which is mainly a result of missing information about planned policies in several NECPs, and a lack of detail in terms of how well policies can ensure the achievement of the 2030 renewable targets. This is in part due to the draft status of the NECPs and many countries planning to add more information at a later point in time. Greece, in contrast, receives full points for providing a good description of existing and planned measures on renewable energies as well as for clearly outlining target achievement with planned measures. France and Spain follow with both 8.6 points.



## 2.2 POLICIES FOR ACHIEVING THE RES TARGET





## INDICATOR 2.3: ENERGY EFFICIENCY

### Results

The level of detail on policies and measures for energy efficiency included in the draft NECPs, as well as their sufficiency to meet the stated targets for energy efficiency, differ from country to country. Overall, Member States did not provide as much detail here compared to non-ETS GHG emission reductions or for renewable energy.

For **existing policies**, all but one country (Hungary) provided some information, albeit this information varies substantially in level of detail and scope of content. More specifically, only eight draft NECPs received maximum points for incorporating a list of policy instruments with titles and supplementary information, such as the actors addressed, financial provisions and an indication of the policy's longevity. The largest group of NECPs (12 total) included *some* information, listing instruments but not going into further detail. The remaining seven countries provided very limited information, such as vague descriptions of policy types but no specifics.

Only three countries (Belgium, Greece and Netherlands) clearly outlined if the policies are sufficient or not to reach the national target which means that most countries do not conclude if their policies are sufficient or not. Greece and the Netherlands state that already existing measures should be sufficient to reach their national energy efficiency targets.

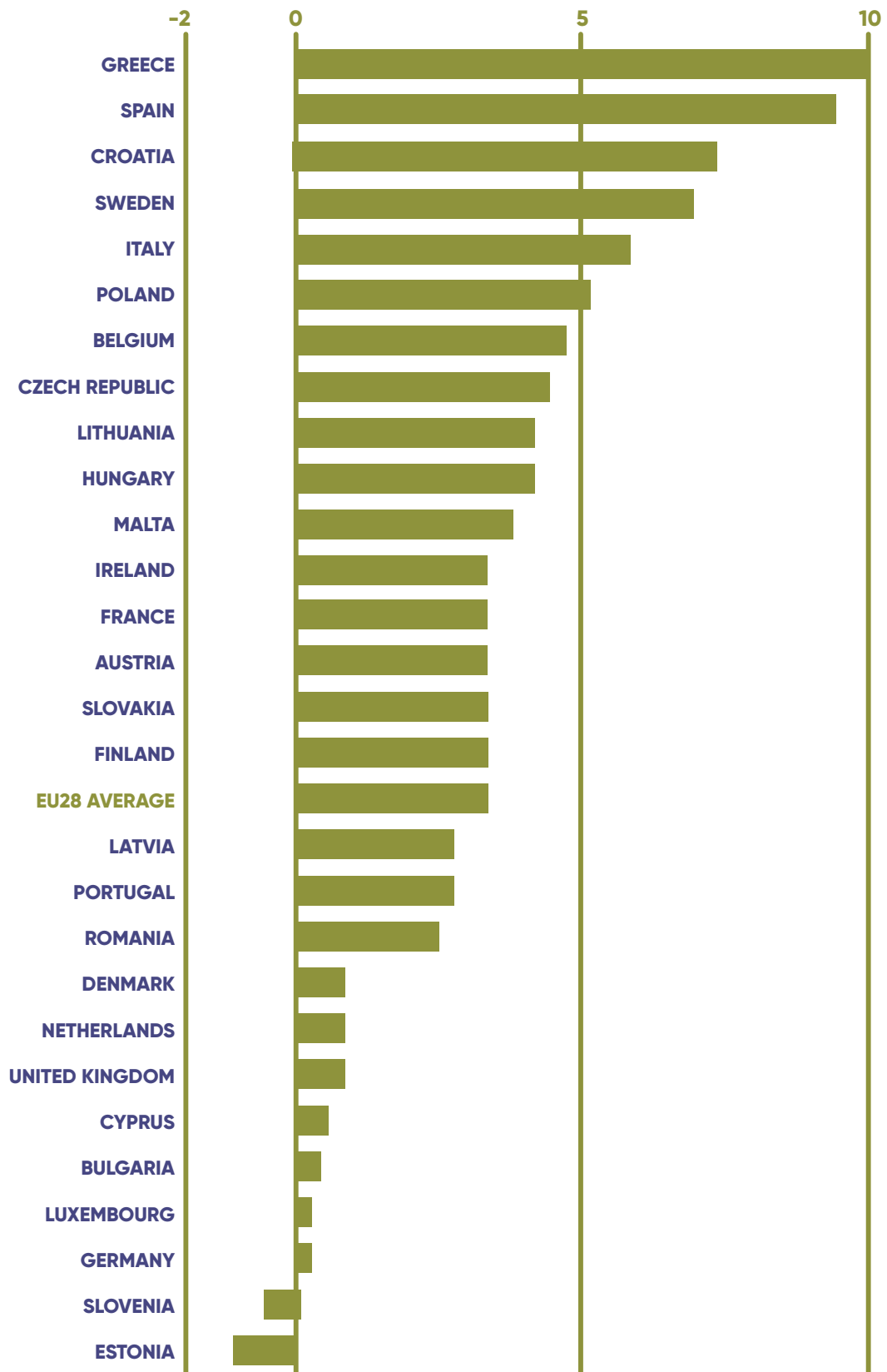
The assessment of **planned policies** follows the same progression. First, on the level of detail presented in the draft NECPs, all but three countries (i.e., Estonia, Germany and Slovenia) gave some indication of planned energy efficiency policies. However, only four countries—Greece, Spain, Croatia and Lithuania—obtained the highest score by including a good descriptions of planned energy efficiency policies.

Eleven Member States provided information on the impact of planned policies on energy consumption but eight of these failed to link these projected values to their respective target. This means that only three countries (Greece, Spain and Poland) outline in their NECPs if the policies are expected to be sufficient to reach the target. Seventeen countries provided no information on the impact of planned energy efficiency policies. The information contained in the draft plans shows that Belgium, Czech Republic, Greece, Spain, Hungary and Sweden expect to achieve their 2030 efficiency targets with planned policies. This is not the case for Bulgaria, Croatia, Malta and Poland. The remaining 18 draft plans could not be evaluated due to a lack of data.

**In summary**, the average score for the EU28 across all sub-indicators was 3.3 points out of a possible maximum score of 10, which is mainly the result of missing information about planned policies in several NECPs. The top scoring country is Greece, which received full points for providing good detail about existing and planned measures and for linking projections to target achievement. Greece is followed by Spain with 9.4, which provided less detailed information about existing policies and related target achievement but good information about planned policies and target achievement. It is important to note that like for the other indicators measuring level of reporting detail there is a high degree of variation in the draft NECPs on existing and planned policies. It is therefore difficult to conclude whether the low scores on policy details indicate a true lack of credible action in the EU28 on energy efficiency or simply (again) missing information.



## 2.3 POLICIES FOR ACHIEVING THE ENERGY EFFICIENCY TARGET



## INDICATOR: 2.4 COAL USE

### Context

**Why is this important?** Coal emissions contribute significantly to GHG emissions from electricity and heat generation in the EU. Under a 1.5°C pathway, coal use for electricity generation must be phased out before 2030. Indeed, the IEA recommends a rapid phase out of coal for electricity generation in OECD countries in the light of the Paris Agreement.<sup>16</sup>

**What does the legislation require?** The Governance Regulation does not require any information about coal phase-out. However, it does require information about current and future coal use for electricity generation, for example, in the context of energy security and the general projections of national GHG emissions.

**What does this indicator measure?** The indicator specifically checks for whether there are any plans for phasing out coal and if these explicitly indicate a phase-out date. Countries which indicate additional investments in coal power, i.e., the opposite of a phase-out, receive negative points. The indicator excludes (in this case gives full points to) countries that do not rely on coal for electricity generation.

### Results

The analysis of draft NECPs shows that a total of eight Member States outline that they do not use coal for electricity generation, including Belgium, Cyprus, Estonia, France, Latvia, Lithuania, Luxembourg and Malta. In addition, 12 countries state that they plan to phase out coal and of these, seven specify that they will cease to use coal for electricity generation by 2030. Thus, 15 countries received full points on this indicator. Austria, Germany and Italy state that they want to phase out coal but do not provide a set date, thereby receiving only half of the possible points.

Four countries outline coal electricity production beyond 2030 and give no indication of any phase out plans. This group includes the Czech Republic, Greece, Croatia and Poland. Poland, in addition, states that they foresee future investments into coal power and infrastructure, which stands at odds with a rapid transition to zero-emission electricity generation. Poland therefore received negative points on this indicator.

There are an additional eight countries that do not provide any detail on coal use for electricity generation and also do not provide any information on a phase-out plan. This group received zero points similar to the countries that outline coal use for electricity generation without providing a phase out plan.

The average score for the EU28 was 2.9 which is just over half of the possible maximum score of 5.

## INDICATOR 2.5: PHASE-OUT OF FOSSIL FUEL SUBSIDIES

### Context

**Why is this important:** The transition to a low-carbon economy requires investments to be aligned with climate and energy objectives. Accordingly, governments should not finance actions that slow down or counteract the transition, and should strive towards the removal of fossil fuel subsidies. In 2015, all parties to the Paris Agreement pledged to make “finance flows consistent with a pathway towards low GHG emissions and climate-resilient development” (PA, Art. 2.1C).

**What does the legislation require:** The Governance Regulation asks all Member States to report on national objectives (Art. 25) and progress (Art. 35) towards the phase-out of fossil fuel subsidies. The NECP template (section 4.6.iv) explicitly asks for a “description of energy subsidies, including for fossil fuels” and section 3.1.3 demands information on “national policies, timelines and measures planned to phase out energy subsidies, in particular for fossil fuels,” where applicable.

**What do we measure:** For this indicator, the assessment is organized along (1) the level of specificity of the information provided and (2) if a phase-out is specifically mentioned. Countries which do not provide information receive zero points, while those providing specific information on phase-out plans (such as an explicit timeline) receive full points. Negative points are allocated to Member States that claim to not have fossil fuels subsidies. All EU countries are known to have subsidies in place,<sup>17</sup> and thus they should be transparent about them in their NECPs.

### Results

The evaluation shows that the information provided on fossil fuel subsidies varies significantly among Member States: eleven countries provided no information on fossil fuel subsidies, including three (Malta, Austria, Slovakia), which stated that the data would be submitted later in the year. A slight majority—14 out of 28—of the Member States reported on energy subsidies to varying extent. Four countries (Cyprus, Latvia, Poland and Sweden) gave general information on energy subsidies but not specifically on fossil fuels. Six more countries (Czech Republic, Estonia, Greece, Lithuania, Slovenia and Spain) presented general facts about fossil fuel subsidies but failed to mention detailed information or the existence of a phase-out plan. Germany provided information about fossil fuel subsidies and included some information on phasing these out but did not specify a timeline for doing so. Ireland, Italy and Romania went a step further and provided information specifically about fossil fuel subsidies, such as a list of existing subsidies, in addition to mentioning a plan to phase out at least one of them. There is no country that lists all its subsidies and has a phase-out plan for all. Thus, no Member State achieved the full number of points (full details and complete phase-out). France, Hungary and the Netherlands explicitly state



in their draft NECPs that they do not have fossil fuel subsidies. This claim was cross-checked with a recent publication on existing fossil-fuel subsidies in Europe,<sup>18</sup> which provides evidence to the contrary. In the case of France, the provided information is particularly confusing. In one section, the draft NECP states that France does not have any fossil fuel subsidies while in another section information on existing subsidies is included. Due to this lack of transparency in reporting, these three countries received negative points on this indicator.

The average score for the EU28 was low at 0.4 out of a possible maximum of 2.

## INDICATOR 2.6: FINANCE

### Context

**Why is this important:** The credibility of an NECP depends greatly on how the Member State intends to finance both the existing and planned policies for reaching the targets. Member States must be aware of a potential investment requirements and be proactive in addressing them. Their policies must provide the right incentives, including financial ones, to achieve the desired change. The proposed legislation on the next MFF also makes reference to the NECPs and the information on investments being made available.<sup>19</sup> Having this information is essential to direct funding from the MFF towards implementation of climate policies and investments in the Member States.

**What does the legislation require:** The Governance Regulation specifically states that “Member States shall provide a general overview of the investment needed to achieve the objectives, targets and contributions set out in the national plan, as well as a general assessment on the sources of that investment” (Article 7). They are further required to describe how “existing policies and measures and planned policies and measures are to attract the investment necessary for their implementation” (Article 8.2.d).

**What do we measure:** This indicator measures the degree to which finance is accounted for by looking at whether draft NECPs contain (1) sufficient and robust information on overall financing needs and (2) detailed information on financing measures required to realise the policies and measures stated in the plan.

### Results on investment needs

Most countries did not provide sufficient detail on their climate finance needs, aside from a few notable exceptions. Five countries received the highest score for a detailed reporting of general investment requirements as well as a breakdown of these by sector (i.e., Italy, Cyprus, Ireland, France, Finland). For example, Cyprus indicated that approximately EUR 112 million of the national budget (EUR 130 per capita) will be dedicated to investing in modernisation projects up to the year 2027, and further distinguished between the amounts set aside for energy infrastructure and combating energy poverty. Finland has allocated EUR

1.2 billion for power grid infrastructure renewal in the period 2015-2025, and further projects the cost of a ban on coal at approximately EUR 36-38 million.

Many countries that provided sector-specific information on investment requirements focused solely on one or two sectors. For example, while Poland only assessed investment for the energy sector, Bulgaria provided a detailed picture of the funding needed for interconnectivity and electricity infrastructure. Denmark, Croatia and the United Kingdom painted a broader picture of total investment needs, thereby receiving a higher score, but did not obtain a top score because their reporting lacked a clear sectoral breakdown.

Nine Member States did not provide any information, which led to a negative score for this indicator. Five of these Member States indicated that information on investment needs will be added to the final plan to be prepared by 2019. Austria noted that the data will be published as late as 2024.

The average score for the EU28 was 1.36 points out of a possible maximum score of 4.

### Results for financing measures

Compared to describing their overall investment needs, Member States did a slightly better job of detailing planned and existing financial measures in their draft NECPs. The majority of countries (19) reported financial measures for at least one but not all three of the key policy target dimensions. Cyprus and Croatia, for example, focused on finance for energy efficiency. The United Kingdom's NECP concentrates heavily on the electricity sector and renewables, foreseeing GBP 900 million of public funds between 2015 and 2021 in research and innovation in the power sector. Draft NECPs can also be grouped by whether they note the use of pre-existing measures, such as the sale of ETS allowance in the case of Croatia, or additional measures, such as grant and loan programmes in Germany's case.

Nine countries provided only general or imprecise formulations on finance measures with brief comments on the scope and function of the planned actions. The Slovenian NECP was the only plan that did not provide any information in the respective sections on finance.

In instances of missing information a handful of countries commented that they will provide additional detail in the final plan (e.g. Lithuania, Malta), or update their list of financial measures for submission in 2019 (e.g. Denmark). However, unlike for investment needs, most countries provided some account of their planned financial measures.

The average score for the EU28 was 2.19 points out of the possible maximum score of 4.

# OVERALL RESULTS FOR DIMENSION 2



Overall, draft NECPs for the EU28 received an average of 17.1 points out of the possible maximum score of 45, well under half the potential points. As with the other two dimensions, the draft plans received a wide array of scores, ranging from Greece with the highest at 33.3 and Slovenia with only 1.2 points.

**A major factor influencing scores in this dimension was the level of detail provided on existing and planned policies and information on their sufficiency to reach the national targets.** Many countries did not go into sufficient depth or provided any detail, in particular, on their planned policy actions, making subsequent assessment on target achievement difficult or impossible and thereby decreasing scores on two fronts.

The highest-scoring countries in this dimension are Greece, Spain, France and Finland. The first two countries delivered good detail about their existing and additional policies, thus receiving most of their points from the first three indicators and not doing as well on the remaining three indicators. Spain in particular outlined its investment needs and financial measures for only some sectors. Greece, as with most other countries, including Slovenia, Austria, Luxemburg, lost points on policies for the non-ETS GHG target, for not providing information on the foreseen use of loopholes built into the flexibility mechanisms of the CAR. France and Finland do not perform as well as Spain and Greece on the policy descriptions, but both provided better information on investment needs and financial measures.

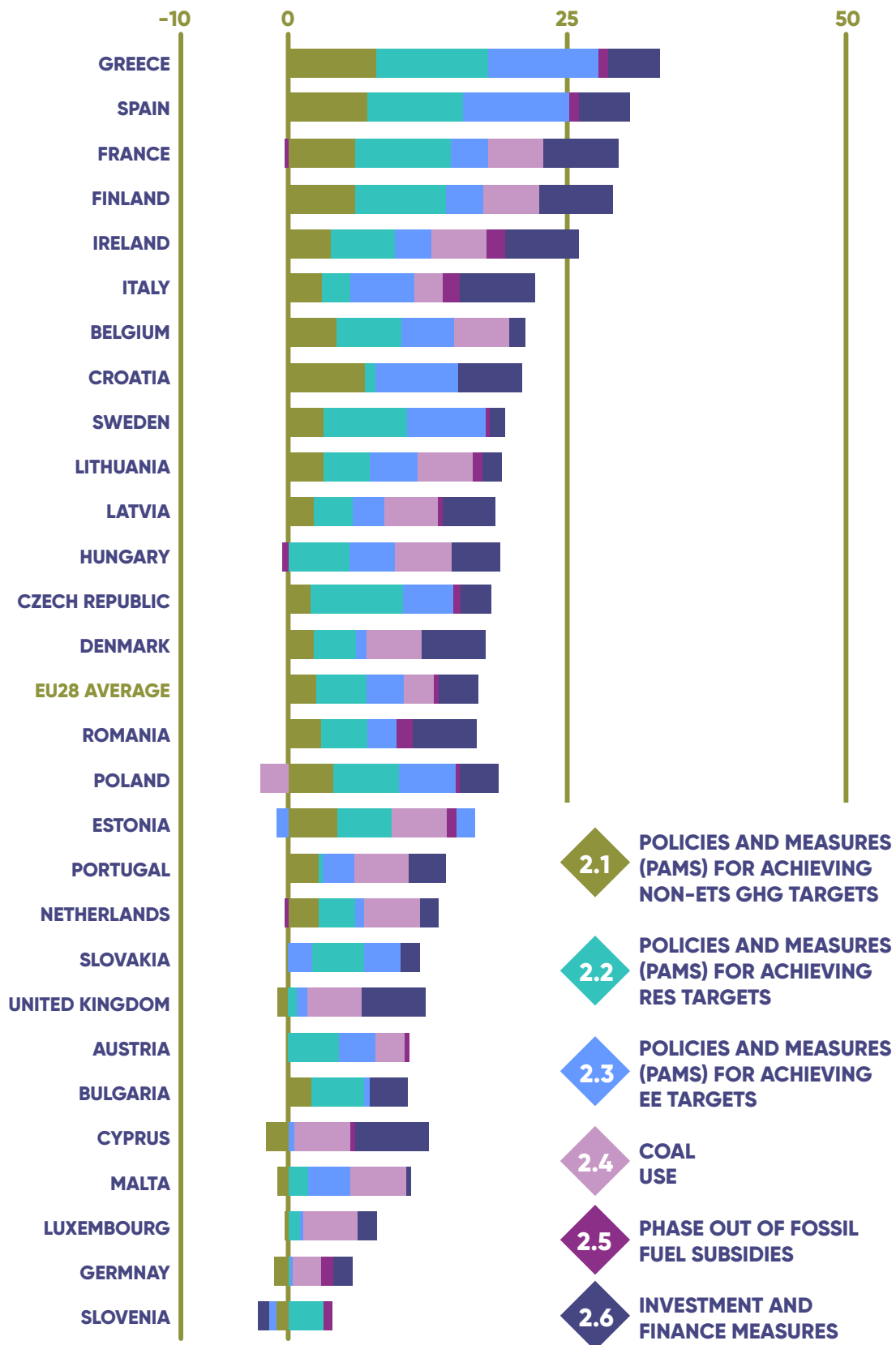
Slovenia and Germany scored among the lowest in the EU28 on the Policy Detail dimension. Germany, in particular, provided limited detail on its existing policies targeting non-ETS emissions policies and no information at all on foreseen measures. This is in part because discussions on the upcoming climate policy package are ongoing in 2019. In addition, Germany did not provide specific information on its plans for a coal phase-out as the respective recommendations from a national stakeholder dialogue were adopted after the draft NECP had been published. The Slovenian NECP does not include projections on planned measures but is also largely missing information on existing and planned policies in the three target areas. Moreover, the draft NECP does not include a justification and misses a link to an ongoing process.

**Moreover, most of the NECP drafts did a relatively poor job on the two sub-indicators related to financing,** with over a third of countries failing to provide any information on investment needs. It is important to note that especially for the Policy Detail dimension, which measures elements of the NECP template that may be more demanding in terms of administrative burden and underlying analysis, there will likely be a particularly noticeable difference in the degree of completion between the draft and final plans.





## POLICY DETAILS BY INDICATOR





	<b>2.1</b> POLICIES AND MEASURES (PAMS) FOR ACHIEVING NON-ETS GHG TARGETS (/10.0)	<b>2.2</b> POLICIES AND MEASURES (PAMS) FOR ACHIEVING RES TARGETS (/10.0)	<b>2.3</b> POLICIES AND MEASURES (PAMS) FOR ACHIEVING EE TARGETS (/10.0)	<b>2.4</b> COAL USE (/5.0)	<b>2.5</b> PHASE OUT OF FOSSIL FUEL SUBSIDIES (/2.0)	<b>2.6</b> INVESTMENT AND FINANCE MEASURES (/8.0)	POLICY DETAILS TOTAL (/45.0)
Greece	7.9	10.0	10.0	0.0	0.8	4.7	<b>33.3</b>
Spain	7.1	8.6	9.4	0.0	0.8	4.7	<b>30.7</b>
France	6.0	8.6	3.3	5.0	-0.4	6.7	<b>29.2</b>
Finland	6.0	8.2	3.3	5.0	0.0	6.7	<b>29.1</b>
Ireland	3.8	5.7	3.3	5.0	1.6	6.7	<b>26.1</b>
Italy	3.0	2.5	5.8	2.5	1.6	6.7	<b>22.1</b>
Belgium	4.3	5.8	4.7	5.0	0.0	1.3	<b>21.2</b>
Croatia	6.9	1.0	7.4	0.0	0.0	5.7	<b>20.9</b>
Sweden	3.2	7.5	6.9	0.0	0.4	1.3	<b>19.4</b>
Lithuania	3.2	4.2	4.2	5.0	0.8	1.7	<b>19.0</b>
Latvia	2.3	3.5	2.8	5.0	0.4	4.7	<b>18.6</b>
Hungary	-0.1	5.4	4.2	5.0	-0.4	4.3	<b>18.4</b>
Czech Republic	1.9	8.3	4.4	0.0	0.8	2.7	<b>18.1</b>
Denmark	2.3	3.9	0.8	5.0	0.0	5.7	<b>17.7</b>
EU28 AVERAGE	2.6	4.4	3.3	2.9	0.4	3.5	<b>17.1</b>
Romania	3.0	4.2	2.5	0.0	1.6	5.7	<b>16.9</b>
Poland	3.9	6.0	5.1	-2.5	0.4	3.3	<b>16.3</b>
Estonia	4.4	4.9	-1.1	5.0	0.8	1.7	<b>15.6</b>
Portugal	2.6	0.4	2.8	5.0	0.0	3.3	<b>14.1</b>
Netherlands	2.7	3.2	0.8	5.0	-0.4	1.7	<b>13.0</b>
Slovakia	2.1	4.6	3.3	0.0	0.0	1.7	<b>11.7</b>
United Kingdom	-1.0	0.8	0.8	5.0	0.0	5.7	<b>11.4</b>
Austria	0.0	4.6	3.3	2.5	0.0	0.3	<b>10.8</b>
Bulgaria	2.0	4.9	0.4	0.0	0.0	3.3	<b>10.6</b>
Cyprus	-2.0	0.0	0.6	5.0	0.4	6.7	<b>10.6</b>
Malta	-1.0	1.8	3.8	5.0	0.0	0.3	<b>9.9</b>
Luxembourg	-0.4	1.0	0.3	5.0	0.0	1.7	<b>7.6</b>
Germany	-1.3	0.1	0.3	2.5	1.2	1.7	<b>4.5</b>
Slovenia	-1.2	3.2	-0.6	0.0	0.8	-1.0	<b>1.2</b>

Finally, it should be recalled that target adequacy has been assessed separately. Some countries which give good detail on policies, and whose policies are stated to be sufficient to meet their targets, do in fact have very unambitious targets.

## RECOMMENDATIONS FOR POLICY DETAILS

The evaluation of Policy Details shows that almost all countries need to do a more thorough job in their final plans of describing the actions they plan to implement *and* the impact these will have on their stated climate and energy goals. This includes a significant increase in the level of detail when it comes to describing policies for all three policy areas and incorporating elements, such as timeframe, implementing body and relevant financial provisions. Furthermore, NECP drafts with insufficient *planned* policies should return to the drawing board and integrate more ambitious actions for the final NECP. This need for this will become increasingly apparent as Member States think more carefully about their Long Term Strategies, as many of the actions needed for deeper parts of the transition will rely on the guaranteed delivery of basic building blocks of a decarbonised economy, such as reducing energy consumption and increasing use of renewables. Moreover, given that most countries failed to detail their anticipated use of CAR flexibilities, final plans should indicate clearly which mechanisms will be used and to what degree.

If the draft NECPs are any indication, countries are not on track to achieving a coal-free energy system. The NECPs that currently lack detail on the current and/or future electricity mix should be updated to include this information. If a country plans to phase out coal, it should highlight this in the relevant NECP section and include a feasible time frame as well as any information on the legal status of the phase out and any further provisions for transition regions. Similarly, countries need to work towards and report progress on phasing out fossil fuel subsidies. A description of the current subsidy landscape should also include the allocated budget and/or foregone revenues for the government, thereby showing the relevance of the subsidy in the national context. Member States should define and incorporate a roadmap for the phase-out of each of the mentioned subsidies to allow for outside evaluators to track their progress.

Finally, in preparing their final NECPs, almost all countries could improve by providing a more robust account of the overall cost of their plan, disaggregating this where appropriate by sector. While most countries did provide some indication of sector-specific finance needs, the scope of the reporting was lacking; draft plans seemed to focus on one or two sectors and in many cases failed to mention finance considerations for all three key policy dimensions. This is a missed opportunity, given that clearly stating investable needs and opportunities in the NECPs can serve as an advertisement for investors. Finally, countries should do a better job of distinguishing between sources of finance, especially the anticipated use of EU funding opportunities.

## DIMENSION 3:

# PROCESS QUALITY



## WHAT AND HOW WE EVALUATE

The Process Quality dimension evaluates the information provided by Member States on how they plan to engage with their respective stakeholders, how they plan to integrate the stakeholders inputs to the NECPs and validates if the NECP plans are compliant with the required information to be provided and in the required format and within the required timing.

The Process Quality dimension consists of **two main indicators**. The first indicator focuses on stakeholder involvement. This is evaluated based on opportunities for input provided by Member States. The second indicator (Compliance) evaluates the extent to which the NECP meets the formal requirements on information to be provided in the mandatory template, and if the NECP was submitted by the 31.12.2018 deadline.

Altogether, the process quality dimension accounts for 10 points towards the total potential score of 100, with 7.5 points on the stakeholder dimension and 2.5 points on the compliance.



## INDICATOR 3.1 STAKEHOLDER PARTICIPATION

### Context

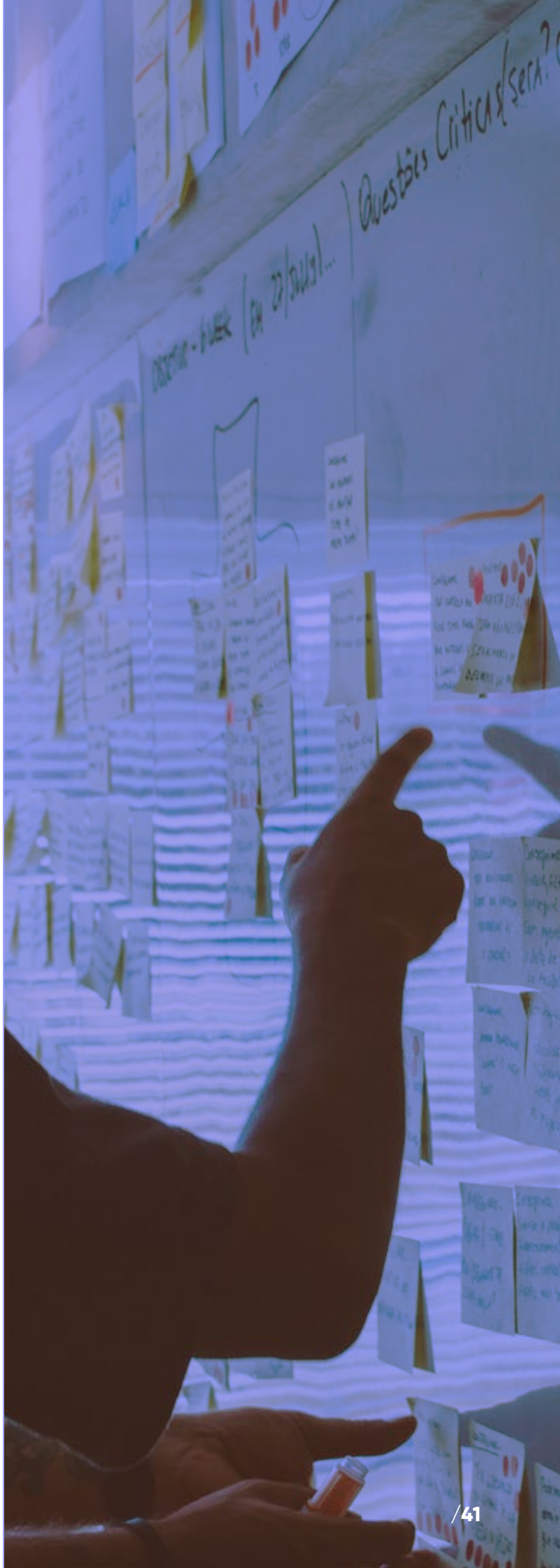
**Why is this important:** The road to Net Zero by 2050 implies significant and transformational impacts on many if not all aspects of society. A good level of participation by stakeholders can generate acceptance and buy-in, which can facilitate an effective implementation of policies foreseen in the NECPs. It is therefore essential that stakeholders are invited to actively participate in the elaboration of the plans and contribute to the various stages of the plans.

**What the legislation requires:** Public participation is a key pillar of EU policy-making and with the Aarhus Convention and implementing legislation in the EU has become a legal obligation. The Governance Regulation includes this mandatory involvement of the public. However, Article 10 of the Governance Regulation suggests that Member States are only required to conduct public consultations on the final NECPs (for submission on 31.12.2019) and not on the drafts, at least for the current iteration. However, the spirit and requirements of the Aarhus Convention demand early and effective consultation, which should also apply to the first draft NECPs. Member States are required to provide information on consultations under Section A-1.3 of their NECPs. Article 10 further requires that they submit a summary of the views collected as an attachment to the NECP.

**What the indicator measures:** For the purposes of assessing the engagement with stakeholders, it is not simply the fact that a public consultation has taken place that is considered, but also frequency and openness of opportunities provided. The indicator measures if the Member State organised some form of consultation with all relevant stakeholders, and if it submitted a summary of the views collected as an attachment to the NECP. Where no consultation has been done, or communicated as being planned for the future, countries receive negative points.

### Results

Twenty Member States achieved a score higher than 3.8 out of 7.5, or above 50%. Eight countries are at the 50% mark, and more than ten countries are above 5.6 (or 75%). However, the EU28 average is at 3.2 on a maximum of 7.5 points which is still below the 50% mark. This means that many Member States did not consult their stakeholders well.



Three clusters appear when looking at the results with a group led by France with medium to high scores, a group with zero score and the third group with negative points. Several Member States did a good to very good job in involving stakeholders effectively. Others that have not done so yet at least mention the intention to take comments and inputs into account in their final NECPs.

Eight MS need to improve significantly the way they involve their stakeholders of which Bulgaria, Germany, Italy and Lithuania that have a zero score and the group with Denmark, Poland, Romania, Slovakia that have a negative score.

## INDICATOR 3.2: COMPLIANCE

### Context

**Why is this important?** The NECPs are the key vehicle for Member States to plan and communicate their own actions towards 2030 and 2050, which should be in line with the EU's climate and energy commitments. To integrate the contribution of each MS and to evaluate the impacts of the various NECPs, but also to allow for coordination and exchange of good practices between MS, requires that the submitted NECP follow the same format and are elaborated in the agreed timeframe. This allows comparability, transparency and accountability - and also facilitates progress monitoring afterwards.

**What does the legislation require?** Member States are obliged to follow a specific template for their NECP, provided in an Annex to the Governance Regulation. Member States have to fill out all subheadings of the NECP framework to fulfil the requirements. The legislation has also provided specific submission dates which needs to be followed for the process to happen smoothly, leaving time for the Commission to assess the drafts and issue recommendations. In the case of the draft NECPs this was the 31st of December 2018.

**What does the indicator measure?** The indicator measures if Member States submitted their NECPs in line with the requirements on the information, in the required format and at the requested notification date.

### Results

A good number of MS are compliant with the format and the timing. All countries ultimately submitted a draft, but 12 out of the 28 countries did not respect the deadline. Seven countries submitted one month after the deadline, with Spain submitting last (two months late). This leads Spain to have a low performance on this indicator, but on the other hand seems to have helped the country in terms of the quality of its plan as it has the highest score overall.

Information is regularly provided but very seldom complete. The policies and measures and other policy indicators were mostly very poor on details. While these were draft plans, produced under difficult circumstances (see also section on “Key Messages”) the level of detail provided is still disappointing. It limits the ability for the Commission and other stakeholders to analyse the extent to which the plan represents a coherent picture of the actions required to achieve the 2030 goals.

Thirteen countries achieve a score higher than 1.8 on a maximum of 2.5, leading to a total EU 28 average of 1.5. Seven countries have scores lower than 1, with the Czech Republic and Croatia with the lowest scores at close to 0 points. These 2 countries submitted late and yet did not follow the template which does not contain information on all subheadings required by the NECP framework.

# OVERALL RESULTS FOR DIMENSION 3



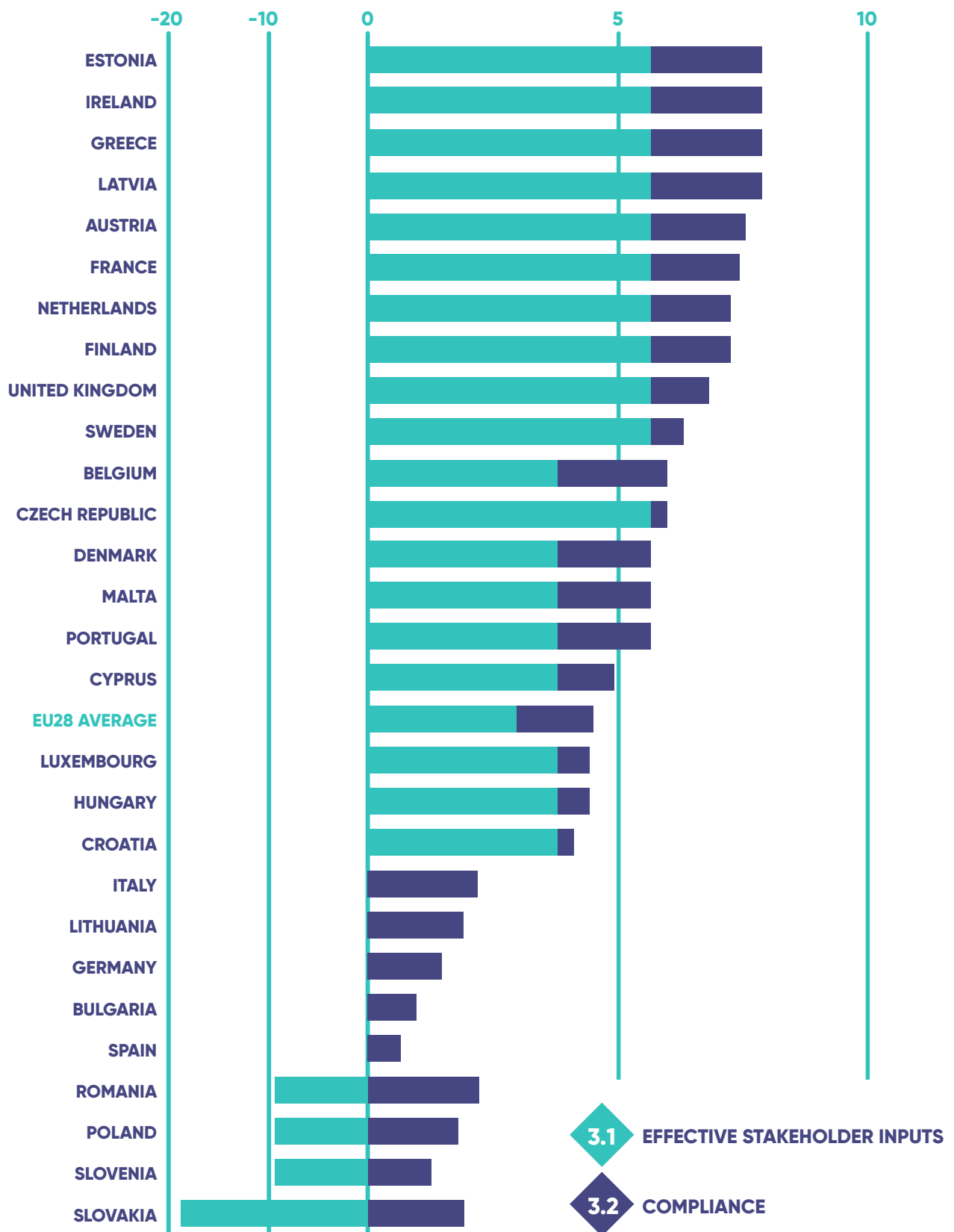
Overall, draft NECPs for the EU28 received an average of 4.5 points out of a possible maximum score of 10, again reaching less than half of the potential points (45.0%). As with the other two dimensions, the draft plans display a full array of scores ranging from Estonia, Ireland, Greece and Latvia with the highest scores at 7.8 out of 10 and Slovakia with a even negative contribution of -1.9 points due to having no information at all on stakeholder consultations in its draft plan. Poland also ranks very low as it states that no stakeholder consultation has been done and does not announce any upcoming process.

This is the first year that Member States have been required to prepare NECPs and NLTs, so some degree of 'teething trouble' is understandable. It is fully expected and hoped that the process of preparing the NECPs - and therefore their content - will progressively improve in subsequent iterations.





## PROCESS QUALITY BY INDICATOR



	3.1 EFFECTIVE STAKEHOLDER INPUTS (/7.5)	3.2 COMPLIANCE (/2.5)	PROCESS QUALITY TOTAL (/10.0)
Estonia	5.6	2.2	7.8
Ireland	5.6	2.2	7.8
Greece	5.6	2.2	7.8
Latvia	5.6	2.2	7.8
Austria	5.6	1.9	7.5
France	5.6	1.8	7.4
Netherlands	5.6	1.6	7.2
Finland	5.6	1.6	7.2
United Kingdom	5.6	1.1	6.8
Sweden	5.6	0.6	6.3
Belgium	3.8	2.2	5.9
Czech Republic	5.6	0.3	5.9
Denmark	3.8	1.9	5.6
Malta	3.8	1.9	5.6
Portugal	3.8	1.9	5.6
Cyprus	3.8	1.1	4.9
EU28 AVERAGE	2.9	1.5	4.5
Luxembourg	3.8	0.6	4.4
Hungary	3.8	0.6	4.4
Croatia	3.8	0.3	4.1
Italy	0.0	2.2	2.2
Lithuania	0.0	1.9	1.9
Germany	0.0	1.5	1.5
Bulgaria	0.0	0.9	0.9
Spain	0.0	0.6	0.6
Romania	-1.9	2.2	0.3
Poland	-1.9	1.8	-0.1
Slovenia	-1.9	1.3	-0.6
Slovakia	-3.8	1.9	-1.9

## RECOMMENDATIONS

**Stakeholder participation:** The 9 countries scoring either zero or negative clearly need to be challenged and must do better in involving their respective stakeholders. The final plans from these MS need to address this specific dimension.

**Compliance:** A good number of MS are compliant with the format and the timing but the information is far from being complete (e.g. details on existing and planned measures, investments, phase out of fossil fuels, stakeholders inputs etc). 12 countries submitted late - and not all seem to have used the extra time to submit a fully filled-in plan. The final plan of the MS must address this missing information. The draft plans must serve as a clear indication that information is missing, and the EU Commission should communicate clearly again on the key importance of following the template and filling in all the data requested.












# FULL RANKING RESULTS



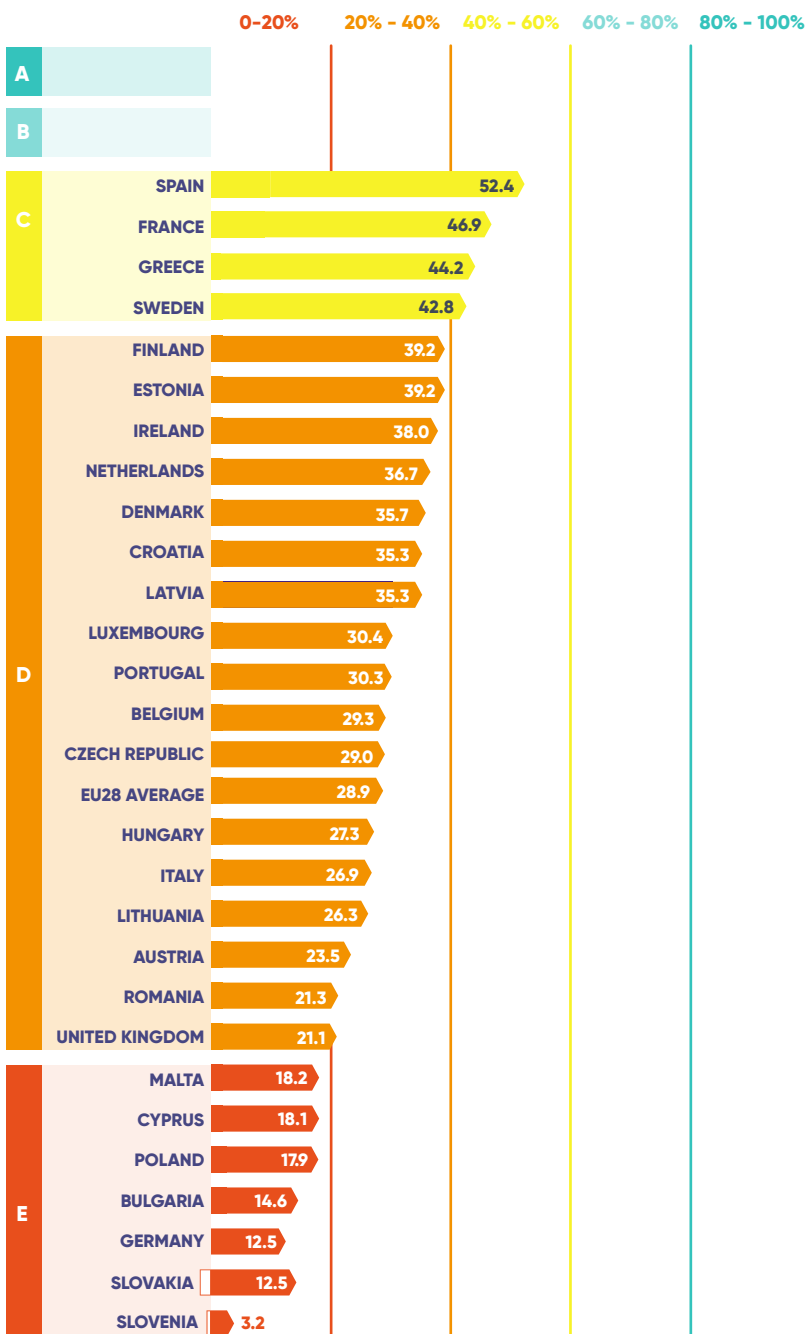
Having analysed the three main evaluation dimensions with their respective good and bad practice examples, an overall ranking result emerges from the sum of the respective scores. The table across two pages depicts the total composite score for each EU Member State's draft NECP. The total score represents the cumulative number of points awarded across all indicators and sub-indicators out of a maximum potential score of 100.

Spain and France lead the way with 52.4% and 46.9% of the potential score, respectively, followed by Greece (44.2%) and Sweden (42.8%). The remaining 24 EU Member States all received less than 40% of the potential points. The Slovenian NECP came in last with a score of 3.2% with Germany and Slovakia (both with 12.5%) just slightly ahead. The average score for the EU28 was 28.9%.

This assessment sheds light on numerous shortcomings in the current state of the NECP process and has identified a number of recommendations and good practices that could be replicated. Despite this, even the highest scoring plans fall far short of an ideal score and receive what would amount to at best a pass for their total score.

Accounting for slightly over the majority of potential awardable points, the Policy Detail dimension certainly has the most impact on the scores achieved. Some countries were able to make up for lost points on target adequacy by providing ample information on their current and future policy actions (e.g. Greece, Ireland, Finland and Belgium). Other countries, such as Sweden, Luxembourg and Estonia, scored particularly well on the Target Adequacy dimension but presented plans that lacked detail on how these lofty targets should be achieved, and some have been noted to use biomass to levels that require to be checked with sustainability standards much more closely.

Looking at how NECPs fared relative to group performance within each dimension, no single Member State can be said to have received high scores across the board. Put differently, no single draft NECP scored among the top 10% or 20% across all dimensions. These figures also mean that not only were NECP scores low overall, but no single country sticks out as a clear frontrunner for all three dimensions. This matters, since ultimately a plan which has good detail on how to achieve inadequate targets will not be sufficient (e.g. Greece); nor will a plan which has good targets but little information on how to reach them (e.g. Luxembourg). For further country-specific details and summary on all indicators per Member State, please refer to the national scorecards in Annex two.







	1. TARGET ADEQUACY	1.1 2030 NON-ETS GHG TARGETS (/15.0)	1.2 NATIONAL 2030 GHG TARGET (/1.0)	1.3 2030 RENEWABLE ENERGY TARGET (/12.5)	1.4 2030 ENERGY EFFICIENCY TARGETS (/12.5)	1.5 NATIONAL 2050 TARGET (/4.0)
Belgium	2.2	1.5	0.0	0.0	0.0	0.7
Bulgaria	3.1	1.5	0.0	0.0	0.0	1.6
Czech Republic	4.9	1.5	1.0	0.0	0.0	2.4
Denmark	12.5	1.5	0.0	7.6	0.0	3.3
Germany	6.6	1.5	1.0	0.0	2.8	1.3
Estonia	15.7	1.5	1.0	10.1	0.0	3.1
Ireland	4.1	1.5	1.0	0.0	0.0	1.6
Greece	3.1	1.5	0.0	0.0	0.0	1.6
Spain	21.1	8.7	1.0	8.3	0.0	3.1
France	10.4	1.5	1.0	0.0	3.9	4.0
Croatia	10.3	1.5	0.0	7.3	0.0	1.6
Italy	2.6	1.5	0.0	0.0	0.0	1.1
Cyprus	2.6	1.5	0.0	0.0	0.0	1.1
Latvia	8.9	1.5	1.0	0.0	2.8	3.6
Lithuania	5.4	1.5	1.0	0.0	0.0	2.9
Luxembourg	18.5	9.9	0.0	0.0	7.5	1.1
Hungary	4.5	1.5	1.0	0.0	0.0	2.0
Malta	2.6	1.5	0.0	0.0	0.0	1.1
Netherlands	16.4	1.5	1.0	4.5	6.4	3.1
Austria	5.3	1.5	0.0	0.0	2.2	1.6
Poland	1.7	1.5	0.0	0.0	0.0	0.2
Portugal	10.5	1.5	1.0	5.1	0.0	2.9
Romania	4.1	1.5	1.0	0.0	0.0	1.6
Slovenia	2.6	1.5	0.0	0.0	0.0	1.1
Slovakia	2.6	1.5	0.0	0.0	0.0	1.1
Finland	2.8	1.5	0.0	0.0	0.0	1.3
Sweden	17.1	8.3	1.0	4.3	0.0	3.6
United Kingdom	3.0	0.0	1.0	0.0	0.0	2.0
EU28 AVERAGE	7.3	2.2	0.5	1.7	0.9	2.0



	2. POLICY DETAILS	2.1	2.2	2.3	2.4	2.5	2.6.1	2.6.2	3. PROCESS QUALITY	3.1	3.2	TOTAL SCORE (/100)
		POLICIES AND MEASURES (PAMS) FOR ACHIEVING NON-ETS GHG TARGETS (/10.0)	POLICIES AND MEASURES (PAMS) FOR ACHIEVING RES TARGETS (/10.0)	POLICIES AND MEASURES (PAMS) FOR ACHIEVING EE TARGETS (/10.0)	COAL USE (/5.0)	PHASE OUT OF FOSSIL FUEL SUBSIDIES (/2.0)	INVESTMENT DATA (/4.0)	FINANCE MEASURES (/4.0)		EFFECTIVE STAKEHOLDER INPUTS (/75)	COMPLIANCE (/25)	
	21.2	4.3	5.8	4.7	5.0	0.0	0.0	1.3	5.9	3.8	2.2	29.3
	10.6	2.0	4.9	0.4	0.0	0.0	2.0	1.3	0.9	0.0	0.9	14.6
	18.1	1.9	8.3	4.4	0.0	0.8	0.0	2.7	5.9	5.6	0.3	29.0
	17.7	2.3	3.9	0.8	5.0	0.0	3.0	2.7	5.6	3.8	1.9	35.7
	4.5	-1.3	0.1	0.3	2.5	1.2	-1.0	2.7	1.5	0.0	1.5	12.5
	15.6	4.4	4.9	-1.1	5.0	0.8	-1.0	2.7	7.8	5.6	2.2	39.2
	26.1	3.8	5.7	3.3	5.0	1.6	4.0	2.7	7.8	5.6	2.2	38.0
	33.3	7.9	10.0	10.0	0.0	0.8	2.0	2.7	7.8	5.6	2.2	44.2
	30.7	7.1	8.6	9.4	0.0	0.8	2.0	2.7	0.6	0.0	0.6	52.4
	29.2	6.0	8.6	3.3	5.0	-0.4	4.0	2.7	7.4	5.6	1.8	46.9
	20.9	6.9	1.0	7.4	0.0	0.0	3.0	2.7	4.1	3.8	0.3	35.3
	22.1	3.0	2.5	5.8	2.5	1.6	4.0	2.7	2.2	0.0	2.2	26.9
	10.6	-2.0	0.0	0.6	5.0	0.4	4.0	2.7	4.9	3.8	1.1	18.1
	18.6	2.3	3.5	2.8	5.0	0.4	2.0	2.7	7.8	5.6	2.2	35.3
	19.0	3.2	4.2	4.2	5.0	0.8	-1.0	2.7	1.9	0.0	1.9	26.3
	7.6	-0.4	1.0	0.3	5.0	0.0	-1.0	2.7	4.4	3.8	0.6	30.4
	18.4	-0.1	5.4	4.2	5.0	-0.4	3.0	1.3	4.4	3.8	0.6	27.3
	9.9	-1.0	1.8	3.8	5.0	0.0	-1.0	1.3	5.6	3.8	1.9	18.2
	13.0	2.7	3.2	0.8	5.0	-0.4	-1.0	2.7	7.2	5.6	1.6	36.7
	10.8	0.0	4.6	3.3	2.5	0.0	-1.0	1.3	7.5	5.6	1.9	23.5
	16.3	3.9	6.0	5.1	-2.5	0.4	2.0	1.3	-0.1	-1.9	1.8	17.9
	14.1	2.6	0.4	2.8	5.0	0.0	2.0	1.3	5.6	3.8	1.9	30.3
	16.9	3.0	4.2	2.5	0.0	1.6	3.0	2.7	0.3	-1.9	2.2	21.3
	1.2	-1.2	3.2	-0.6	0.0	0.8	-1.0	0.0	-0.6	-1.9	1.3	3.2
	11.7	2.1	4.6	3.3	0.0	0.0	-1.0	2.7	-1.9	-3.8	1.9	12.5
	29.1	6.0	8.2	3.3	5.0	0.0	4.0	2.7	7.2	5.6	1.6	39.2
	19.4	3.2	7.5	6.9	0.0	0.4	0.0	1.3	6.3	5.6	0.6	42.8
	11.4	-1.0	0.8	0.8	5.0	0.0	3.0	2.7	6.8	5.6	1.1	21.1
	17.1	2.6	4.4	3.3	2.9	0.4	1.4	2.2	4.5	2.9	1.5	28.9

# KEY MESSAGES FROM THE EVALUATION



## A POSITIVE PERSPECTIVE ON LOW SCORES FOR THE DRAFT NECPs

With a total EU average score of less than 30%, the quantitative results of the assessment of the draft NECPs do not paint a positive picture. Judging from the draft plans, Europe is not on a Net Zero pathway. However, **the draft documents are only a first step** in the implementation of the new energy and climate governance system of the EU. **They can and need to be improved upon.** To arrive at constructive and forward looking take-away messages, the context in which the draft plans have been written needs to be considered, as well as their function in the overall process.

Firstly, **these integrated plans are the first of their kind.** In the past, Member States have had to draw up similar national plans for renewable energy and for energy efficiency, but in each case separately and along different timelines. No directly comparable obligation existed for the climate targets. The NECPs combine these and other policy areas and ask for a depiction of the national energy system as a whole — in the context of a long-term pathway compatible with the Paris Agreement. The integration across policy areas should result in more streamlined and efficient planning processes in the long run and also better policy-making, but it requires an initial investment in people and procedures (including inter-ministerial coordination). Moreover, Member States clearly differ in their access to the capacities and resources needed to pull together the information and the analysis required for many aspects of the NECP drafting.

Secondly, **these draft plans were produced under less than ideal circumstances.** Despite the fact that the move to integrated NECPs had been proposed as early as 2014, Member States did not have a lot of time for their actual preparation. The specifics had been under negotiation for a year and a half, and when the final compromise on the actual text of the Governance Regulation was reached, this left six months before the NECP submission deadline.

Other factors have influenced the results: for some countries, the submission deadline was misaligned with the timing of internal policy-making processes (e.g. Germany), whereas others were able to create a dedicated positive political dynamic and use the NECP drafting obligation as a means to establish new national goals and policies (e.g. Spain).





While these circumstances do not excuse Member States for the unfinished state of their plans, they put the drafts into perspective and put the focus on the future. **The draft NECPs can and should serve as a basis for much better final plans by the end of the year.** The insights published in this report and other related publications serve as input to a dialogue at the EU level and in Member States about lessons learnt and key areas for improvement.

The good news is: **there are positive, good practice examples for all the aspects** analysed in this report. These can be used for mutual learning among Member States. These good practices include the following:

- Luxembourg, Spain and Sweden decided to put forward national non-ETS targets beyond their legal obligation under existing EU legislation. Greece projects that it will significantly overachieve the EU obligation but has not yet opted to declare this larger achievement its formal target—which it could do for the final plan.
- A handful of countries, led by Estonia and Spain, are showing leadership on renewable energy targets with stronger national contributions towards the overall EU objectives (others in this group include Denmark, Croatia, Portugal, the Netherlands and Sweden).

- Similarly, on energy efficiency, Luxembourg is showing other Member States that more ambitious goals are politically feasible and economically sensible, and it is joined by France, Latvia, Germany and Austria on this issue.
- Although there is still room for improvement, several countries have already put significant effort into elaborating policies and measures. Most notable among these are Greece and Spain, they are followed closely by France, Finland, Sweden, Croatia, Poland and the Czech Republic.
- In addition, a set of countries have included significant detail on their national investment needs in their draft NECPs, including Cyprus, Finland, France, Ireland and Italy.
- A strong group of Member States already sought stakeholder inputs for their draft plans, notably including Estonia, the UK, Czech Republic, Ireland, to mention but a few.

Finally, **it remains a positive fact in itself that the EU has committed to this far-reaching and exacting planning system.** Net Zero societies will not be arrived at by chance. Used well, this comprehensive governance framework will be a key asset for developing deep understanding of the long-term sectoral transformations needed, and playing these insights back into near-term decisions about policies, infrastructure, investments and incentivisations. The approach can even be a model for other countries.

## RECOMMENDATIONS FOR MEMBER STATES

These examples from a broad range of Member States show that positive examples can be found across the EU. However, all of the plans need significant improvements. For the final versions, national decision-makers should consider the following recommendations:



1

### TARGET ADEQUACY:

The 2030 climate targets should reflect the Paris-compatible objective of Net Zero GHG emissions by 2050. Member States have largely decided to stick to the legal obligations under the 2030 Climate Action Regulation (CAR) which are not in line with a Net Zero 2050 trajectory or the scientific findings of the IPCC 1.5°C Report. Similar restraint is visible on renewable energy and energy efficiency. It is important that Member States do not consider the EU targets as a maximum cap but rather as a minimum threshold for national climate ambition. This question is relevant given that the Governance Regulation demands the 2030 plans to be consistent with the 2050 National Long Term Strategies, due by the end of the year as well.

2

### CREDIBLE POLICIES:

Member States risk missing out on financing and investments due to vague and incomplete descriptions of policies and measures. Few Member States have provided a coherent and credible set of policies and measures, accompanied by policy impact analyses, that are needed to win investor confidence and benefit from lower cost of capital for clean energy financing. It is key that Member States identify the investment needs and financing measures if they are to mobilize the necessary investments, e.g. for building renovations and decarbonised transport infrastructure.

3

### PUBLIC ENGAGEMENT:

Stakeholder involvement is essential to advance societal buy-in for the transition, and to capture the wealth of information available. The engagement with national actors on the draft plans has been insufficient so far, although in many cases there are promises to improve that between the draft and the final plan. Stakeholder involvement is key to developing quality final plans. Member States should create varied and meaningful opportunities for input by stakeholders.

## RECOMMENDATIONS FOR THE EUROPEAN COMMISSION

The European Commission has been made the guardian of the NECP process, as the Governance Regulation determines that it shall assess all draft plans and issue country-specific recommendations before the end of June 2019. This assessment thus also contains messages specific to the European Commission - which are relevant for the immediate task at hand, but also carry into the future implementation of the new governance system. The above recommendations for Member States are also relevant for the European Commission as it prepares to issue its recommendations. In addition, the European Commission should consider the following:



**Make Net Zero by 2050 the guiding principle for the NECPs.** Feedback to Member States should be in line with the EU 2030 package, while maintaining and strengthening the perspective on a Net Zero GHG objective for 2050. While the latter is not embedded in EU legislation at this point in time, it is clear that an increasing number of state and non-state actors are considering this goal as the only reasonable benchmark. The long-term dimension is clearly underdeveloped in the draft NECPs, despite the Governance Regulation's call for consistency with national Long Term Strategies. The European Commission should uphold the 2050 imperative to prevent short-termism from creating further lock-in effects on fossil fuel investments.



**Provide clear and unambiguous recommendations to Member States on all missing aspects.** Existing NECPs already contain significant amounts of information, spanning several hundred pages, but the focus is often on the status quo, with still essential data on future policies and financing missing. The European Commission should explicitly signal what needs to be improved in each section of the draft plans and request additional detail and analysis.



**Strengthen the template!** The mandatory template is a strong improvement over other types of national plans in previous years. Having standardised information for all Member States is really important for properly assessing the content of the plans. In fact, this assessment would have been impossible without the mandatory template. The Commission should ensure that Member States fill out all required sections at similar and sufficient levels of detail.



**Establish a formal “helpdesk” within the European Commission,** for example in the form of an Energy Transition Support Service, that helps Member States to resolve concrete planning and implementation challenges. This function could also help the Commission to follow-through on its recommendations to Member States towards final NECPs by the end of the year, and in the years to come for the progress report in 2021 and the update of the plans in 2023, as well as the finalisation of the Long Term Strategies. It could extend the support provided to Member States in the drafting thus far and provide a much-needed resource for those facing capacity bottlenecks.



**Establish parameters for sufficient improvement in the final plans - and prepare for an alignment and support process.** While the main assessment under the Governance Regulation should be carried out against the draft NECPs, the Commission will also need to evaluate the final plans after submission. A separate process in 2020 (after final plans are submitted) could be useful to determine whether the plans are sufficiently specific and ambitious and to identify areas that are particularly challenging (e.g. regarding non-ETS reductions), in order to engage in an EU-wide best practice exchange process, with resources and political backing. This could also help facilitate stronger regional collaboration and lead to further Union level policy initiatives in support of the NECPs. A process of evaluating the national Long Term Strategies, as a means of identifying where support is needed and enabling conditions may need to be improved, is also recommended.



## LOOKING BEYOND NECP DRAFTING: LINKS TO THE MFF AND THE FUTURE EP

Beyond the finalisation of the draft plans there are other EU policy processes that can directly support an ambitious implementation at the national level. In particular, the next Multiannual Financial Framework (MFF) and the revision of the Energy Lending Policy of the European Investment Bank (EIB) could help to direct EU public funding towards clean energy and transport projects and policies. All parties involved, including Member States and the European Commission, must not waste but seize this tremendous opportunity of using public financial support to attract private investments to further the implementation of the NECPs, creating a tangible benefit for national economies.<sup>20</sup>

While the new European Commission will have to formally monitor the NECPs, the incoming European Parliament will also need to play a role in supervising progress on the Energy Union. It could do so by establishing a dedicated Standing Committee<sup>21</sup> to complement the Commission's State of the Energy Union reports - and offer a space for exchange with stakeholders. This could even grow into an equivalent of the national multi-level stakeholder dialogues required under the Governance Regulation, broadening the debate and involving the multi-faceted community engaged in this area. This could also provide input to a process starting in 2020 on furthering future action on climate and energy across the EU, once the first ever final NECPs and national LTS have been assembled.

In conclusion, while the draft NECPs show the beginnings of the next steps towards climate action by 2030, they are not yet fully formed maps to a climate-friendly future and do not live up to the spirit of the Paris Agreement. With the right level of support, guidance and learning, however, European Member States have the opportunity to improve their plans, underlining their commitment to the Net Zero objective by 2050 as the direction of travel - and demonstrating to the rest of the world that a path towards a climate neutral future is possible.

ANNEX ONE:

# EXPANDED METHODOLOGY



ID	TITLE	MAX. SCORE PER INDICATOR	SUB- ID	EVALUATION QUESTION
<b>DIMENSION 1: TARGET ADEQUACY</b>				
1.1	2030 Non-ETS GHG targets	15.0	1.1.1	What is the 2030 target for the non-ETS sectors? ([%], Base year = 2005)
1.2	National 2030 GHG target	1	1.2.1	Is there an economy-wide national GHG reduction target for 2030? (Base year = 1990)
1.3	2030 Renewable Energy target	12.5	1.3.1	What is the (indicative) national renewables contribution ([%], 2030 target )?
1.4	2030 Energy Efficiency targets	12.5	1.4.1	What is the (indicative) national energy efficiency contribution (2030 target)?
1.5	National 2050 target	4	1.5.1	Does the plan contain a specific national climate objective beyond 2030?
			1.5.3	Is there an explicit reference to the need to be coherent with a national 2050 strategy?
			1.5.4	Are the Paris Agreement and its long-term objectives mentioned?

## DIMENSION 2: POLICY DETAIL

2.1	Policies for achieving the non-ETS GHG target	10	2.1.1	What is the detail on existing policies related to non-ETS emissions?
			2.1.2	What is the detail on planned policies related to non-ETS emissions?
			2.1.3	What is the information on non-ETS target achievement with existing measures?
			2.1.4	Are existing policies sufficient to meet the non-ETS target?
			2.1.5	Please add non-ETS emissions with existing measures for 2020/2025/2030 or cumulated (2021-2030)
			2.1.6	What is the information on non-ETS target achievement with planned measures?



## RESPONSE OPTIONS

## SCORING PER RESPONSE

	max. 15*
Yes	1.00
No	0.00
	max. 12.5*
	max. 12.5*
No	0.00
No national target is stated, but the EU objective of 80-95% by 2050 is referenced	0.44
A national target is explicitly stated (2040 or 2045 or 2050)	0.89
A national net-zero emission target by 2050 (or earlier) is stated	1.33
No mention of a national 2050 strategy or the need to produce one	-0.44
Some (vague) reference to a national LTS but no specific mention of the need for the NECP to be coherent with it	0.44
An explicit mention of the national LTS and the need for coherence of the NECP with the LTS	0.89
An explicit explanation of the connection between the NECP and the national LTS and how these are coherent	1.33
No mention of the Paris Agreement in the draft NECP	0.00
Some reference to the Paris Agreement and its long-term objectives	0.67
Strong reference to the Paris Agreement and explicit mention of its temperature targets (including 1.5C)	1.33
The NECP does not provide any information	-0.24
Very limited detail: only provides high-level formulations (no info on individual measures).	0.00
Some detail: includes specifics on a range of individual measures, such as a list with instrument titles	0.48
Good detail: includes specific instrument titles and additional information (e.g., target group, financial provisions, time frame, implementing body)	0.71
The NECP does not provide any information	-0.95
Very limited detail: only provides high-level formulations (no info on individual measures).	0.00
Some detail: includes specifics on a range of individual measures, such as a list with instrument titles	1.90
Good detail: includes specific instrument titles and additional information (e.g., target group, financial provisions, time frame, implementing body)	2.86
No details on the non-ETS emissions up to 2030	0.00
Includes non-ETS emissions in 2030 (or cumulated 2021-2030) but no indication on target achievement.	0.36
Clearly shows target (non)achievement (non-ETS emissions in 2030 or cumulated (2021-2030) in comparison to the target)	0.71
Yes, No, N/A	
No details on the non-ETS emissions up to 2030	0.00
Includes non-ETS emissions in 2030 (or cumulated 2021-2030) but no indication on target achievement.	1.43
Clearly shows target (non)achievement (non-ETS emissions in 2030 or cumulated (2021-2030) in comparison to the target)	2.86

2.1	Policies for achieving the non-ETS GHG target	10	2.1.7	Are planned policies sufficient to meet the non-ETS target?
			2.1.8	Please add non-ETS emissions with planned policies for 2020/2025/2030 or cumulated (2021-2030)
			2.1.9	What information does the draft NECP provide about using CAR flexibilities?
2.2	Policies for achieving the RES target	10	2.2.1	What is the detail on existing policies related to renewables?
			2.2.2	What is the detail on planned policies related to renewables?
			2.2.3	What is the information on RES target achievement with existing measures?
			2.2.4	Are existing policies sufficient to meet the RES target?
			2.2.5	Please add RES share (or amount and FEC) in 2030 with existing policies
			2.2.6	What is the information on RES target achievement with planned measures?
			2.2.7	Are planned policies sufficient to meet the RES target?
			2.2.8	Please add RES share (or amount and FEC) in 2030 with planned measures
2.3	Policies for achieving the EE target	10	2.3.1	What is the detail on existing policies related to efficiency?
			2.3.2	What is the detail on planned policies related to efficiency?
			2.3.3	What is the information on EE target achievement with existing measures?

Yes	1.43
No	0.36
N/A	0.00
No information	-0.71
Explicitly states that no flexibilities will be used	1.43
Mentions the potential use of CAR flexibilities but does not provide specifics	-1.43
States that only banking and borrowing of AEAs is foreseen	1.43
States that one or more of the following flexibilities will be used: (1) Transfer of AEAs; (2) ETS allowances; (3) LULUCF net removals; (4) Safety Reserve	-1.43
Please mention which of the four listed flexibilities will be used	
The NECP does not provide any information	-0.28
Very limited detail: only provides high-level formulations (no info on individual measures).	0.00
Some detail: includes specifics on a range of individual measures, such as a list with instrument titles	0.56
Good detail: includes specific instrument titles and additional information (e.g., target group, financial provisions, time frame, implementing body)	0.83
The NECP does not provide any information	-1.11
Very limited detail: only provides high-level formulations (no info on individual measures).	0.00
Some detail: includes specifics on a range of individual measures, such as a list with instrument titles	2.22
Good detail: includes specific instrument titles and additional information (e.g., target group, financial provisions, time frame, implementing body)	3.33
No details on the RES contribution up to 2030	0.00
Includes data on the share of RES (or amount) in 2030 but no indication on target achievement.	0.42
Clearly shows target (non)achievement (RES share or amount in 2030 in comparison to the target)	0.83
Yes, No, N/A	
No details on the RES contribution up to 2030	0.00
Includes data on the share of RES (or amount) in 2030 but no indication on target achievement.	1.67
Clearly shows target (non)achievement (RES share or amount in 2030 in comparison to the target)	3.33
Yes	1.67
No	0.42
N/A	0.00
The NECP does not provide any information	-0.28
Very limited detail: only provides high-level formulations (no info on individual measures).	0.00
Some detail: includes specifics on a range of individual measures, such as a list with instrument titles	0.56
Good detail: includes specific instrument titles and additional information (e.g., target group, financial provisions, time frame, implementing body)	0.83
The NECP does not provide any information	-1.11
Very limited detail: only provides high-level formulations (no info on individual measures).	0.00
Some detail: includes specifics on a range of individual measures, such as a list with instrument titles	2.22
Good detail: includes specific instrument titles and additional information (e.g., target group, financial provisions, time frame, implementing body)	3.33
No details on PEC and/or FEC in 2030	0.00
PEC or FEC is provided	0.28
PEC and FEC are provided but no indication on target achievement	0.56
Clearly shows target (non)achievement (PEC or FEC in comparison to the target)	0.83



			2.4.1	What is the share or the amount of coal for electricity generation in 2020, 2030, 2040
2.4	Coal use	5	2.4.2	Is information provided about a coal phase out plan?
			2.4.3	If there is a phase out scheduled, provide date.
2.5	Phasing out fossil fuel subsidies	2	2.5	What is the information provided on fossil fuel subsidies?
			2.6.1	Does the draft NECP contain information on investment needs?
2.6	Finance	8	2.6.2	What is the detail on financing measures addressing the three target areas?

## DIMENSION 3: PROCESS QUALITY

3.1	Effective stakeholder inputs	7.5	3.3.1	How did the country involve stakeholders in the drafting process?
			3.3.2	Does the draft NECP include an attachment with a summary of the public's views?
3.2	Compliance	2.5	3.2.1	Is the NECP in compliance with the requirements on information and is it in the required format?
			3.2.2	On what date was the draft NECP submitted to the Commission?

The Member State does not use coal for electricity generation	5.00
No details about a planned coal power phase-out	0.00
Yes, but no details about timing and measures	2.50
Yes, a governmental coal power phase out plan including details on timing	5.00
No phase out plan and the country mentions new investments in coal plants	-2.50
For check 2030 threshold	
No information on energy subsidies provided	0.00
Some information on energy subsidies, but not specified if these go towards fossil fuels	0.40
Information on fossil fuel subsidies but excluding details and no phase out	0.80
Information on fossil fuel subsidies, excluding details but including overall statement to phase out fossil-fuel subsidies	1.20
Information on fossil fuel subsidies, including details and phase out planned for some	1.60
Information on fossil fuel subsidies, including details and phase out planned for all	2.00
The draft NECP states that there are no fossil fuel subsidies	-0.40
No information provided	-1.00
Only general, high-level formulations on investment needs	0.00
Information provided but only for some specific sectors	2.00
Information provided for the country as a whole but not for several or all sectors	3.00
Information provided for the country as a whole and for several or all sectors	4.00
The NECP does not provide information.	0.00
Very limited detail: only provides high-level formulations (no info on individual measures).	1.33
Some detail with information on financing measures but not in detail for all of the three target areas.	2.67
Detailed information on financing measures for all of the three target areas.	4.00
No mentioning of a consultation with the public	-2.50
No public consultation was carried out in the process of drafting	-1.25
No public consultation was carried out in the process of drafting, but it announces concrete plans for future consultations	0.00
One or more consultations were conducted but only for a select group of organisations or individuals	2.50
One or more consultations were conducted and participation was open to stakeholders from all sectors and society	3.75
No	0.00
Yes	3.75
No, the draft NECP does not follow the structure given by the NECP framework	0.00
No, the draft NECP does not contain information on all subheadings despite following the template	0.31
No, the draft NECP does not contain information on all subheadings yet the Member State provides justification for missing elements	0.63
Yes, the draft NECP contains information on all subheadings, even if some of the answers sought for the ranking needed more detail	0.94
Yes, the draft NECP contains information on all subheadings and no answer to the other indicators suggests that information is missing	1.25
	max. 1.25**
/	not used for scoring
*	Measured against a national benchmark (cf. ##)
**	Formula based on the dates provided

## TABLE WITH NATIONAL BENCHMARKS FOR THE RENEWABLE ENERGY TARGET AMBITION (INDICATOR 1.3)

SCENARIO	MINIMUM COMPLIANCE (32% AT EU LEVEL)	MODERATE AMBITION (LOW RANGE)	MODERATE AMBITION (HIGH RANGE)	NET ZERO (HIGH RANGE)
Austria	48.60%	48.99%	58.30%	68.90%
Belgium	27.20%	27.58%	36.60%	43.25%
Bulgaria	26.30%	26.57%	33.00%	39.00%
Croatia	32.40%	32.73%	40.60%	47.98%
Cyprus	27.70%	28.10%	37.60%	44.43%
Czech Republic	24.70%	25.01%	32.40%	38.29%
Denmark	48.40%	48.90%	60.80%	71.85%
Estonia	36.30%	36.60%	43.70%	51.64%
Finland	50.50%	50.83%	58.70%	69.37%
France	39%	39.43%	49.70%	58.73%
Germany	33.90%	34.32%	44.50%	52.59%
Greece	33%	33.40%	42.90%	50.70%
Hungary	24.80%	25.11%	32.50%	38.41%
Ireland	33.50%	33.97%	45.30%	53.53%
Italy	32.10%	32.50%	42.20%	49.87%
Latvia	53.20%	53.50%	60.60%	71.62%
Lithuania	35.40%	35.73%	43.60%	51.53%
Luxembourg	25.10%	25.47%	34.40%	40.65%
Malta	26.90%	27.35%	38.20%	45.14%
Netherlands	29.80%	30.22%	40.30%	47.63%
Poland	26.50%	26.80%	34.00%	40.18%
Portugal	45.10%	45.47%	54.40%	64.29%
Romania	35.40%	35.70%	42.80%	50.58%
Slovakia	26%	26.31%	33.80%	39.94%
Slovenia	37.40%	37.72%	45.50%	53.77%
Spain	35.70%	36.12%	46.30%	54.72%
Sweden	64.10%	64.50%	74.20%	87.69%
United Kingdom	32.10%	32.56%	43.50%	51.41%
EU	32.00%	33.00%	45.00%	53.18%

Source:

Split by country based on  
Ecofys, 2017

Interpolation to reach 33% at  
EU aggregated level

Split by country based on  
Ecofys, 2017

Extrapolation



## TABLE WITH NATIONAL BENCHMARKS FOR THE NON-ETS TARGET AMBITION (INDICATOR 1.1)

SCENARIO	MINIMUM COMPLIANCE (CLIMATE ACTION REGULATION)	MODERATE AMBITION (LOW RANGE)	MODERATE AMBITION (HIGH RANGE)	NETZERO (HIGH RANGE)
Belgium	-35.00%	-41.80%	-52.00%	-61.45%
Bulgaria	0.00%	-6.40%	-16.00%	-18.91%
Czech Republic	-14.00%	-20.80%	-31.00%	-36.64%
Denmark	-39.00%	-45.80%	-56.00%	-66.18%
Germany	-38.00%	-43.20%	-51.00%	-60.27%
Estonia	-13.00%	-19.80%	-30.00%	-35.45%
Ireland	-30.00%	-40.40%	-56.00%	-66.18%
Greece	-16.00%	-24.00%	-36.00%	-42.55%
Spain	-26.00%	-33.20%	-44.00%	-52.00%
France	-37.00%	-43.40%	-53.00%	-62.64%
Croatia	-7.00%	-13.80%	-24.00%	-28.36%
Italy	-33.00%	-39.80%	-50.00%	-59.09%
Cyprus	-24.00%	-30.00%	-39.00%	-46.09%
Latvia	-6.00%	-14.00%	-26.00%	-30.73%
Lithuania	-9.00%	-15.80%	-26.00%	-30.73%
Luxembourg	-40.00%	-44.40%	-51.00%	-60.27%
Hungary	-7.00%	-13.40%	-23.00%	-27.18%
Malta	-19.00%	-25.80%	-36.00%	-42.55%
Netherlands	-36.00%	-42.40%	-52.00%	-61.45%
Austria	-36.00%	-42.40%	-52.00%	-61.45%
Poland	-7.00%	-13.80%	-24.00%	-28.36%
Portugal	-17.00%	-23.40%	-33.00%	-39.00%
Romania	-2.00%	-8.80%	-19.00%	-22.45%
Slovenia	-15.00%	-23.00%	-35.00%	-41.36%
Slovakia	-12.00%	-18.80%	-29.00%	-34.27%
Finland	-39.00%	-44.60%	-53.00%	-62.64%
Sweden	-40.00%	-46.40%	-56.00%	-66.18%
United Kingdom	-37.00%	-43.00%	-52.00%	-61.45%
EU (ETS+non-ETS)	-40.00%	-46.00%	-55%	65%

Source:

Climate Action Regulation

Interpolation between the -40% and the -55% to reach -46% at the EU aggregated level

55% level, split by country based on CAN Europe NECP guidelines

Extrapolation in line with -65% at the aggregated EU level

ANNEX TWO:

# NECP COUNTRY SCORECARDS



# NECP NATIONAL SCORECARD

# SPAIN



## TARGET ADEQUACY:

21.1/45

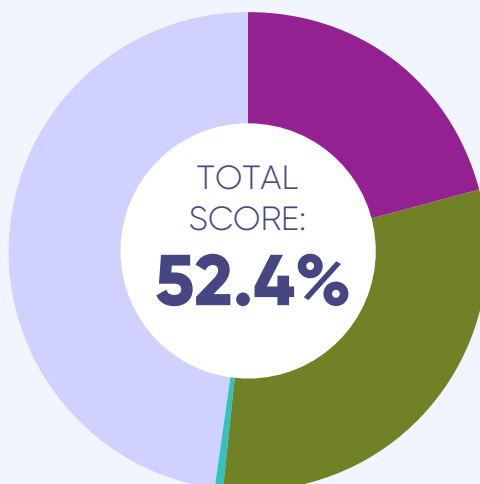
1.1. 2030 Non-ETS GHG targets	8.7
1.2. National 2030 GHG target	1.0
1.3. 2030 Renewable Energy target	8.3
1.4. 2030 Energy Efficiency targets	0.0
1.5. National 2050 target	3.1



## PROCESS QUALITY:

0.6/10

3.1. Effective stakeholder inputs	0.0
3.2. Compliance	0.6



MISSING SCORE  
47.6%

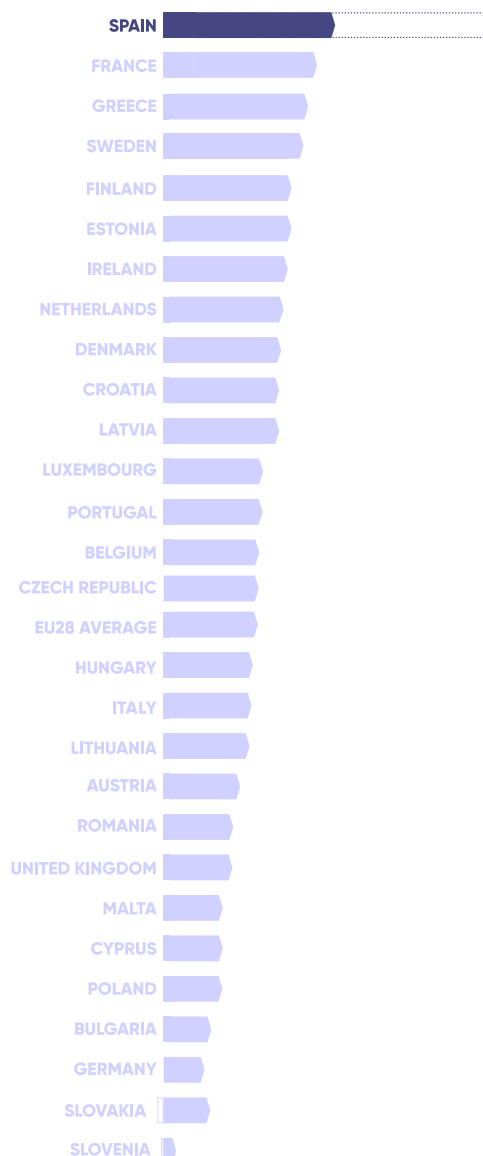


## POLICY DETAILS:

30.7/45

2.1. Policies and Measures (PAMs) for achieving non-ETS GHG targets	7.1
2.2. Policies and Measures (PAMs) for achieving RES targets	8.6
2.3. Policies and Measures (PAMs) for achieving EE targets	9.4
2.4. Coal use	0.0
2.5. Phase out of fossil fuel subsidies	0.8
2.6.1. Investment data	2.0
2.6.2. Finance measures	2.7

- ✓ The plan makes strong reference to the Paris Agreement with its aim to reach net zero emissions by 2050, although its total greenhouse gas (GHG) emissions target for 2030 is inconsistent with the long-term target.
- ✓ Second most ambitious 2030 non-ETS emissions target in this ranking with- 38%.
- ✓ The draft plan provides good details on existing and planned policies and measures (PAMs) on energy efficiency, renewables and GHG emissions.
- ✓ Explicit and detailed description of fossil fuel subsidies, yet no phase-out schedule is provided.
- ✗ The draft mentions the possibility of applying the LULUCF flexibility mechanism, but is unclear if its use is actually envisaged.
- ✗ Very low on the process quality ranking. The NECP was submitted late, the consultations not held early enough to be taken into account, and some important sections are missing like on regional cooperation.



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# NECP NATIONAL SCORECARD

# FRANCE



## TARGET ADEQUACY:

10.4/45

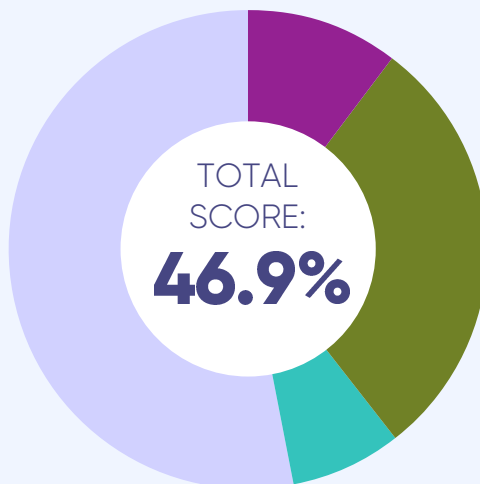
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	3.9
1.5.	National 2050 target	4.0



## PROCESS QUALITY:

7.4/10

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	1.8



MISSING SCORE 53.1%

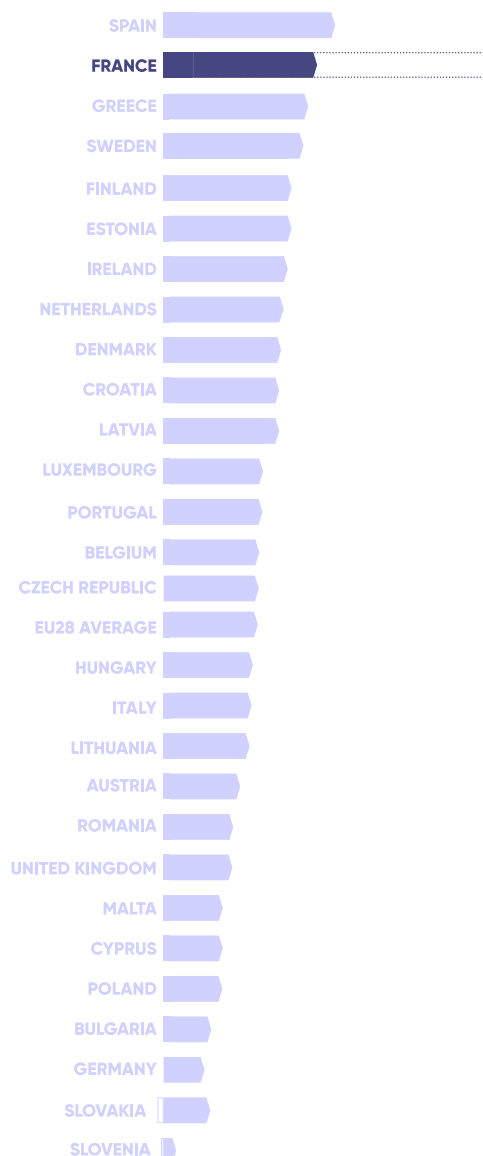


## POLICY DETAILS:

29.2/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	6.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	8.6
2.3.	Policies and Measures (PAMs) for achieving EE targets	3.3
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	-0.4
2.6.1.	Investment data	4.0
2.6.2.	Finance measures	2.7

- ✓ Ranks highest on its long-term vision, mentioning the target of carbon neutrality in 2050 (although this includes the use of LULUCF flexibility).
- ✓ Ranks second on policy details, although the plan doesn't fully clarify which new measures will enable them to reach their target, and some key measures are lower than the ones in the Energy Transition Law (e.g., lower annual renovation target).
- ✓ Good details on policies and measures for renewables, although limited support for some technologies for which France has strong potential (e.g. methanisation, offshore wind).
- ✓ France is one of only five Member States that details specific investment needs for the country as a whole and for several sectors.
- ✗ 2030 non-ETS greenhouse gas (GHG) emissions and renewable targets are at or below compliance.
- ✗ The French NECP contains no analysis of the social impacts of the plan.



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# NECP NATIONAL SCORECARD

# GREECE



## TARGET ADEQUACY:

3.1/45

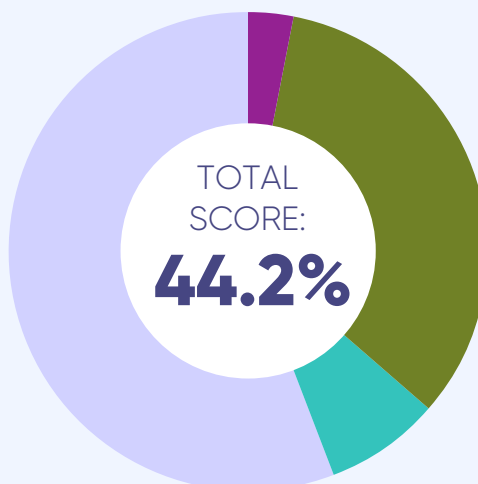
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.6



## PROCESS QUALITY:

7.8/10

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	2.2



MISSING SCORE  
55.8%

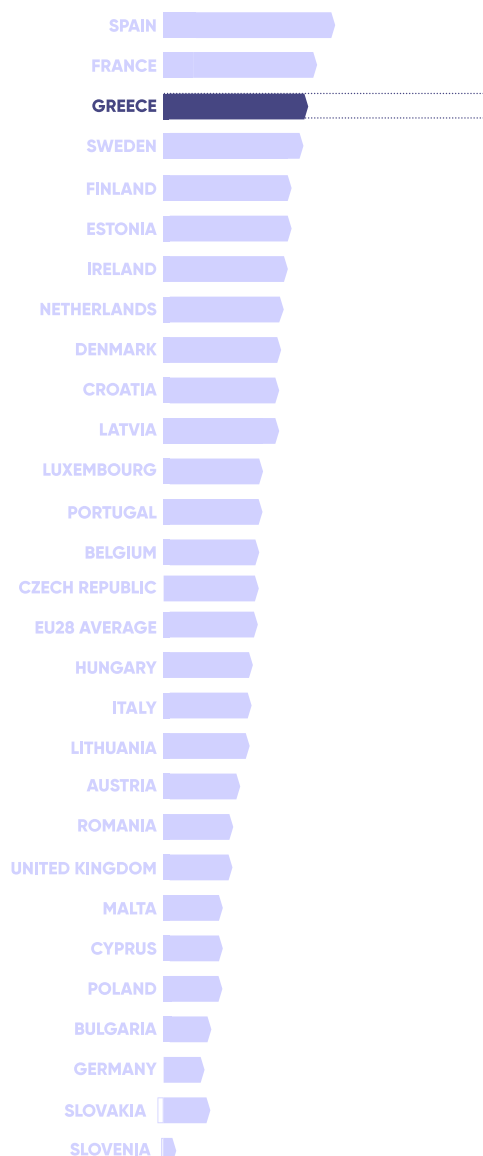


## POLICY DETAILS:

33.3/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	7.9
2.2.	Policies and Measures (PAMs) for achieving RES targets	10.0
2.3.	Policies and Measures (PAMs) for achieving EE targets	10.0
2.4.	Coal use	0.0
2.5.	Phase out of fossil fuel subsidies	0.8
2.6.1.	Investment data	2.0
2.6.2.	Finance measures	2.7

- ✓ The draft NECP includes a good description of policies and measures.
- ✓ It also provides information on the expected impact of planned policies.
- ✓ Greece has undertaken a consultation process with a range of sectors specific actors and civil society groups.
- ✗ While Greece scores highly on process and on policy details, it is very weak on the ambition dimension of this assessment. The non-ETS greenhouse gas target for 2030 appears artificially low, being below Greece's own business as usual projections.
- ✗ The plan does not provide details on the long-term, 2050 dimension.



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# NECP NATIONAL SCORECARD

# SWEDEN



## TARGET ADEQUACY:

17.1/45

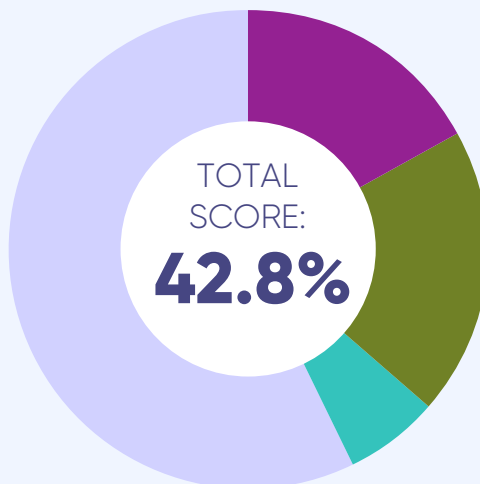
1.1. 2030 Non-ETS GHG targets	8.3
1.2. National 2030 GHG target	1.0
1.3. 2030 Renewable Energy target	4.3
1.4. 2030 Energy Efficiency targets	0.0
1.5. National 2050 target	3.6



## PROCESS QUALITY:

6.3/10

3.1. Effective stakeholder inputs	5.6
3.2. Compliance	0.6

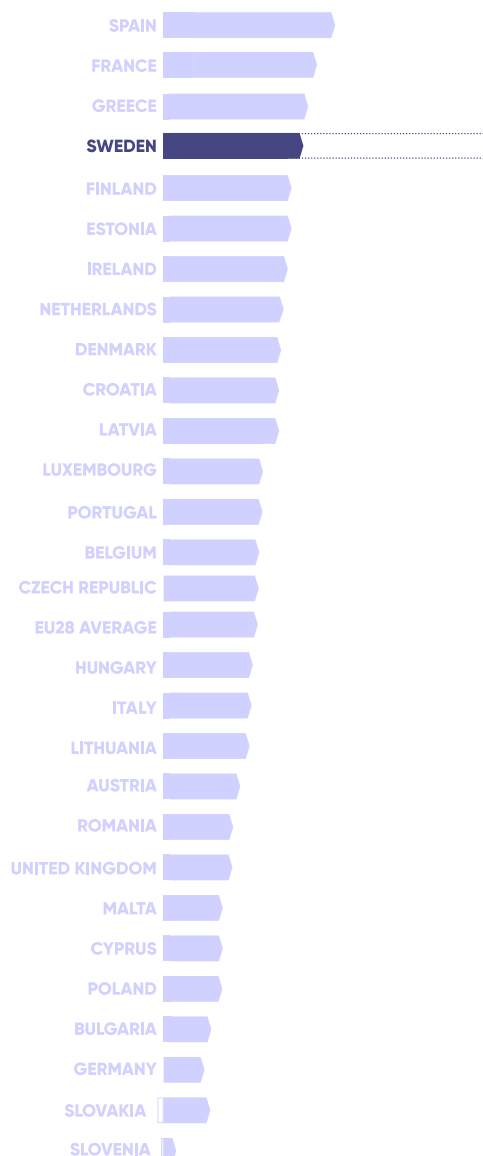


## POLICY DETAILS:

19.4/45

2.1. Policies and Measures (PAMs) for achieving non-ETS GHG targets	3.2
2.2. Policies and Measures (PAMs) for achieving RES targets	7.5
2.3. Policies and Measures (PAMs) for achieving EE targets	6.9
2.4. Coal use	0.0
2.5. Phase out of fossil fuel subsidies	0.4
2.6.1. Investment data	0.0
2.6.2. Finance measures	1.3

- ✓ Most ambitious 2030 non-ETS emissions target at -50% (vs the legal CAR target of -40%) and highest renewables target at 65% of final energy by 2030. The plan also has a total GHG emissions target of -63% and makes strong reference to the Paris Agreement.
- ✓ The draft plan provides a good level of detail on existing and planned policies and measures across all 3 dimensions (energy efficiency, renewables and GHG emissions).
- ✗ Its energy efficiency target is expressed in terms of energy intensity and is insufficient only stabilizing its final energy consumption.
- ✗ The draft recognizes that current and planned policies are not sufficient to reach the targets but mentions it will elaborate further in the final version.
- ✗ The draft NECP mentions the possibility of applying the LULUCF flexibility mechanism, stating LULUCF is to play an important role.
- ✗ Sections on investment requirements and financing measures are weak.



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# NECP NATIONAL SCORECARD

# FINLAND



## TARGET ADEQUACY:

2.8/45

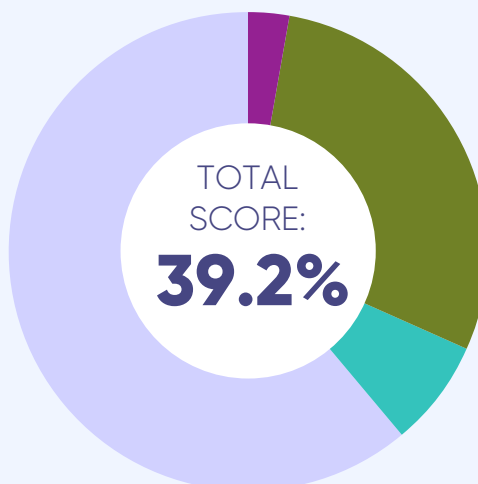
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.3



## PROCESS QUALITY:

7.2/10

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	1.6

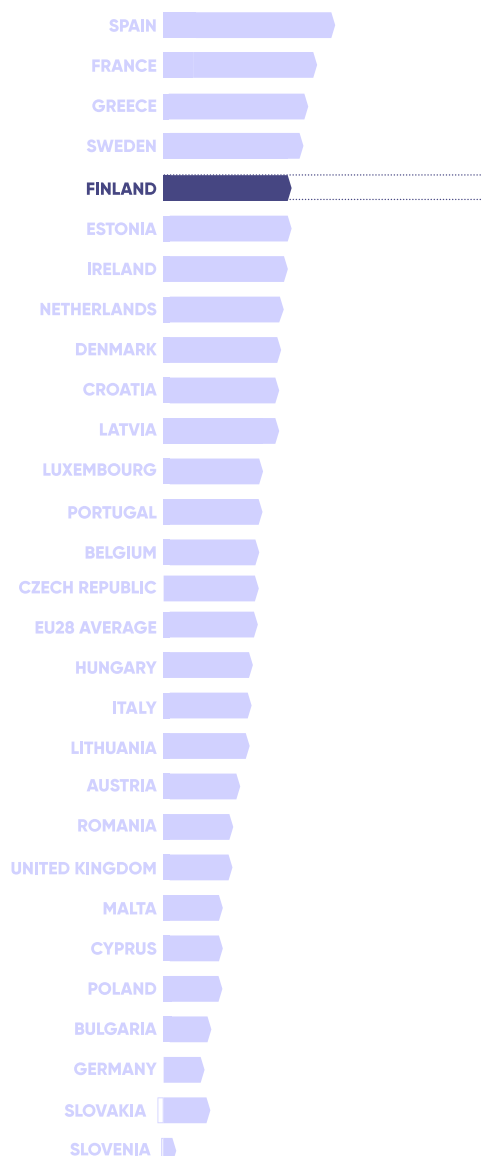


## POLICY DETAILS:

29.1/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	6.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	8.2
2.3.	Policies and Measures (PAMs) for achieving EE targets	3.3
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	4.0
2.6.2.	Finance measures	2.7

- ✓ The draft plan provides good details on existing and planned policies and measures for non-ETS emissions and renewables, ranking fourth on policy details.
- ✓ The plan indicates a coal phase-out by 2030.
- ✓ One of only five Member States that details specific investment needs for the country as a whole and for several sectors.
- ✗ Shows overall limited ambition on renewables, energy efficiency and non-ETS emissions for 2030.
- ✗ There is no information on fossil fuel subsidies.
- ✗ No consultation process was undertaken for the draft plan.



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# NECP NATIONAL SCORECARD

# ESTONIA



## TARGET ADEQUACY:

15.7/45

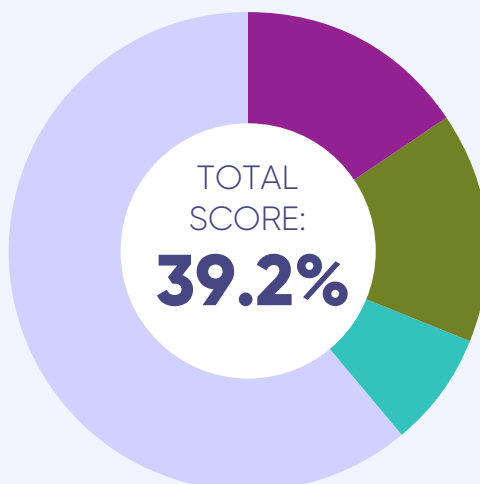
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	10.1
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	3.1



## PROCESS QUALITY:

7.8/10

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	2.2



MISSING SCORE 60.8%

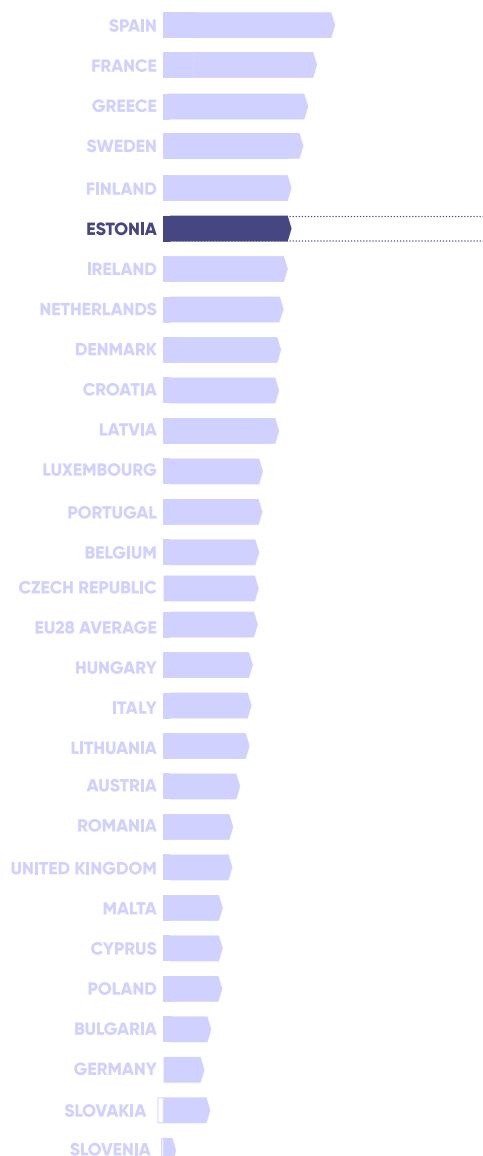


## POLICY DETAILS:

15.6/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	4.4
2.2.	Policies and Measures (PAMs) for achieving RES targets	4.9
2.3.	Policies and Measures (PAMs) for achieving EE targets	-1.1
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.8
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	2.7

- ✓ The plan makes a strong link to 2050, aiming to be compatible with a 'Net-zero emissions by 2050' pathway. References to reorganisation of the economy and the energy system are anchored in "General Principles of Climate Policy until 2050".
- ✓ The draft plan provides well detailed policies and measures but also principles and guidelines considered in updating and implementing the strategies and national development plans.
- ✓ Several stakeholder consultations were undertaken. The draft plan provides an overview of the submissions.
- ✗ It only reaches compliance on non-ETS greenhouse gas emissions and its energy efficiency target is too low.
- ✗ The draft NECP presents general facts about fossil fuel subsidies, but fails to mention detailed information or phase-out plans.
- ✗ Estonia gets 94% of its renewable energy from biomass, which undermines its apparently impressive renewables target of 42% of final energy mix in 2030. Sustainability criteria should be set for woody biomass with the involvement of key stakeholders.



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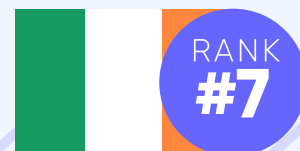
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# NECP NATIONAL SCORECARD

# IRELAND



## TARGET ADEQUACY:

4.1/45

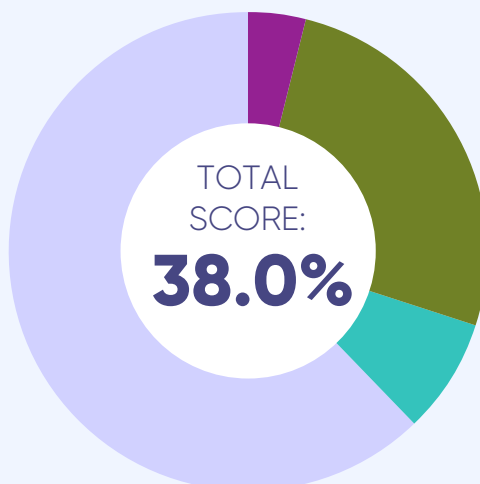
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.6



## PROCESS QUALITY:

7.8/10

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	2.2



MISSING SCORE 62.0%

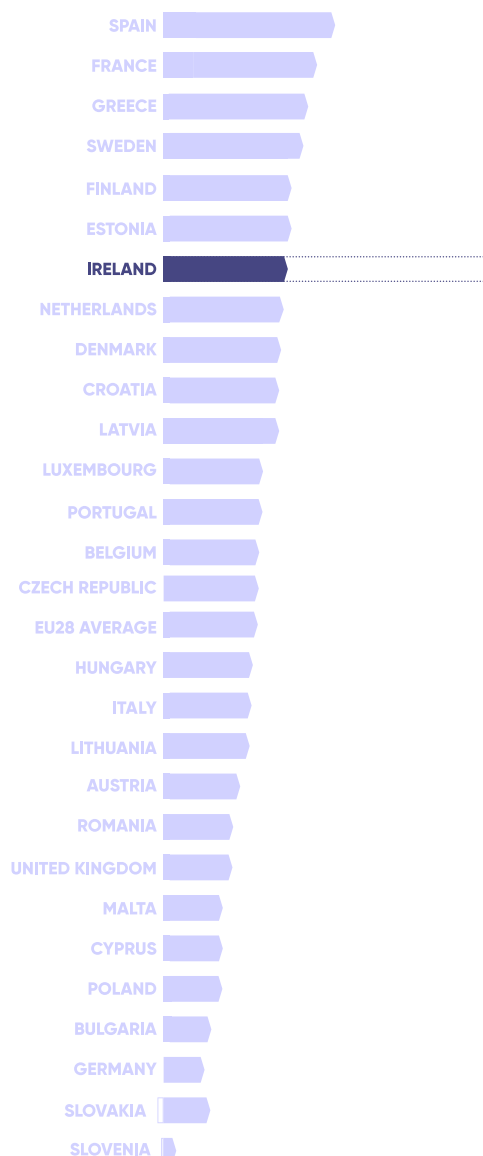


## POLICY DETAILS:

26.1/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	3.8
2.2.	Policies and Measures (PAMs) for achieving RES targets	5.7
2.3.	Policies and Measures (PAMs) for achieving EE targets	3.3
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	1.6
2.6.1.	Investment data	4.0
2.6.2.	Finance measures	2.7

- ✓ Mentions coal phase-out by 2030 with existing measures, and by 2025 with additional measures.
- ✓ The NECP contains quantified information on sustainable biomass use. Limited imports are assumed.
- ✓ Public consultations were conducted and open to stakeholders from all sectors and society groups. However, no summary of the public's views is attached.
- ✓ The NECP contains details information on financial measures for policies and measures but not in detail for all the three target areas.
- ✓ The NECP provides information specifically about fossil fuel subsidies, including details on existing subsidies, but does not mention a planned phase-out.
- ✗ Existing policies and planned policies will not be enough to meet the non-ETS greenhouse gas emissions, the renewables and the energy efficiency targets.
- ✗ The Paris agreement is mentioned but there is no explicit reference to a national 2050 target nor to the need for the NECP to be coherent with a national 2050 strategy.



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[www.europeanclimate.org/national-climate-plans-2030](http://www.europeanclimate.org/national-climate-plans-2030)

**TARGET ADEQUACY:**

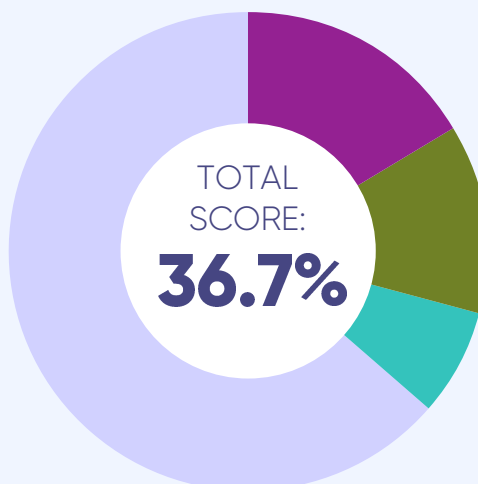
**16.4/45**

1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	4.5
1.4.	2030 Energy Efficiency targets	6.4
1.5.	National 2050 target	3.1

**PROCESS QUALITY:**

**7.2/10**

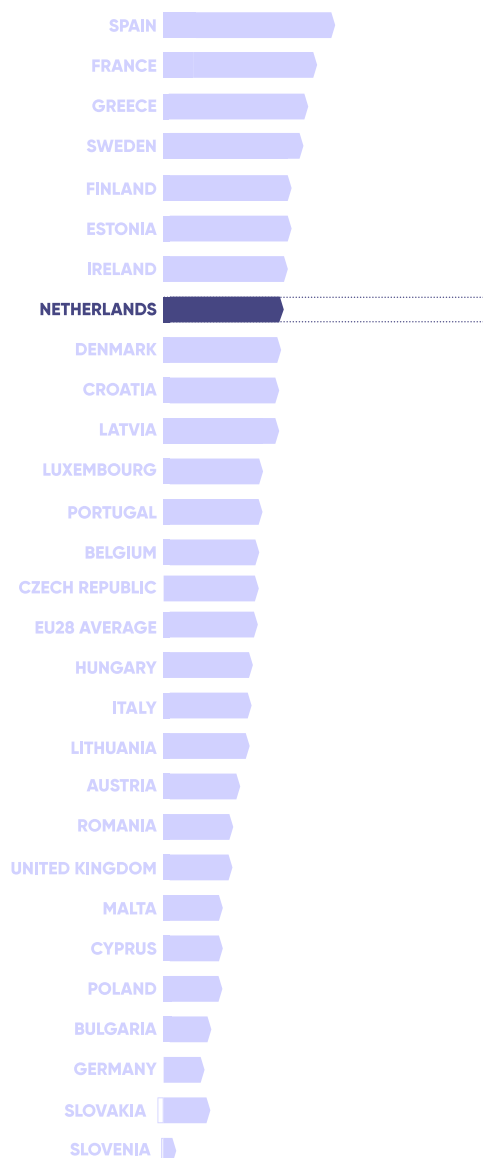
3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	1.6

**POLICY DETAILS:**

**13.0/45**

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	2.7
2.2.	Policies and Measures (PAMs) for achieving RES targets	3.2
2.3.	Policies and Measures (PAMs) for achieving EE targets	0.8
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	-0.4
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	2.7

- ✓ The plan makes a strong link to the 2050 ambition.
- ✓ The draft NECP states that consultations were undertaken with stakeholders participating in the development and drafting of the Climate Agreement in the sector platforms.
- ✓ One of the six countries with higher than compliance targets on renewables, with a target of 31% renewable energy sources in the final energy mix in 2030.
- ✗ Poor details on policies and measures. The plan does not provide details on renewable energy shares in 2030 with planned measures.
- ✗ The draft NECP presents general facts about fossil fuel subsidies but fails to mention detailed information or phase-out plans.



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# NECP NATIONAL SCORECARD

# DENMARK



## TARGET ADEQUACY:

12.5/45

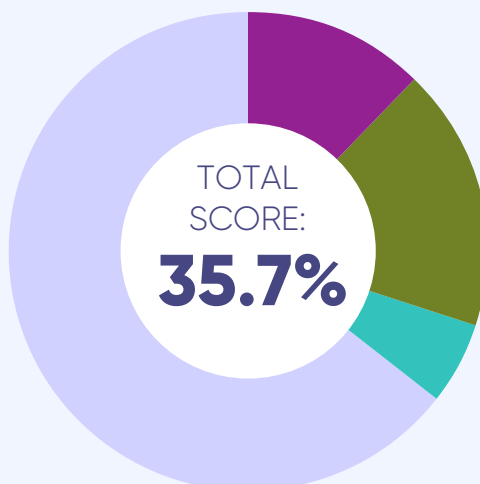
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	7.6
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	3.3



## PROCESS QUALITY:

5.6/10

3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	1.9

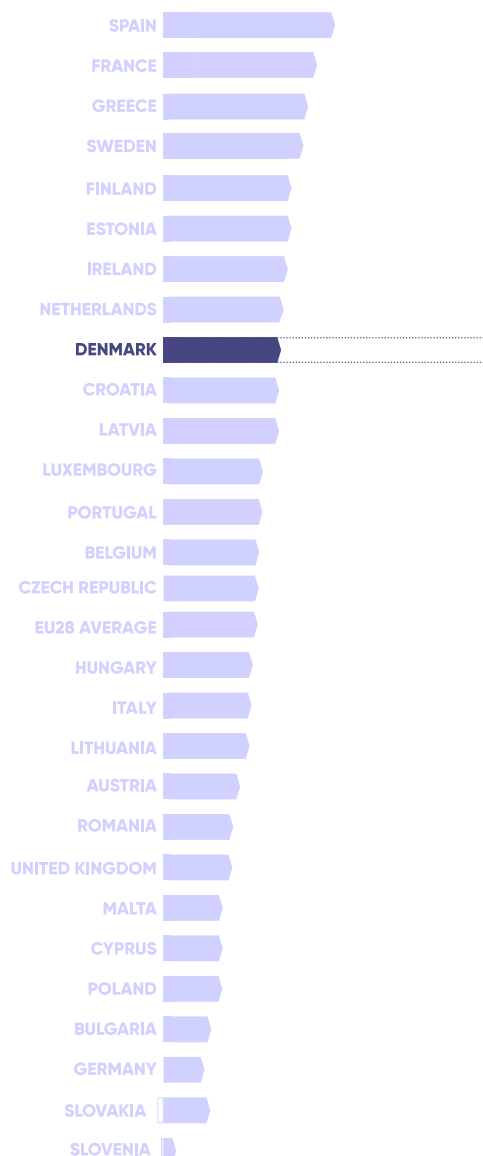


## POLICY DETAILS:

17.7/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	2.3
2.2.	Policies and Measures (PAMs) for achieving RES targets	3.9
2.3.	Policies and Measures (PAMs) for achieving EE targets	0.8
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	3.0
2.6.2.	Finance measures	2.7

- ✓ The draft NECP integrates the long-term dimension including a net-zero 2050 target.
- ✓ Denmark has set the third most ambitious 2030 renewables target.
- ✓ It includes a plan for a coal-phase out in the electricity sector by 2030.
- ✓ It also provides details on the required investments and financing measures up to 2030.
- ✗ The draft plan shows low ambition on non-ETS emissions and provides no economy-wide 2030 or energy efficiency target.
- ✗ Little detail on planned policies and measures for non-ETS emissions, renewables and energy efficiency.
- ✗ The draft plan anticipates full use of Climate Action Regulation flexibilities, including LULUCF and ETS allowances.



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# NECP NATIONAL SCORECARD

# CROATIA



## TARGET ADEQUACY:

10.3/45

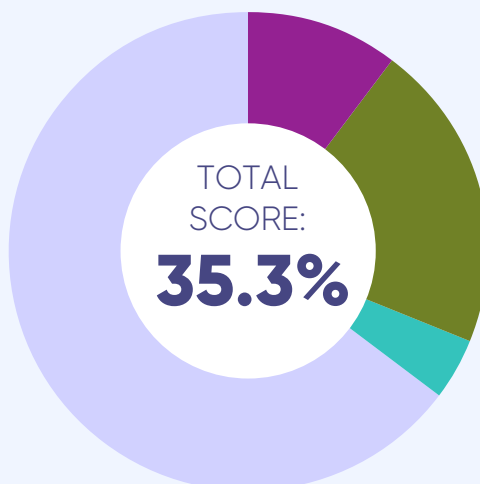
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	7.3
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.6



## PROCESS QUALITY:

4.1/10

3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	0.3



MISSING SCORE  
64.7%

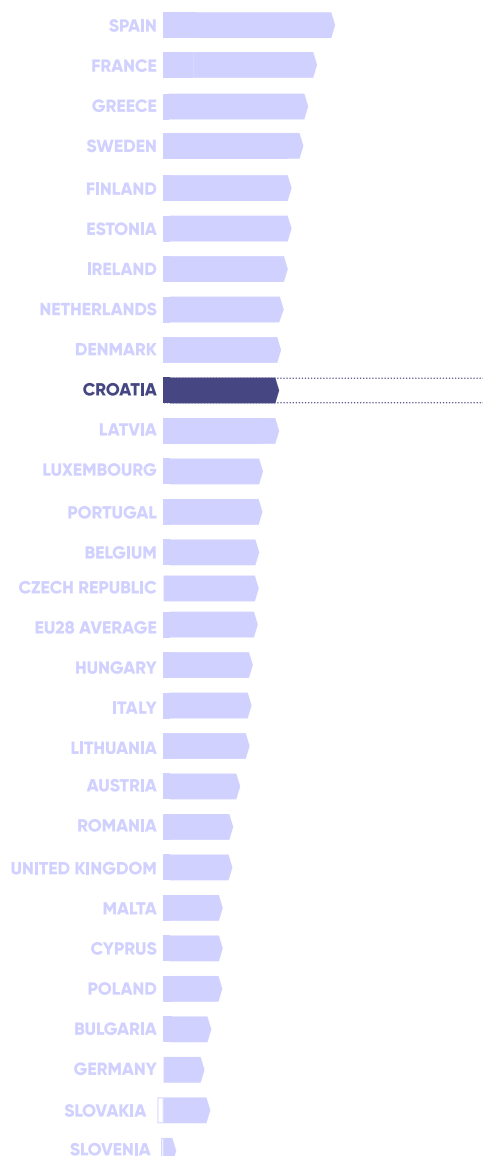


## POLICY DETAILS:

20.9/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	6.9
2.2.	Policies and Measures (PAMs) for achieving RES targets	1.0
2.3.	Policies and Measures (PAMs) for achieving EE targets	7.4
2.4.	Coal use	0.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	3.0
2.6.2.	Finance measures	2.7

- ✓ Croatia is among the best scorers for its renewables ambition, ranking third.
- ✓ The level of details of the policies and measures is generally good.
- ✗ The projections with additional measures on energy efficiency show that planned policies are not sufficient to reach the targets.
- ✗ Croatia indicates that coal-based electricity production is foreseen beyond 2030. No phase-out schedule is mentioned.
- ✗ The template for the plan is not correctly followed.



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# NECP NATIONAL SCORECARD

# LATVIA



## TARGET ADEQUACY:

8.9/45

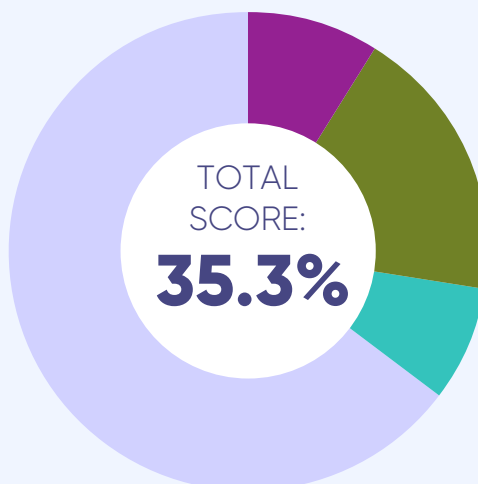
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	2.8
1.5.	National 2050 target	3.6



## PROCESS QUALITY:

7.8/10

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	2.2



MISSING SCORE  
64.7%

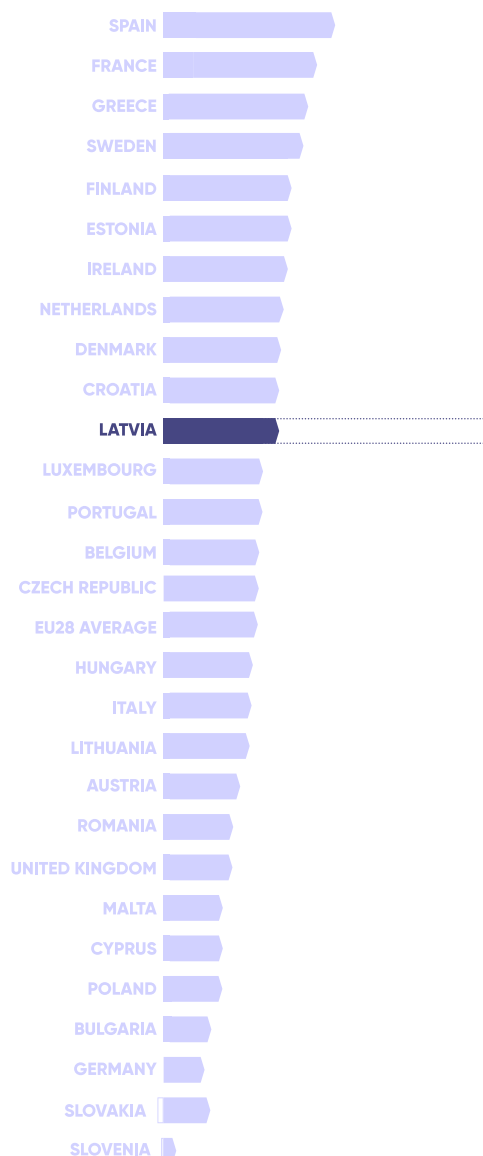


## POLICY DETAILS:

18.6/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	2.3
2.2.	Policies and Measures (PAMs) for achieving RES targets	3.5
2.3.	Policies and Measures (PAMs) for achieving EE targets	2.8
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.4
2.6.1.	Investment data	2.0
2.6.2.	Finance measures	2.7

- ✓ Latvia has launched a consultation process open to stakeholders including social partners, and engagement of civil society.
- ✓ The plan contains detailed information on existing and planned policies as well as on investment needs and financing measures. Some information on finance for specific sectors.
- ✓ Latvia has a good overall 2030 greenhouse gas (GHG) emissions target of -55% (vs 1990).
- ✗ Unfortunately this overall target does not convert to higher than a compliance target for the non-ETS GHG emissions (-6%), arguing that it will set a higher target only in 2020 after the adoption of the EC implementing act.
- ✗ Gives only general information on energy subsidies but not on fossil fuels, nor on the policies to drive phase-out.



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# NECP NATIONAL SCORECARD

# LUXEMBOURG



## TARGET ADEQUACY:

18.5/45

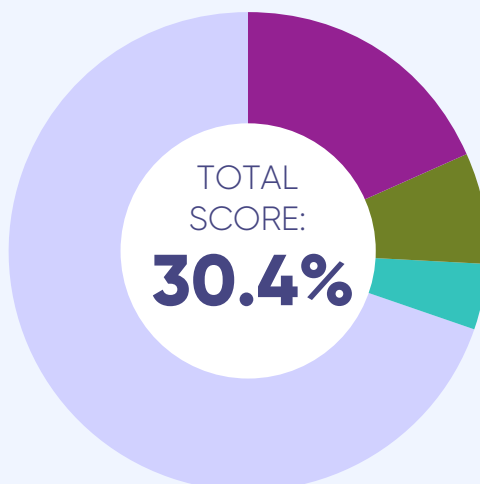
1.1.	2030 Non-ETS GHG targets	9.9
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	7.5
1.5.	National 2050 target	1.1



## PROCESS QUALITY:

4.4/10

3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	0.6



MISSING SCORE  
69.6%

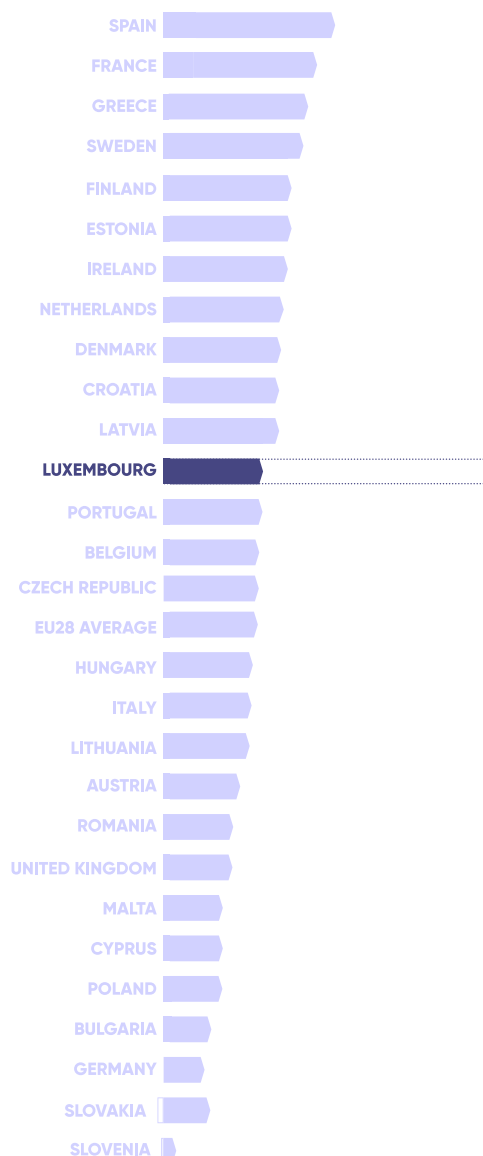


## POLICY DETAILS:

7.6/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	-0.4
2.2.	Policies and Measures (PAMs) for achieving RES targets	1.0
2.3.	Policies and Measures (PAMs) for achieving EE targets	0.3
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	2.7

- ✓ Most ambitious 2030 non-ETS emissions target at -50% (together with Sweden).
- ✓ Public consultations were held but only for a selected group of stakeholders.
- ✗ No economy-wide 2030 target and no proper inclusion of the 2050 dimension.
- ✗ Low ambition on its 2030 renewables and energy efficiency targets.
- ✗ Insufficient detail on existing and planned policies and measures and no projections on their impact included in the draft NECP.
- ✗ No information on fossil fuel subsidies or on investment needs.



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**TARGET ADEQUACY:**

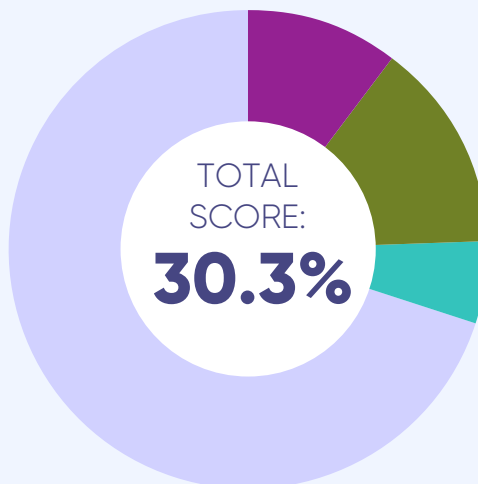
**10.5/45**

1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	5.1
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	2.9

**PROCESS QUALITY:**

**5.6/10**

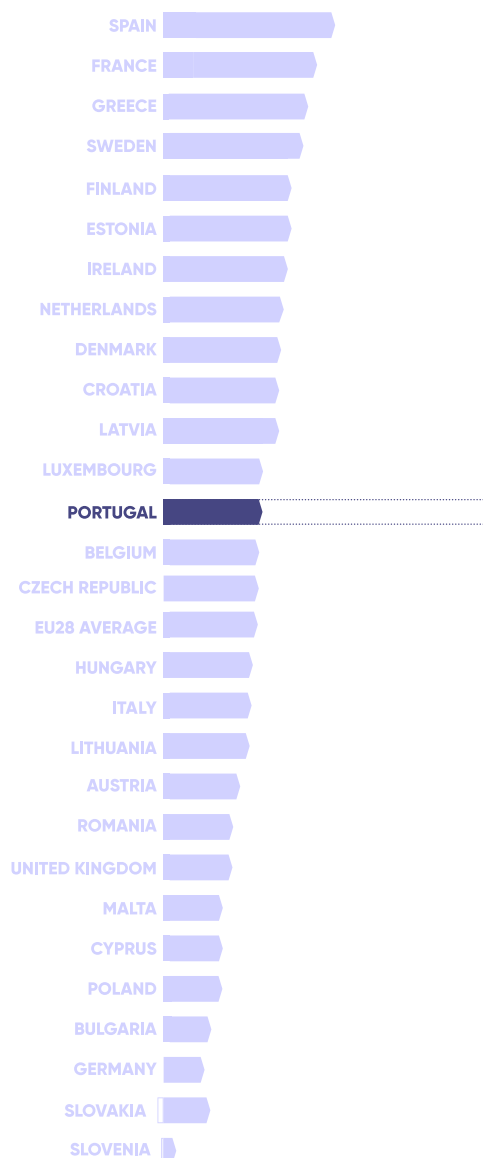
3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	1.9

**POLICY DETAILS:**

**14.1/45**

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	2.6
2.2.	Policies and Measures (PAMs) for achieving RES targets	0.4
2.3.	Policies and Measures (PAMs) for achieving EE targets	2.8
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	2.0
2.6.2.	Finance measures	1.3

- ✓ Fifth most ambitious renewables target for 2030.
- ✓ Plan details economy-wide 2030 and 2050 targets.
- ✓ Plan indicates coal power phase out by 2030.
- ✓ Provides information on investment needs for specific sectors.
- ✗ Low ambition on non-ETS emissions and energy efficiency targets for 2030.
- ✗ Little detail on existing and planned policies and measures.
- ✗ No information on fossil fuel subsidies, nor a phase-out schedule.
- ✗ No clear information on financing measures.
- ✗ Anticipates the use of Climate Action Regulation flexibilities.



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**TARGET ADEQUACY:**

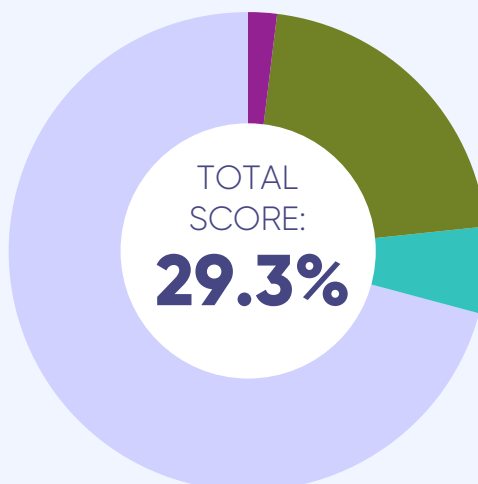
**2.2/45**

1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	0.7

**PROCESS QUALITY:**

**5.9/10**

3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	2.2

**POLICY DETAILS:**

**21.2/45**

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	4.3
2.2.	Policies and Measures (PAMs) for achieving RES targets	5.8
2.3.	Policies and Measures (PAMs) for achieving EE targets	4.7
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	0.0
2.6.2.	Finance measures	1.3



The plan contains general information on all subheadings as required by the NECP framework and provides some analysis on whether the scenario with additional measures reaches the targets.



However, Belgium ranks second lowest on ambition due to very low ambition on energy efficiency and renewables for 2030. Almost no reference to the 2050 horizon.



Policies are rarely defined in sufficient detail and consist more of sub-objectives than actual measures. The way they are accounted for in the scenario with additional measures is not transparent enough.



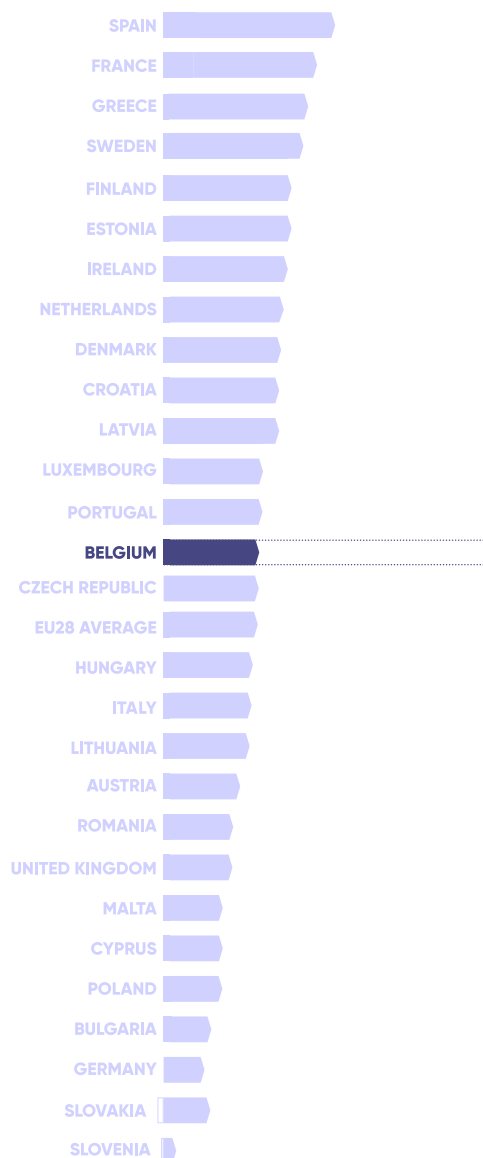
No information on energy and fossil fuel subsidies is provided.



No perspective on investment requirements and financing measures.



The draft NECP provides no information about possible use of Climate Action Regulation flexibilities at all.



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**TARGET ADEQUACY:**

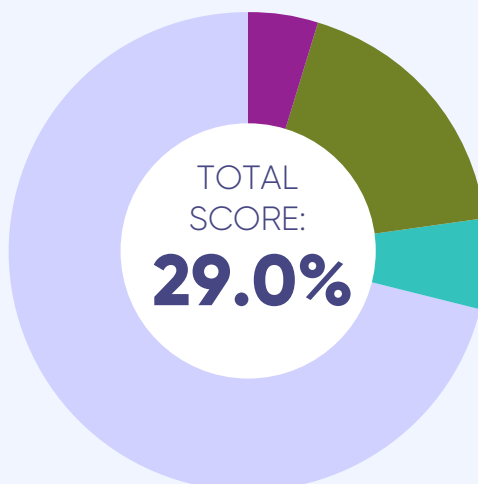
**4.9/45**

1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	2.4

**PROCESS QUALITY:**

**5.9/10**

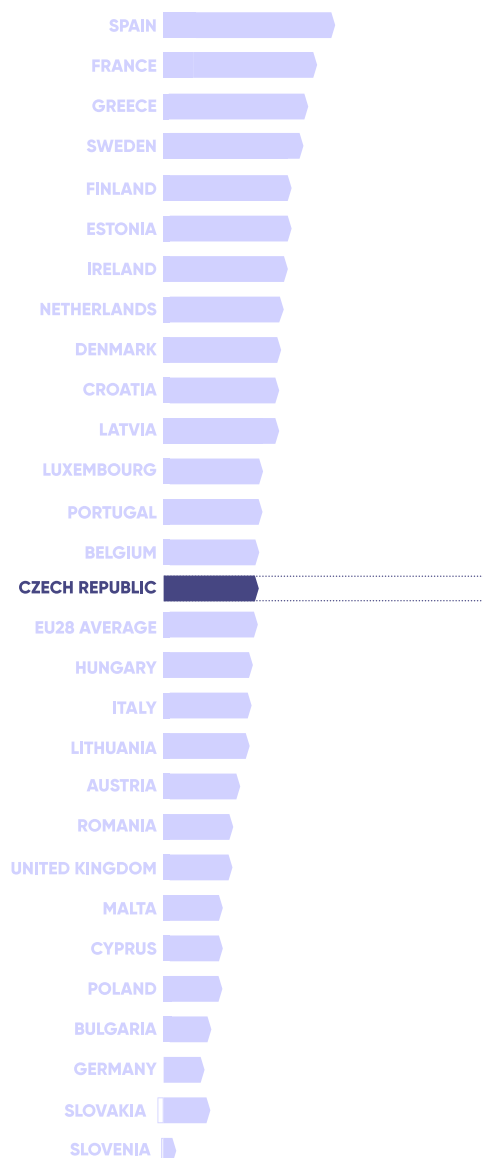
3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	0.3

**POLICY DETAILS:**

**18.1/45**

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	1.9
2.2.	Policies and Measures (PAMs) for achieving RES targets	8.3
2.3.	Policies and Measures (PAMs) for achieving EE targets	4.4
2.4.	Coal use	0.0
2.5.	Phase out of fossil fuel subsidies	0.8
2.6.1.	Investment data	0.0
2.6.2.	Finance measures	2.7

- ✓ The draft NECP provides economy-wide greenhouse gas (GHG) emissions targets for 2030 and 2050. It includes explicit mention of the national long-term strategy and the need for coherence between the 2030 NECP and long-term planning to 2050.
- ✓ It contains good detail on existing and planned policies and measures for renewables.
- ✓ Several stakeholder consultations were undertaken.
- ✗ The plan shows low targets for non-ETS emissions, renewables and energy efficiency.
- ✗ It does not include information on phasing out coal or fossil fuel subsidies.
- ✗ Limited information is available about the required investments up to 2030.



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# NECP NATIONAL SCORECARD

# HUNGARY



## TARGET ADEQUACY:

4.5/45

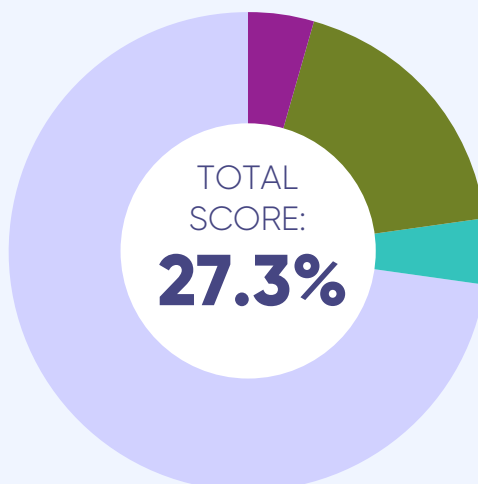
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	2.0



## PROCESS QUALITY:

4.4/10

3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	0.6



MISSING SCORE  
72.7%

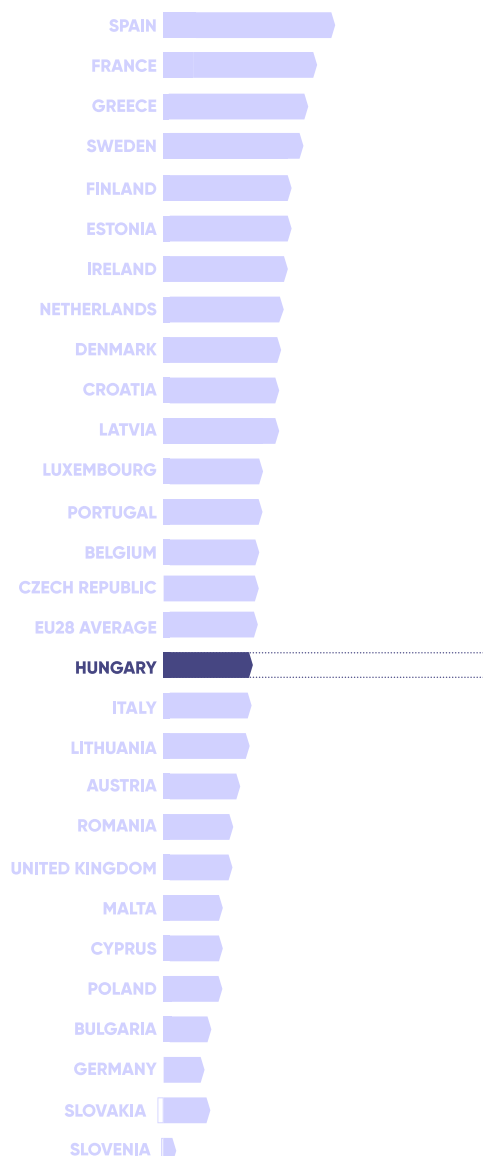


## POLICY DETAILS:

18.4/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	-0.1
2.2.	Policies and Measures (PAMs) for achieving RES targets	5.4
2.3.	Policies and Measures (PAMs) for achieving EE targets	4.2
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	-0.4
2.6.1.	Investment data	3.0
2.6.2.	Finance measures	1.3

- ✓ Coal-phase out is mentioned for 2030.
- ✓ Consultations were held during the writing of the plan, though only with selected stakeholders.
- ✗ Hungary did not give any detail on existing or planned policies and measures in non-ETS sectors.
- ✗ The general level of detail of existing and planned policies and measures in the different dimensions is poor.
- ✗ Hungary explicitly mentions that there are no fossil fuel subsidies while available literature proves the contrary.



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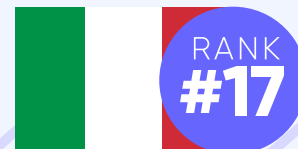
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# NECP NATIONAL SCORECARD

# ITALY



## TARGET ADEQUACY:

2.6/45

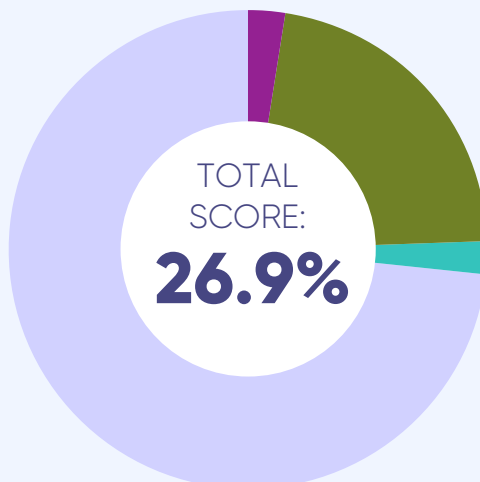
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.1



## PROCESS QUALITY:

2.2/10

3.1.	Effective stakeholder inputs	0.0
3.2.	Compliance	2.2



MISSING SCORE  
73.1%

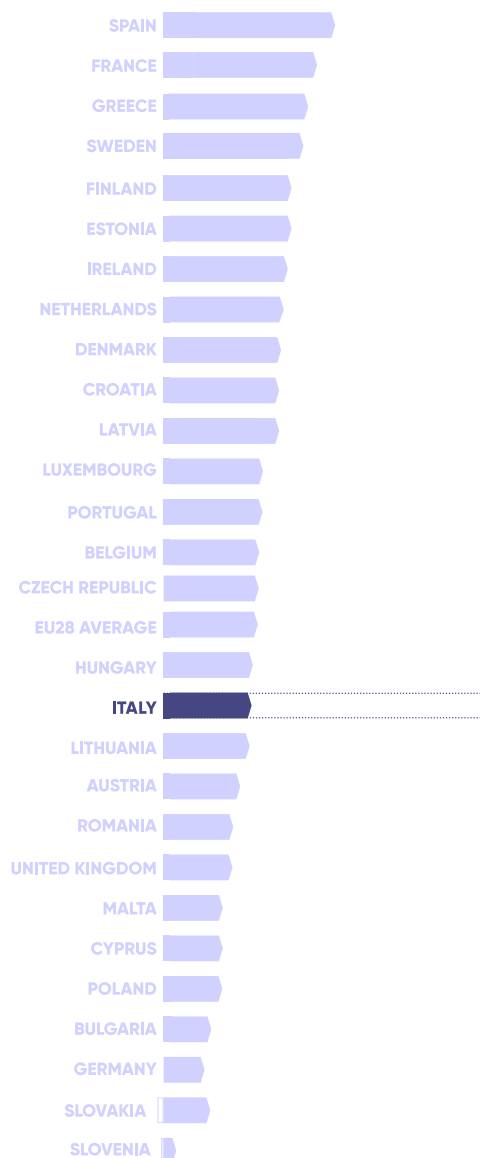


## POLICY DETAILS:

22.1/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	3.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	2.5
2.3.	Policies and Measures (PAMs) for achieving EE targets	5.8
2.4.	Coal use	2.5
2.5.	Phase out of fossil fuel subsidies	1.6
2.6.1.	Investment data	4.0
2.6.2.	Finance measures	2.7

- ✓ Coal-phase out is mentioned for 2025.
- ✓ Explicit and detailed description of fossil fuel subsidies, but no phase-out schedule is provided.
- ✓ Detailed reporting of required investments for supporting planned policies and measures and sectoral breakdown of these investments.
- ✗ Italy plans to use flexibilities to achieve its non-ETS greenhouse gas (GHG) emissions target.
- ✗ Insufficient detail on policies and measures for non-ETS GHG emissions reduction, so not possible to assess their credibility and ability to reach the non-ETS target.
- ✗ The energy efficiency ambition is too weak in relation to the EU objectives.
- ✗ No consultations were held while drafting the plan.
- ✗ Poor level of detail for renewables-related policies and measures.



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# NECP NATIONAL SCORECARD

# LITHUANIA



## TARGET ADEQUACY:

5.4/45

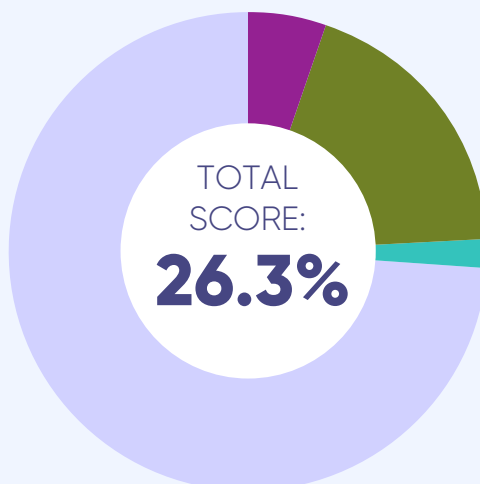
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	2.9



## PROCESS QUALITY:

1.9/10

3.1.	Effective stakeholder inputs	0.0
3.2.	Compliance	1.9



MISSING SCORE  
73.7%

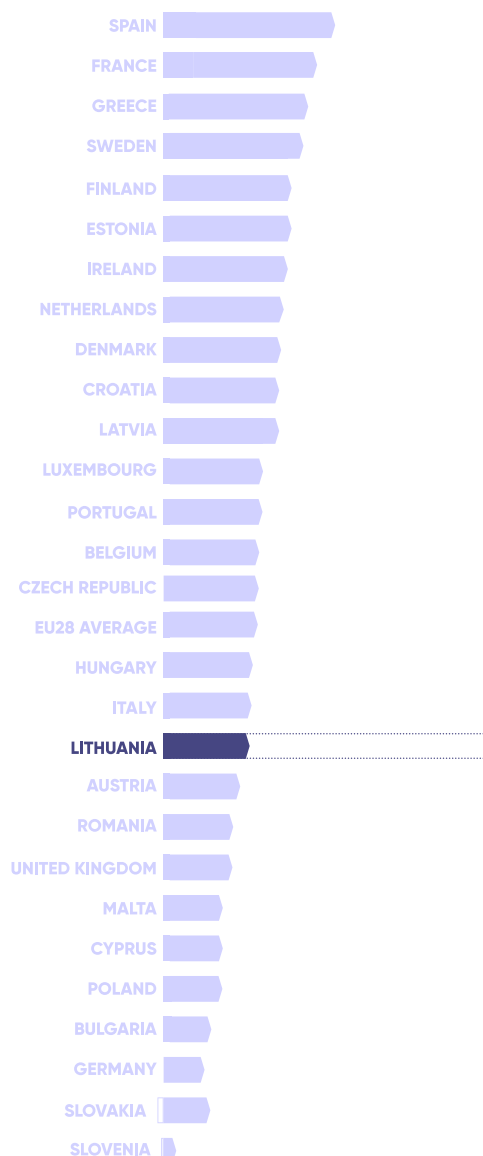


## POLICY DETAILS:

19.0/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	3.2
2.2.	Policies and Measures (PAMs) for achieving RES targets	4.2
2.3.	Policies and Measures (PAMs) for achieving EE targets	4.2
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.8
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	2.7

- ✓ Lithuania is among the top three countries on ambition. It aims at 45% renewables target and wants to achieve it by promoting wind energy, prosumers and biomass for efficient cogeneration.
- ✓ The draft NECP includes economy-wide 2030 and 2050 greenhouse gas emissions targets.
- ✗ There is no information about Lithuania's planned policies and measures to deliver its targets.
- ✗ The draft plan does not provide information about the required investments up to 2030.
- ✗ No consultation process undertaken for the draft plan; the plan contains only a promise of future involvement.



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# NECP NATIONAL SCORECARD

# AUSTRIA



## TARGET ADEQUACY:

5.3/45

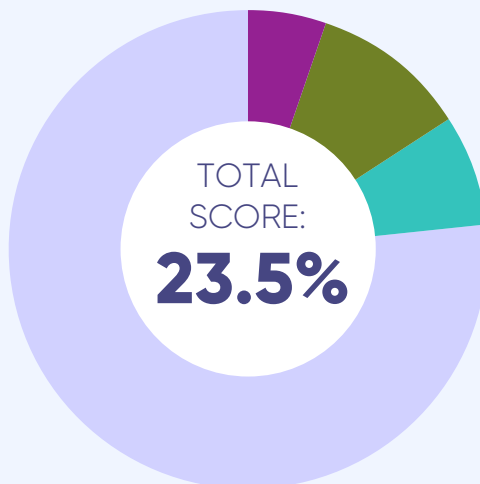
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	2.2
1.5.	National 2050 target	1.6



## PROCESS QUALITY:

7.5/10

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	1.9



MISSING SCORE 76.5%

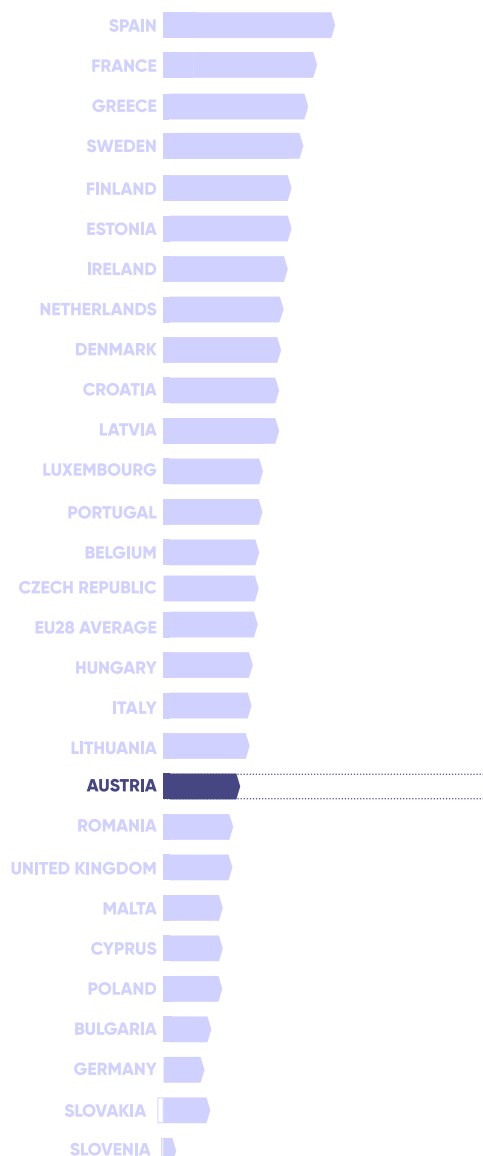


## POLICY DETAILS:

10.8/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	0.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	4.6
2.3.	Policies and Measures (PAMs) for achieving EE targets	3.3
2.4.	Coal use	2.5
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	1.3

- ✓ The draft plan includes an energy efficiency target slightly above the minimum legal requirement.
- ✓ The draft NECP anticipates a coal phase-out, yet no further details are provided.
- ✓ Austria has undertaken a consultation process open to stakeholders from all sectors and civil society.
- ✗ The draft plan shows low ambition for non-ETS emissions and renewables targets.
- ✗ It provides only some information on existing and planned policies and measures for energy efficiency and very little detail on existing and planned policies and measures for non-ETS emissions
- ✗ It also gives insufficient information on projections for existing and planned policies for renewables and energy efficiency.
- ✗ The plan does not include information on fossil fuel subsidies, nor a phase-out schedule.
- ✗ No information on the required investments up to 2030.



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**TARGET ADEQUACY:**

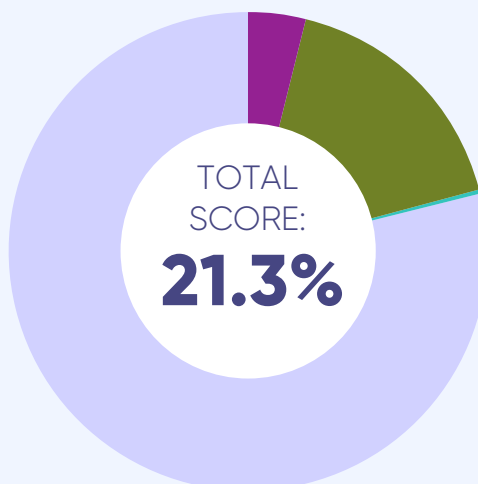
**4.1/45**

1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.6

**PROCESS QUALITY:**

**0.3/10**

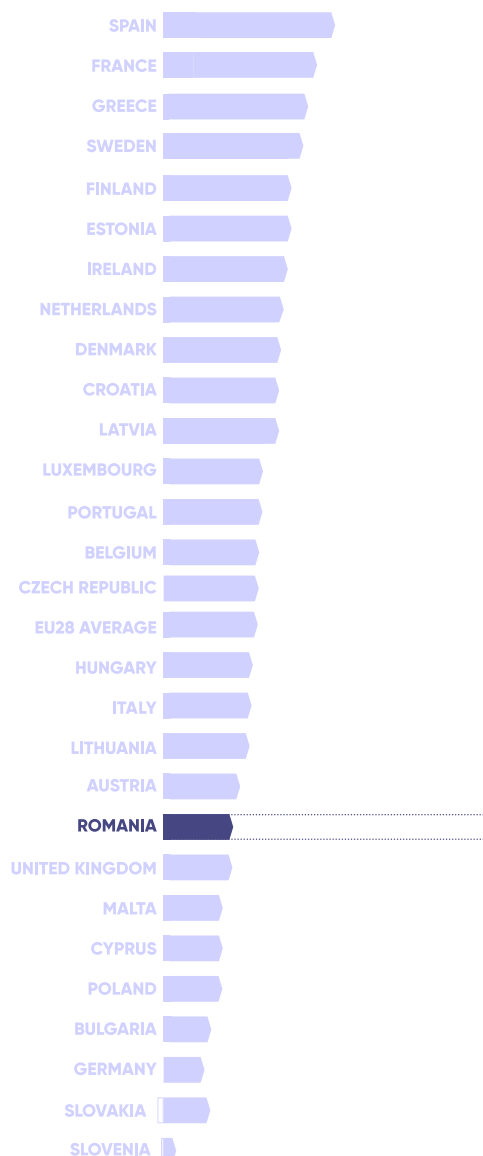
3.1.	Effective stakeholder inputs	-1.9
3.2.	Compliance	2.2

**POLICY DETAILS:**

**16.9/45**

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	3.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	4.2
2.3.	Policies and Measures (PAMs) for achieving EE targets	2.5
2.4.	Coal use	0.0
2.5.	Phase out of fossil fuel subsidies	1.6
2.6.1.	Investment data	3.0
2.6.2.	Finance measures	2.7

- ✓ The NECP contains detailed information on financing measures for policies and measures, although it could be further detailed for some policies.
- ✓ The NECP draft provides a description of energy subsidies, including details on existing fossil fuels subsidies, and sets out a phase-out schedule for some of these.
- ✗ The existing policies and measures of Romania are not enough to meet targets for renewables and non-ETS sector (GHG) emissions, though policies and measures planned to come in to force should make up the gap. However, the measures are described in very limited details.
- ✗ Public consultations were initiated but only for a select group of individuals.
- ✗ There is no information about coal use or potential coal phase-out schedule.
- ✗ There is no information to verify if biomass use is truly sustainable.



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# NECP NATIONAL SCORECARD

# UNITED KINGDOM

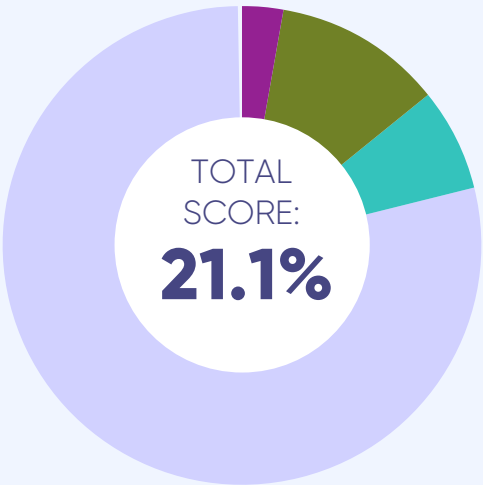


## TARGET ADEQUACY:

1.1.	2030 Non-ETS GHG targets	0.0
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	2.0

## PROCESS QUALITY:

3.1.	Effective stakeholder inputs	5.6
3.2.	Compliance	1.1

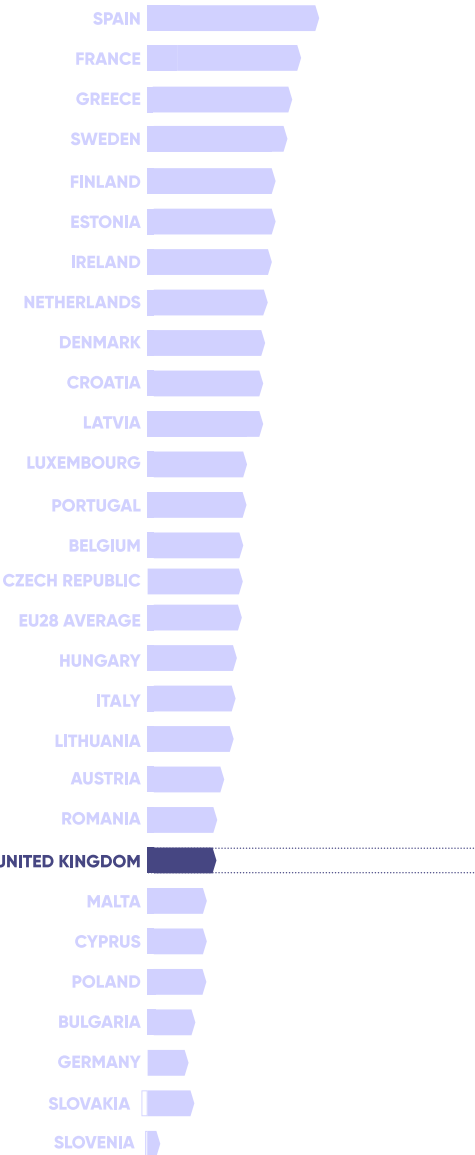


MISSING SCORE  
78.9%

## POLICY DETAILS:

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	-1.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	0.8
2.3.	Policies and Measures (PAMs) for achieving EE targets	0.8
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	3.0
2.6.2.	Finance measures	2.7

- ✓ Detailed information on existing and planned policies as well as on investment needs and financing measures.
- ✓ Planned coal phase out by 2025.
- ✓ Public consultations were conducted and open to stakeholders from all sectors and civil society groups.
- ✗ The NECP appears to present a lot of information but omits essential elements, including the UK's 2030 non-ETS emissions target and the 2030 renewables and energy efficiency contributions.
- ✗ Projections for existing and planned policies and measures for 2030 non-ETS emissions and the 2030 renewables and energy efficiency contributions are missing, although general policy impacts are included.
- ✗ There is no information on fossil fuel subsidies, nor a phase-out schedule.



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# NECP NATIONAL SCORECARD

# MALTA



## TARGET ADEQUACY:

2.6/45

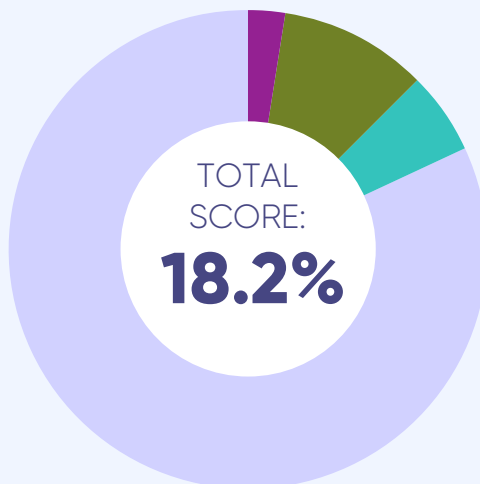
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.1



## PROCESS QUALITY:

5.6/10

3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	1.9



MISSING SCORE  
81.8%

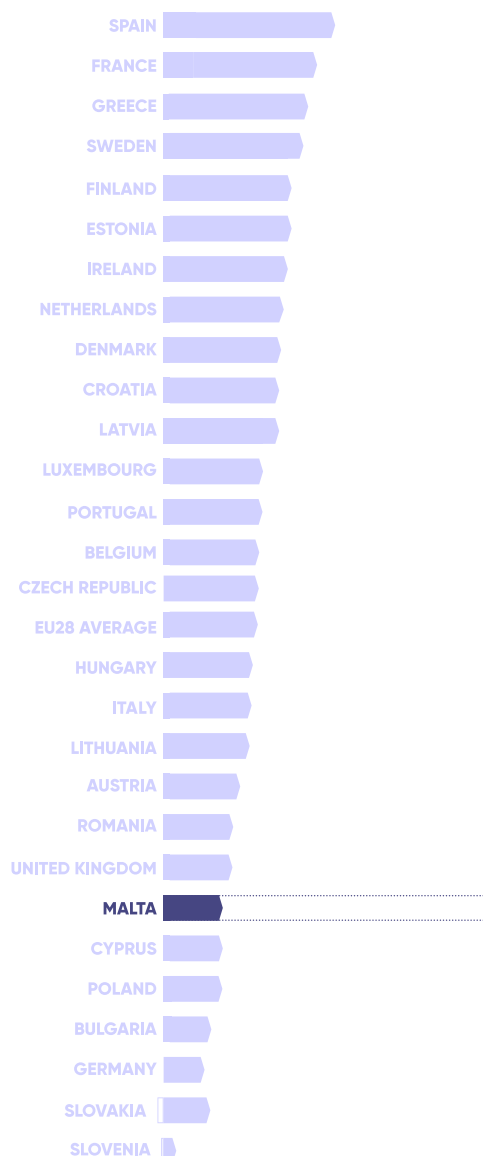


## POLICY DETAILS:

9.9/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	-1.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	1.8
2.3.	Policies and Measures (PAMs) for achieving EE targets	3.8
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	1.3

- ✓ Provides detailed information on existing policies and measures for the non-ETS emissions target.
- ✓ Consultations were held, but only for certain stakeholders.
- ✗ Shows overall low ambition on its 2030 non-ETS emissions and renewables targets; does not include a 2030 energy efficiency contribution figure.
- ✗ Provides only some details on existing and planned policies and measures for renewables and energy efficiency, no information on planned policies and measures for non-ETS emissions. Projections are missing.
- ✗ No information on fossil fuel subsidies or investment needs and only general information on financing measures.
- ✗ Mentions possible use of Climate Action Regulation flexibilities.



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# NECP NATIONAL SCORECARD

# CYPRUS



## TARGET ADEQUACY:

2.6/45

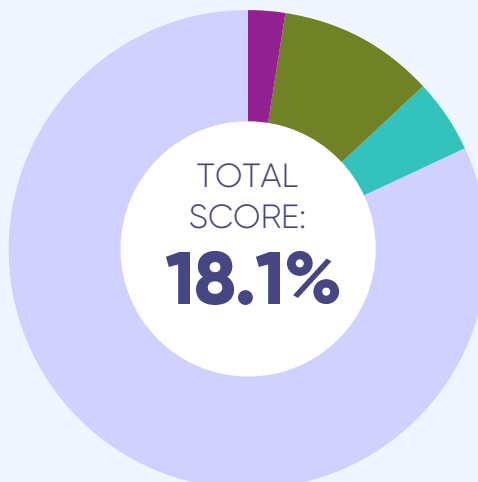
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.1



## PROCESS QUALITY:

4.9/10

3.1.	Effective stakeholder inputs	3.8
3.2.	Compliance	1.1



MISSING SCORE  
81.9%

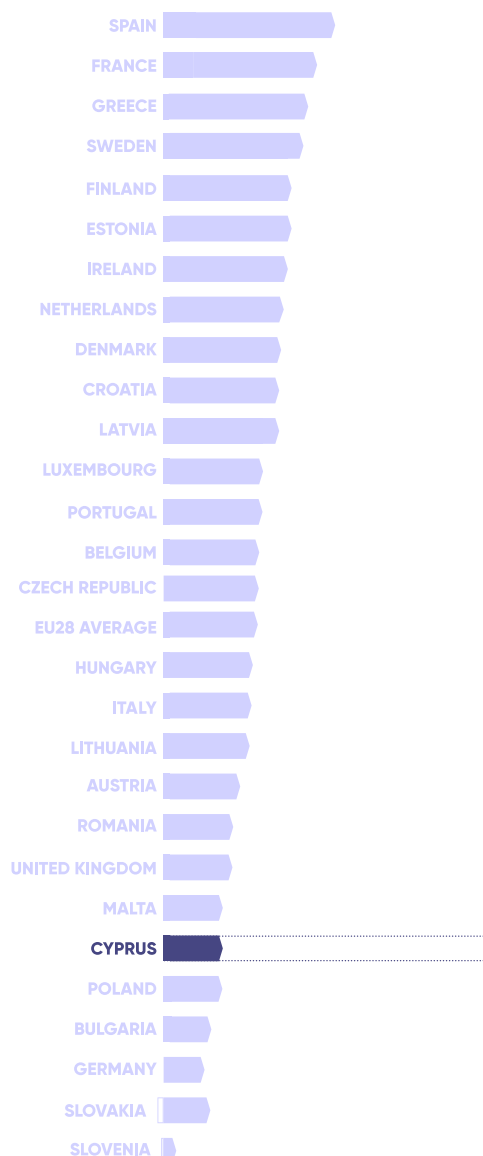


## POLICY DETAILS:

10.6/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	-2.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	0.0
2.3.	Policies and Measures (PAMs) for achieving EE targets	0.6
2.4.	Coal use	5.0
2.5.	Phase out of fossil fuel subsidies	0.4
2.6.1.	Investment data	4.0
2.6.2.	Finance measures	2.7

- ✓ One of only five Member States that detail specific investments needs for the country as a whole and for several sectors.
- ✓ Public consultations were held - but only with a selected group of stakeholders.
- ✗ Shows overall very low ambition on its 2030 non-ETS emissions, renewables and energy efficiency targets.
- ✗ No economy-wide 2030 target and no detail on the 2050 dimension.
- ✗ Draft plan states that Cyprus plans to phase out coal power, but does not indicate by when.
- ✗ Insufficient details on existing and planned policies and measures and most projections for planned policies and measures are missing from the draft NECP.
- ✗ Draft plan anticipates the use of Climate Action Regulation flexibilities, namely LULUCF.



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# NECP NATIONAL SCORECARD

# POLAND

RANK  
#24



## TARGET ADEQUACY:

1.7/45

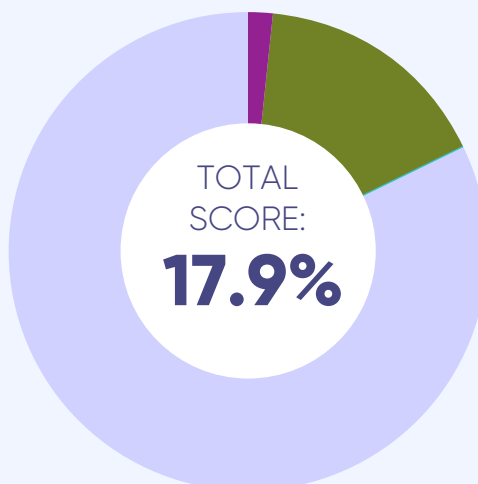
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	0.2



## PROCESS QUALITY:

-0.1/10

3.1.	Effective stakeholder inputs	-1.9
3.2.	Compliance	1.8



MISSING SCORE  
82.1%

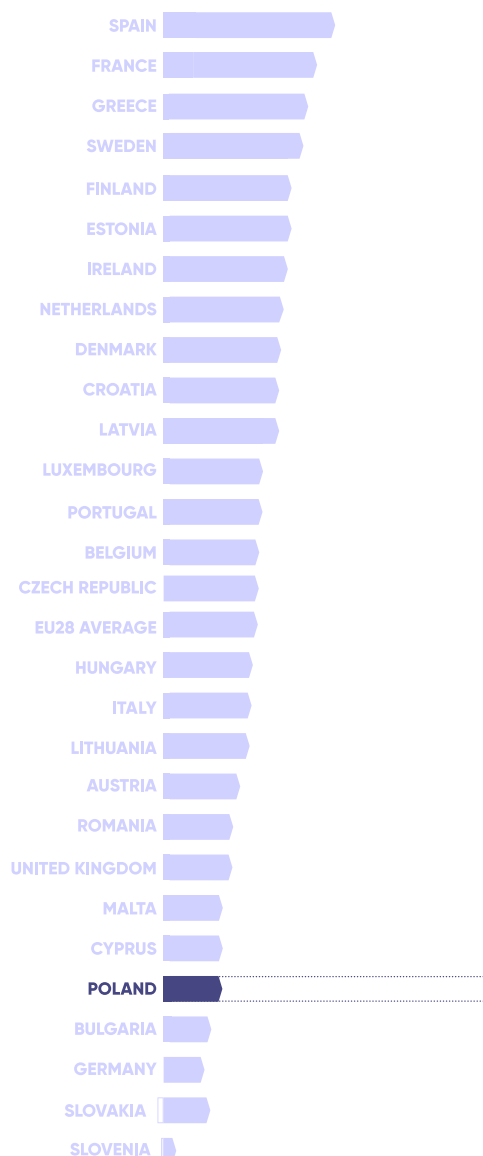


## POLICY DETAILS:

16.3/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	3.9
2.2.	Policies and Measures (PAMs) for achieving RES targets	6.0
2.3.	Policies and Measures (PAMs) for achieving EE targets	5.1
2.4.	Coal use	-2.5
2.5.	Phase out of fossil fuel subsidies	0.4
2.6.1.	Investment data	2.0
2.6.2.	Finance measures	1.3

- ✓ The draft NECP includes information on Poland's investment needs for some specific sectors.
- ✓ It provides projections for existing and planned measures aimed at non-ETS emissions, renewables and energy efficiency.
- ✗ The plan shows low ambition on its non-ETS emissions, renewables and energy efficiency targets.
- ✗ It does not include an economy-wide 2030 GHG target and it has no proper inclusion of the 2050 dimension.
- ✗ Limited information is available in the plan on planned policies and measures and on financing measures.
- ✗ The plan anticipates new coal power investments and the use of Climate Action Regulation flexibilities for the non-ETS target.
- ✗ No consultation process was undertaken for the draft plan.



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# NECP NATIONAL SCORECARD

# BULGARIA



## TARGET ADEQUACY:

3.1/45

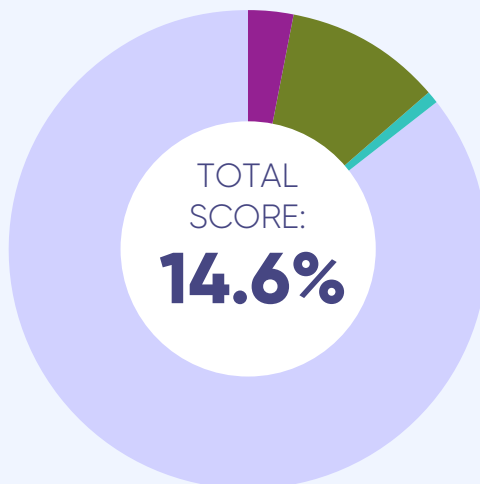
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.6



## PROCESS QUALITY:

0.9/10

3.1.	Effective stakeholder inputs	0.0
3.2.	Compliance	0.9



MISSING SCORE  
85.4%

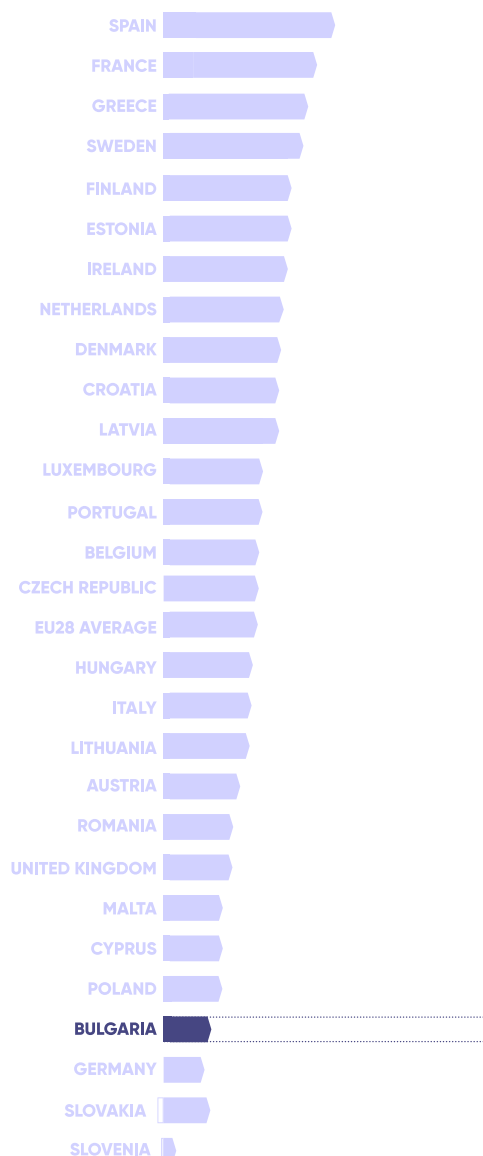


## POLICY DETAILS:

10.6/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	2.0
2.2.	Policies and Measures (PAMs) for achieving RES targets	4.9
2.3.	Policies and Measures (PAMs) for achieving EE targets	0.4
2.4.	Coal use	0.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	2.0
2.6.2.	Finance measures	1.3

- ✓ The draft NECP provides yearly targets for renewable energy until 2030 by technology and by sector.
- ✓ The dimension on the internal energy market is well-developed, especially with respect to electricity interconnections.
- ✗ Low greenhouse gas (GHG) emissions ambition, only stabilising emissions non-ETS sectors by 2030 (relative to 2005): no emission reductions foreseen.
- ✗ Bulgaria mentions restricted opportunities to invest in renewable energies, such as the need to protect biodiversity, as a reason to propose low renewables targets.
- ✗ The NECP relies on solid biomass (mainly firewood) and there are no details on how to ensure that wood is truly sustainable.
- ✗ Consultations with stakeholders have not been launched yet.



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# NECP NATIONAL SCORECARD

# GERMANY



## TARGET ADEQUACY:

6.6/45

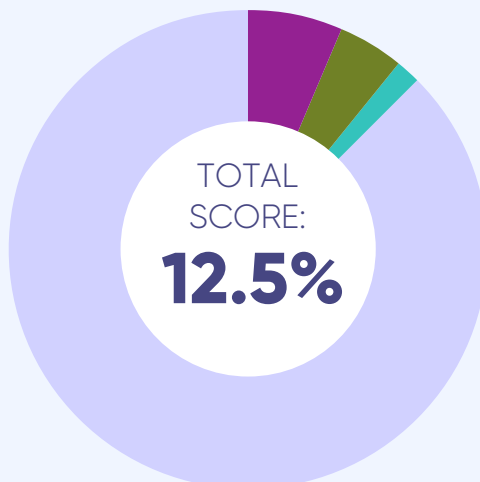
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	1.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	2.8
1.5.	National 2050 target	1.3



## PROCESS QUALITY:

1.5/10

3.1.	Effective stakeholder inputs	0.0
3.2.	Compliance	1.5



MISSING SCORE 87.5%

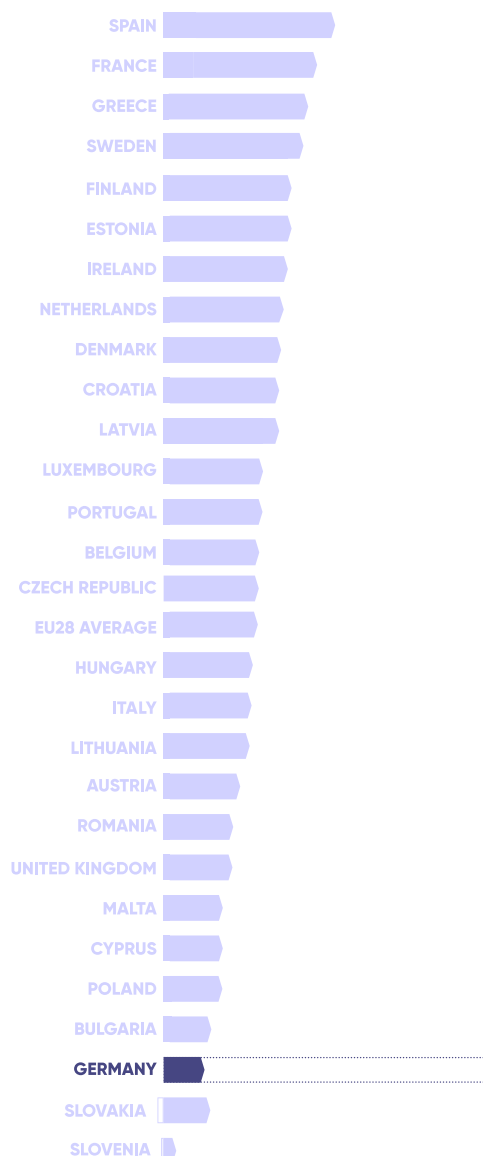


## POLICY DETAILS:

4.5/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	-1.3
2.2.	Policies and Measures (PAMs) for achieving RES targets	0.1
2.3.	Policies and Measures (PAMs) for achieving EE targets	0.3
2.4.	Coal use	2.5
2.5.	Phase out of fossil fuel subsidies	1.2
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	2.7

- ✓ The draft plan includes an energy efficiency target slightly above the minimum legal requirement.
- ✓ It also provides a good description of existing renewables and energy efficiency policies.
- ✓ The draft NECP includes economy-wide 2030 and 2050 greenhouse gas emissions targets.
- ✗ There is no information about planned policies and measures despite the clear need for additional action (however, the draft plan points to an ongoing national decision-making process).
- ✗ The draft plan does not provide information about the required investments up to 2030.
- ✗ No consultation process was undertaken for the draft plan; the plan contains only a promise of future involvement.



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# NECP NATIONAL SCORECARD

# SLOVAKIA



## TARGET ADEQUACY:

2.6/45

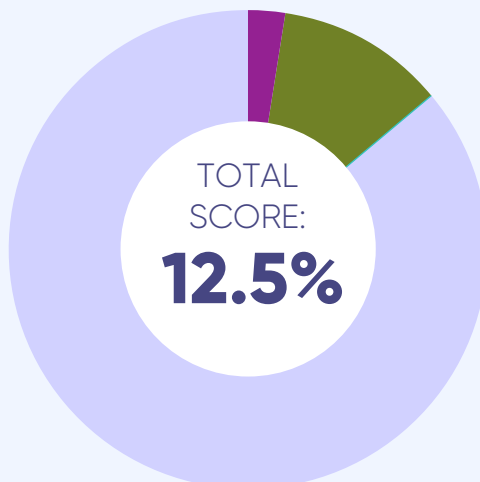
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.1



## PROCESS QUALITY:

-1.9/10

3.1.	Effective stakeholder inputs	-3.8
3.2.	Compliance	1.9



MISSING SCORE 87.5%

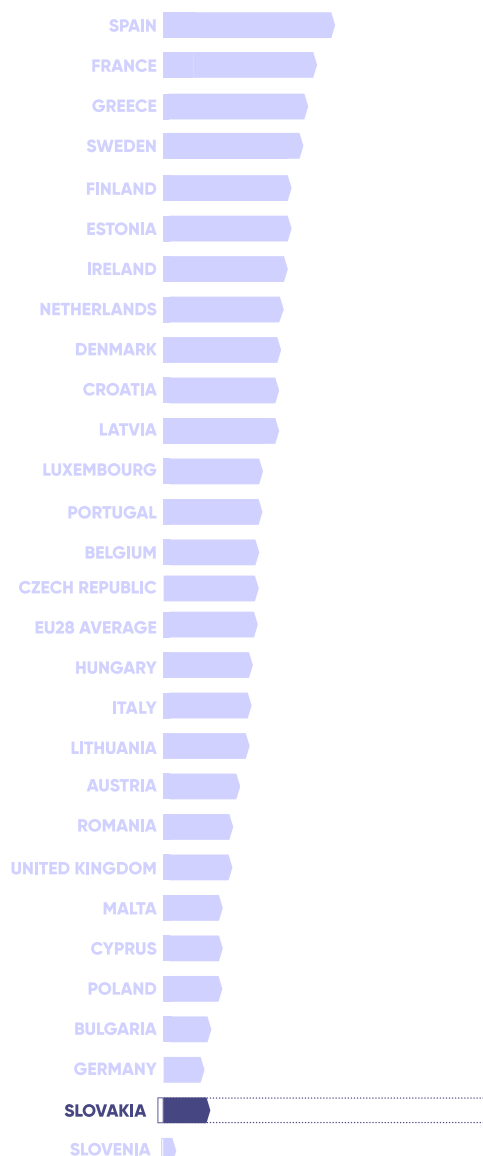


## POLICY DETAILS:

11.7/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	2.1
2.2.	Policies and Measures (PAMs) for achieving RES targets	4.6
2.3.	Policies and Measures (PAMs) for achieving EE targets	3.3
2.4.	Coal use	0.0
2.5.	Phase out of fossil fuel subsidies	0.0
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	2.7

- ✓ The draft plan provides good details on existing and planned policies and measures for non-ETS emissions and renewables.
- ✓ There is also good detail on financing measures including the use of EU funds.
- ✗ Shows overall very low ambition on its 2030 non-ETS emissions, renewables and energy efficiency targets.
- ✗ The draft plan contains no detail on the long-term, 2050 dimension.
- ✗ There is also no information on a coal or fossil fuel subsidies phase-out and no information on the investment needs.
- ✗ No consultation process was undertaken for the draft plan.



This scorecard is the outcome of a ranking exercise of the draft National Energy and Climate Plans (NECPs) of the 28 EU Member States. It is based on the information provided directly in the draft NECPs.

The underlying assessment focuses on three core dimensions: the adequacy of the communicated climate and energy targets, the detail of the policy descriptions, and the quality of the NECP drafting process.

It is not a full impact assessment and does not evaluate the likely effectiveness of the presented existing or additional policies or the accuracy of the information provided.

For more information on the analysis carried out please see the report "Planning for Net Zero: Assessing the draft National Energy and Climate Plans", May 2019.

[www.europeanclimate.org/national-climate-plans-2030](http://www.europeanclimate.org/national-climate-plans-2030)

# NECP NATIONAL SCORECARD

# SLOVENIA



## TARGET ADEQUACY:

2.6/45

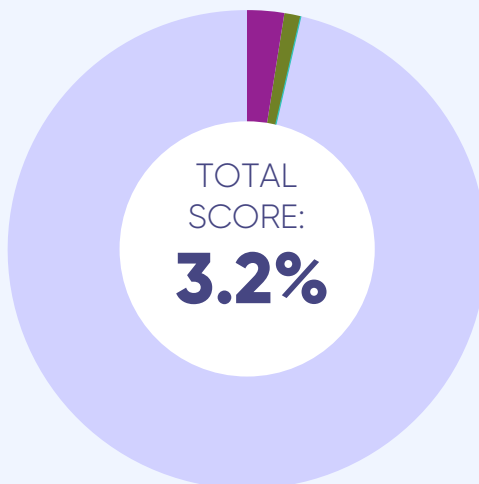
1.1.	2030 Non-ETS GHG targets	1.5
1.2.	National 2030 GHG target	0.0
1.3.	2030 Renewable Energy target	0.0
1.4.	2030 Energy Efficiency targets	0.0
1.5.	National 2050 target	1.1



## PROCESS QUALITY:

-0.6/10

3.1.	Effective stakeholder inputs	-1.9
3.2.	Compliance	1.3



MISSING SCORE  
96.8%

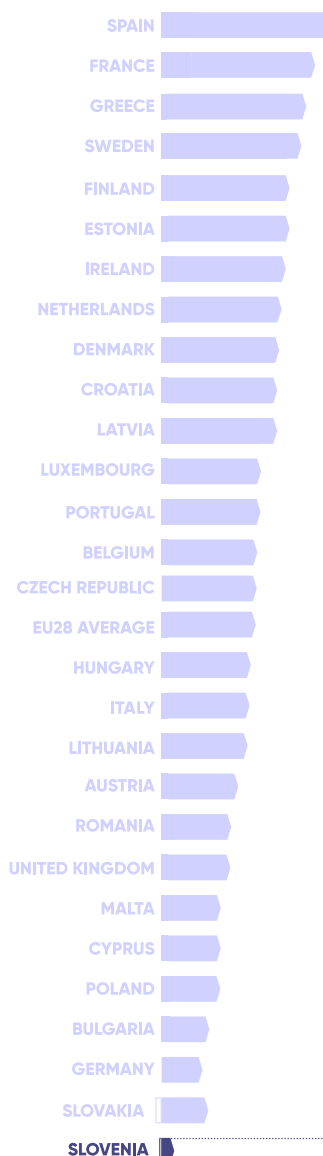


## POLICY DETAILS:

1.2/45

2.1.	Policies and Measures (PAMs) for achieving non-ETS GHG targets	-1.2
2.2.	Policies and Measures (PAMs) for achieving RES targets	3.2
2.3.	Policies and Measures (PAMs) for achieving EE targets	-0.6
2.4.	Coal use	0.0
2.5.	Phase out of fossil fuel subsidies	0.8
2.6.1.	Investment data	-1.0
2.6.2.	Finance measures	0.0

- ✓ The draft NECP includes some reference to the long-term strategy and the Paris Agreement.
- ✗ The plan does not provide an energy efficiency target and it has no adequate inclusion of the 2050 dimension.
- ✗ Slovenia has set low targets for non-ETS emissions and renewable energy.
- ✗ The draft plan does not provide information on planned policies and measures to tackle non-ETS emissions or energy efficiency.
- ✗ It does not provide information about the required investments nor the required financing measures up to 2030.
- ✗ The plan does not include information on phasing out coal or fossil fuel subsidies.
- ✗ No dedicated consultation was undertaken for the draft plan.



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# ENDNOTES

- 1 European Climate Foundation (2018): Net Zero By 2050: From Whether To How, accessed 09 May, 2019.
- 2 See European Commission (2016): Clean Energy for All Europeans, COM/2016/0860 final and European Commission (2019): Governance of the Energy Union, accessed 08 May, 2019.
- 3 idem
- 4 European Commission (2019): National Energy and Climate Plans, accessed 08 May 2019.
- 5 For more information on national long-term strategies, see for example work done by the Climate Recon 2050 project at [www.climatedialogue.eu](http://www.climatedialogue.eu).
- 6 (1) 2030 target for non-ETS GHG emission reduction, (2) 2030 target for economy-wide GHG emission reduction, (3) 2030 target for renewable energy, (4) 2030 target for energy efficiency, (5) any reference to a 2050 target.
- 7 Modelling undertaken for the Commission's 2011 Roadmap for moving to a competitive low carbon economy in 2050 showed that an EU 2030 target reflecting domestic greenhouse gas emission reductions of -40-44% compared to 1990 levels would be on the least-cost trajectory to emission reductions of 79-82% by 2050.
- 8 DG ENER, (2016): Non paper on complementary economic modelling. (Here we use the 33%/33% scenario as a proxy.)
- 9 Climact (2018): Net-zero by 2050: From Whether To How
- 10 ibid.
- 11 LIFE PlanUp (2019) Guide to EU climate and sectoral decarbonisation policies.
- 12 See Annex one
- 13 Coalition for Energy Savings (2019): State of energy efficiency in National Energy and Climate Plans. Brussels.
- 14 Ibid
- 15 see Iwaszuk and Duwe (2018): 2050 climate strategies in EU countries: State of play. Climate Recon 2050: Briefing Note 1.
- 16 IEA (2017): World Energy Outlook 2017. Paris: International Energy Agency.
- 17 See e.g. Guillot, L. and Hublet, R. (2019): 2030 National Energy and Climate Plans – a vehicle for shifting financial flows towards climate neutrality? Bruges: College of Europe.
- 18 Ibid.
- 19 see Duwe (2018): Bringing Paris into the future MFF: How to maximize the benefits of EU funding for the achievement of EU climate objectives. Berlin: Ecologic Institute.
- 20 See also Duwe (2018): Bringing Paris into the future MFF: How to maximize the benefits of EU funding for the achievement of EU climate objectives. Berlin: Ecologic Institute.
- 21 See also Buck et al. (2019): European Energy Transition 2030: The Big Picture. Ten Priorities for the next European Commission to meet the EU's 2030 targets and accelerate towards 2050. Berlin: Agora Energiewende.

