

## Briefing

# National Energy and Climate Plans: Building block for implementing the EU's increased climate ambition

On 17 September 2020, the European Commission presented its 2030 Climate Target Plan and Impact Assessment, proposing to increase the EU's 2030 climate target to at least 55% and to inform on the appropriate level of EU ambition for renewable energy and energy efficiency in 2030. This substantial increase in emission reductions in the short term is an important step to address the climate emergency. However, according to the latest available science, in order to achieve the 1.5°C objective of the Paris Agreement and honour its equity principle, the EU should agree on achieving at least 65% emission cuts by 2030.

In parallel to its 2030 Climate Target Plan and Impact Assessment, the Commission has also published its assessment on the ambition levels in final National Energy and Climate Plans (NECP). This is an important exercise as National Energy and Climate Plans are required to describe, in an integrated manner, the Member States' climate and energy objectives, targets, policies and measures for the period from 2021 to 2030 and to deliver a minimum ambition level set by the EU's current climate and energy legislation.

In view of the in depth analysis of the Commission on NECPs, in this briefing document, Climate Action Network (CAN) Europe and ZERO – Association for the Sustainability of the Earth System – reiterate their recommendations from the report “PAVE THE WAY FOR INCREASED CLIMATE AMBITION : Opportunities and Gaps in the final National Energy and Climate Plans” in order to describe how the NECPs can contribute to implementing higher climate and energy targets in the EU. This briefing paper also adds on the country assessments of the report previously published by CAN Europe and ZERO, and includes opportunities and gaps for the final Bulgarian, German and Irish NECPs.

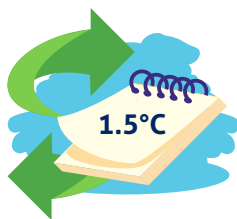
## Raising the ambition in the final NECPs

The Commission's assessment of final NECPs is an important tool as it indicates the current level of ambition Member States consider in these plans. This assessment shows that for the economy-wide greenhouse gas emissions reductions, the current NECPs will achieve 41% emissions reductions in 2030, slightly overshooting the current EU climate target of at least 40%. It also underlines that current NECPs will be reaching a 33,5% of renewable energy share while a gap to the agreed 2030 energy efficiency target will remain.

The Commission's assessment of National Climate and Energy Plans points in the same direction as the conclusions of the recent [report](#) published by CAN Europe and ZERO on final NECPs: Some policies and measures presented in the NECPs have great potential to boost climate ambition and bring important social and economic co-benefits. On the other hand, a number of policies and measures should be immediately scrapped from NECPs as they risk a high-emission lock-in, biodiversity loss and ecosystem degradation, as well as the failure on the implementation of increased 2030 targets.

As the Commission's proposal for a new 2030 climate target of "at least 55% emissions reductions" is now on the table and the EU will soon be enhancing its 2030 climate target, it is important that the NECPs are adapted to the new circumstances and continue to improve. Otherwise there is a risk that NECPs become outdated even before they start being implemented.

In this crucial moment of revising the EU's 2030 climate target, the European Commission needs to update its recommendations for Member States, to match the need for stronger climate action. This is especially relevant for recommendations that were not addressed in the final plans such as those related to the increase of the energy contributions and the lack of detail regarding the specific policies and measures needed. This would be necessary to ensure that NECPs become living strategy documents that follow the policy developments in the EU. Given the announcement of the Commission to revise the current climate policy architecture, including the EU Emissions Trading System Directive, the Effort Sharing Regulation and the LULUCF Regulation, it will be crucial to ensure that national targets and obligations and their monitoring under the NECPs remain a central part of the future EU framework.



In this context, also the upward revision of the energy targets and measures for 2030 which should accompany the increase of the climate target needs to be taken into account. This would entail the revision of the Energy Efficiency Directive, Renewable Energy Directive and other relevant energy-related legislation, including targeted action to accelerate the rate and depth of buildings renovations. Ensuring that the infrastructure planning and funding are aligned with the 1.5°C objective of the Paris Agreement, also needs the revision of the Trans-European Networks - Energy (TEN-E) Regulation.

Finally, the Commission should ensure clear and proper reporting for the next steps of the process, covering the progress of implementation and improvements made to the level of ambition of the NECPs, and including how the different recommendations have been incorporated.

## **Key Recommendations: INCREASE THE CLIMATE AMBITION**

Currently, EU leaders are discussing the European Commission's proposal to increase the EU's 2030 climate target from 40% to at least 55%. This level of ambition should be further increased to at least 65% to truly meet the EU's fair share to meet the Paris Agreement's 1.5°C target.

As Member States' climate targets are currently not in line with what is necessary to achieve the 1.5°C goal, an enhanced EU 2030 climate target would require Member States to increase their contribution to the EU's target, and to close gaps in policies and measures in final NECPs in order to reflect the highest ambition possible.

In this regard, Denmark and Ireland provide good examples for all EU Member States showing that increasing the ambition level in final NECPs and going beyond the EU's agreed ambition level is possible. Denmark has set an economy wide emission reduction target of 70% by 2030, and Ireland has committed to achieving a 7% annual average reduction in greenhouse gas emissions between 2021 and 2030. Both countries have indicated that they are updating their submitted NECPs with higher targets and stronger policies and measures to reflect these commitments and therefore should be considered as an example for all Member States on updating the final NECPs to implement the substantially higher EU climate target.

## **ACCELERATE THE DEPLOYMENT OF RENEWABLE ENERGY**

According to the Commission's NECP assessment, the level of ambition of Member States included in the NECPs could be sufficient to reach the current 2030 EU renewable energy target. However, given that the EU's current renewable energy and energy efficiency targets would need to be revised upwards to achieve the Paris Agreement goals, higher ambition on the deployment of renewable energy is needed.

An ambitious deployment of renewables is only possible when supported by bold policies and measures. The full potential of solar and wind should be tapped while respecting biodiversity, guided by spatial planning. There is also a need for better policies for renewable energy storage, to further support prosumers and energy communities and to develop clean energy infrastructure capacity that will enable an increase in the share of renewables.

It should also be noted that there are concerns about the unsustainable supply of biomass and/or the lack of specific measures to ensure sustainability for biomass supply in some of the current plans. This should also be addressed in the Commission's recommendations and Member States should close this gap in their NECPs.

## AIM FOR HIGHER AMBITION ON ENERGY EFFICIENCY

The overall EU action on energy efficiency, assessed as the sum of all EU countries NECPs, is not enough to reach the current EU 2030 energy efficiency target. The collective gap in ambition for energy efficiency is clear evidence for the importance of binding targets at EU and national level.

Higher ambition and bolder action on energy savings is needed in order to fulfil the Paris Agreement goals. Governments need to put energy efficiency measures such as building renovations at the heart of their energy and climate plans and their recovery mechanisms and stimulus packages. This will not only help address the gap but also achieve higher emissions reductions alongside contributing to economic recovery. The Commission's recommendations should steer Member States towards that direction.

## END FOSSIL FUEL SUBSIDIES

In their NECPs, Member States are required to report on their fossil fuel subsidies and their plans to phase these out. However, in the final NECPs, only Spain made limited progress on addressing fossil fuel subsidies. Austria, France, Germany, Slovenia and Belgium recognised the issue while Poland, Bulgaria, Hungary and Greece did not even recognise it.

Fossil fuel subsidies distort markets, making clean energy and energy efficiency technologies more expensive. They also lead to a 'lock-in' of high-carbon investments, increasing the risk of 'stranded assets'. EU Member States have repeatedly committed themselves to stop providing subsidies for fossil fuels, yet these commitments remain lip-service.

In its recommendations to Member States, the Commission must ensure that fossil fuel subsidies are reported comprehensively and national processes for an early and just phase out of fossil fuels are progressing in a rapid, fair and effective way, as this is needed to ensure policy coherence when it comes to achieving climate goals.

## PHASE OUT COAL

Of the twelve coal countries in the EU, five (Greece, Hungary, Portugal, Slovakia and Spain) have agreed on 2030 as the deadline for coal use while Portugal even advanced its coal phase out date to 2021. Despite the fact that Spain and Slovakia officially announced that their coal power capacity will be zero by 2030, this is not stated as an explicit policy objective in their NECPs. The following seven Member States however plan to burn coal beyond 2030: Bulgaria, Czechia, Germany, Romania, Poland, Croatia, and Slovenia.

In fact, nearly all of these countries show very limited reductions in coal capacity over the next decade.

Poland, Germany and Czechia account for approximately 90% of the 53 GW of coal capacity expected to be operational in the EU at the end of 2030.

Although not among the countries dependent on coal, a specific case that deserves attention is Estonia, as the only European country to produce and use oil shale as its main energy source. The Estonian NECP mentions no plan of phasing out oil shale which needs to be urgently addressed.

Without national governments setting a clear timeline to go beyond coal, it is unclear how the EU can achieve and implement higher climate and energy targets and whether the financing tools, such as the Just Transition Mechanism, can effectively support a fair and just energy transition. In order to implement higher targets, all EU countries need to phase out coal by 2030, and transition directly to clean electricity without increasing the use of other fossil fuels such as fossil gas.

## **CLOSE THE GAPS IN POLICIES AND MEASURES**

In current NECPs, there is an important potential to close gaps in policies and measures and to improve them in most cases, since most of the measures presented either lack clarity or a quantification of their impact on emission reductions.

Hence, the Commission must address this improvement potential that Member States have, especially in the transport, energy poverty, agriculture, research and development sectors, to plan and propose well designed policies and properly quantified measures in these sectors that could lead to substantial deep emission cuts.

Once these gaps are closed, NECPs would have a bigger potential to contribute to higher climate and energy targets.

## **BOOST GREEN MEASURES IN FINAL NECPs TO ENSURE A SUSTAINABLE RECOVERY**

In order to achieve the enhanced 2030 climate and energy targets, the next EU Budget for the period 2021- 2027, in particular the structural funds, and the Just Transition Fund (JTF), as well as the EU's recovery package (Next Generation EU) play an important role as recognised both by the European Commission and the Member States. These instruments offer an essential funding opportunity to boost action in Member States up to 2030, in particular with regards to the renovation wave, investments into renewable energy sources and their storage, system integration, and electrification of transport.

Thus in the development of EU funds spending plans (Partnership Agreements and Operational Programmes), Recovery and Resilience Plans and Territorial Just Transition Plans, Member States must anticipate higher climate and energy targets and allocate EU and national financial resources accordingly.

The European Commission as well should take into account the higher 2030 climate ambition while assessing the strategic coherence of submitted Member States' plans. This would require a visible and significant boost of financial support for NECP relevant measures to be a minimum requirement and fossil fuel investments should not be approved.

## Country Recommendations to address Opportunities and Gaps in final NECPs



### BULGARIA

Genady Kondarev, Za Zamiata (Friends of the Earth Bulgaria)

Bulgaria's final NECP is a collection of different policies and measures taken from different national policy documents where some of them no longer correspond to the national reality. In order to ensure that Bulgaria follows the Paris Agreement, the final NECP must be revised. Firstly, the country should adopt an ambitious emissions reduction target for 2030 and update its NECP by scraping big fossil fuel infrastructure, nuclear and waste incineration plans.

Bulgaria can win much more by deciding to update its national plan to grasp the opportunities presented by the new EU policies instead of aligning with outdated external dirty energy interests. Taking an active and supportive role in important EU initiatives under the European Green Deal such as the renovation wave, hydrogen backbone, cleaner transport would create jobs and accelerate the just transition of the country.

#### COMPARISON BETWEEN DRAFT AND FINAL NECP:

Bulgaria's final NECP includes some improvements compared to its draft version. The most important one is the increase of the country's renewable energy contribution. In its final NECP, Bulgaria's renewable energy contribution has increased from 25% to 27% in line with the EU Commission recommendations. However, this new level of contribution is still below the RES targets of neighbouring Member States, Greece and Romania (RES final energy consumption (overall) Greece 35%; Romania 30.7%). It is very visible from the document that Bulgaria lacks vision for the introduction of real market instruments in the energy sector - there is only a brief mention if any on how capacity mechanisms will be open for all technologies, how auctioning will be well tested before the full energy market liberalisation in 2025 and again energy services are not at all in the sight of the legislator.

Regarding coal, there is no coal phase-out foreseen in the final NECP. There's a decrease in the coal fleet by 2030, yet remains negligible. Keeping coal in the energy mix is in contradiction with the full liberalisation of the market by 2025. In addition, it opens the pathway to heavy reliance on gas and nuclear energy, as there's a continuous search for gas transition projects, and oil and gas exploration and a new nuclear capacity is foreseen by 2035.

The final NECP still mixes the biodegradable waste and the non-biodegradable waste as fuel. There is rather one given scenario by the plan without any comparison of different ambitions and why this path was chosen.



## OPPORTUNITIES

**Market liberalisation by 2025** It is a first step in the right direction that Bulgaria will phase out regulated electricity prices by the end of 2025 while promoting competition and transitioning to fully market conditions. This will allow the development of a competitive market where new energy technologies can compete with conventional ones. However, it is important to start building the alternatives as soon as possible in a cost-competitive way. Market auctioning for new capacity in RES and storage is an important step towards reducing GHG emissions and the government shouldn't wait until 2025 to introduce these mechanisms.

**Regional cooperation in order to avoid excessive capacity reserves and expensive storage technology** One way to save costs from unnecessary capacity kept in reserve or from unnecessary storage to trim peaks in the energy demand, is to cooperate regionally. When renewables are balanced in a larger geographic region, substantially less back-up capacity and infrastructure is needed.



## GAPS

**No coal phase out by 2030 and no just transition plan** The coal fleet should be phased out soon and replaced by clean renewable technologies, since it is old and a loss making sector. It is likely that the fleet will be under extreme pressure to close with the market liberalisation in 2025. Against this backdrop, a national just transition plan is needed as a quick scaling up of the projects for the replacement technologies.

**No listing of fossil fuel subsidies and no planned phase out** Bulgaria has the largest GDP share invested in fossil fuel subsidies in the EU and this shouldn't be ignored in the NECP. Bulgaria must develop a clear plan to phase out fossil fuel subsidies and open up the market to cost-competitive sustainable renewable options.

**Enable the rights of the prosumers and energy communities** In its current form, the Bulgarian NECP does not include any concrete policies and measures regarding prosumers and energy communities. In the NECP, it is not clear how and when this will be addressed. However, the Bulgarian government must develop necessary legislation and changes in its NECP to enable citizens to produce and consume their own energy and to participate in the energy markets in line with the new EU policies.

**Polluting transport sector** In the NECP, there's a continuous reliance on automotive transport and air travel. There's no drift away from internal combustion foreseen in the plan, quite the opposite.

**Continuous reliance on waste incineration** Including non-biological fractions of waste, instead of recycling and aiming at a circular economy is not in line with the European Green Deal objectives supported by all Member States. Overdeveloping the incineration practices is not in line with the waste management hierarchy of the EU and hides a lock-in potential as well as severe health and environmental consequences to the country.



## GERMANY

Audrey Mathieu, Germanwatch

The delivery of the final NECP has been delayed to include the key proposals of the "2030 Climate Protection Plan", also called "Climate Package", and reaffirms Germany's ambition of reducing greenhouse gases by at least 55% by 2030, compared to 1990 levels. This target is anchored in the new German Climate Law, adopted in autumn 2019, in which Germany has also committed to the goal of climate neutrality by 2050. However, the NECP lacks robustness on how to achieve these goals. The non-ETS target is the EU Effort Sharing target for Germany of 38% reduction by 2030, compared to 2005 levels. The reduction share of primary energy consumption has been set at 30% by 2030, compared to 2008. However, regarding both these targets and the 30% share of renewables in the gross final energy consumption by 2030, the ambition stays at a minimal level.

### COMPARISON BETWEEN DRAFT AND FINAL NECP:

The German NECP contains now the decisions of the "Climate Package" which intend to guarantee the country the achievement of its current objectives for 2030 (-55% GHG emissions). The most significant adopted measure in the "2030 Climate Protection Plan" now present in the NECP is the introduction of national CO<sub>2</sub> pricing as of 2021, via the Fuel Emissions Trading Act (BEHG). This measure is a start and should - according to the NECP - enable Germany to meet the 2030 national target almost exactly, especially regarding the emissions in sectors not covered by the ETS, more specifically transport and heating.



But the current set prices per tonne CO<sub>2</sub> p.a. until 2025 are firstly not high enough to have the necessary steering effect in a timely manner. Secondly, they represent a risk for social acceptability, because if they remain unchanged, a rapid price increase within a shorter period of time (between 2026 and 2030) will be necessary in order to stay on track.

Germany, in its final NECP, presents its energy efficiency contribution in both primary and final energy terms, something which was missing from the draft NECP. The reduction of primary energy consumption has been set at 30% by 2030, compared to 2008. The final plan also points out measures to tap the energy efficiency potential of the gas and electricity infrastructure. Reference is made to the fact that the electricity and gas network is not just about expansion, but above all: optimization measures and taking into account the development of electricity demand in the grid planning.

The reference to the Tenant Electricity Supply Act is no longer mentioned in the final NECP. However, an improvement of the law would be essential, for reasons of social justice and to open up urban roof areas for solar systems.

The final NECP contains a long list of measures to reduce emissions from agriculture and agriculture related land use change. The measures go beyond merely technical proposals, including also the need to reduce livestock numbers, the adoption of more sustainable consumption patterns, the importance of soil organic matter, and the need to better manage wetlands and peatlands.



## OPPORTUNITIES

**Reviewing and adapting government policy on climate and energy** Now anchored in the NECP and in accordance with the German Climate Law, annual emissions for the energy, industry, transport and agriculture sectors shall be monitored and reviewed every year. If a sector deviates from its reduction path, the government shall follow up immediately: The responsible ministry shall present an immediate program for reducing the sectoral gap within three months.

**Renewable Energy Sources act (EEG) to be amended** The NECP often refers to the pending EEG amendment. This could be a chance to increase target and expansion paths as well as redesign the EEG surcharge and thus make it socially fairer. Also the reference to the government's openness regarding the discussion for a new structure of the grid charges system is encouraging for making the energy system more flexible and integrated.

**Economic Recovery Plan** Despite its late adoption in mid-June, the NECP did not yet take into account the national economic recovery plan of 130 billion euros which foresees encouraging measures for environmental and digital investment.

The German recovery plan proposes nearly 35 billion euros for investments in favor of the climate, in particular in the transport sector and in the development of a hydrogen sector, which has the potential to improve climate action.



## GAPS

**Emission reduction targets are not aligned with the Paris agreement.** The 2030 sector targets presented in the NECP correspond to the lower range of the emission reductions target by 2050 (80% reduction path by 2050) which is far from what needs to be done in order to achieve the Paris Agreement objective. The sector targets must be adjusted accordingly. In addition, the industrial sector should be separate from the other sectors, to facilitate the review of progress in this area.

**The RES target in the power sector may not be achieved with described measures.**

The 65% RES target in the power sector by 2030 remains a declaration of intent. Some challenges to meet this target remain unaddressed in the plan, such as wind onshore tenders not currently delivering the desired capacity extensions, and the wind clearances for residential development which have been delegated to the federal states. The measures being taken, in particular additional tenders for 4 gigawatts of each onshore wind energy and photovoltaic in the years 2019 – 2021, have not been enough to even come close to the set target set.

**The Energy Efficiency target is hard to achieve with described measures.** Energy Efficiency measures that are to be implemented in this legislature in addition to the decisions of the climate cabinet are not enough to meet the target of 30% reduction in primary energy consumption. In addition, the current non-binding efficiency target for 2030 is not compatible with the Paris Agreement and is therefore not sufficient to achieve greenhouse gas neutrality by 2050. The plan includes only a list of measures from previous plans, and a coherent strategic approach to close the action gap is thus missing. Without further information on the design and savings effects, a thorough assessment of how all separate measures can be used to achieve the objectives is not possible.

**Gas infrastructure investments and security of supply.** According to the final NECP, the German gas supply is to be further diversified and expanded in line with demand. However, these LNG terminals represent significant overcapacities as well as an economic and security risk. Investments in gas infrastructure should only be made if the requirements cannot be met by other clean measures, such as energy efficiency. If the expansion of the gas infrastructure is defined as essential, then the infrastructure should be suitable for 100% renewable hydrogen from the outset, but the need for better integration of electricity and gas network planning is missing in the NECP. Besides it is necessary to make this process more transparent, since the assumed necessary capacities clearly exceed the scientific projections.

**Power grid modernization measures have now taken on a more prominent role in the NECP but still not sufficient** However, there are still no specific regulatory measures to accelerate and, wherever sensible, to use sophisticated technologies such as overhead line monitoring, high-temperature conductor cables or effective load flow control (e.g. with phase shifters and network boosters). Furthermore, for the Federal Government, power grid expansion remains the best instrument for making the energy system more flexible. Although the current NECP makes more reference to other flexibility measures, these are still not sufficient to create more flexibility in the demand area and also to expand storage. Digitization is still not enough taken into account. The intelligent network infrastructure must be massively expanded in the coming years. Smart meters, which will be mandatory for all large electricity customers from 2020, will be optional for households until 2032. Measures to support smart meters in the residential sector are missing. An early conversion obligation must also be checked for households.

**Market integration** No new measures have been proposed since the “Electricity Market 2.0” package of measures of 2016 and the German NECP is not up to the task of presenting the planned development of the electricity market by 2030. It should for example provide a roadmap on how the penetration of renewable energies in the heat and mobility sectors should occur and refer to the National Hydrogen Strategy which gives a new impetus. The biggest obstacles to market integration is the current price system, the lack of integration of the infrastructure and its planning, and the slow advancement of digitization.

**The already amended Wind Offshore Law (WindSeeG) and more importantly the National Hydrogen Strategy do not figure in the NECP** Other EU countries have already integrated their hydrogen strategies transparently into the NECPs. The role of renewable gases for target achievement in the respective areas remains unclear. The National Hydrogen Strategy is only mentioned as to be decided, even though it was already available at the time of the publication of the NECP.

**No coal phase out by 2030.** According to final German NECPs, the country is planning to phase out coal by 2038 at the latest and the country would still have up to 17 GW net capacity of coal power by 2030 - 2nd biggest capacity, after Poland. In order to be in line with the EU's commitments to the Paris agreement, all coal fired power plants should be shut down by 2030 at the latest.



## IRELAND

Sadhbh O'Neill, Friends of the Earth Ireland

The Irish NECP reflects commitments that were made since the draft NECP was published in December 2018, by incorporating detail and modelling from the 2019 Climate Action Plan. However these commitments (which represented some progress but only about 2% annual emission reductions to 2030) do not now reflect current government policy, which aims to achieve 7% on average emission cuts per annum between 2021 and 2030, or 51% by 2030. As such, the final submitted NECP is out of date, and is an exercise in compliance with EU law rather than a statement of climate policy ambition. The NECP as submitted is still not Paris compliant, nor will it prepare Ireland adequately for the likely increase in EU climate ambition by 2030.

### COMPARISON BETWEEN DRAFT AND FINAL NECP:

The final NECP reflects detailed actions set out in the Climate Action Plan. The Plan was published in June 2019, so between the draft and the final NECP, and it contains important commitments to improve policy coordination and governance across government departments, including a new climate law. The law will address weaknesses in the existing 2015 Act, including a commitment to setting a net zero target, carbon-proofing policies, establishment of carbon budgets, a strengthened Climate Change Advisory Council (CCAC) and greater accountability to the Parliament. The NECP affirms the commitment to increase the renewable share of electricity generation to 70% by 2030, however it is important to note that a significant fraction (c.15%) consists of corporate PPAs (cater for a growing number of data centres that according to some estimates, could consume up to 29% of Ireland's electricity demand by 2028. This additional electricity demand is not included in the NECP or 2019 Climate Action Plan and threatens to undermine efforts to electrify the heating and transport sectors. The final NECP commits the Government to pursue a trajectory of emissions reduction nationally which is in line with reaching net zero in Ireland by 2050. However this trajectory is not reflected in the targets as set out in the NECP as submitted. It also contains a new quantitative ceiling for emissions in the agriculture/land use sector (which is, however, only an indicative target, based on voluntary measures).



## OPPORTUNITIES

**The section on energy efficiency is welcome** as it demonstrates a new level of policy coherence, even though the measures in some places are still weak and unambitious. For example, it groups together NZEB standards for new buildings and refurbishments, grouping home retrofits, heat pump target (600,000 by 2030) and public buildings. Importantly, it proposes a ban on installation of oil boilers from 2022 and gas boilers by 2025.

However, it does not address financing obstacles, the challenges of the private rented stock or the opportunity to retrofit the social housing stock as a priority measure that could reduce fuel poverty.

**There was an opportunity to implement recommendations from a cross-party parliamentary report from 2019** particularly in relation to the agricultural sector where most of the report's recommendations were not included in the final NECP, especially with regard to diversification and reforms to the forestry model.



## GAPS

**The biggest gap relates to the energy security dimension.** The NECP makes clear that a new government policy statement banning future oil exploration will not affect existing licences, or ban exploration for gas. There is an implicit assumption that 'diversification of energy sources and supply' (p.52) will require reliance on LNG imports and a high reliance on use of gas even as the 70% RE-E is approached, and retrofitting is rolled out. A recent study commissioned by Friends of the Earth Ireland on energy security policy for Ireland has highlighted that there is ample security of gas supply from existing interconnections with the UK which will not be affected by Brexit, and electricity interconnections with the UK and France, which should be seen as an opportunity for Ireland to expand its onshore and offshore wind capacity for export.

**The NECP contains a new indicative target for emissions reductions in the agriculture/land use sector.** However the measures do not adequately set out how this target will be achieved. Experience to date has shown that voluntary measures have not reduced emissions and are unlikely to succeed in meeting the NECP targets for 2030. In the meantime this target is expected to be undermined by further expansion of the dairy sector which will be continued under the next phase of the AgriFood Strategy to 2025 and from 2025-30. The NECP does not contain any measures to limit Nitrogen inputs or the national herd numbers which are responsible for driving up GHG and ammonia emissions.



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