KEY RECOMMENDATIONS AHEAD OF THE COMMISSION'S FINAL ASSESSMENT OF NATIONAL ENERGY AND CLIMATE PLANS

MARCH 2025

Together for 1.5

ACCELERATE CLIMATE ACTION IN EUROPE

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INTRODUCTION

National Energy and Climate Plans, or NECPs, are crucial for guiding the EU towards its climate and energy objectives and to ensure a just and fair transition while accelerating climate action towards 2030 and beyond. Their relevance as a framework for planning, driving investments, reporting, and monitoring progress has been emphasised by civil society organisations in the past years, as well as by European agencies, institutions, and independent bodies. Recent examples include the Joint Research Center report on the delivery of the Green Deal and the Clean Industrial Deal, which specifies that "National Energy and Climate Plans are essential tools to ensure EU target achievements and to support strategic investment."

Member States haven't necessarily taken these messages to heart. Only five of them had met the mandatory submission deadline on 30 June 2024, and in March 2025 - almost nine months after - **only 22 out of 27 final updated NECPs have officially been submitted to the European Commission.** Regrettably, the final updated NECPs of Belgium, Croatia, Estonia, Poland and Slovakia are still missing.

With their final updated NECPs, Member States were expected to significantly improve their draft versions submitted in 2023, whose overall quality and ambition were insufficient to meet the EU 2030 climate and energy targets (let alone to align with Paris Agreement commitments). Gaps in the draft plans have been identified by independent analyses carried out by NGOs; by the ESABCC (January 2024); by ECNO (October 2024); by the JRC (January 2025); and by the European Commission itself, both in its EU-wide assessment of draft NECPs (December 2023) and latest State of the Energy Union (September 2024), which identifies "ambition gaps, including bottlenecks and missing links [...] towards the Union's 2030 targets".

As several final updated NECPs remain unavailable, it is still impossible to determine whether the 27 plans will overall be sufficient to achieve, as a minimum, the EU 2030 climate and energy targets. Nonetheless, it is possible to evaluate the single plans and the extent to which they have sufficiently improved compared to their draft versions. Among others, CAN Europe's NECP Tracker tool showcases the persistence of **several gaps even in the final updated NECPs, on a country-by-country basis**, either in the ambition of 2030 targets or the policies that should back them up[1].

This briefing highlights the main points of concern in some of the final updated NECPs. Our suggestions aim to support and **inform the European Commission's EU-wide assessment** of the final updated NECPs, as well as reflections on gap-filling mechanisms and bilateral discussions with Member States. The ultimate goal is to pave the way and set the right direction towards a timely and accelerated energy and climate policy implementation and framework towards 2030 then to 2040 and beyond, in line with the Paris Agreement commitments.

Most of the analysed NECPs however, reveal glaring gaps and inconsistencies between the stated targets and planned measures, policies and investments, undermining their credibility as strategic plans and putting EU policy implementation at risk.

These recommendations, though not exhaustive, reflect the most urgent priorities identified by national NGOs from **12 EU countries**: Bulgaria, Czech Republic, Denmark, Germany, Hungary, Italy, Ireland, Finland, Portugal, Slovenia, Spain, and Sweden. The points of main concern have been linked to the Commission's country-specific recommendations - where relevant as these should have been taken into account by the Member States when preparing their final updated NECPs.

The key trends stemming from the recommendations detailed below are the following:

- **Several Member States must update their national targets to meet EU goals and benchmarks as a minimum.**
- **Policies and measures should be better aligned with their respective climate and energy targets.**
- **Many national NGOs are calling for additional measures in areas such as transport, energy efficiency, and protection of natural carbon sinks.**
- **The overreliance on fossil fuels is worrying and must end.**
- **Fossil fuel subsidies need to be mapped and phased out.**
- **The insufficient incorporation of just transition elements in the final NECPs, in particular energy poverty, should be addressed.**

The briefing also includes an **Annex**, which looks into **gaps in the transparency and quality of climate and energy data**. The Annex notably sheds light on the Member States' **inconsistency in setting their respective 2030 LULUCF targets and scenarios**, which likely stems from the inconsistency in the historical data used to calculate baseline values (see Annex for details).

The environmental and climate organisations that drafted these recommendations remain available for any clarification and more detailed exchanges. Given both the necessity and legal obligation to ensure the final NECP updates are effective, **we urge Member States and the Commission to integrate these recommendations into their ongoing discussions and decision-making processes**. CAN Europe and its network plan to publish a comprehensive analysis of the final NECPs in early June.

[1] Along with the infringement process started by the EC last autumn, CAN Europe and Climate Litigation Network are coordinating a targeted Campaign to shed light on the gaps and shortcomings of the final NECPs of a subset of countries to make the Member States accountable to provide final plans fit for purpose.

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BULGARIA
ENVIRONMENTAL ASSOCIATION "ZA ZEMIATA"

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Update targets and measures to meet EU energy targets as a minimum – The final NECP presents lower ambition for the Renewable Energy sources deployment in the power sector compared to the draft plan and the Final Energy Consumption (FEC) contribution is not aligned with the Energy Efficiency Directive (EED) benchmark. Several relevant national elements of concern are not mentioned in the plan and the final NECP should have provided relative policies and measures to address them: (i) virtual net metering should be introduced, (ii) the burdensome access to the grid by prosumers needs to be better addressed, (iii) energy communities for heating and cooling should be incentivized as well, (iv) the aggregators' role for balancing the grids and demand side response (DSR) needs to be strengthened, (v) administrative procedures for building and maintaining network infrastructure need to be eased. Bulgaria should address these shortcomings with a set of policies and measures that would bring it back on track to achieve its 2030 renewables targets and energy efficiency contributions.

Provide additional measures for the transport sector - The final NECP includes the same measures undertaken for the past 15 years as the only tools to achieve a more sustainable transport system. These measures, which are mainly dependent on EU funds programs, have not been able to bring substantial change to the sector, not even through the massive targeted investments in urban public transport. It is important to address these shortcomings and provide additional policies and measures for the greening of the transport sector (e.g. A clear goal for the reduction of international transit freight traffic and a clear program for the replacement of the long-distance intercity, regional, and municipal public buses with zero-emission ones).

Stop overreliance on false solutions and fossil fuels – The final NECP shows a worrying overreliance on costly and unproven technologies that won't ensure the required emissions cuts and risk locking the country in fossil fuel assets and mega projects, burdening taxpayers. The plan is not phasing down fossil fuel subsidies, as they are not identified. The plan includes the construction of two new nuclear reactors (without a backup plan if the process will be delayed or economic analyses and assessments of the need for new nuclear power), the prioritisation of oil and gas explorations in the Black Sea, the speeding up of procedures and state guarantees for the Vertical Gas Corridor (expanding gas connections with Greece and Romania), no phase-out plans for the Balkan/Turk stream (the last Russian pipeline to Europe, fuelling the war in Ukraine) and a significant increased focus on CCS technologies (Bulgaria likely aims to become the regional hub/CCS cluster for carbon dioxide storage).

CZECHIA

CENTRE FOR TRANSPORT AND ENERGY (CDE)

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Provide credible targets in line with EU energy goals – Despite the Commission's and national CSOs' recommendations calling for a higher target for renewable energy production, the target has not been increased beyond the original 30% share of final energy consumption by 2030. The target set for final energy consumption is in line with the EU benchmark set in the Energy Efficiency Directive (EED), but it is projected to be missed by a large margin due to insufficient policies and measures in the With Additional Measures (WAM) scenario. Czechia should increase its renewable energy target to at least 33% to be in line with the Renewable Energy Directive (RED) benchmark and consider more options for supporting energy savings.

Provide consistent policies and measures to achieve the climate and energy targets – It is highly uncertain whether the measures listed in the final NECP are sufficient to achieve the relatively ambitious WAM scenario. The plan includes a description of existing measures and policies, rather than a list of additional measures to be implemented. It lacks clear measurable targets and timelines for implementation of specific measures, and assessment of their impact, showing only little improvement compared to the draft NECP. Compared to the draft version, all references to ETS2 have been deleted as a result of political backlash. Also, despite the Commission's recommendations, the plan still fails to address investment needs and funding sources sufficiently. Czechia should provide a clear timeline for the implementation of measures sufficient for achieving the WAM scenarios and should also implement ETS2 without delay.

Map and phase out fossil fuels subsidies - The final NECP lacks any commitments and plans to phase out fossil fuel subsidies and even explicitly states that Czechia has no such intention at the moment. This is clearly in conflict with the Commission's recommendations and guidelines. Czechia should conduct a thorough mapping of all fossil fuels subsidies and provide a concrete plan for their phaseout.

DENMARK
VEDVARENDEENERGI (SUSTAINABLE ENERGY)

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Beware of proper implementation of policies and measures to achieve climate and energy objectives – The final NECP is based on the latest official energy and climate projections, incorporating the best estimates of agreed policies and measures. However, uncertainties remain regarding their actual impact, particularly in areas such as energy renovations of public and commercial buildings, the ESR target, and the 2026-2029 LULUCF budget – issues already highlighted in the Commission's recommendations for Denmark.
For what concerns energy efficiency, the contributions for Primary and Final Energy Consumption reported in the final plan are projected to be reached only based on the not updated reference scenario from 2020.
The energy renovation targets set by the Energy Efficiency Directive (EED) for public and commercial buildings are not met according to projections and the achievement of the 2021-2030 budget target for the tangible impact of energy efficiency policies partly relies on the implementation of energy taxes instead of targeted policies and measures.
On top of that, there are also procedural risks that shall be taken into account such as (i) the agricultural transition might be slower than expected as it is based on an assumed interest by farmers, which might be less than expected and (ii) CCS is more expensive than expected and (iii) the proposed offshore wind power parks are being delayed as no company wanted to install them without state support. It is important to focus on solving these potential implementation loopholes for a timely delivery of the NECPs' policies and measures.

Plan measures to address energy poverty – The final plan includes some social measures for vulnerable families and for supporting the affected companies in their transition, but it does not target Danish families in energy poverty. As also highlighted by the Commission's country-specific recommendations, a more extended analysis of the social, employment and skills impacts, including distributional impacts of the climate and energy transition in Denmark, should have been provided and this point should be addressed in a timely manner.

Stop overreliance on false solutions – The Danish plan includes large state support for CCS and PtX. These technologies present environmental concerns and unproven results at the scale planned in the final NECP. They also would likely be more expensive than what is budgeted in the plan. In light of funding uncertainties, it would be important to direct the available financial sources towards proven and effective renewable energy technologies, including faster phase-out of fossil fuels in heating, industry, and transport.

FINLAND

WWF FINLAND
FINNISH ASSOCIATION FOR NATURE CONSERVATION (FANC)

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Update targets and measures to meet EU targets as a minimum – The final NECP lacks the necessary ambition, coherence, and transparency required for Finland to achieve its climate commitments. The plan faces significant shortcomings in its ability to provide a credible pathway to meet climate targets on national and EU levels. It notably fails to present detailed and sufficient measures to achieve the proposed emissions reductions, relying instead on outdated strategies that are not aligned with the current government's actions. In addition, the absence of With Additional Measures (WAM) scenarios, leaves the plan dependent on With Existing Measures (WEM) scenarios, insufficient to bridge the emissions gap. The current government has weakened Finland's climate ambitions compared to the previous administration, and it risks falling short of its climate goals and failing to align with EU commitments: the most glaring shortcoming is the lack of measures to address the decline of LULUCF sinks. To address these gaps, Finland should include detailed WAM scenarios, notably for the areas mentioned in the Commission's recommendations – renewable energy, energy efficiency and LULUCF – that have been largely ignored by the Finnish government.

Map and phase out fossil fuels subsidies - The final NECP lacks a comprehensive mapping of direct and indirect fossil fuels subsidies and their phase-out plan. As also pointed out by the Commission in its recommendations, the plan still lacks information on how and by when they will be phased out, which is particularly relevant given their high share in total energy subsidies. The government notably fails to justify why preferential tax rates for fossil fuels should not be classified as indirect subsidies. This conflicts with the findings of the Finnish Environment Institute (SYKE), which identifies significant fossil fuel subsidies, such as the reduced energy tax on peat and the lower tax rate on diesel. Furthermore, the report from the Coalition of Finance Ministers for Climate Action emphasizes that fossil fuel subsidies act as a negative carbon price, undermining climate goals and imposing considerable welfare costs. It highlights the need for Ministries of Finance to address fossil fuel subsidies as a critical step in implementing effective carbon pricing and accelerating the green transition.

Improve the NECP Governance - The stakeholder engagement during the NECP revision process was inadequate and feedback from consultations was not properly addressed and/or taken into account. A meaningful multi-level stakeholder engagement process should be ensured and effectively implemented and included in the governance of the plan.

GERMANY
GERMANWATCH

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Align policies and measures with EU climate and energy objectives – According to projections, Germany is expected to fall short on several climate and energy targets, with the most glaring gaps expected in the ESR and LULUCF sectors. For ESR, it is expected to miss the EU target by 111 MtCO2eq by 2030 and the additional measures included in the plan are not detailed enough, offering little transparency on the emissions savings meant to be delivered. The Federal Environment Agency estimates for its part that the cumulative ESR target gap would reach 226 MtCO2eq by 2030 under the With the Additional Measures (WAM) scenario, which contradicts substantially the data included in the NECP. The LULUCF sector is projected in the NECP to not become a permanent sink by 2050. The Federal Environment Agency is even more pessimistic than the NECP and projects a target gap of 60 MtCO2eq by 2030 in this sector. Regarding energy efficiency, the NECP provides a detailed linear reduction trajectory to reach both Primary and Final Energy Consumption contributions but the WAM scenario leads to higher consumption values. The plan does not contain enough information on how Germany intends to close the gaps in these sectors. Overall, the federal government is overly relying on price developments under the upcoming ETS II to close the ESR target and energy efficiency contributions gaps, which raises questions on the social and political feasibility of the trajectories presented in the NECP. These shortcomings should be addressed by planning significant additional measures, especially in the transport and building sectors, while addressing the recommendations issued by the Commission on LULUCF.

Provide more detailed information on financing needs – The NECP only addresses the issue of financing vaguely, without a sectoral needs analysis or detailed information on how the measures are to be financed. The Federal Government states that it does not plan to address the knowledge gap around climate financing needs and relies exclusively on third-party studies. The vast majority of fossil fuel subsidies listed in the plan are not paired with a phase-out date.

Integrate Just Transition elements in the plan – The final NECP does not adequately address the socio-economic aspects of the transition, overlooking systemic impacts on employment and skills. Although required by the Governance Regulation, the final NECP does not include an assessment of energy poverty nor a national indicative target to reduce it. The European Energy Efficiency Directive (EED) also contains some specific obligations to combat energy poverty, which Germany has so far ignored. These shortcomings may be partially attributed to the weak public consultation process put in place to gather feedback on the draft NECP, as also highlighted by the Commission's recommendations.

HUNGARY
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Align targets, policies and measures with EU energy objectives - Hungary's final NECP still falls short of aligning with EU energy targets. While EU legislation mandates a 34% share of renewable energy in gross final energy consumption by 2030, the plan sets a lower target of just 30%. Additionally, it fails to adequately improve the vague regulatory framework and measures for renewables, particularly for wind power plants and energy communities. This regulatory uncertainty maintains an unpredictable, unfavorable investment environment for renewable energy projects.
On energy efficiency, the EU expects Hungary to reach a final energy consumption of 16.2 Mtoe by 2030. However, the NECP sets a higher contribution of 17.67 Mtoe. Despite the Commission's recommendations emphasizing the need for clear policies and measures to meet national energy efficiency contributions – and the NECP itself acknowledging the crucial role of deep building renovations – the plan lacks a concrete roadmap with detailed measures and milestones.
A particularly concerning trend emerges in sections of the NECP where Hungary not only omits concrete measures to reduce energy consumption but explicitly aims to offset an anticipated 26% rise in industrial energy demand. Instead of seizing the opportunity to mainstream energy savings and efficiency and advance renewable energy deployment, the plan risks undermining progress on both fronts.

Provide a detailed roadmap to phase out fossil fuels – The final NECP not only fails to provide clear trajectories and timelines for the overall phase-out of fossil fuels and relative subsidies but plans 1500 MW new fossil gas infrastructure (CCGT power plants) and postpones the coal phase-out date (the only one previously notified)[2], contradicting Paris Agreement objectives and preventing Hungary to actually reach climate neutrality by 2050. These concerns have been pointed out by Hungarian CSOs and the Commission.

Address the energy poverty issue adequately – The plan fails to formulate any adequate goal, plan, or vision for addressing the issue of energy poverty. Building on the Commission's recommendations, we urge a timely assessment of the number of households in need; Hungarian CSOs also call for a clear energy poverty reduction target and consultative planning of the Hungarian Social Climate Plan that needs to serve as a detailed roadmap.

[2] Contrary to the previous commitment of the Hungarian government to phase out lignite from electricity production by 2025 (Matra Power Plant) also embedded in the EC-adopted Territorial Just Transition Plans (and the Just Transition Fund's expectations),the final updated NECP delays the lignite-firing phase out to 'by 2029 the latest'

IRELAND

THE ENVIRONMENTAL JUSTICE NETWORK IRELAND (EJNI)

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Provide coherent policies and equitable measures to achieve national energy efficiency contributions and renewable energy trajectories – The plan aims for a 32.5% improvement in energy efficiency, including the retrofitting of 500,000 homes. However, projections in the NECP show energy consumption exceeding the 2030 target final energy consumption of 10.451 Mtoe by 2.01 Mtoe. The slow pace of retrofits and limited support for low-income households raise concerns about meeting this goal. The NECP falls short of addressing deeper systemic transformations, such as reducing energy demand and rethinking policy and economic models in high-emission sectors, hindering progress toward long-term climate goals and on the road to improved energy security. Concerns linked to missing energy efficiency measures and to energy security due to the dependence on substantial energy imports from third countries are also highlighted in the Commission's recommendations; those shortcomings should be clarified and addressed. Ireland's final NECP seeks to source 80% of its electricity from renewables by 2030. Yet, major infrastructure issues, such as grid capacity and energy integration, remain significant obstacles. Rapid increases in high energy demand, particularly from data centers, will compromise progress. It is important to address these shortcomings and provide policies and measures to ensure Ireland will be on track to reach its renewable energy target.

Provide a detailed plan and timeline to phase out fossil fuels subsidies – The final NECP doesn't provide clear plans and dates for the overall phase-out of fossil fuels subsidies. The Commission also underlined the need for Ireland to fill the information gap concerning the subsidies phase-out in terms of date and timeline, but no improvement was made in the final plan.

Provide a detailed plan to reduce Irish agricultural emissions without fail, requiring reductions in milk and livestock production – Agriculture, dominated by intensive dairy and livestock farming, emits 48% of Irish non-ETS emissions. The national mitigation policy has relied on voluntary farmer adoption of technical efficiency measures since 2012, yet the sector now emits 10 % more GHGs. The final NECP repeats this failed approach. Ireland's 2030 Effort Sharing Regulation emissions target reduction of 42 % by 2030 relative to 2005 needs to be backed up by a detailed plan, thus aligned precautionary limits on milk and meat production are likely necessary to direct required system change in agriculture.

ITALY
WWF ITALY

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Align policies and measures with targets included in the plan – The final NECP does not provide a systematic correlation between the described policies and their effectiveness in reducing sectoral emissions based on verifiable data. For all sectors, it remains unclear how and to what extent the referenced policies will lead to greenhouse gas emission reductions sufficient to meet the identified sectoral targets and emission reduction targets, which are already misaligned with ESR objectives.
Furthermore, no detailed socio-economic impact assessment was conducted for all the measures included in the NECP. The overall evaluation only considers potential employment impacts in an aggregated manner, while the social aspect remains entirely generic.

Provide a detailed plan and timeline to phase out fossil fuels and relative subsidies – The NECP lacks clear timelines, policies, and measures for phasing out all fossil fuels and significantly reducing fossil fuel subsidies, leaving a substantial gap in the country's energy transition strategy. On the contrary, fossil fuels remain central to Italy's energy policy, particularly concerning gas and new fossil infrastructure, such as LNG terminals and pipelines. The only phase-out date provided for fossil fuels is that for coal, set for January 2026 – except in the Sardinia region, where it is scheduled for January 2029 due to the need for interconnection works. At the same time, many NECP measures reinforce the role of gas and gas infrastructure towards 2030, with significant investments and initiatives aimed at positioning Italy as a regional gas supply hub. Moreover, the plan does not sufficiently address the phase-out of environmentally harmful subsidies, despite multiple specific recommendations received on this issue. We urge coherent action to address these shortcomings.

Plan measures to address energy poverty – The plan does not establish national objectives for energy poverty. It provides only vague references to existing measures, such as social bonuses, which, while helpful, are passive and insufficient to tackle its root causes. Social bonuses remain a mere financial burden on the state rather than providing structural support to help families escape precarious conditions. While the concept of energy income holds promise, the NECP lacks both the necessary resources and a comprehensive strategy for its effective implementation. With 4 million families experiencing energy poverty, the allocation of just €200 million over two years is grossly inadequate, as it would only support interventions for approximately 40,000 households. At this rate, it would take over 200 years to assist all families in need. This is in stark misalignment with the urgency of the Commission's recommendations that shall be addressed as soon as possible.

PORTUGAL

ZERO

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Need for additional measures in the Transport and Agriculture sectors to align projections with targets - The final plan targets a 40% reduction in Transport and 11% in Agriculture by 2030 (vs. 2005), while the respective "With Additional Measures" (WAM) scenarios achieve only 30% and 6%, respectively. Planned policies and measures are not enough to reach the proposed targets, on the contrary, these sectors present increasing emission trends. The Transport sector is particularly worrying due to its weight in national emissions (30.3%), jeopardizing the achievement of national GHG reduction targets. It is essential to prioritise the electrification of all duty vehicles and heavy passenger vehicles, which account for almost 50% of fuel consumption, but represent a very small proportion of vehicles, so investing in their electrification is cost-effective. The rapid electrification of these vehicles can be boosted by combining energy storage in batteries (essential for solar) with logistics and public transport platforms.

Reduce Primary Energy Consumption to align projections with minimum EED obligations - The contribution for Primary Energy Consumption (PEC) in the final NECP is aligned with the minimum EED obligations but the WAM scenario shows an increase in consumption instead of the needed decrease. The plan justifies that "the estimated increase in PEC reflects, on the one hand, the decarbonisation of existing consumption through electrification and, on the other, the electricity needs arising from the development of the green industry". This means that the expected increase in PEC is due to Hydrogen production, which will be mainly used to export through the cross-border green hydrogen project H2MED. Hydrogen transport is highly inefficient, and the EU's energy security and autonomy must be guaranteed by reinforcing electricity networks and local hydrogen production whenever energy efficiency has reached the optimum threshold, electrification is not technically feasible and the quantities of biomethane available are not sufficient. H2MED presents risks such as the uncertainty about sufficient green hydrogen production (81 GWh/day), the risk of perpetuating the fossil gas market, inefficient transport, and the lack of data to justify the efficient consumption of green hydrogen in Central Europe.

Provide detailed information on investment needs of policies and measures - In the final NECP - and as also highlighted in the Commission's recommendations for Portugal - planned policies and measures still lack quantified information on the investment needs and funding sources. There is no indication of the amounts of funding needed to implement each measure, and of the associated funding sources, which makes it impossible to assess the financial viability of all the measures.

SLOVENIA

FOCUS/ASSOCIATION FOR SUSTAINABLE DEVELOPMENT

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Update targets and measures to meet EU targets as a minimum – The emissions reduction targets (ESR and gross emissions) for 2030 in the final NECP haven't improved compared to previous drafts. For 2030, the plan proposes a 28% GHG reduction in non-ETS sectors (which is only 1% above the EU binding target), and a 35% gross emissions reduction target. The NECP only sets a 55% gross emissions target by 2033, after the expected closure of the biggest coal power plant in Slovenia, but both targets for 2030 and 2033 are not Paris Agreement compatible.
Significant additional potential remains in the transport and agriculture sectors, with only a 1% reduction in transport emissions compared to 2005 and a 2.8% reduction in agriculture emissions compared to 2005. In addition, the RES target is set to 33% by 2030, which is more than 10 percentage points below the target recommended by the Commission. Slovenia needs to update targets and measures to meet EU targets as a minimum.

Bring back more ambitious targets and measures to phase out fossil fuel subsidies – The final NECP presents weakened measures and targets for the phase-out of fossil fuel subsidies compared to previous drafts. An article on the phase-out of fossil fuel subsidies was also removed from the draft National Climate law. According to the draft climate law published in autumn 2023, the country would have completely eliminated all budget and tax expenditures that encouraged the use of fossil fuels by 2026 but the latest draft of the law published last summer no longer includes this provision. Also in the context of the update of the National Energy and Climate Plan, the provisions on the elimination of the excise duty rebate measure for fossil fuels in transport by 2025 were amended to the effect that the State will only consider the possible elimination of excise duty rebates for industrial-commercial use and for commercial transport by 2026.

Both amendments were introduced after the conclusion of the public consultation process due to pressure from industry representatives and the Slovenian Chamber of commerce. Such a regressive revision of the NECP is contrary to Article 14 of Regulation (EU) of 2018/1999 and represents a concerning backtrack towards lowered ambition that Slovenia needs to reverse to phase out fossil fuels subsidies.

SPAIN
SEO/BIRDLIFE

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Energy efficiency and the reduction of consumption – Spain is not in line with the minimum EED obligations both for primary and final energy consumption for 2030. Hence, it needs to reduce energy consumption across all economic sectors. We invite the Commission and national decision-makers to consider the following measures: (i) solve bureaucracy problems between central, regional and municipal governments to speed in accessing the available grants and incentives for buildings renovation; (ii) adopt mobility plans for metropolitan areas that boost collective and affordable public transport, promote intermodality and discourage the use of individual cars; (iii) remove the subsidies on diesel from the road transport while incentivizing railway goods traffic; (iv) carry out a comprehensive renovation of industrial machinery and processes; (v) give a strong boost to the research and development of innovative and more efficient energy technologies.

Renewable energy and the electrification of end uses – The whole-economy electrification rate is expected to be only 35% by 2030, while electricity demand is expected to increase to 34% by 2030. Spain needs to deploy renewables faster, prioritizing distributed generation models that respect nature and local communities, contribute to the electrification of end uses and promote the development of distributed energy storage models, as well as the optimization of electricity grids. Some measures to be incorporated are: (i) massive replacement of gas systems by heat pumps in buildings sector and industrial processes; (ii) aid for the retrofit of vehicles with internal combustion engines to battery electric vehicles (BEVs); (iii) aid for the purchase of new and 2nd hand BEVs; (iv) bonus for recharging BEVs under social leasing regime at public points; (v) aid for the establishment of carsharing for BEVs in cities and municipalities.

Farming, nature restoration and the improvement of carbon sinks – The trajectory for the LULUCF sector reaches -38.5 MtCO2eq of net removals by 2030, which is less ambitious than the one set in the EU LULUCF Regulation (-43.6 MtCO2eq)[3]. Nitrous oxide emissions from fertiliser use and methane from livestock must also be reduced significantly: the agriculture sector is responsible for 12.2% of total GHG emissions in Spain. Measures on natural carbon sinks should be strengthened. Some options include: (i) reforestation to expand the total wooded area, with native species resilient to climate change; (ii) sustainable management and maintenance of the existing forest mass of Spain to better protect mature trees; (iii) reduced use of forest products for energy purposes with strict enforcement of environmental and social standards; (iv) promotion of agroforestry systems and regeneration of Spanish 'dehesas' (extensive Mediterranean wood pastures).

[3] Even less ambitious appling the EEA 2024 dataset values to the EU LULUCF target set by the Regulation, that would result in LULUCF net emissions value in 2030 of -52.3 MtCO2eq (see Annex)

SWEDEN
NATURSKYDDSFORENINGEN

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Align policies and measures with targets included in the plan – None of the targets will be met with the current policies and measures included in the Swedish NECP. Rather than using the plan as a starting point for overseeing policies, most of the document is based on existing measures and defending why Sweden should not be more ambitious. This issue was the major criticism of the draft plan and has also been mentioned in the Commission's recommendations concerning lacking additional measures on renewable energy, but no improvements were made in the final version. This is a missed opportunity for the advancement of Sweden to achieve a fair and just transition and these shortcomings should be addressed.

Restore energy efficiency contributions and provide coherent policies and measures to achieve them – In direct contrast with the EU obligations regarding energy efficiency, in December 2023 the Swedish government committed to reassess the national contributions but has not suggested a new proposal yet. This means that the country halted the implementation of the national energy efficiency contributions while also simultaneously laying out a planning goal of 300 TWh of electricity demand by 2045. Both initiatives are in direct conflict with the energy efficiency first principles, a point which has already been highlighted in the Commission's recommendations and should be taken up in further bilateral discussions. In addition, the plan lacks concrete policies and measures to achieve the expected energy efficiency contributions, which are not only crucial to free up capacity in the electricity system but also to allow electrification of transport and industry.

ANNEX
INCONSISTENCIES IN CALCULATING 2030 LULUCF TARGETS ACROSS NECPS

As mentioned in another report, many NECPs showed gaps in the quality and transparency of their climate and energy data. Typical issues include:

1. the unavailability, partial availability, or complex access to data, especially related to 2030 targets and scenarios (WEM and WAM). In several circumstances, data are missing or provided in inaccessible formats, such as percentages or graphs without explicit values.
2. discrepancies between national and EU datasets, particularly with historical data, undermine the reliability and comparability of NECPs.

While analyzing the final NECPs, project partners have identified an **inconsistency in the calculation of LULUCF objectives for 2030.**

National net removal objectives for 2030 are set in the updated LULUCF Regulation (2023/839), under **Annex IIa, column D.** These objectives are calculated as the sum between the average of LULUCF emissions in the 2016-2018 **baseline period (column B)** and the **relative target (column C)**, which is the national binding target set by the LULUCF Regulation (Article 4.3). To summarise: column D = column B + column C. The EU-wide target is to achieve 310 Mt of GHG emissions removals by 2030.

The inconsistency concerns the values of the 2016-2018 baseline period (column B), which were calculated using an old 2020 dataset. These values are now obsolete: the most updated EEA dataset (2024 submission) presents significantly different values for the same 2016-2018 period.

It follows that **2030 net removal objectives set in column D are also rather obsolete.** If we were to sum the binding relative target (column C) to the more updated EEA 2024 baseline (instead of the old 2020 baseline), we would obtain different values compared to those in column D of Annex IIa.

At times, these differences are extremely significant. For example, Denmark's 2030 net removals objective as set in column D is almost five times less ambitious than what would be required if we used the more up-to-date, realistic baseline (5.799 Mt CO2-eq by 2030, compared to 0.921 Mt CO2-eq). On the other hand, Germany's 2030 net removals objective as set in column D is almost five times more ambitious than what would be required if we used the more up-to-date, realistic baseline (-30.840 Mt CO2-eq by 2030, compared to -8.804 Mt CO2-eq).

We are concerned about how Member States have dealt with this inconsistency in their NECPs. All final NECPs we analysed thus far mention at least the binding relative target (column C). Those who have also included 2030 net objectives also seem to have used column D values (i.e. resulting from the old 2020 baseline). However, there still seem to be two reasons of concern:

- As mentioned above, net removal objectives based on column D values are now obsolete and rather detached from reality. For countries such as Denmark who "benefit" from this situation – that is, whose 'old' net removals objective (i.e. based on the old 2020 baseline) is less ambitious than what would be required according to more recent EEA data, which reflects better the reality on the ground – this could result in the less action being delivered than required and/or desirable.

- In several cases, the WEM/WAM scenarios are calculated starting from a different baseline compared to the net removal objectives in the same plan. The baseline used for WEM/WAM scenarios in most cases seems to align with EEA 2024 baseline values rather than the old 2020 baseline. This may create a significant inconsistency between the 2030 targets and the policy scenarios put in place to achieve them. It also makes it difficult to assess and monitor whether Member States would be on track to meet their expected objectives.

We would welcome a clarification by the Commission on this point. Notably, we would be interested in knowing whether, in its assessment of final NECPs, (1) it intends to assess the Member States' alignment with commitments under the LULUCF regulation solely based on the binding relative target (Column C), or whether it will also take into account 2030 net removal objectives; (2) in the latter case, whether it will consider the values resulting from the old baseline (column D) or more updated ones; and (3) whether it will also take WAM scenario values as a reference point in its assessment of final NECPs. This will help us evaluate the ambition of final updated NECPs and monitor their implementation in the coming years.

	LULUCF values from EEA Dataset				Annex IIa from LULUCF Reg https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02018R0841-20230511			
					B	C	D	
Member State	2016	2017	2018	Avarage 2016-2017-2018	The average greenhouse gas inventory data for the years 2016, 2017 and 2018 (kt of CO2 equivalent), 2020 submission	Member State targets, 2030 (kt of CO2 equivalent)	Value of the greenhouse gas net removals (kt of CO2 equivalent) in 2030, 2020 submission (Columns B+C)	EEA based Avarage 2016-2017-2018 + Member State Targets 2030 (column C)
Belgium	-6667	-2930	5222	-1458.56721	-1032	-320	-1352	-1779
Bulgaria	-9794	-9781	-9872	-9815.7678	-8554	-1163	-9718	-10979
Czech Republic	-6946	-5338	-12	-4098.56261	-401	-827	-1228	-4926
Denmark	868	715	2503	1361.905981	5779	-441	5338	921
Germany	-9766	-6152	760	-5052.82303	-27089	-3751	-30840	-8804
Estonia	1907	1768	3471	2381.819135	-2112	-434	-2545	1948
Ireland	3198	5165	4186	4183.400411	4354	-626	3728	3557
Greece	-4086	-3886	-4684	-4218.42633	-3219	-1154	-4373	-5372
Spain	-46602	-47108	-47957	-47222.3893	-38326	-5309	-43635	-52531
France	-30310	-19444	-24382	-24712.3693	-27353	-6693	-34046	-31405
Croatia	-5698	-4884	-5493	-5358.2257	-4933	-593	-5527	-5951
Italy	-40913	-20427	-41900	-34413.2596	-32599	-3158	-35758	-37571
Cyprus	-191	-307	-302	-266.745231	-289	-63	-352	-330
Latvia	-1449	-2891	-388	-1575.77418	-6	-639	-644	-2215
Lithuania	-7116	-6533	-5717	-6455.33004	-3972	-661	-4633	-7116
Luxembourg	-468	-379	-241	-362.965328	-376	-27	-403	-390
Hungary	-4555	-5358	-4806	-4906.23811	-4791	-934	-5724	-5840
Malta	1	3	2	1.727399847	4	-2	2	0
Netherlands	5932	5110	5029	5357.167319	4958	-435	4523	4922
Austria	-6667	-2930	5222	-1458.56721	-4771	-879	-5650	-2338
Poland	-40781	-41662	-40960	-41134.6016	-34820	-3278	-38098	-44413
Portugal	1051	21472	-3497	6341.859354	-390	-968	-1358	5374
Romania	-50512	-48709	-46770	-48663.6783	-23285	-2380	-25665	-51044
Slovenia	711	707	804	740.6538954	67	-212	-146	529
Slovakia	-5313	-5204	-4231	-4916.08655	-6317	-504	-6821	-5420
Finland	-9493	-7032	2324	-4733.23267	-14865	-2889	-17754	-7622
Sweden	-51273	-44703	-38610	-44862.0441	-43366	-3955	-47321	-48817
EU-27/Union	**-324934**	**-250717**	**-250300**	**-275317**	**-267704**	**-42296**	**-310000**	**-317613**


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