EU climate goals at risk

NECPs' ambitious implementation must close the gaps

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EXECUTIVE SUMMARY

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Executive Summary

The updated National Energy and Climate Plans (NECPs) set out the roadmap for achieving the EU's climate and energy targets for 2030, while laying the foundation for the post-2030 framework and an ambitious 2040 climate target. It is essential to assess both the quality of these plans and the challenges surrounding their implementation to ensure that current shortcomings are addressed in a timely and effective manner, enabling the EU to stay on course to meet its climate and energy related goals.

This report highlights key gaps in 16 final NECPs (Austria, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Finland, France, Germany, Hungary, Ireland, Italy, Malta, Portugal, Slovenia, Spain) concerning:

(i) the **ambition** of Member States' targets to meet climate and energy objectives,
(ii) the adequacy of **financing** within the NECPs,
(iii) the integration of **just transition** requirements,
(iv) the adequacy of **public participation** processes and
(v) the **enforcement**, monitoring and correction mechanisms integrated into the NECPs.

CAN Europe's analysis of the final NECPs was carried out ahead of the Commission's final NECPs assessment, published on 28 May 2025. According to this assessment, the current plans, *if implemented*, would put the EU only 1 percentage point short of meeting its 2030 climate target (-55% net emissions compared to 1990 levels). While it is true that some headline targets have improved on paper compared to the drafts, the main outcome of this analysis is that **the current NECPs still fall short in several critical areas. The lack of credible policies and measures, meaningful stakeholder and public involvement, clear financing strategies, and robust enforcement mechanisms jeopardises the achievement of the EU's 2030 climate and energy objectives**, let alone the alignment with the Paris Agreement.

The briefing substantiates the need for both Member States and the European Commission to address the identified gaps and consider the outlined recommendations to ensure an effective, just, and timely implementation of the NECPs - truly in line with the 2030 climate and energy targets.

The slow progress so far also means that **the EU is missing out on the socio-economic co-benefits** that could be harvested with a swift, Paris-compatible decarbonisation path. Urgent action and strengthened accountability are essential to bridge the gap between commitments and implementation.

The upcoming revision of the Governance Regulation also offers opportunities to address structural shortcomings and strengthen the governance framework for the next round of NECPs, post-2030.

Ambition gap

The Ambition gap is evaluated by assessing **whether targets and benchmarks are backed up by consistent 'With Additional Measures' (WAM) and 'With Existing Measures' (WEM) scenarios in the NECPs**.

According to our analysis, in most countries, the policies and measures (PAMs) are still insufficient to deliver the promised targets. For instance, only half of the NECPs analysed included policy scenarios that meet - or exceed - the minimum decarbonisation targets for sectors under the Effort-Sharing Regulation (agriculture, buildings, transport, waste, small industry). In the critical area of energy efficiency, most countries fall short of even the minimum benchmarks set by the Energy Efficiency Directive.

This raises concerns about the effective implementation of the NECPs, and the ability to meet the EU's 2030 climate and energy targets. In the following some headline recommendations towards correcting the observed gaps are listed:

ENERGY

- Member States should accelerate a fair and sustainable renewable energy deployment and include additional measures to collectively reach a Renewable Energy Share of 45% by 2030 or at least the minimum EU-wide 42.5% share set in the Renewable Energy Directive (REDIII).
- Member States should plan more energy efficiency and energy savings measures and reinforce existing ones to meet and exceed the minimum Energy Efficiency Directive (EED) requirements.
- The European Commission should support, monitor and enforce the implementation of RED III and EED.

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- Member States should fill the 'transparency gap' on reported information (regarding the targets, scenarios and additional PAMs).
- Member States should provide additional policies and measures to meet their ESR and LULUCF Targets.
- The European Commission should ensure (if needed by taking legal action and activating other enforcement mechanisms) that Member States are on track to fulfill their pledges.

Financing gap

Most NECPs don't provide a projection of the investments needed to deliver the NECPs, let alone clear links of measures with the dedicated financial sources for its implementation. To fill the ambition gap it's also pivotal to define concrete and precise financial streams for the PAM's implementation and to redirect money towards the transition that is consistently spent to subsidize fossil fuels .

- Member States should conduct a thorough assessment of the financing gap – both public and private, and per sector.
- Member States should develop a comprehensive strategy to mobilise and leverage investments from the private sector (which is expected to contribute for the larger share of investments needed to achieve a socially just green transition).
- Member States should make better use of public resources. This also includes shifting public finances away from fossil fuels and other false solutions, and redirecting them towards the socially just green transition. It also includes developing detailed and time-bound plans for phasing out fossil fuel subsidies, both direct and indirect.

Just Transition gap:

The road to 2030 and beyond must be rooted in social justice. PAMs and their financial sources need to reflect just transition requirements to move towards a society that embeds equity, affordability, and inclusion at its core. Most NECPs don't sufficiently integrate just transition elements/requirements in their planning.

- Member States should provide a systemic socio-economic impact assessment of PAMs included in the NECPs, with gender disaggregated data where possible.
- Member States should elaborate a coherent and systemic approach to address energy and transport poverty.
- Member States should assess the sectors most in need to be supported during the transition and include PAMs to target workforce reskilling and upskilling.
- The European Commission should monitor and enforce compliance with just transition requirements, including the integration of gender equality in Member States' NECPs.

Public Participation gap

Carrying out a meaningful public participation process, as mandated by the Governance Regulation, is fundamental to address the specific needs of different segments of society and to build a transition that is widely accepted, effective, equitable, and inclusive. In most of the Member States the NECP consultation process was poorly designed. Moreover, it's unclear how the feedback of different stakeholders has been integrated in the final plans.

- Member States should clarify how the stakeholders feedback has been incorporated into the final NECP.
- In view of the next cycle of NECPs revision process, Member States should elaborate a meaningful and transparent public consultation process aligned with EU requirements and the Aarhus Convention – by ensuring the participation of all stakeholders including civil society, providing enough time to contribute, transparent information on the plan's content and the overall decision-making process and they need to clarify how the feedback is going to be incorporated in the final plans.

Enforcement gap

Considering the importance of the NECPs, and these gaps in the targets and the process, it's pivotal to put in place solid enforcement and monitoring mechanisms to address these shortcomings. The majority of Member States rely on EU mechanisms for enforcement, while it would be important to act also at the national level with effective monitoring and legal action in case gaps are identified.

- Member States should strengthen enforcement and monitoring mechanisms at the national level.
- The European Commission should make full use of the existing EU enforcement mechanisms, including infringement proceedings, to ensure that the objectives agreed in EU legislation and reflected in the NECPs are achieved and their content complies with EU law.
- During the revision of the Governance Regulation, the current compliance mechanisms should be strengthened and new ones should be adopted, including via the introduction of provisions granting access to justice at the national level. In addition, some core elements of EU climate governance should be safeguarded and strengthened (including the binding targets, reporting and monitoring requirements, public participation obligations and multi-level governance).

With just five years left until 2030, Member states should fill the observed gaps and implement NECPs in an ambitious way. They must deliver – as a minimum – on the European climate and energy obligations, which will also strengthen the EU's ability to reach ambitious post-2030 targets currently under discussion, and to enable the EU to meet its part in reaching the Paris Agreement goals to avoid the worst effects of climate change and benefit society.

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INTRODUCTION

Introduction

Why NECPs Matter

National Energy and Climate Plans (NECPs) are the cornerstone of the EU's climate and energy governance framework. Required under the EU Governance Regulation, **these binding plans define how each Member State intends to contribute to the EU's collective climate and energy objectives by 2030**, with indicative pathways extending to 2040 and beyond.

When designed and implemented ambitiously[1] and on time, NECPs can drive the transformative action needed to achieve climate neutrality and a just transition – central objectives to both the European Green Deal and the EU's new Strategic Agenda (2024–2029). In light of accumulating scientific evidence on the accelerating impacts of climate change and its inevitable socio-economic impacts, swift and decisive action through NECPs is critical.

Beyond setting national targets, **NECPs integrate energy, climate, and socioeconomic policies into a single strategic document**. They offer a crucial opportunity to align national priorities with EU-wide goals, ensure long-term planning, **and mobilise investments needed to decarbonise the economy.**

The 2024 NECP Update Process

EU Member States were required to submit their final updated NECPs to the European Commission by 30 June 2024. These updates are essential for adjusting national strategies to reflect recent developments in EU climate and energy legislation (the so-called Fit for 55 package) and to close the gap between current policies and the EU's 2030 climate targets. Last December, the European Commission analysed the updated draft plans, and stressed the need "for more robust measures and implementation in the final NECPs to stay on track towards 2030".

In a more recent report from February this year, the European Environment Agency (EEA) concluded: "Despite steady progress in key areas, the European Union is only partially on track to achieve the EU's 2030 climate, environment and sustainability objectives."

CAN Europe and its members have been closely monitoring the NECP process for over three years. Our last analysis, published in March 2025, provided key recommendations aimed at

[1] CAN Europe calls for the EU to cut emissions by at least 65% (gross) by 2030 and reach net-zero emissions by 2040 to align with the Paris Agreement.

supporting and informing the European Commission's assessment of the final updated NECPs, and bilateral discussions with Member States.

By the time of publication of our analysis, only 24 out of 27 Member States had submitted their final updated NECPs — an indication that political momentum and ownership remain insufficient.

Our Analysis: Progress Made, Gaps Persist

This current assessment focuses on the final NECPs of **16 countries: Austria, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Finland, France, Germany, Hungary, Ireland, Italy, Malta, Portugal, Slovenia, Spain**. It also provides an overview of the current political context for Belgium, Estonia[2] and Poland, that still have to submit the plans nearly 1 year after the submission deadline.

CAN Europe's analysis of the final NECPs was carried out ahead of the Commission's assessment, published on 28 May 2025, according to which the current plans, *if implemented*, would put the EU only 1 percentage point short of meeting its 2030 climate target (-55% net emissions compared to 1990 levels). While it is true that the gap in national targets has narrowed compared to previous drafts, this analysis reveals that current NECPs still fall short in several critical areas. The level of ambition remains insufficient to meet the EU's legally binding 2030 climate and energy objectives – let alone align with the Paris Agreement. This shortfall could constitute a breach of the European Climate Law.

While the targets in the plans are largely shaped by EU legislation and provide a snapshot of intended outcomes, they do not tell the full story. When assessing future ambition, **it is also important to take into account the actual state of implementation** between 2019 and 2022. Historically, implementation often takes longer than anticipated and may encounter a range of challenges. CAN Europe' NECP Tracker tool shows that implementation of the previous 2019 NECPs is lagging behind and all Member States assessed show worrying trends and gaps in keeping up to their pledges. This context is essential when considering the need for solid and effective PAMs. What truly determines success is whether countries define and implement credible measures, allocate adequate funding, and ensure transparent governance and public participation.

[2] The Estonian government approved the final updated NECP during the completion of this analysis. However, as of the publication date of this briefing, the plan was not yet available on the European Commission website and therefore it is not included.

Key Gaps Identified

We analysed five core dimensions where major shortcomings remain:

- **Ambition and Policy Coherence**
  Many plans lack the necessary ambition to deliver the emissions reductions required. The proposed policies and measures often lack consistency or fail to clearly match with the targets they are meant to achieve.

- **Just Transition Measures**
  While the plans are expected to address social equity and support for vulnerable groups, too many fail to articulate concrete actions to deliver a fair transition in affected regions. This undermines the transformative potential of the NECPs and risks leaving communities behind.

  For further details: see also this thorough just transition assessment by the Together for 1.5 project, detailing if a subset of NECPs sufficiently address EU-level just transition requirements.

- **Financing**
  A significant "financing gap" remains: lack of information and the difference between identified investment needs and plans to secure funding. Without a credible financing strategy, even well-designed plans risk remaining on paper.

- **Public participation**
  The Governance Regulation requires Member States (inter alia) to ensure the public is given early and effective opportunities to participate in the preparation of the NECPs and the plans should include a summary of the public's views and information on how these views have been taken into account. However, in most NECPs, this process has been opaque and flawed – a missed opportunity to strengthen plans through inclusive dialogue.

  A detailed analysis on the public consultations in the NECP revision process is also available in the Report published in March 2025 by CAN Europe and WWF EPO.

- **Enforcement**
  Most NECPs provide little to no detail on how implementation will be monitored or enforced. The absence of clear accountability mechanisms raises serious concerns about follow-through.

Looking Ahead

With climate impacts intensifying and the 2030 deadline fast approaching, stronger political leadership, greater public engagement, and clearer implementation strategies are urgently needed. Looking past the current NECP process, the upcoming new planning cycle to 2040 and the revision of the Governance Regulation offer golden opportunities to course correct the current shortcomings.

The following sections, broken down at the general and country-sheet level, provide a detailed overview of our findings across the five key gap areas and corresponding recommendations to 2030 for Member States and the European Commission to fill the shortcomings on: ambition, just transition, financing, governance, and enforcement. These recommendations have been identified together with 19 environmental and climate organisations at the national level, who remain available for any clarification and more detailed exchanges.

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GENERAL ASSESSMENT

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General Assessment

Ambition gap

To assess the ambition gap, the report compares the national 2030 climate targets and energy benchmarks defined in the EU legislation – the Effort Sharing Regulation (ESR), Land Use and Land Use Change and Forestry Regulation (LULUCF), Renewable Energy Share (RES) in the revised Renewable Energy Directive (RED III), and in the Energy Efficiency Directive (EED) – with the policy-based scenarios (based on additional measures - WAM, or on existing measures - WEM) provided by EU Member States in their NECPs[3].

Specifically, the report uses 5 main climate and energy indicators by 2030: (1) emissions from Effort-Sharing sectors; (2) emissions from the LULUCF sector; (3) the share of renewables in final energy consumption; and both (4) primary and (5) final energy consumption.

The results are shown in the table below and detailed in the following sections. However, it's already possible to observe that none of the NECPs analysed is ambitious enough to provide consistent policies and measures (PAMs) to back up all the binding EU targets and benchmarks at the national level.

For instance, only half of the Member States analysed included policy scenarios that meet or exceed the minimum decarbonisation targets for sectors under the ESR (agriculture, buildings, transport, waste, small industry sectors). In the critical area of energy efficiency, most countries fall short of even the minimum benchmarks set by the EED: only 2 of the 16 countries reviewed have planned additional measures to deliver the minimum requirements for primary energy consumption, while only 4 out of 16 align with those for final energy consumption.

While the RES target presents a slightly more encouraging picture overall, the national targets and benchmarks show a worrying discrepancy in terms of the actual PAMs to pave the way to their fulfillment.

[3] This partly differs from the analysis carried out by the European Commission to assess the ambition gap, published in the Annex to the Communication (28 May 2025). The Commission used WAM (or WEM) scenarios in the assessment of climate targets (ESR and LULUCF), while it used the contributions (i.e. not the scenarios) for renewables and energy efficiency.
All figures used for this assessment were retrieved or derived from the final updated NECPs, but potential discrepancies with figures provided in the Commission's assessment are possible – due to the uncertain or implicit nature of certain figures, as well as to the different level of access to information (e.g. via bilateral exchanges).

TABLE 1: Assessment whether the NECPs scenarios are in line with the targets and benchmarks in EU legislation, accordingly to percentage deviation

Country	Effort Sharing Regulation	Land Use and Land Use Change and Forestry		Renewable Energy Sources share in Final Energy Consumption	Final Energy Consumption	Primary Energy Consumption
		2020 Baseline	2024 Baseline			
Austria						
Bulgaria						
Croatia						
Cyprus						
Czechia						
Denmark	*	*	*	*	*	*
Finland	*	*	*	*	*	*
France						
Germany						
Hungary						
Ireland						
Italy						
Malta		*	*			*
Portugal				*		
Slovenia						
Spain						

Notes: The colors are the result of the percentage deviation from the comparison between the EU Targets and Benchmarks and the "With Additional Measures" (WAM) scenarios provided in the NECPs. (See Legend table). When the cell is black no scenario was provided.

The Malta LULUCF with the 2024 Baseline value cannot be calculated since the EU Target is 0 and mathematically the calculation of a percentage deviation is impossible. To obtain the color assessment it was assumed that the benchmark is 0.000000001 MtCO2eq.

** "With Existing Measures" (WEM) scenario was used, since the WAM scenario was not provided in the NECP*

TABLE 2: LEGEND – WAM/WEM scenario compared to EU Target/Benchmark	
	x ≤ -4% = significantly below
	-4% < x ≤ -2%= below
	-2% < x < 0 %= slightly below
	x = 0%= in line
	0% < x < 2% = slightly above
	2% ≤ x < 5% = above
	x ≥ 5%= significantly above
	No policies and measures scenario

Renewable energy contributions

According to the Governance Regulation (Regulation (EU) 2018/1999) and the revised Renewable Energy Directive (Directive (EU) 2023/2413, thereafter REDIII), the final updated NECPs must include national renewable energy contributions that collectively achieve the updated Union's 2030 target for Renewable Energy Share (RES) in the EU's energy consumption. RED III raised the target from 32% to 42.5% by 2030, with the aim of collectively reaching 45% through an additional 2.5% indicative top up.

The shares that Member States are expected to contribute – to collectively reach the 42.5% target – are determined on the formula set out in Annex II of the Governance Regulation (referred to as the Governance Regulation formula benchmark).

However – as outlined in CAN Europe's Paris Agreement Compatible Scenario – the EU should aim for a cumulative RES target of at least 50% by 2030 to be fully on track with its fair share of the Paris Agreement objectives. Therefore, aligning with the existing EU regulatory framework is necessary, but not enough to deliver the EU's fair share to the Paris Agreement pledge.

As described in the introduction, this briefing focuses on a subset of 16 NECPs, therefore a comprehensive assessment of all the national renewable energy contributions is currently not possible, nor to assess if the EU RES target of 42.5% or 45 % is within reach.

Overall, on paper, the majority of the national RES targets analysed **are in line** with their expected contribution under the REDIII, yet the ambition and credibility of the plans to achieve these targets vary significantly across Member States. Realistic trajectories to meet them appear to be much more heterogeneous.

In particular, 8 countries (Austria, Bulgaria, Cyprus, Denmark, Finland, Italy, Portugal, Spain) are in line with the levels established under the REDIII as they have provided a scenario with additional measures meeting the EU requirements. Among them Spain and Denmark stand out for exceeding their national benchmark, with Spain providing a WAM scenario with 4,86 percentage points above its required share, and similarly Denmark aiming at 13,8 percentage points above (WEM). Nevertheless, the Danish renewable energy development has been criticized for the large dependence on biomass, and the European Commission urged Denmark to fully transpose EU rules accelerating permitting procedures for renewable energy projects.

ZOOM IN – Spain sets an ambitious Renewable Energy Target

Spain has set a renewable energy target of 48%, exceeding the country's 2030 target under EU legislation (43%). This increase is supported by the **high penetration of renewables in the energy system** and particularly **in final uses** such as: transport, heating/cooling and electricity. However, the electrification of sectors such as transport and heating/cooling in Spain is going quite slow, with a share of renewable energy in gross final energy consumption of only 24.8% in 2023 (11.96% in transport and 21.4% in cooling/heating). **Renewable energy use in electricity generation is making good progress and** has already reached 56.8% in 2024 – with a target of 81% by 2030. This is supported by a **boost in the deployment of wind and solar energy in the last years** – including through self-consumption – as well as greater system flexibility, increased citizen participation in the energy system, and targeted support measures for renewables installation where necessary. The target also reflects the expected decrease in the overall final energy demand, driven by progress in energy savings and efficiency across all sectors.

According to our analysis, 7 countries (Croatia, Czechia, Germany, Hungary, Ireland, Malta, Slovenia) do not meet the EU target in either their WAM or WEM scenarios – with discrepancies slightly below the EU requirements, that mostly range between 2% and 4%. Slovenia stands out with a particularly large gap: it has set a RES target of 33% instead of the requested 46%, the relative WAM scenario arrives solely at 36.7% resulting in a significant implementation gap of 9.3 percentage points. France did not mention any RES target in its NECP and did not report any WAM nor WEM scenario related to RES.

In this framework. where several Member States do not provide solid policies and measures (PAMs) to meet the RES targets, and where countries with a significant influence at the EU level (such as France and Germany) have not put forward credible commitments to respect their obligations, **it remains uncertain whether national RES contributions will be enough to meet the EU 2030 renewable energy target,** and which additional steps will be taken to close the gap. This uncertainty is also reinforced by CAN Europe' NECP Tracker tool[4] which shows that the implementation of renewable energy measures (in terms of share of renewable energy in electricity generation and final energy consumption) is generally off track in 10 of the 16 countries analysed. These countries are Bulgaria, Croatia, Cyprus, Denmark, France, Italy, Poland, Portugal, Slovenia and Spain.

[4] The NECP tracker is a tool that assesses, inter alia, where Member States stand in the implementation of their NECPs, by comparing the most recently released data with the trajectories outlined by Member States in their NECPs until 2030

Key factors contributing to these delays include lengthy permitting processes that hinder the rollout of renewables and related infrastructure. The adoption of RED III sets new provisions with that regard, and Member States are currently transposing them into national law. However, bottlenecks remain, including limited capacity and coordination between the national authorities. As an example, Croatia managed to allocate 37% of its Recovery and Resilience Facility (RRF) resources to green spending, but the implementation of measures was delayed due to permitting and administrative constraints.

The policies and measures outlined in the scenarios primarily contribute to the WAM scenarios. However, in some cases, only existing measures have been provided. Additional efforts are required to raise ambition to at least meet the EU target, as **many Member States still have significant untapped renewable energy potential.** For instance, countries such as Spain, Croatia, and Slovenia focus heavily on deploying renewables in the electricity sector, while the transport and heating and cooling sectors do not receive comparatively as much attention to electrify their end-uses.

Recommendations based on our assessment of final NECPs:

- **The European Commission should ensure that all Member States effectively implement RED III** and integrate **adequate** PAMs in their national plans to contribute to delivering at least the minimum EU-wide 42.5% renewable energy share by 2030.
- **Member States should include additional measures to deliver the 2.5% top-up to collectively reach a Renewable Energy Share of at least 45% by 2030** and the European Commission should take additional measures such as cross border joint auctions to deliver the 2.5% top-up.
- **The European Commission should provide enhanced technical and financial support to help Member States** develop strong and innovative **PAMs to enable a rapid rollout of renewables**, particularly on solar and wind. Measures should include faster permitting procedures as set out in RED III, with strong environmental safeguards and meaningful public consultation, while also upgrading dedicated infrastructure, including robust national grids networks and cross-border interconnectors.
- The European Commission should make sure that Member States integrate a **strategy to phase out support for bioenergy sources with negative climate and biodiversity impacts.**
- **The European Commission should rigorously monitor the implementation of national contributions** and, where necessary, activate **enforcement mechanisms and infringement procedures** for Member States failing to fulfil the requirements set in the Governance Regulation and in RED III.

Energy efficiency contributions

The revised Energy Efficiency Directive (EU/2023/1791)[5] introduced an EU-binding 2030 energy efficiency target for final energy, and increased the EU target for both primary and final energy consumption. These developments call for ambitious national energy efficiency contributions to the EU energy efficiency target, and more national energy efficiency and energy savings measures to be rolled out and reflected in the final NECPs.

Out of the 16 Member States analysed, 12 (Austria, Cyprus, Czechia, Denmark, France, Germany, Ireland, Italy, Malta, Portugal, Slovenia, Croatia) are reporting final energy consumption levels in 2030 which are in line with the minimum EED obligation. It is clear that many Member States only aimed for the bare minimum obligations of the EED; none is in line with what is needed to stay within the Paris Agreement compatible limits.

On the positive side, large Member States that represent an important share of the EU energy consumption – such as France, Germany and Italy – respect the updated EED rules (Spain being a notable exception). Member States not in line with the minimum level of the final energy consumption benchmark according to the EED are Bulgaria, Hungary and Spain.

In the case of primary energy consumption the picture is a little worse: **CAN Europe's assessment shows that 10 out of 16 Member States translated the least ambitious result of the EED formula in their final NECP updates, thus respecting only the minimum EED obligation**. This is likely due to the EU primary energy efficiency target for 2030 being non-binding, and lacking a mechanism to correct an ambition gap. The discrepancy between the minimum EED obligation and the national primary energy objectives shows the importance of a stronger governance framework. The **six Member States that are not in line with the minimal level of primary energy consumption according to the EED** are Austria, Hungary, Italy, Slovenia, Spain and Croatia.

Beyond setting an energy efficiency target in line with the revised EED, Member States must also plan and implement adequate policies and measures to ensure these targets are achieved. In the NECPs, this is reflected in the WAM scenario, which showcases the impact of the current and additional policies on energy consumption to 2030. In the analysed final NECP updates, the discrepancy between the defined contributions and the WAM projections becomes larger, showing the need for Member States to urgently plan more energy efficiency and energy savings measures or reinforce existing ones.

For final energy consumption, only four Member States (Cyprus, Denmark, Portugal, Slovenia) have calculated that the additional and existing measures will be sufficient to meet their revised efficiency contribution. For **primary energy,** only two countries calculated the same (Bulgaria and Denmark). **Accordingly, although the majority of the analysed Member**

[5] Directive - 2023/1791 - EN - EUR-Lex

States have set the contributions for final and primary energy in line with the minimum EED obligations, only a few have the necessary measures in place to achieve those targets.

In addition, beyond the figures and contributions themselves, the **accompanying narrative** is crucial for understanding whether a Member State is likely to adopt the necessary policies, and undertake sufficient efforts to meet its minimum energy efficiency contribution. Among those Member States that have aligned with the minimum EED requirements, several distinct types of supporting narratives can be identified.

First, some Member States, such as **Italy,** recognise the discrepancy between the revised energy efficiency contribution and their WAM scenario and indicate that additional measures, policies and levers will need to be implemented to achieve their national target.

Second, some Member States, such as **Germany,** indicate their national energy efficiency contribution without referring to the discrepancy between national contributions and the WAM scenario, therefore without noting the discrepancy of the impact of the planned measures with their revised efficiency target.

Finally, some Member States, such as **Ireland**, include a sufficient level for their energy efficiency contribution, but clearly underline that such objectives are deemed too ambitious or unachievable due to contradicting trends such as economic or demographic growth, and electrification needs, among others. For instance, Ireland questions the distribution of the national contributions that were agreed per EED as per formula and the economic and demographic growth projections that have been used to set these objectives. These Member States seem therefore less reliable in meeting their respective targets, even though they are, on paper, ambitious enough.

All in all, our analysis has shown that some Member States have been more systematically introducing energy consumption levels for 2030 that are in line with the required minimum contribution for primary and final energy in their final national plans. It is important that Member States falling short of the minimum EED obligations in their final NECPs address this gap when transposing the EED into national law, and go beyond the minimum requirements to align with the goals of the Paris Agreement.

Furthermore, the national contributions outlined in the final NECP updates **do not necessarily translate to a sufficient level of commitment and effort** to meet these contributions/align with the EED. Often, the most ambitious projections of adopted and planned policies and measures fall short of aligning with EED obligations or there is a weak commitment overall, risking that the recently agreed 2023 EED is not taken seriously enough.

Recommendations based on our assessment of final NECPs:

- **Member States should urgently plan more energy efficiency and energy savings measures** or reinforce existing ones.
- **The European Commission should act to ensure that all national contributions are sufficient to meet the overall EU objectives**, targeting especially those Member States that are not fulfilling the EED provisions.
- **The European Commission should closely monitor the evolution of the energy consumption in each Member State** and react in case of insufficient progress from 11 October 2025 onwards (which is the deadline for the transposition of the EED into national legislation) to 2030, ensuring that actions can be taken as soon as possible to ensure the achievement of the EU 2030 target for primary and final energy consumption.

Effort Sharing Regulation

The Effort Sharing Regulation (ESR) establishes **national greenhouse gas (GHG) emission reduction targets** by 2030. Accounting for approximately 60% of the total domestic EU emissions, this regulation covers the following sectors: road transport, buildings, agriculture, small industry and waste. Under the ESR, each Member State is assigned a specific reduction target (and yearly emission allocations), contributing to the EU-wide goal of cutting emissions by 40% (compared to 2005 levels) by 2030 in these sectors. Together with the Emissions Trading System (ETS) and the Land Use, Land Use Change and Forestry (LULUCF) Regulation, it constitutes one of the three main climate pillars to achieve an overall net emission reduction of at least 55% by 2030.

In their NECPs, Member States are required to include **both the emissions reduction target** they aim to achieve by 2030 in sectors covered by the Effort-Sharing regulation, as well as **policy-based scenarios** that showcase the expected decarbonisation trajectory with the existing and additional measures presented in the plan (respectively, WEM and WAM scenarios).

Values for both the emissions reduction target and the policy scenarios are not always presented clearly in the plans. Often, multiple options are given for the same indicator, creating significant uncertainty about which values should be considered definitive. This lack of transparency and clarity also extends to the more detailed sectoral indicators. This report analyses the ambition presented by countries to meet their respective ESR targets acknowledging these information gaps.

ZOOM IN – Transparency gap

A recent study from the European Climate Neutral Observatory (ECNO) carried out an in-depth analysis on the transparency and policy information gap of four final updated NECPs. It finds that the lack of transparency and policy information in the plans translates into an ambition gap when the missing indicators or measures represent stakes of emissions that are not considered in the final calculations of the WAM scenarios. Italy, for instance, reports only 19 out of the 54 mandatory indicators across the transport, building, industry and energy sectors (transparency gap), and lacks a number of policies and measures to support certain stated ambitions (policy information gap), such as those on expanding solar PV deployment or on infrastructure for hydrogen transport and storage. The transparency and the policy information gaps in this case results respectively in 36 $MtCO_2eq$ and 96 $MtCO_2eq$ missing in the final GHG net emissions pledged policies trajectories

All countries analyzed set national ESR targets in line with or above EU requirements. This represents an improvement compared to the draft updated NECPs. However, several of them are just **paper targets**: their ambition levels **do not necessarily match with the policy-based WEM and WAM scenarios presented in the plans**. In 8 out of 16 plans analysed, the 2030 emissions reduction levels projected in the WAM scenarios were below the respective national binding targets established under the Effort-Sharing regulation (Cyprus, Denmark, Finland, France, Germany, Ireland, Italy, Malta). Five among them have a percentage deviation from the target higher than 10%, with Ireland and Germany presenting the most glaring gaps. For the other half of the plans whose WAM scenarios are aligned with the respective national targets (Austria, Bulgaria, Croatia, Czechia, Hungary, Portugal, Slovenia, Spain) the quality gap resides in the description of policies and measures, which are often too few or too vague to justify the projections of the WAM scenarios.

In general, it is the **absence or inadequacy of PAMs that casts most doubts on the ability of final updated NECPs to deliver** on their respective national binding targets. The analysed NECPs contain major ambition gaps especially in the transport, waste, agriculture and buildings sector.

Countries such as Bulgaria, Croatia, Finland, Germany, Portugal and Slovenia present an overall lack of ambition in the **transport** sector, with scarce investments in public infrastructures, and fragmented and obsolete policies. In Slovenia, for instance, emissions in the transport sector are expected to be only 1% lower in 2030 compared to 2005 levels.

Similarly, the **agriculture** sector – particularly in countries such as Slovenia, Portugal, and Ireland – holds significant untapped potential for emissions reductions that are not currently supported by ambitious PAMs. This is especially true for nitrous oxide emissions from fertilizer use and methane emissions from livestock.

With PAMs planned in the final updated NECPs, the risk is that **Member States would not be able to significantly accelerate the current emissions reduction trajectories in the Effort-Sharing sectors**. This is especially the case for transport and agriculture, which experienced the slowest emissions reductions compared to 2005 levels according to the EEA, and where several countries are struggling to keep up even with the less ambitious commitments of their 2019 NECPs, as showcased by NECP Tracker.

ZOOM IN: Bulgaria needs to tackle methane emissions from waste sector

Among the additional policies necessary to meet its ESR national target, Bulgaria must include a specific focus on waste. Methane emissions resulting from the waste management sector are responsible for a third of Bulgaria's methane emissions, but the country does not dispose of a specific target to reduce them. The final plan indicates that the measures listed in the Third National Climate Change Action Plan (3rd NAPCC 2013-2020) have been extended to 2030. However, these measures have been implemented to a very low extent, especially the capture of landfill gas from closed and operating municipal waste landfills, which are the main source of methane in the waste sector.

In order to achieve the targets on reducing methane from waste set out in the 3rd NAPCC 2013-2020, local authorities need the technical, expert and financial resources to successfully implement separate collection of bio-waste from households and businesses, mandatory from the start of 2024. In addition, the prioritisation of measures is also needed: in urban settings through the promotion of separate collection of bio-waste and development of nearby local composting facilities, in rural settings through the promotion of on-site composting.

Recommendations based on our assessment of final NECPs:

- **Member States should fill the transparency gap on reported information**, address all the Governance Regulations obligations related to the different sectoral indicators and provide clear and unequivocal information concerning Targets, the WEM and the WAM scenarios.
- **Member States should provide additional PAMs** to at least align to their respective ESR targets. Additional measures should notably be foreseen for laggard sectors such as transport and agriculture – e.g. developing integrated, sustainable and just **transport infrastructures,** and tackling emissions from fertilisers use (nitrous oxide) and livestock (methane).
- **The European Commission should make sure that all the Governance Regulation's obligations are adequately fulfilled** and legal tools are applied to **ensure that Member States are on track to cumulatively meet their ESR targets.**

Land Use and Land Use Change and Forestry

To increase the carbon sink capacity of the European ecosystems, the LULUCF Regulation has set a EU-wide goal of 310 $MtCO_2eq$ in net carbon sinks by 2030. Each Member State is assigned a specific binding national target to contribute to the EU-wide target. The binding national target, however, is expressed in relative terms – i.e. not as the net carbon sink value to be achieved by 2030. This has complicated the assessment of the NECPs ambition gap in the LULUCF sector: Member States used different baseline values to derive their net 2030 targets, generating several discrepancies across plans.

Specifically, the LULUCF regulation uses an old 2020 dataset to calculate the baseline (the average of emissions in the 2016-2018 period) for national net 2030 targets. In the meantime, however, calculation methodologies to derive LULUCF emissions have been updated, and the values for the 2016-2018 period have changed, at times substantially. The European Environment Agency (EEA) dataset – updated to 2024 – provides such more accurate and reliable data. This change resulted in completely different values for the same baseline period compared to the 2020 dataset. **Many countries in their NECPs derived their net 2030 target using the 2020 dataset baseline, but have used the 2024 dataset to derive their WAM/WEM scenarios**.

For this reason, our assessment compares the LULUCF projections of the WEM/WAM scenarios to their net 2030 targets using both the 2020 and 2024 baselines.

All the NECPs analysed include net 2030 targets that explicitly refer to the net 2030 contributions as set in the LULUCF regulation (2020 Baseline). France is the only exception, as it includes a national net 2030 target in line with the 2024 baseline recalculation. However, even if the net targets are aligned with EU requirements on paper, **the lack of concrete policies and measures and the low ambition outlined in the policy-based scenarios raise concerns on the Member States' ability to meet the outlined pledges**.

In 10 out of 16 NECPs analysed, the policy-based WAM and WEM scenarios fall short of meeting the net 2030 target set in the LULUCF regulation (2020 baseline). Eight among them (Finland, France, Germany, Ireland, Italy, Spain, Croatia and Malta) have a percentage deviation from the target higher than 11%. Only five countries (Czechia, Denmark, Hungary, Portugal, Slovenia) present WAM or WEM scenarios in line with the net 2030 target (2020 baseline), while Austria does not report any scenarios for LULUCF.

The picture does not change substantially by using the more recent baseline (2024) to calculate the net 2030 target. Only four Member States would be in line to meet it with their WAM and WEM scenarios (Cyprus, Denmark, Portugal and Slovenia), while 11 would fail to do so. Among them, 10 have a percentage deviation from the target higher than 13%.

The excessively low levels of ambition of some countries – such as France, Germany and Finland – both in absolute and relative terms (e.g. considering both the gap from their targets and their size) raise concerns on the EU's ability to achieve its 2030 EU-wide LULUCF target.

Reversing the decline of carbon sinks and meeting both EU and national sink targets requires strong consistency and synergy across existing policies. Inconsistencies between EU policies should be examined and addressed. For example – as highlighted by the European Scientific Advisory Board on Climate Change (2024) – the European Commission promotes practices under the Common Agricultural Policy (CAP) that risk reducing overall sink capacity. These include payments for cropland expansion, including on organic soils, and subsidies that incentivise increased biomass use.

On the other hand, the Nature Restoration Regulation provides an opportunity to Member States to shift the trend by restoring and protecting important carbon-rich ecosystems while, as a co-benefit, increase carbon sinks.

Recommendations based on our assessment of final NECPs:

- **Member States should provide more clear and transparent information** and direction **to achieve the overall LULUCF target** by 2030.
- **Member States should** seize the opportunity to **develop fit-for-purpose Nature Restoration Plans** aiming at restoring and protecting important carbon sinks, especially forests and wetlands.
- **Member States and the European Commission should improve accounting systems** through streamlined data collection and strengthen capacity and collaboration amongst Member States.
- **The European Commission should address policy inconsistencies** in the European climate policy architecture: a synergistic bundle of policies are vital to increase carbon sink.

Financing gap

While there is no single methodology for estimating investment needs, all available estimates point to the fact that **the EU and its Member States need to significantly increase the mobilisation of public and private investments** if they truly aim to achieve the EU climate and energy targets for 2030 and 2050. According to European Commission estimates, an average of EUR 360 billion of additional investments are needed per year between 2021 and 2030 (compared to the 2011-2020 period). Even more would be needed, in this decade, to align with a 1.5°C compatible scenario.

Overall, the final updated NECPs analysed **do not provide a substantial contribution to bridge that financing gap**. First and foremost, they largely **fail to provide the information needed to properly assess the quality and quantity of the financing gap in each Member State** – thereby preventing an effective intervention to fill it.

There are essentially two sections of the NECP template where Member States are expected to provide such information. Under Section 3, where they are expected to (1) **detail** investment needs and sources of financing expected for each policy and measure (or group of measures); and under Section 5.3, where they are expected to (2) provide an **overview** of investment needs and gaps. While the quality and level of detail of the plans analysed in this report differ, it is possible to identify three common sets of issues.

Granular investments for policies and measures

First, policies and measures (Section 3) of most NECPs are not associated with the respective investment needs or sources of financing in a consistent manner. In the same plan, one finds measures described in greater detail than others. The level of detail varies across plans: Bulgaria and Malta, for example, only include investment needs and sources of financing in very few occasions, while countries such as Cyprus or Spain are comparatively more consistent. Portugal indicates sources of funding but does not mention the amount. Denmark provides an overview of funding allocations in the Annex, but is not easily intelligible.

As a general trend, more information on both needs and resources tends to be available for policies and measures related to energy infrastructures or energy efficiency compared to other decarbonisation measures (for instance in Croatia, Cyprus, France and Spain). Also, more information tends to be available if the measure is already in place (i.e. budget has already been allocated) and/or if it is financed with EU funds. However, none of the plans presents a fully coherent analysis. Three countries among those assessed – Czechia, Germany and Slovenia – completely fail to identify investment needs and sources for policies and measures.

Overall investments needs and resources

Second, in most NECPs the **overview of both investment needs and sources of financing** (Section 5.3) **is insufficient to have a clear overview of a country's financing gap**. This is despite the Commission's country-specific recommendations on the draft updated NECPs, which in each case suggested improvement of this section.

In several NECPs, **investment needs** are either not reported at all (Czechia, Denmark, Finland, Portugal), barely mentioned (Malta) or, when some figures exist, they seem not to be linked to the NECPs projected scenarios or objectives. For instance, Austria, France or Ireland provide a set of studies that estimate economy-wide investment needs up to 2030, which however are not derived from the scenarios laid out in the plan.
Some other countries do – at least to some extent – refer to other sections of the NECP or its objectives. However, only a handful of them mention calculating their investment needs based on the NECP's scenario with additional measures (Croatia, Cyprus, Germany, Hungary, Slovenia). Italy and Spain are among those that provide an assessment of investment needs by sector, but their assessments do not seem to build on the rest of the plan. Overall, explanations on assumptions and methodology are, when they are provided, vague or succinct.

Even when countries provide projections of the investments needed to achieve their national climate and energy objectives by 2030, they do not necessarily know where the funding will come from – i.e. what would be the **sources of financing**.

A majority of NECPs assume that most investments will come from the **private sector**, be it businesses or households (e.g. for buildings renovation or renewables). However, most of them lack a comprehensive and credible **strategy** – or even a set of measures – to leverage or mobilise such private investments. Countries such as Italy and Portugal, which at least describe some existing private financing initiatives, are only marginally better than others.
Also, very few plans manage to **quantify** what **the contribution of the private sector** would amount to: Spain is the only one that assesses the share of private investments over investment needs (82%), while Finland is the only one that provides a list of "planned clean energy investments up to 2030 and beyond" from the private sector (though "indicative"). The majority fails to provide either an estimate of expected private investments or a division of investment needs between public and private sector (for instance: Croatia, Czechia, Finland, Germany, Hungary, Ireland, Slovenia).

In relative terms, more information is available on **public sources of financing** (sometimes, with EU funds explicitly expected to cover a substantial portion of it, for instance in Cyprus, Czechia, Italy, Spain). However, the landscape is yet again inconsistent and extremely varied. Countries such as **Germany or Hungary provide no information whatsoever on available public sources.** Others present vague, inconsistent, non-exhaustive lists of potential public

sources – national or EU – with no concrete quantification of volumes (Bulgaria, Czechia, Finland, Ireland, Italy, Malta). Some countries provide a more thorough description of available public funds (Cyprus, Portugal) or a list of expenditures already allocated to climate action (Austria, Denmark). Slovenia even manages to assess its public investments gap, by comparing available resources with expected public incentive needs.

Lack of coherence on financing across the NECP

Third – and perhaps most importantly: **the overview of investment needs (Section 5.3) and the list of planned policies and measures (Section 3) do not communicate well with one another**. Even in the most positive cases – i.e. where it is possible to derive even a rough estimate of the financing gap the information available on investment needs and sources of financing is not fully integrated with the other sections of the NECP. When investment needs are mentioned, they do not seem to build on a realistic, comprehensive estimate of investments needed for the policies and measures presented in the plan. Smilarly, when sources of financing are provided, they seem to be derived from other available information (e.g. on already existing sustainable finance instruments, or EU funds spending plans) rather than based on planned policies and measures, and linked to it.

ZOOM IN: NECP financing promises versus reality

Almost one year has gone by after the deadline for submission of final NECPs, and several changes are already underway that could threaten the number of investments available for the implementation of the plans. Specifically, several governments are not sustaining or cutting down the level of public investments promised in the NECP. In Austria, for example, the new administration has already shown to disregard measures proposed in the NECP and is planning to revise it downwards. In Czechia, the government deleted all information on available public funding in the final version of its NECP. In Finland, the government has cut funding for several energy efficiency measures (e.g. the halving of resources for energy efficiency in the Energy Subsidy Programme). In France and Germany, climate and environmental policies suffered major budget cuts in 2024, making their respective current national budgets inconsistent with the financing required to implement the NECP. The special fund ("Sondervermögen") and MFF present opportunities to fill existing funding gaps, but also present strong risks regarding DNSH principle and climate earmarking.

All these factors **ultimately prevent a comprehensive assessment of national financing gaps based on the NECP.** Despite the lack of information in the plans, these **gaps are known to**

exist, and are considered significant. For one thing: even under the assumption that sufficient public and private resources were available to implement all policies and measures presented in the plans and were perfectly aligned with them – which is far from being the case, as we have just described – the overall amount would still be insufficient for the EU to meet its 2030 targets. This follows from the fact that – as discussed in Section 1 of this report – the aggregate policies and measures themselves are largely insufficient to meet the respective national climate targets and energy contributions.

Moving forward, what can be done to bridge this financing gap and ensure implementation on the ground? While the largest share of investments will inevitably come from the private sector, the public sector also has to play its part. The basic starting point is to **divert public money away from fossil fuels and towards a just green transition**.

Redirecting harmful financing

While **coal** phaseout plans and exit dates are now set for most countries – albeit with some delays compared to previous commitments (Hungary, Italy) and sometimes not for all sectors (Denmark, Hungary) – **most NECPs do not include plans to phase out fossil gas.** As a matter of fact, several NECPs include policies and measures that foresee an expansion of fossil gas infrastructure. Bulgaria, for instance, plans to expand oil and gas infrastructure in the Black Sea and to apply state guarantees for the Vertical Gas Corridor. In its Mantra power plant, Hungary plans to substitute coal with fossil gas. And several countries, such as Croatia, Cyprus, Ireland, Italy and Germany, have laid out plans for an expansion of LNG infrastructure. Several countries are also directing money towards expensive or unproven technologies such as **nuclear** (for instance Bulgaria, Czechia, France) and **CCS** (for instance Austria, Bulgaria, Denmark, France).

Public financial support for fossil fuels also comes in the form of **fossil fuel subsidies**. In their NECPs, Member States have to provide a list of fossil fuel subsidies as well as plans to phase them out. However, the overwhelming majority of NECPs analysed in this report (14 out of 16) either presented an incomplete list of fossil fuel subsidies or did not present it at all. Several among those who presented an incomplete list fail to mention indirect subsidies (for instance: Denmark, Finland, Ireland). Among those who did not present any list, a few claim not to provide any fossil fuel subsidies at all (Bulgaria, Cyprus).

In stark contrast with Member States' and the EU's international commitments, **no NECP includes a comprehensive and concrete strategy to phase out fossil fuel subsidies**. Some countries openly say they have no intention of developing them (Czechia, Malta); others reiterate their commitment, but only foresee sporadic or *ad hoc* interventions. Austria, for example, mentions that an inter-ministerial group on fossil fuel subsidies will be formed. Germany and Portugal foresee the phaseout of only one subsidy, while Italy foresees a

"review" of some subsidies without promising their phaseout. Only a few countries include phaseout measures, but either without a clear phaseout date (Croatia) or watered down compared to previous drafts (Slovenia).

Recommendations based on our assessment of final NECPs:

- Member States should **conduct**, as soon as possible, **a thorough assessment of the financing gap** – both public and private, and per sector – to achieve their respective climate and energy objectives. Integrating the financing needs of policies and measures planned in the NECP into such assessment is a necessary precondition (albeit not sufficient in itself).

- Member States should **develop a comprehensive strategy to mobilise and leverage investments from the private sector**, which is expected to contribute for the larger share of investments needed to achieve a socially just green transition.

- Member States should also **make better use of public resources**. This includes **shifting public finances away from fossil fuels** and other false solutions, and redirecting them towards the socially just green transition.

- It also includes **developing detailed and time-bound plans for phasing out fossil fuel subsidies**, both direct and indirect.

- Finally, both Member States and the European Commission should maximise efforts **to raise more public resources** directed towards the socially just green transition. At the same time, they clearly **should by no means back track on the (insufficient) volume of investments already allocated**.

Just Transition gap

The integration of just transition aspects into the NECPs is assessed in a more qualitative manner compared to the evaluation of climate and energy ambition benchmarks above. **Assessing the socio-economic implications of policies and measures (PAMs) is essential for their effectiveness, fairness, and public acceptance**. Going beyond the requirements of EU regulation, embedding social equity in climate planning is critical to ensuring the just and fair implementation of NECPs.

The Governance Regulation mandates Member States to include the estimation of the socio-economic impacts of PAMs in the final NECPs, as well as the strategies to address the social, occupational and skills implications related to the transition. The regulation also instructs Member States to assess the number of households which are potentially affected by energy poverty. If a significant number of households in energy poverty exists, Member States should include in their NECP a national target to reduce energy poverty, including a timeframe by when the objectives are to be met.

In addition, the Commission's notice on the Guidance to Member States for the update of 2021-2030 NECPs further invites Member States to develop clear strategies identifying and measuring the social, employment and skills consequences of PAMs, and encourages them to set an objective for reducing energy poverty, or otherwise to justify its omission from the plan.

Furthermore, according to the **Just transition Fund Regulation**, the NECPs should also be **coherent with the Territorial Just Transition plans (TJTP)** in terms of investments needed, timelines, objectives and PAMs. Distributional impacts and support for low income households, reskilling and upskilling needs and reference to gender inequalities should also be featured according to the Just Transition Fund, Art. 11(4), and the EU Regulation (UE) 2018/1999, Art. 15. Further, Member States are expected to take full account of the gender dimension in their NECPs[6].

The elements examined in this gap assessment, along with the country sheets below, highlight several key aspects related to EU requirements, such as:
(i) if the NECP systematically assesses the positive and adverse **socio-economic impacts of PAMs,** and if it includes a comprehensive set of targeted policies to maximize the social benefits and mitigate potential adverse **impacts of the transition**, (ii) if there are adequate measures designed to help reduce **energy poverty and transport poverty**, (iii) if the NECP includes a comprehensive set of targeted policies to maximize the **employment** benefits and mitigate potential adverse impacts of the transition, in particular if the plan clearly targets the sectors in which to focus actions on **re/upskilling** with adequate measures.

[6] Governance Regulation (Regulation (EU) 2018/1999) - recital 45

Socio-economic impacts in the plans

The majority of NECPs provide a largely inadequate assessment of the socio-economic impacts associated with the measures included in the plans. Most of the Member States, when they do, provide incomplete assessments that are not encompassing and are lacking a systemic analysis of the PAMs impacts. For example Hungary, Ireland, Malta, and Portugal fail to assess individual PAMs in detail. Countries such as France and Slovenia focus on certain sectors/regions but omit others. As a consequence, planned PAMs are inadequate to address potential negative social and employment impacts, especially for what concerns specific needs of the most vulnerable groups.

When addressing the social impacts, the overwhelming **majority of the NECP doesn't address the gender dimension** – with France, Germany, Hungary, Ireland, Malta, Portugal, Slovenia, and Italy not integrating the gender perspective into the socio-economic assessment of PAMs at all. The only exceptions amongst analysed Member States are Finland and Spain, which integrate the gender perspective in measures concerning renewable energy deployment, just transition and up/reskill of professionals in the energy efficiency sector.

Addressing energy and transport poverty

The plans present a fragmented approach for what concerns **energy poverty**. The majority of them (e.g. Germany, Ireland, Italy, Malta, Spain) do not set national reduction targets for energy poverty nor effective timelines and PAMs to reduce it except for France, Slovenia and Portugal setting reduction targets.
The majority of PAMs include subsidies and building renovations, but a more structural approach is needed. This would mean the development of regulatory tools – such as Minimum Energy Performance Standards – that can help Member States target their renovation efforts toward the building segments most in need. These measures must be complemented by appropriate financial incentives, technical assistance, and social safeguards. In the case of energy poverty, it is of crucial importance that Member States focus on the worst-performing part of the residential sector (in line with the requirements enshrined in the recast Energy Performance of Buildings Directive Article 9).

Transport poverty remains mostly neglected in the final NECPs, as the issue is generally not properly addressed and included in the plans. For example, the measure set by Germany "*Deutschlandticket*" is not differentiated according to the different income levels. Ireland, Hungary, Portugal and Italy provide no concrete mitigation measures, and Spain and Slovenia, which mention transport poverty, postpone action to the future Social Climate Plans (SCP).

Alignment with the Social Climate Plans

There is a general **tendency to rely on Social Climate Plans as a way to delay the design and adoption of key measures needed t6o address challenges in the transport and buildings sectors.** Addressing these shortcomings becomes even more critical in light of the implementation of ETS 2 and its anticipated social impacts.

More specifically for the **buildings** sector, the financial envelope of the Social Climate Fund will be insufficient to address the urgent needs, especially vis-a-vis the increasing energy poverty rates, bound to increase further with the introduction of the EU ETS2.

Zoom-in: France and energy renovation of houses

The French NECP outlines a series of measures to support the energy renovation of residential buildings, which could serve as useful examples for other Member States that have not yet adequately addressed this issue. These include:

- The Implementation of the tariff shield during the recent energy price crisis
- Energy Saving Certificates scheme: requires energy suppliers to finance a certain amount of energy saving works in buildings, industry, transport, agriculture and district heating networks; some of which are in households affected by energy poverty. (From 2016 to 2022, approximately EUR 6.7 billion worth of renovation works were financed by the scheme.)
- MaPrimeRénov': a grant scheme that supports individuals in financing energy renovation projects, including comprehensive renovations. (In 2023, it funded the renovation of 569,243 dwellings, providing a total of EUR 2.74 billion in aid.) 70% of the projects concern low-income and very low-income households, for which the grant ceiling is increased.
- Zero-Rate Eco-Loan: a financial tool that allows households to finance energy renovation work with no interest and defer repayment of the remaining costs to a later stage
- Tariff shields
- Winter truce and minimum electricity supply service
- The energy voucher: aid for the payment of bills. This is a state aid provided to low-income households to help cover energy bills, regardless of the heating source, or it can be used for energy renovation works. When used for renovations, the voucher helps reduce the financial burden of the energy transition on vulnerable households. In 2022, 5.8 million households received an energy voucher ranging from EUR 48 to EUR 277; with a usage rate of 82.6%. The voucher reduced the climate-adjusted energy poverty indicator from 11.7% to 10.2%, a decrease of 1.5 percentage points.

In view of the ETS2, Member States are urged to plan a comprehensive strategy to eradicate energy poverty in buildings. This could happen, for instance, by ensuring their National Building Renovation Plans and Social Climate Plans are consistent and complementary and also aligned with NECPs. This could help Member States better define and target both buildings and households in need of renovation, while also supporting the design of more inclusive and integrated financial and technical assistance programmes to facilitate their rollout.

Impacts on the workforce

The final NECPs don't feature a comprehensive set of targeted policies to maximize the employment benefits and mitigate potential adverse impacts of the transition on the workforce. In addition, the plans don't clearly identify the sectors in which to focus actions on re/upskilling with targeted re/upskilling measures provided. **While many countries mention job impacts, only a few provide sector-specific re/upskilling strategies**. For example, Germany and Italy lack targeted measures despite referencing skilled labor gaps; France identifies sectors needing support, but hasn't delivered a plan to realise it; Spain and Slovenia go further with job creation forecasts, but concrete pathways are underdeveloped. Malta, Ireland, Hungary, and Portugal make only vague references. This does not mean that no action is being taken in these countries; however, initiatives to anticipate and manage changes in the world of work related to the green transition are sporadic rather than systematic, and are not adequately reflected in the NECPs.

On a positive note, Croatia lists the training program "CROSKILLS ENU-12 for green jobs.

ZOOM IN – Croatia and the training program "CROSKILLS ENU-12

Croatia has defined one measure addressing re/upskilling called "ENU-12," which focuses on developing a framework to ensure adequate skills for green jobs related to building renovation. The measure describes that systematic work will be done in order to attract young people to construction and other technical occupations. This will contribute to the availability of professional staff to implement energy renovation of buildings in the long run, which is the basis for achieving the energy and climate targets.

The program also includes plans to continue upskilling and reskilling workers for new jobs through CROSKILLS training centres. The measure stresses that skilled workers will be needed for building renovation purposes and for installing of renewable energy systems: photovoltaic systems, solar thermal systems, shallow geothermal systems and heat pumps, as well as smaller boilers and biomass furnaces.

Recommendations based on our assessment of final NECPs:

- **Member States should provide a systemic socio economic impact assessment of PAMs** included in the NECPs, with gender disaggregated data where possible.
- **Member States should elaborate a coherent and systemic approach to address energy and transport poverty,** ensuring coherence with the Social Climate Plans as a starting point, but also by including additional PAMs where needed.
- **Member States should** assess the sectors most in need to be supported during the transition and **include PAMs to target workforce reskilling and upskilling.**
- **The European Commission should monitor and enforce compliance with just transition requirements by:**
    - strengthening the current reporting obligations in the NECP progress reports, making the inclusion of just transition elements mandatory
    - ensuring stronger alignment with the EU requirements set out in the SCF and JTF regulations.
    - issuing country-specific recommendations more consistently, whereby highlighting the gaps with requirements in the Governance Regulation.
- **The European Commission should strengthen the Governance regulation with a requirement to integrate gender equality in Member States**' NECPs and long-term strategies (that are currently only mentioned in the recitals).
- **The European Commission should ensure that the soon-to-be-established Fair transition observatory will contribute to qualitative and quantitative gender-disaggregated data collection and stakeholders' engagement.**

Public participation gap

Importance of social involvement

The NECPs offer a valuable opportunity to consolidate EU requirements, national policies and measures, and investment strategies within a single framework. Given their broad scope, the policies and measures (PAMs) they contain will have tangible impacts on people across the EU. Therefore, the meaningful involvement of civil society and stakeholders in the elaboration of the NECPs is pivotal to ensure the achievement of EU objectives and that the transition is socially accepted, equitable and fair.

Public participation process in the NECPs

The Governance Regulation (Regulation (EU) 2018/1999), in line with the requirements of the Aarhus Convention provides the legal obligation to carry out public participation processes along the NECPs updates. The regulation mandates Member States to organise early and effective public consultations prior to the submission of draft and final NECPs.

However, **the majority of public consultation processes have generally lacked inclusiveness and started too late to allow for meaningful impact.** Most Member States in fact started consultation processes after the submission of the draft NECPs to the European Commission, leaving limited timeframe for feedback and offering consultation formats that were not conducive to thorough analysis.

To ensure a meaningful contribution and feedback from the public and stakeholders, Member States were required to share transparent information regarding the plans, and their content, targets and (WEM and WAM) scenarios. Despite the legal requirements in the majority of Member States, this has not been the case. Regarding the format of consultations, only a few Member States – such as Denmark, Portugal, Spain, and Slovenia – combined online and in-person formats. In most cases, consultations were held exclusively online, often relying on limited-input formats such as multiple-choice surveys. Slovenia is one of the few Member States presenting a well-structured public participation process started in due time.

ZOOM IN – Slovenia structured a proper public participation process

The public participation process during the revision of the Slovenian NECP was technically well prepared and represents a good example to be taken into account. The process began with a preliminary public consultation from August to October 2022 focusing on the implementation of the previous NECP, the 2030 national targets and on achieving climate neutrality.
In March 2023, a preliminary consultation document was presented followed by a month-long online consultation and 6 targeted topic-specific consultations.

This first preliminary consultation informed the preparation of the second (May 2023) and third (December 2023) drafts, the latter included new measures for the first time.

In parallel with the Strategic Environmental Assessment (SEA) procedure, a fourth draft was prepared in April 2024 followed by a formal 1-month long consultation taking place in June 2024. The final draft was submitted in August 2024 after the cross-sectoral coordination and the SEA process finalization.

All the information regarding the expert basis, the revision process, all the events and comments submitted by the public are all available on the dedicated Ministry page. Notably, the Ministry also prepared a document with their positions on public comments made on the final draft, including the explanation on the inclusion and/or exclusion of comments but margins of improvement can be made. For example, in the final draft from August 2024, after the public consultation took place, a measure regarding the phasing out of fossil fuel subsidies regressed meaningfully after the pressure from industry and Slovenian chamber of commerce.

The incorporation of the public consultation's feedback

The Governance Regulation also requires Member States to report on the public consultation process and to explain how the input received was taken into account[7]. However, in the vast majority of final NECPs, it remains unclear how – if at all – stakeholders' feedback was incorporated into the final plans. This represents a missed opportunity to address specific views and needs that may have been raised, for example by the most vulnerable segments of society. It also risks reducing the effectiveness and public acceptance of the plans, as meaningful engagement is key to ensuring legitimacy and successful implementation. Moreover, overlooking stakeholder input means missing out on valuable

[7] Article 10 of the Regulation mandates that Member States ensure the public is given early and effective opportunities to participate in the preparation of the NECPs. Furthermore, Article 9(4) requires that the NECPs include a summary of the public's views or provisional views and provide information on how these views have been taken into account.

knowledge and innovative solutions that could strengthen the design and targeting of policies.

Recommendations based on our assessment of final NECPs:

- **Member States should clarify how the stakeholders feedback has been incorporated** into the final NECP
- In view of the next cycle of NECPs revision process, **Member States should elaborate an early and meaningful public consultation process** aligned with EU requirements and the Aarhus Convention, by ensuring the participation of all stakeholders, including civil society, providing enough time to contribute, transparent information on the process and content of the plan

Enforcement gap

Slow progress despite urgency

The revision process of the 2019 NECPs was scheduled to conclude with the submission of final updated plans by 30 June 2024. However, the process has been protracted and marked by insufficient commitment from some Member States. As of May 2025 – nearly one year past the official final deadline – Belgium, Estonia[8] and Poland have yet to submit their final NECPs, raising concerns about the seriousness with which the process is being undertaken.

CAN Europe believes that the full implementation of NECPs should enable the EU to meet – and ideally exceed – 2030 climate and energy targets. This demands strict compliance, recognising that current targets are a minimum baseline, not a ceiling.

With the implementation phase already underway, only four and a half years remain to achieve the objectives of the EU Fit for 55 package. In this context, robust mechanisms to ensure effective implementation and address existing gaps are of utmost importance.

Legal tools to ensure monitoring and compliance

Both the European Commission and civil society have taken legal action to promote swift compliance and implementation. The Commission has initiated infringement procedures against several Member States – such as Belgium, Estonia, and Poland – for failing to submit their revised NECPs by the legal deadline.
At the same time, CAN Europe, together with several national NGOs[9], has coordinated the submission of complaints to the Commission concerning the content of the plans. The campaign sheds light on the gaps presented by final NECPs that are in breach of EU law for not setting adequate targets, providing poor transparency on fossil fuels subsidies phase out, and for inadequate public participation processes.

An examination of existing national monitoring or compliance mechanisms to national commitments reveals a heterogeneous picture. The majority of the analysed Member States, including **Austria, Bulgaria, Cyprus, Czechia, Hungary, Finland, and France,** do **not present any specific monitoring or enforcement mechanisms** to ensure that the pledges in their NECPs are met. Instead, they generally rely on **existing EU-level mechanisms** to track and enforce compliance with their commitments.

[8] The Estonian government approved the final updated NECP during the completion of this analysis. However, as of the publication date of this briefing, the plan was not yet available on the European Commission website and therefore it is not included.
[9] A Sud and WWF Italy (Italy), Environmental Justice Network Ireland (EJNI), Friends of the Earth Bulgaria / Za Zemiata (Bulgaria), Friends of the Earth Malta (Malta), Germanwatch (Germany), Notre Affaire à Tous (France), SEAL and SSNC (Sweden), Terra Cypria (Cyprus)

For example, **Slovenia** does not currently have an enforcement mechanism in place, but a proposal to establish one is included in the new climate law now under discussion.

Italy also does not have any gap-filling mechanisms in place to keep the country on track. Although environmental associations submitted several proposals to amend the draft plan and participated in all consultations, there are no legal mechanisms to ensure that participation effectively influences the outcome. Even after the Commission issued its recommendations on the draft NECP, major environmental NGOs repeatedly highlighted that the process leading to the final plan deviated significantly from those recommendations.

The lack of national monitoring and enforcement mechanisms represents a systemic risk to the implementation of the final NECPs. Without clear enforcement tools, there is limited accountability, reducing the incentive for timely action. It also hampers the ability to identify and address gaps early, increasing the likelihood of falling behind climate and energy goals. Most importantly, if national implementation is not properly enforced, it jeopardizes the achievement of the overall EU climate and energy targets.

ZOOM-IN – Denmark as a positive example of national monitoring and correction

In **Denmark**, the government estimates future emissions based on adopted policies, and the independent Climate Council evaluates Denmark's progress toward national and EU climate and energy targets. Following the Climate Council's report, the Parliament holds a climate debate, after which the government proposes potential actions to meet the targets. Selected proposals are then developed into specific policy initiatives by the government, although this final step can occasionally be delayed.

Other examples include **Ireland** that introduced a national gap-filling mechanism, notably through the Climate Action and Low Carbon Development (Amendment) Act 2021. This Act legally enforces carbon budgets and sectoral emissions ceilings, which provide a domestic framework to address shortfalls in emissions reductions. The Climate Action Plan and annual updates also serve to revise policies and address areas where the NECP may fall short. Under the Climate Act, the Minister is required to outline a roadmap of "specific actions necessary to comply with the carbon budget" in each annual Climate Action Plan. While Ireland has national mechanisms like the Climate Act to address shortcomings, the country's NECP process largely relies on EU mechanisms for broader alignment with climate targets.

National courts and tribunals may also play a role in ensuring that Member States fulfil their obligations. In December 2020, several CSOs filed a lawsuit against the Government of **Spain** before the Supreme Court for inaction on climate change. This marked a decisive step in the judicial process they initiated in September 2020, demanding that the Administration

responds adequately to the climate emergency. In July 2023, the Contentious-Administrative Chamber of the Supreme Court rejected the appeal filed by the CSOs. However, in December 2024, the Constitutional Court accepted the case for review, thereby reactivating the so-called 'Climate Trial.'

The Governance regulation revision as an opportunity to strengthen compliance tools

The European Commission announced that the Governance Regulation will be revised during the 2024-2029 legislative term. In this light and based on our assessment of the NECP process, certain governance elements – like the binding targets, reporting and monitoring requirements, public participation and stakeholder involvement rules – should be safeguarded and reinforced. Other elements – such as the compliance tools (e.g. gap-filling mechanisms, access to justice) – should be further strengthened[10].

Recommendations based on our assessment of final NECPs:

- **Member States should strengthen enforcement and monitoring mechanisms at the national level.**
- **The European Commission should make full use of the existing EU enforcement mechanisms**, including infringement proceedings, to ensure that the objectives agreed in EU legislation and reflected in the NECPs are achieved and their content complies with EU law.
- **During the revision of the Governance Regulation,** the current compliance mechanisms should be strengthened and new ones should be adopted, including via the introduction of provisions granting access to justice at the national level. In addition, some core elements of EU climate governance should be safeguarded and strengthened (including the binding targets, reporting and monitoring requirements, public participation obligations and multi-level governance).

[10] A revised and responsive Governance Regulation – Respecting environmental democracy rights in climate planning
https://caneurope.org/content/uploads/2024/03/Revised-and-Responsive-Governance-Regulation.pdf

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Austria

Ambition Gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – AUSTRIA					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	57.00%		57.00%	57.00%	
Final Energy Consumption (Mtoe)	21.6		21.6	24.67	
Primary Energy Consumption (Mtoe)	24.88		25.9*	31.62	
ESR ($MtCO_2eq$)	29.64		29.64	29.64	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-5.65	NA	
	-5.65	-2.338			

Sources: Data from NECP Tracker and ECNO

**This is the value reported for primary energy consumption in 2030, as indicated in the trajectory for primary energy consumption in the Austrian final NECP*

Energy – With the additional policies and measures (WAMs) presented in the NECP, Austria would meet the minimum EU requirements for renewables, but it would fail to meet the minimum EU requirements for energy efficiency. On **renewables**, both the target and the WAM scenario presented in the NECP align with the minimum EU requirement (57% of RES in final energy consumption). On energy efficiency, the NECP provides a national contribution for **final energy consumption** that is in line with the minimum Energy Efficiency Directive (EED) obligation, but presents a gap compared to the WAM scenario, therefore more policies and measures (PAMs) need to be planned. For what concerns **primary energy consumption**, both the national contribution and the WAM scenario do not comply with the EED minimum obligation.

Climate – With the WAM presented in the NECP, Austria would reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)**.

However, the lack of detail and impact of some decarbonisation measures cast doubts on whether such a policy scenario could be implemented in practice.

On paper, the **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with the minimum EU requirement. However, the plan does not include a WAM scenario, which makes it impossible to establish whether planned measures are enough to achieve it. The NECP itself states that a WAM scenario could not be produced due to the difficulties in the quantification of the storage potential of natural carbon and the major uncertainties the LULUCF sector is subject to.

- ➢ **Provide a corrected primary energy consumption contribution and develop additional PAMs to reach both minimum EU requirements for energy efficiency**
- ➢ **Develop a credible WAM scenario for the LULUCF sector, and develop enough PAMs to achieve at least the minimum EU requirement for LULUCF**

Financing gap

The NECP fails to correctly assess its financing gap, as it does not provide a clear figure for overall investment needs (it only provides a list of studies with no direct link to the NECP itself). On the other hand, the plan provides figures for planned public investments (EUR 15.7 billion between 2022-2030), including EU funds, but fails to pair them with PAMs in a systematic and comprehensive way. Such planned public investments could, however, be subject to change: the NECP was developed by the previous government, and the new administration is already showing signs of disregarding proposed measures.
At the same time, the NECP does not make significant steps forwards when it comes to diverting money away from fossil fuels and towards the socially just energy transition. First, it fails to provide a comprehensive list of fossil fuel subsidies and a plan for their phaseout. The plan does commit to achieve a reduction of 2 $MtCO_2eq$ from the phaseout of fossil subsidies, but does not detail concrete steps towards it – except for the establishment of an inter ministerial working group to ensure compliance with such target. Second, the plan does not include a plan to phase out fossil gas, and also supports questionable and expensive solutions such as CCS.

- ➢ **Conduct a thorough and comprehensive assessment of public and private investments needed to implement the plan's policies and measures.**
- ➢ **Develop a clear timeline and roadmap to phase out fossil fuels and fossil fuels subsidies.**

Just Transition gap

The plan includes the socio-economic assessment of the impacts of planned policies and measures - such as those on added values, investments, private consumption, employment and income - but fails to recognise the gender dimension in its evaluation of social impacts. The NECP doesn't feature a comprehensive set of targeted policies to maximize the social benefits and mitigate potential adverse impacts of the transition, they are only mentioned marginally. For example, the climate bonus - a countermeasure to balance the impact of the Austrian CO_2 price - is briefly referenced in the plan but has already been cut by the new government after the release of the NECP. The plan refers to the Social Climate Fund but without providing specific details e.g. on measures that will be financed through it.

Energy poverty is quantified and there are measures listed to address it such as: subsidies for shifting heating systems away from fossil fuels, subsidies for climate-fit housing targeted at vulnerable groups and energy-saving programs for households. However, the NECP doesn't include a national objective nor a timeframe to tackle energy poverty. On the other hand, transport poverty is not explicitly mentioned nor addressed. Furthermore, the NECP refers to the shortage of skilled workers only through the "Just Transition Action Plan".

- **Improve the socio-economic assessment of PAMs**
- **Provide a clear national objective and timeline to address energy poverty**
- **Provide targeted PAMs to tackle transport poverty and the impacts of the transition on workforce re/upskilling**

Public Participation gap

The public consultation process was intermittent and limited in scope. It started with a kick-off workshop involving stakeholders, followed later with the possibility to submit written suggestions after the draft NECP was published, aimed at filling the gap to reach the climate target. The consultation did not take place early enough to be meaningful and the public was not informed on PAMs contained in the WEM and WAM scenarios, as they were not ready during the consultation period. Similarly, there was a lack of transparency regarding the regulatory framework for the NECP review and the decision-making procedure to be followed for its update. The measures proposed by stakeholders were assessed by a scientific committee based on their impact on CO_2 levels but it's unclear how these measures have been incorporated into the final NECP.

Similarly, the draft NECP also referenced the Citizens' Council for Climate which developed recommendations on policies and measures for climate protection but their concrete impact on the final plan has been minimal.

- **Ensure a meaningful public consultation process where the consultation takes place early enough to have a concrete impact and where relevant information on WEM/WAM scenarios and the overall decision-making process is transparent**
- **Clarify how the stakeholders feedback has been incorporated into the final NECP**

Belgium

Almost a year after the deadline, Belgium still has **not submitted its final NECP to the European Commission**. For this delay, the European Commission opened an infringement procedure against Belgium in Autumn 2024.

Context of the revision process

The **process to elaborate the draft updated NECP,** undertaken during the previous legislatures, had already been cumbersome. It consisted of the simultaneous drafting of regional and federal plans, in a political process that mostly lacked cross-cutting coordination. In a next phase, no agreement could be found over the so-called 'burden sharing' issue: the intra-Belgian negotiations over which regions need to tackle the percentage of the Belgian to fulfill the Effort-Sharing (ESR) target. This tense political process also led to deadlock and opacity in targets and projection.

Eventually, the previous governments nonetheless submitted a **draft updated NECP in 2023**. In particular due to the lack of ambitious targets and measures in the Flemish region, this Belgian NECP did not provide an adequate response to the various Belgian targets and in the autumn of 2023, Belgium was also convicted for its lacklustre climate policy in the so-called **'Klimaatzaak'**.

In December 2023, the Court of Appeal judged against Flanders, Brussels and the federal government. The Court imposed a quantitative target of -55% (Effort Sharing Regulation (ESR) + Emissions Trading System (ETS)) to reach by 2030. However, the Flemish government immediately opened another appeal procedure.

Key concerns

The final updated NECP needs an intra-Belgian agreement across four governments. Almost a year after the elections (Belgium held federal, regional and local elections in June 2024), the Brussels' government has still not been formed. Moreover, fundamental conflicts over the 'burden sharing' as well as the division of ETS (and ETS2/CBAM) revenues have so far not been resolved and remain very challenging to address.

In addition, the Flanders resisted a substantial increase in its regional ambitions. It set an ESR target for itself of 40%. Since Flanders is the region with highest emissions levels, this meant that Belgium as a whole would undershoot its 47% ESR target: the draft NECP, which assumed all regions would fully realise their respective ESR targets (see below), only attained a 42% reduction by 2030.

As NGOs warned in the run up to the draft NECP, the included projections "with additional measures" (WAM) have turned out to be overly optimistic. Additional policies are needed at every level and for every sector. An analysis conducted by the Flemish government, freely available (and as such a positive step forward), shows that the region will not attain (by quite a margin) the 40% ESR reduction target it had set for itself in the draft NECP. As indicated in the previous point, even this 40% target would lead to a substantial ambition gap. Yet it is now evident that additional policies will be needed, even if only to attain this lower bound.

In sum, much work still needs to be done in order to deliver the final NECP, let alone a sufficiently ambitious one. Ideally, such a deal would immediately include an agreement on the shape (and distribution) of the **Belgian Social Climate Plan**, which needs to be submitted by June 2025.

Bulgaria

Ambition Gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – BULGARIA					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	33.00%		34.96%	34.96%	
Final Energy Consumption (Mtoe)	8.42		8.82	8.82	
Primary Energy Consumption (Mtoe)	14.24		13.2	13.2	
ESR ($MtCO_2eq$)	20.07		20.07	19.8	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-9.718	-9.516	
	-9.718	-10.979			
Sources: Data from NECP Tracker and ECNO					

Energy – According to the additional measures scenarios (WAM) presented in the NECP, Bulgaria would seemingly meet the minimum EU requirements for renewables, but it would partly fail to meet the minimum EU requirements for energy efficiency. On **renewables**, both the NECP target and the WAM scenario are slightly above the minimum EU requirement. For **primary energy consumption**, Bulgaria is more ambitious than the minimum Energy Efficiency Directive (EED) obligation, while both the national contribution and the WAM scenario for **final energy consumption** are not aligned with the EED. However, the plan does not include credible and systemic information on the policies and measures that would be required to implement such scenarios, notably for energy efficiency. The plan also fails to include a target nor measures for reducing methane emissions in the energy sector.

Climate – With the WAM presented in the NECP, Bulgaria would be seemingly on track to reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)**. However, unclear and incomplete policies and measures (PAMs) risk jeopardising the effective emissions reduction. The most glaring gaps are observed for non-CO_2 emissions – including methane and N_2O from energy, waste and agriculture sectors – and in the transport sector. On sustainable mobility, for instance, the final NECP only

includes the same measures undertaken for the past 15 years. These measures, which are mainly dependent on EU funds programs, have failed to bring about substantial change to the sector, not even through the massive targeted investments in urban public transport.

On the other hand, the **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with the minimum EU requirement only on paper. According to the WAM scenario, the proposed PAMs are insufficient to achieve it. This might be related to the overestimation of carbon sinks, but it's hard to say as the respective measures are vaguely described.

- **Provide additional PAMs to achieve the final energy consumption contribution by 2030 such as: the introduction of the virtual net metering, address the burdensome access to the grid by prosumers, incentivise energy communities for heating and cooling**
- **Provide additional PAMs for the transport sector such as: a clear goal for the reduction of international transit freight traffic and a clear program for the replacement of the long-distance intercity**
- **Provide additional PAMs targeting methane reduction, especially in the waste and oil&gas sectors, in order to ensure the ESR target is truly met**
- **Provide additional PAMs to achieve the LULUCF target by 2030**

Financing gap

The NECP fails to correctly assess its financing gap. Investment needs for additional policies and measures – i.e. to implement WAM scenario – are not calculated in a systematic and coherent way; the estimates are provided only for some sectors (such as electricity and heat from renewables). At the same time, funding sources remain extremely vague and are only rarely clearly associated with planned policies and measures.

At the same time, the NECP does not make significant steps forwards when it comes to diverting money away from fossil fuels. Bulgaria claims to provide no fossil fuel subsidies, and therefore its NECP presents neither a list nor a phaseout plan. In reality, the plan foresees a significant expansion of fossil fuel infrastructure, including the expansion of oil and gas infrastructure in the Black Sea and the application of state guarantees for the Vertical Gas Corridor (expanding gas connections with Greece and Romania). It also does not foresee a phaseout of the Balkan-Turkstream, Russia's last pipeline to Europe. Finally, the plan risks channeling financial resources towards costly and/or unproven technologies such as nuclear (two unnecessary new nuclear reactors are planned) and CCS technologies (Bulgaria likely aims to become the regional hub for CO_2 storage).

- ➢ **Complete the assessment of investment needs for all sectors, and associate planned policies and measures to clear sources of financing**
- ➢ **Halt the expansion of fossil gas infrastructure; rather plan for its phase-out.**
- ➢ **Specify how and when the existing fossil fuels subsidies will be phased out**

Just Transition gap

The NECP does not systematically assess the positive and adverse socio-economic impacts of planned policies and measures, particularly on vulnerable households and regions facing specific transition challenges, such as coal-dependent areas. The gender dimension is not tackled at all. In addition, the plan doesn't include a comprehensive set of targeted policies to maximize the employment benefits and mitigate potential adverse effects of the transition. It also fails to clearly identify the sectors that require focused re/upskilling efforts. While the NECP refers to the Just Transition Territorial Plans (JTTPs) and related existing programs, these are patchy and lack a strategic approach.

The plan acknowledges the introduction of ETS2, the expected increase in prices and its social impact in terms of energy and transport poverty, nevertheless it rather postpones concrete measures to future planning.

Despite the high levels of energy poverty in Bulgaria, the NECP provides only a vague and initial assessment of the energy-poor population. It does not include any data on transport poverty, nor a national target and timeline to tackle it.

- ➢ **Conduct a systemic socio-economic assessment of PAMs**
- ➢ **Provide targeted PAMs to tackle energy and transport poverty**
- ➢ **Plan and implement adequate PAMs to tackle the impacts of the transition on workforce re/upskilling and on vulnerable groups through the Social Climate Plan, Building Renovation Plan and the JTTPs**

Public Participation gap

The overall public consultation process fell short to provide a quality public engagement due to the limited format, its short duration and the lack of available modeling and analytical data. The belated first consultation period held in December 2023 lasted just 10 working days, which civil society and the European Commission criticized as insufficient; it was conducted only online with no interactive in-person engagement. The second consultation occurred in late June 2024, very close to the submission deadline, which was still missed. An

in-person event was organized, but it served only to present the updated NECP rather than collect public input.

The final NECP does not contain a section on how the responses of the public consultation were taken into account, only a vague and non-exhaustive summary of statements. As of today, the Strategic Environmental Assessment is still missing, when it originally had to inform the public consultation process and had to be published together with the draft NECP.

- **Extend the consultation period and provide both accessible information and adequate time for feedback to allow for a meaningful participation**
- **Publish a summary report clarifying how the public input influenced the final NECP**

Croatia

Ambition Gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – CROATIA					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	44.00%		42.50%	42.50%	
Final Energy Consumption (Mtoe)	5.88		5.88	6.1	
Primary Energy Consumption (Mtoe)	6.83		8.05	8.1	
ESR ($MtCO_2eq$)	15.08		14.33	14.21	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-5.527	- 4	
	-5.527	-5.951			
Sources: Data from NECP Tracker and ECNO					

Energy – Even by implementing all additional policies and measures (WAMs) presented in the NECP, Croatia would fail to meet the minimum EU requirements for energy efficiency and renewables. **The renewable energy sources** target and the corresponding WAM set in the NECP are not in line with the expected national contribution. The plan does not sufficiently address barriers to renewables deployment, such as administrative delays, grid limitations, and lack of incentives for small-scale and community-based projects. For what concerns energy efficiency, the national contribution for **final energy consumption** is in line with the requirements of the Energy Efficiency Directive (EED); however, this is not the case for **primary energy consumption.** According to the WAMs, Croatia's policies and measures (PAMs) will not be sufficient to be in line with the minimum EED obligations, therefore more measures are needed. The absence of concrete policies on renovation of the building stock, efficient heating and cooling, and behavioural change programmes for households and SMEs further weakens the credibility of the efficiency component.

Climate – With the WAM scenario presented in the NECP, Croatia would seemingly reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)** but not for the **Land Use, Land-use Change, and Forestry (LULUCF),** registering a

notable absence of robust monitoring frameworks for many of them. Without clearly assigned indicators, baselines, or timelines for implementation and evaluation, it is difficult to assess progress or ensure accountability. The ESR target and respective WAM scenario presented in the plan are in line with the EU requirements but the measures of specific sectors do not seem to be adequate. In particular, policies and measures (PAMs) proposed for the transport sector, one of the largest and growing sources of emissions in Croatia, are fragmented and fail to provide a coherent decarbonisation strategy.

Concerning the LULUCF sector, the actual measures proposed are neither sufficiently ambitious nor operationalised in a way that guarantees the sink will be maintained or strengthened. This is particularly critical given that the carbon sink in 2024 is already under pressure and has shown signs of weakening.

- **Improve the renewables target and provide additional PAMs to reach the minimum EU requirement for renewables**
- **Improve the primary energy consumption contribution and provide additional PAMs to align with the minimum EU requirements for primary and final energy consumptions**
- **Provide additional PAMs to ensure climate targets are achieved**

Financing gap

The NECP includes an overview of Croatia's investment gap, as it provides an estimate of total investment needs per sector according to the WAM scenario, as well as an overview of available funds. This is rather positive. However, the plan fails to associate individual policies and measures to investment needs and sources of financing in a systematic way. While sources of funding are clearly defined for some PAMs (for instance, certain energy renovation programs and grid investments), in several other circumstances needs and resources remain under-defined (notably, for PAMs in the transport and agriculture sectors), when not totally absent (for instance, PAMs related to behavioral change and local energy communities). Another significant gap is the limited mobilisation of private capital. The plan notes that private investment will be required, especially in the residential and commercial sectors, but lacks concrete instruments that would catalyse such investments.

Unfortunately, the NECP still foresees public financial resources being directed toward fossil fuels, including the expansion of gas pipelines, the increase of the LNG terminal capacity and the exploration of potential hydrocarbon deposits. Also, it does not provide any comprehensive list nor clear phaseout date for fossil fuel subsidies, despite including a measure that foresees their elimination.

- ➢ **Provide details on investment needs and sources of financing for *all* PAMs. Include a strategy to mobilise private investments.**
- ➢ **Halt the expansion of fossil gas infrastructure and include a clear phaseout date for fossil fuel subsidies.**

Just Transition gap

A socio-economic impact assessment was conducted for the policies included in the NECPs but it only focuses on some sectors and does not recognise the gender dimension in the evaluation of social impacts. The assessment contains the analysis of macroeconomic effects calculated by input-output analysis, and estimates that the potential adverse social effects of the transition on the whole economy are not relevant. However, the transition is likely to have macro-economic implications in regions highly dependent on coal and oil plants, for which no targeted support is foreseen.

The NECP includes two measures that tackle energy and transport poverty and both are related to the development of programmes to alleviate them; there is no comprehensive approach throughout the document. There is also one measure related to the drafting of the Social Climate Plan (SCP) which mentions ETS2 and its effects on vulnerable groups. Apart from this, energy poverty is only mentioned within measures that tackle energy efficiency and energy renovation of buildings.

On green jobs, the plan outlines the measure “ENU-12” to develop a framework to ensure adequate skills in the context of green jobs required for building renovation. However, this is the only measure where this topic is tackled.

- ➢ **Improve the socio-economic impact assessment of PAMs**
- ➢ **Provide a national energy poverty target and trajectory to achieve it**
- ➢ **Provide additional PAMs to tackle transport poverty and the impacts of the transition on workforce re/upskilling**

Public Participation gap

Croatia conducted a public consultation for its updated NECP exclusively through a national online platform, without any in-person meetings or events. The consultation period lasted one month but it took place after the European Commission had already issued its recommendations, meaning that major policy choices were likely already set. The consultation occurred late in 2024, as part of a generally delayed NECP development process. While the Ministry provided some information on the regulatory context and

decision-making process, it generally lacked clarity and transparency and the communication relied mainly on the Ministry's website and NGO channels. It is still uncertain how the public input has been reflected in the final revised NECP.

- **Improve the timeline of public consultations for them to occur before key decisions are made**
- **Increase and diversify participation formats, including in-person meetings and broader outreach to boost inclusivity and engagement**
- **Improve transparency by clearly explaining the consultation purpose, the decision-making process, and reporting publicly how the public feedback will be used**

Cyprus

Ambition Gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – CYPRUS						
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment	
RES in Final Energy Consumption (%)	33.00%		33.00%	33.20%		
Final Energy Consumption (Mtoe)	1.8		1.8	1.8		
Primary Energy Consumption (Mtoe)	2.04		2.03	2.13		
ESR ($MtCO_2eq$)	2.92		2.90	3.16		
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-0.352	-0.350		
	-0.352	-0.33				
Sources: Data from NECP Tracker and ECNO						

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, Cyprus would meet the minimum EU requirements for renewables, but it would partly fail to meet the minimum EU requirements for energy efficiency. The **renewable energy sources** target and the national contribution for **final energy** consumption are backed up by coherent projections and the national contribution for final energy is in line with the minimum Energy Efficiency Directive (EED) obligation. On the other hand, the national contribution for **primary energy** is in line with EU legislation, but the respective WAM scenario is not ambitious enough to deliver on the objective and the EED. Most of the policies and measures (PAMs) targeting buildings are not systemic but rather consist of subsidies for energy efficiency improvements, while worst performing buildings would require more focus. The overall energy savings target, including the energy poverty target, is more ambitious than the target set by the EU.

Climate – With the WAMs presented in the NECP, Cyprus would not reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)**. Cyprus' revised NECP is not on track to meet the ESR target as it only reaches 26% of GHG emissions reduction in non-ETS sectors, when it should have been 33%. Additional measures are insufficient, considering that they don't cover the gap for achieving the ESR target and their

impact is uncertain. Some policies included are rather questionable and contingent on not easily predictable factors (i.e., geopolitics). This is particularly exemplified in the case of the LNG, the extraction of fossil gas from Cyprus' EEZ, and the Great Sea Cable. All of these measures, the first two of which constitute false solutions, are already faced with barriers, undermining their implementation, and thus the achievement of the target set in the NECP.
On the other hand, the WAM would allow Cyprus to achieve its minimum **Land Use, Land-use Change, and Forestry (LULUCF)** target, which is backed up by a list of actions detailing the ways to increase land use absorption. Such measures include tree planting, afforestation and creation of forest areas, conservation of forest areas, creation of Parks and Green Spaces, Planting trees on agricultural land, but it's unclear whether and under which pathway these measures will be applied.

- ➢ **Provide additional PAMs to achieve the primary energy consumption contribution**
- ➢ **Provide additional PAMs to achieve the ESR target**

Financing gap

The plan does not provide a fully coherent assessment of its financing gap. However, it does provide an estimation of overall investments needed to implement the scenario with additional measures (EUR 20.8 billion) as well as an overview of planned public investments (around EUR 3,5 billion for the WAM scenario). Overall, also policies and measures are associated with funding needs and funding sources – though some better than others (for instance, energy efficiency measures are more detailed than decarbonisation measures).

On the other hand, the NECP unfortunately makes no progress in diverting finances away from fossil fuels. While diesel and heavy fuel oil are expected to be phased out (by 2026 and 2030 respectively), the plan foresees an expansion of fossil gas (LNG) and it expects it to remain a key part of its national energy policy. Also, Cyprus claims to provide no fossil fuel subsidies, and therefore its NECP does not present a phaseout plan. However, the reality is different: the plan itself mentions that Cyprus provides "subsidies on oil prices" (pp. 143).

- ➢ **Halt the expansion of fossil gas infrastructure, and rather plan for its phaseout**
- ➢ **Provide a comprehensive list and phase out plan for fossil fuel subsidies**

Just Transition gap

The NECP includes a socio-economic impact analysis of the effects of planned policies and measures. This analysis addresses potential implications for households, employment, the environment, and public health. It also acknowledges that energy prices, particularly in the buildings and transport sectors, are expected to rise. However, the analysis falls short of

providing a systematic evaluation of the effects on vulnerable households and groups. For example, there is no assessment of how rising fuel and electricity costs might impact elderly people living alone. Additionally, the gender dimension is entirely not addressed.

The NECP outlines national objectives related to energy poverty, setting a target to achieve 52.7 ktoe in energy savings, which corresponds to 15.1% of the overall energy savings goal (349.04 ktoe). However, the timeline for achieving this target is not clearly specified. Households affected by energy poverty have been quantified and the NECP outlines several specific policies and support measures such as: reduced electricity supply tariff, exemption from having their electricity disconnected during crucial periods if uninterrupted electricity supply is necessary for health reasons, and financial incentives to participate in schemes for energy efficiency upgrading of dwellings. The NECP also specifies that, through the Social Climate Fund, EUR 174 million will be allocated from 2026 to compensate vulnerable households. Despite these positive steps, the NECP makes no reference to transport poverty, and it does not propose any measures to address mobility-related inequalities.

The NECP mentions that the measures will have positive impacts on employment. However, a comprehensive set of targeted policies to maximise employment benefits or to address the potential negative impacts of the green transition on jobs is lacking.

- **Cyprus needs to improve the socio-economic assessment of PAMs impacts, including the gender dimension**
- **Cyprus needs to provide solid measures to address transport poverty**

Public Participation gap

The public consultation was conducted very late in the process—only 25 days before the final submission—leaving little to no room to revise the plan based on public feedback. Additionally, no clear mechanism or documentation was provided to explain how such feedback was evaluated, integrated or used to shape final decisions. There is no evidence that the public consultation input meaningfully influenced the final NECP. This lack of transparency and responsiveness suggests that the consultation may have been largely procedural, rather than a genuine opportunity for meaningful and participatory influence.

- **Enhance transparency and communication: clearly explain the regulatory framework and decision-making process to the public and clarify how public feedback is incorporated in the final plan**
- **Start consultations earlier and improve accessibility: engage stakeholders and the public before key drafts are finalized and provide adequate supporting material during consultations**

Czechia

Ambition Gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – CZECHIA					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	33.00%		30.10%	30.10%	
Final Energy Consumption (Mtoe)	20.35		20.35	22.57	
Primary Energy Consumption (Mtoe)	29.18		29.19	NA*	
ESR ($MtCO_2eq$)	48.1		46.66	41.74	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-1.228	-3.78	
	-1.228	-4.926			

Sources: Data from NECP Tracker and ECNO

**Czechia did not report the exact value for projected Primary Energy Consumption, but the charts available in the NECP show Primary Energy Consumption at around 33 Mtoe in the WAM scenario, largely insufficient to achieve the stated target.*

Energy – Even by implementing all additional policies and measures (WAMs) presented in the NECP, Czechia would not meet the minimum EU requirements for both renewables and energy efficiency. Despite the Commission's and national CSOs' recommendations calling for a higher **renewable energy sources target**, it has not been increased beyond the original 30%, with the respective WAM scenario also lagging behind. The national contribution for **final energy** is mostly in line with the minimum Energy Efficiency Directive (EED) obligation, but it is projected to be missed due to insufficient policies and measures (PAMs) in the WAM scenario. Also the national contribution for **primary energy** is in line with the minimum EED obligation, however the little information retrievable from the plan on the respective WAM indicates that additional measures would be needed to close the gap towards the national contribution for primary energy.

Climate – With the WAM presented in the NECP, Czechia would seemingly reach a higher reduction than the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)**, but sufficient PAMs to credibly back that scenario are lacking.

For **Land Use, Land-use Change, and Forestry (LULUCF)**, the plan does not provide detailed modelling. The WAM scenario only claims that, according to current developments, Czechia could reach -3.78 $MtCO_2eq$ of carbon sinks by 2030. This figure would be sufficient to align with EU regulation if we based our analysis on the 2020 baseline (used in the LULUCF regulation), but it would not be sufficient if we base our analysis on the updated 2024 dataset.

- ➢ **Provide additional PAMs to achieve the minimum primary and final energy consumption contributions**
- ➢ **Align the renewables target with the minimum EU requirement and provide consistent additional PAMs to reach it**
- ➢ **Provide additional PAMs to achieve the LULUCF target**

Financing gap

The NECP fails to provide an assessment of its financing gap. It includes almost no information on the overall investment needs, and it only presents a summary of already existing funding sources, without integrating them to the plan. The individual policies and measures are also not associated with investment needs or sources of financing.

In addition, the plan lacks any commitments and plans to phase out fossil fuel subsidies. On the contrary, the NECP even explicitly says that Czechia has no intention of phasing them out systematically as they are "*key to achieving the EU's objectives on climate protection, reducing air pollution, increasing the share of renewable energy sources and reducing energy intensity*". This is in contradiction with international commitments and the Commission's recommendations issued for the draft updated NECPs. A basic list of direct subsidies is provided, but it is incomplete and in contradiction with other parts of the plan (claiming that only housing allowances qualify as subsidies).

- ➢ **Include a thorough estimation of investment needs and funding sources to calculate the financing gap**
- ➢ **Conduct a thorough mapping of all fossil fuels subsidies and develop a plan for their phaseout.**

Just Transition gap

The final NECP includes projected impacts of the WAM and WEM scenarios on energy poverty of different segments of the population and different regions, with clear positive impacts of the WAM scenario on most households. However, the gender dimension is not recognised in the assessment of social impacts.

The plan lists energy efficiency and decarbonisation measures to support vulnerable groups partially through the inclusion of successful existing financial programs of “New Green Savings” and “New Green Savings Light” supporting energy savings for households as the main measures of tackling energy poverty. The Social Climate Fund is only mentioned very briefly and in general terms as a way of targeting vulnerable groups but every mention of ETS2 has been deleted from the NECP as a political decision. The NECP notes that Czechia still does not have a national definition of energy poverty, but it does include relevant data estimating its level and some projections for the WAM scenario. Nevertheless, no specific measures nor specific objectives designed to reduce energy and transport poverty are listed.

The NECP doesn’t include a comprehensive set of targeted policies to maximize the employment benefits and mitigate potential adverse impacts of the transition.

- ➢ **Integrate the plan with a comprehensive set of policies and measures to address energy and transport poverty**
- ➢ **Provide additional PAMS to maximize the employment benefits and mitigate potential adverse impacts of the transition**

Public Participation gap

The public consultation carried out during the NECP update featured the establishment of the Platform for Energy and Climate Strategies in April 2023, which included a limited range of stakeholders (notably only two civil society representatives). Members had access to working drafts and could submit comments. However, local and regional authorities were only indirectly involved via their associations, with no direct consultations at those levels. Two rounds of online public consultations were held using a basic online form. The first round (May–June 2023) lasted less than three weeks and began without prior notice, with no draft or supporting materials available. The second round (Jan–Feb 2024) ran for about seven weeks, also without prior notice, and offered only a link to the draft NECP, with no additional explanatory material.

The final NECP includes a link to a summary of consultation responses but does not explain how public input influenced the final content. There was no evidence that stakeholder or public feedback significantly shaped the final NECP.

- ➢ **Enhance transparency and communication: clearly explain the regulatory framework and decision-making process to the public and specify how the consultation feedback is reflected in the final plan**
- ➢ **Start consultations earlier and improve accessibility: engage stakeholders and the public before key drafts are finalized and provide adequate supporting material during consultations**

Denmark

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – DENMARK						
	Minimum EU requirement		NECP Target / Contribution	WEM* Scenario	Traffic light assessment	
RES in Final Energy Consumption (%)	60.00%		60.00%	73.80%		
Final Energy Consumption (Mtoe)	13.73		13.73	13.17		
Primary Energy Consumption (Mtoe)	15.52		15.35	15.35		
ESR ($MtCO_2eq$)	20.2		20.18	22.44		
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	NA**	0.689		
	5.338	0.921				

Sources: Data from NECP Tracker and ECNO

**No WAM scenario was reported in the NECP*

***The NECP does not mention the 2030 net removal objectives for LULUCF. It only mentions the 2030 relative target (0.44).*

Energy – According to the existing policies and measures (WEM) scenarios presented in the NECP, Denmark would meet the minimum EU requirements for renewables and energy efficiency. Policies to fulfill the **renewable energy sources** target are on the track to achieve the objective. For what concerns energy efficiency, the national contributions for both **primary and final energy consumption** are in line with the requirements of the Energy Efficiency Directive (EED). However, the contributions are projected to be reached only based on the outdated reference scenario from 2020. In addition, several implementation elements risk undermining the achievement of the energy efficiency objectives.

Energy renovation requirements for public buildings under the EED are not being met with current plans. Energy efficiency efforts rely more on energy taxes than on targeted policies and measures (PAMs). Additionally, procedural and technical risks, like delays in offshore wind projects due to lack of state support and slow development of biochar technology, are hindering progress.

Climate – With the WEM scenario presented in the NECP, Denmark would not reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR),** whereas it seemingly reaches the minimum EU requirement for the **Land Use, Land-use Change, and Forestry (LULUCF)** (despite not expressing a net 2030 target explicitly). However, some procedural risks need to fully be taken into account. Notably, the agricultural transition that might be slower than expected as it is based on an assumed interest by farmers, which might be less than expected.

- ➢ **Provide additional PAMs and a WAM scenario to achieve the minimum EU contribution for ESR sectors**
- ➢ **Ensure the full implementation of PAMs to achieve climate and energy objectives**

Financing gap

The NECP fails to provide a fully coherent assessment of Denmark's financing gap, as it doesn't include an estimation of the overall investment needs. On the other hand, it includes an overview of planned public spending for climate action, with references to 80 PAMs (Annex 12). Each PAM includes information on funding sources and allocations over time (past, present and future). However, some entries lack clarity both in terms of funding descriptions and the PAMs themselves, which in some cases are listed only by number without further explanation elsewhere in the NECP.

At the same time, the plan reveals shortcomings when it comes to the allocation of public funds. Financial sources are in fact still channeled into indirect fossil fuels subsidies (which are not even comprehensively mapped and do not have a clear phaseout timeline[11]) as well as into expensive, high-risk, low-certainty technologies, especially Carbon Capture and Storage and Power-to-X.

- ➢ **Develop an estimation of investment needs, overall and for individual PAMs**
- ➢ **Redirect financial sources towards proven and effective renewable energy technologies, and away from fossil fuels in heating, industry, and transport**

Just Transition gap

The NECP does not systematically assess the positive and adverse socio-economic impacts of planned policies and measures, it rather focuses on vulnerable households and/or in regions and territories facing particular transition challenges. The gender dimension is not recognised in the assessment of social impacts.

[11] Denmark is working in international cooperations, including a coalition (COFFIS) with a declaration at UNFCCC COP28 on phasing out of subsidies including identification of indirect subsidies and international cooperation in handling indirect subsidies in the form of under-taxation of international aviation and shipping.

The NECP does not directly include a comprehensive set of targeted policies to maximize the social benefits and mitigate potential adverse impacts of the transition. In addition, the plan discusses how the state mitigated energy price increases for consumers during the 2022 energy crisis, but it is not explained how they can mitigate energy price increases with coming price increases, including with ETS2. It is described that an analysis is planned of the effects of the ETS2 and how the Social Climate Plan can help mitigate the effects for vulnerable groups. The NECP explains the social programs in place to mitigate impacts for vulnerable groups, so it partially provides measures designed to help reduce energy poverty and transport poverty.

While the NECP estimates that around 29,000 low-income households live in poorly insulated homes, it does not provide targeted actions to reduce energy poverty. Instead, it outlines general social measures aimed at supporting vulnerable families affected by the transition. Although the list of energy efficiency measures includes a subsidy program for renovations in such buildings, it is not income-restricted.

On another note, the NECP does not discuss transport poverty directly, but the support provided for public transport and bicycles is reducing transport costs for people without a car.

The NECP describes research and development programs with aims of supporting employment and creation of new jobs but does not focus on re/upskilling.

- **Provide a national objective and additional PAMs to address energy poverty**
- **Provide a more extended analysis of the social, employment and skills impacts, including distributional impacts of the climate and energy transition in Denmark**

Public Participation gap

Denmark conducted a public consultation on the draft updated NECP, which included a 2-hour in-person meeting and a 4-week written consultation via the national online portal (Høringsportalen). The consultation presented both WEM and WAM scenarios, and both the regulatory context and decision-making process were made available online.

It is unclear to what extent public input influenced the final NECP, as no detailed feedback or explanation was provided regarding how comments were taken into account. Additionally, the consultation closed only 12 days before the draft was submitted to the European Commission, which limited the possibility for meaningful revisions based on public input.

- **Improve outreach and accessibility: start consultations earlier and extend the consultation period to ensure that public input can meaningfully shape the NECP**
- **Enhance transparency and accountability: publish a summary of public feedback and how it was used in the final NECP**

Estonia

Almost a year after missing the deadline, Estonia still has **not submitted its final NECP** to the European Commission[12]. For this delay, the European Commission opened an infringement procedure against Estonia in Autumn 2024.

Context of the revision process

Estonia is delaying the submission of its updated NECP due to the **ongoing development of its national climate law,** the Climate-Resilient Economy Act. As the law is expected to introduce new sectoral climate targets, the Ministry of Climate has opted to postpone the NECP submission to ensure alignment with the climate law. Submitting the NECP based on old targets would risk making the plan quickly outdated once the new law is adopted. On the other hand, the legislative process has faced repeated delays and the current government plans to push a new, changed version of the climate law through by the end of 2025. While the final adoption of the law may still take until the first quarter of 2026, some officials have suggested that the NECP could be submitted earlier based on the draft law. As substantial amendments may still occur during parliamentary proceedings, this might lead to yet another update of the NECP later on.

Key concerns

The NECP is still used in Estonia as a **summary of preexisting targets and measures**, rather than as a strategic planning document in itself. It only reflects what is decided in other development strategies and does not improve climate ambition levels. Thus, the draft NECP emphasizes the main shortcomings of Estonian climate and energy policy: the failure to commit to a specific time frame for oil shale phase out and the inability to decide how Estonia will reach its target in the Land Use, Land-use Change, and Forestry (LULUCF) sector.

Estonia currently has no binding deadlines for phasing out oil shale production, and the forthcoming climate law does not include any. The Just Transition Territorial Plan proposes two non-binding goals: the phaseout of oil shale use in electricity production by 2035, and the phaseout of oil shale in energy production altogether by 2040. However, these goals are originating from the 2021 coalition agreement; they are not politically enforced and they are not reflected in industry plans, which continue to support oil shale mining beyond 2040.

[12] The Estonian government approved the final updated NECP during the completion of this analysis. However, as of the publication date of this briefing, the plan was not yet available on the European Commission website and therefore it is not included.

In addition, Estonia's LULUCF sector shifted from being a carbon sink to a net emitter in 2017-2020, and no clear targets for reducing logging volumes and peat extraction are currently envisioned.

The last public draft of the Climate-Resilient Economy Act included sectoral targets for 2030, 2035, 2040 and 2050. Environmental NGOs have welcomed the inclusion of strong legal principles, such as just transition and intergenerational justice.

However, they have raised concerns about the unambitious climate targets. Compared to earlier commitments, the draft law weakens Estonia's 2030 net emission reduction target – from a previously planned 70% reduction (compared to 1990 levels) to 59%. The draft law delays greenhouse gas reductions until 2030, with nearly half of the effort postponed after 2040. Moreover, the shale oil sector is allowed to increase emissions by 40% by 2030, mostly to fit a new shale oil plant.

Given this context, **it's still very unclear if Estonia will provide an ambitious plan fulfilling – at the very least – the EU requirements.**

Finland

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – FINLAND					
	Minimum EU requirement		NECP Target / Contribution	WEM* Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	62.00%		62.00%	62.00%	
Final Energy Consumption (Mtoe)	20.6		NA**	22.8	
Primary Energy Consumption (Mtoe)	29.78		NA**	30.7	
ESR ($MtCO_2eq$)	17.2		17.2	19.5	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-17.754	10***	
	-17.754	-7.622			

Sources: Data from NECP Tracker and ECNO

**No WAM scenario was reported in the NECP*

***The Finnish Government mentioned that the Primary and Final Energy Consumption targets will be updated in the coming National Strategy*

****The table reports the updated WEM scenarios published in Spring 2025 (almost a year after the submission of the Finnish NECP), which projects that the LULUCF levels will be significantly worse than previously suggested (-6.4 $MtCO_2eq$). According to the updated scenarios, the Finnish LULUCF sector will be a net emitter of 10 $MtCO_2eq$ in 2030. The major challenges are related to forest sinks.*

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, Finland would meet the minimum EU requirements for renewables, but it would fail to meet the minimum EU requirements for energy efficiency. The **renewable energy sources** target is set to 62% and measures are projected to back this objective. Nevertheless, several actions taken by the current government, such as the reduction of the distribution obligation of biofuels, are in contradiction with these targets.

The plan falls short to provide national contributions for **final and primary energy**, contrary to the legal obligations as per 2023 Energy Efficiency Directive (EED). Also the plan does not provide a WAM scenario and the "existing measures" (WEM) scenarios only include scenario-based estimations of final energy consumption, not enough to fulfil the legal obligations. The NECP is very misleading in the way various energy efficiency measures are

presented. The plan refers to the Roadmap to fossil-free transport (2021) and the Medium Term Climate Policy Plan (2022) as measures to improve energy efficiency. However, the new Government formed after the general elections in 2023 did not follow up with the implementation of many of the measures contained in these documents.

Climate – With the (poorly detailed) WEM scenarios presented in the NECP, Finland would fail to meet the minimum decarbonisation targets for both sectors falling under the Effort-Sharing Regulation (ESR) and for the Land Use, Land-use Change, and Forestry (LULUCF) sector. Among the **Effort-Sharing** sectors, the gap is especially evident for transport, as a significant disconnection exists between the ambitious NECP targets and current government policies and measures (PAMs), which have reversed or failed to act on many of them. The **LULUCF** target is aligned with EU regulation, but the WEM scenarios have been updated after the submission of the NECP in June 2024. The updated scenarios suggest that the LULUCF sector may be a source of net emissions of some 10 $MtCO_2eq$ in 2030 (which implies a deficit of almost 28 $MtCO_2eq$ compared to the present target of -17,75 $MtCO_2eq$). The government's decision not to update the Climate Change Plan for the Land-Use Sector (MISU) during the current term – despite a clear need for stronger action – exposes a significant gap in commitment.

- ➢ **Provide additional PAMs and clear trajectories to align with minimum national targets for ESR and LULUCF sectors**
- ➢ **Provide additional PAMs and clear trajectories to align with the minimum primary and final energy consumption national contributions per the EED formula**

Financing gap

The NECP fails to assess its financing gap, as it does not provide any estimation of overall investment needs. Sources of financing are sometimes associated with policies and measures, but not in a systematic way. In some cases, these sources of financing are already under threat. For instance, there have been several budget cuts in energy efficiency measures: in 2024, investments in energy efficiency in the energy subsidy programme has been halved, and the energy subsidy for residential buildings was not extended. The abolition of state subsidies for public transport is another step backwards not mentioned in the plan.

Financial resources are instead channeled into environmentally harmful subsidies, which are neither comprehensively listed, nor have a phaseout plan. The NECP mentions that the energy tax refund for energy-intensive industries will end by 2025, but this is the only specific measure identified with a clear end date. At present, the market is also distorted by other environmentally harmful subsidies such as those for peat, while there is no tax on burning biomass.

- ➢ **Provide a detailed estimation of overall investment needs and financial sources to implement policies and measures**
- ➢ **Map and phase out all direct and indirect fossil fuel subsidies**

Just Transition gap

Although the NECP recognizes the socio-economic impacts of the transition and addresses regional inequalities to some extent, the socio-economic assessment of policies and measures remains incomplete. On a positive note, the plan includes a gender impact assessment covering all six sectors. The document often emphasizes that additional impact evaluations will be conducted in the future and that additional measures will be identified through the Social Climate Plan (SCP), leaving significant gaps in understanding how specific vulnerable groups will be supported. In addition, the plan falls short in proposing concrete, comprehensive, actionable measures to maximize social benefits and mitigate adverse impacts of the transition, especially to support vulnerable groups, which limits its ability to ensure a socially fair and inclusive transition.

The NECP doesn't include national objectives with regard to energy and transport poverty, including a timeframe for when the objectives are to be met. The only time-bound target mentioned is the national goal of reducing the number of people at risk of poverty or marginalisation by 100,000 by 2030. The plan fails to take into account the current government's extensive cuts to social security and their overall impact. As a recent report by the Energy Agency states, the best way to prevent energy poverty in Finland is to continue to develop the social security system, the energy efficiency of the building stock and support and advisory services.

The NECP only vaguely mentions that the transition will have impacts on employment and requires re-skilling and training but does not include any targeted policies to address this.

- ➢ **Improve the socio-economic impact assessment of PAMs**
- ➢ **Provide national objectives to tackle energy and transport poverty**

Public Participation gap

The public consultation process took place online for less than three weeks, this time frame was too short to provide meaningful input. The public was also not fully informed about the new WAM scenario and the WEM scenarios lacked context; this limited the stakeholders' ability to assess the plan's ambition and to provide informed feedback. Furthermore, the NECP process itself did not comply with the participation obligations under Finland's Climate Change Act. The final NECP was published less than three weeks after the consultation, with

the plan remaining largely unchanged from the 2023 draft and not meaningfully addressing the stakeholders feedback.

- **Ensure full compliance with the Climate Change Act**
- **Improve accessibility and transparency: share with stakeholders relevant information for a meaningful participation and publish a summary of public feedback and how it was used in the final NECP**

France

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – FRANCE					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	44.00%		35.00%*	NA*	
Final Energy Consumption (Mtoe)	106.93		106.9	118.7	
Primary Energy Consumption (Mtoe)	158.67		158.6	192.5	
ESR ($MtCO_2eq$)	210.58		210.58	215	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-31	-18	
	-34.046	-31.405			

Sources: Data from NECP Tracker and ECNO

**The 2024 Final Updated NECP does not explicitly state a Renewables Energy Share in the Final Energy Consumption Target nor WAM. The value reported in the table is taken from other separate declarations of the government*

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, France would fail to meet the minimum EU requirements for renewables and energy efficiency. For each **renewable energy** source, the French NECP indicates either a capacity objective or a generation objective for wind, solar, hydropower, biogas, biofuels and renewable heat & cold production. A forecast of 570 TWh of renewable energy by 2030 is mentioned, but it is not yet formally approved by French legislation: the "Programmation pluriannuelle de l'énergie" (PPE) was supposed to be published in 2023, but has yet to be finalized. Given this context, the 2024 Final Updated NECP does not explicitly state a renewables target nor the connected WAM scenario. In fact, France is opposed to including a RES target and supports inclusion of a low-carbon energy target.

For what concerns energy efficiency, the national contributions for both **primary and final energy consumption** are in line with the requirements of the EED. However, the impact of policies and measures (PAMs) modelled until now under the WAM scenarios will not be sufficient to achieve the national contributions for primary and final energy (to be confirmed in the final version of the SNBC and PPE documents).

Climate – With the WAMs presented in the NECP, France would fail to meet the minimum decarbonisation targets for both sectors falling under the Effort-Sharing Regulation (ESR) and for the Land Use, Land-use Change, and Forestry (LULUCF) sector.

France presents an **ESR** target aligned with EU legislation, which however is not backed up by sufficient measures and consistent projections. The NECP includes carbon budgets for non-ETS sectors, for 2024-2028 and 2029-2033. There are no set targets for 2030 but rather multi-year "budgets" for 2029-2033 which however still need to be approved on the final round of modeling and consultations of the third Stratégie nationale bas-carbone (SNBC), currently underway.

France also explicitly acknowledges that its **LULUCF** sector will not meet previous carbon sink projections, due to a greater-than-expected decline in absorption capacity. While the LULUCF Regulation requires a target of -31.405 $MtCO_2eq$ by 2030 (-34.046 $MtCO_2eq$ with the 2020 Baseline)[13], the provisional targets in the NECP are significantly lower: -18 $MtCO_2eq$ (2029–2033) instead of the previous -47 $MtCO_2eq$. These lower figures reflect a realistic reassessment of what France can absorb and will be finalized in the upcoming SNBC as well.

- ➢ **France should provide a RES target fulfilling at least EU requirements and develop more measures to reach it, particularly for onshore wind power**
- ➢ **France should provide additional measures to meet the EU benchmarks for energy efficiency**
- ➢ **France should provide additional PAMs to meet its ESR and LULUCF target**

Financing gap

The plan does not provide a fully comprehensive assessment of its financing gap. It reports on the overall investment needs for the green transition through a report commissioned by the Prime Minister published in 2023 which, however, does not build on PAMs outlined in the NECP. The report estimates that the French ecological transition requires an additional net EUR 66 billion/year and a cut in brown/carbon-intensive investments by EUR 35 billion/year. In some cases, the NECP specifies the source of financing for PAMs, or financial instrument and scheme the policies rely on (for renovation, energy efficiency or industrial decarbonization for instance), but not systematically. Also, the national budget is currently not consistent with the financing required to implement the policies and measures listed in the NECP. In 2024, climate and environmental policies suffered major budget cuts.

[13] See Annex I on LULUCF

The mentioned cuts should start from the phase out of fossil fuel subsidies, which the NECP fails to list comprehensively. A comprehensive timeline to phase them out is also missing: the NECP mentions some recent evolutions lowering fiscal advantages for fossil fuels, but does not list the other fossil fuel subsidies that need to be gradually phased out.

- ➢ **Provide a comprehensive assessment of the financing gap, by improving the integration of investment needs and sources of financing with PAMs**
- ➢ **Map and phase out all fossil fuels subsidies**

Just Transition gap

The NECP does not systematically assess the **socio-economic impacts** of the policies and the gender dimension is not addressed at all in this regard. The plan is very explicit on the particular transition challenges faced by French regions and territories with coal stakes and what is in place to support the transition. However, the NECP does not cover other particular transition challenges such as the automobile and high emitting industry sectors and the data are very general, lacking substantial content. On the other hand it does list supporting and/or corrective measures to minimize the impact on low income households.

France sets a national objective to reduce the energy poverty indicator based on the (weather-adjusted) energy effort rate of 0.5% by 2030 compared to 2022: this indicator is crucial but the rate is too slow.

In addition, there are several measures designed to reduce energy poverty (MaPrimeRenov to support renovation costs by low income households, the energy check to help pay for rising energy costs) and transport poverty (leasing scheme for electric vehicles for low income households).

Despite the legal requirements adopted in the 2015 Climate Law, France still does not have a Multi Year Plan for **Skills and Jobs i**n the energy transition. The plan lists the sectors in need of actions for re/upskilling (based on the data by the SGPE (Secretariat General for Ecological Planning) and assesses the positive and adverse effects on the job market.

- ➢ **Improve socio-economic impact assessment, including the gender dimension**
- ➢ **Address the transition challenges in missing sectors e.g. automobile and high emitting industry**

Public Participation gap

France didn’t carry out a direct public consultation on the updated NECP as a whole. Instead, three separate consultations have been organised focused on related strategies: the

Stratégie nationale bas-carbone (SNBC) and the Programmation Pluriannuelle de l'Énergie (PPE). These were online and relatively long in duration (3.5 months, 1 month, and 6 weeks respectively), but none directly targeted the NECP, and only the first occurred early enough to potentially influence content.

The consultations led to few meaningful changes, and the last consultation occurred after the NECP's submission, limiting any real opportunity for stakeholder influence, whose extent remains unclear.

- ➢ **Target the consultation process specifically on the NECP**
- ➢ **Clarify how the stakeholders feedback has been incorporated into the final plan**

Germany

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – GERMANY					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	41.00%		41.00%	38.20%	
Final Energy Consumption (Mtoe)	155.53		155.55	186.66	
Primary Energy Consumption (Mtoe)	194.23		193.64	242.48	
ESR ($MtCO_2eq$)	242.35		242.35	287	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-30.84	-2.2	
	-30.84	-8.804			
Sources: Data from NECP Tracker and ECNO					

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, Germany would fail to meet the minimum EU requirements for renewables and energy efficiency. The **renewables** target meets EU requirements but is not backed by consistent policies and measures (PAMs), and the plan lacks a clear financing strategy to support their implementation. Similarly, the national contributions for both **primary and final energy consumption** are in line with the requirements of the Energy Efficiency Directive (EED), but, according to the WAM scenario, the measures foreseen in the NECP will not be sufficient to achieve them. Major gaps on energy efficiency PAMs are observed in the transport and heating and cooling sectors.

Climate – With the WAM presented in the NECP, Germany would not reach the minimum decarbonisation target for sectors falling under the Effort-Sharing Regulation (ESR) as well as for the Land Use, Land-use Change, and Forestry (LULUCF) sector.

Germany is expected to miss its national **ESR** target by 111 $MtCO_2eq$ cumulatively (2021-2030 period), according to the NECP. Also, the additional measures included in the plan are not detailed enough, presenting substantial gaps in the transport and building sectors. The Federal Environment Agency estimates that the cumulative ESR target gap

would reach 226 $MtCO_2eq$ by 2030 under the WAM scenario, which is far higher and contradicts substantially the data included in the NECP.

Similarly, the **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with the minimum EU requirement, but the proposed PAMs are insufficient to achieve it according to the WAM scenario.The German NECP states that the federal 2030 LULUCF target cannot be easily compared with the EU LULUCF target, as they differ in terms of their calculation method and data basis.The new projections show that Germany is neither in line to meet the EU nor its own federal target.

- ➢ **Provide additional PAMs to meet the renewables target**
- ➢ **Provide additional PAMs to align at least with the EED requirements, especially addressing gaps in transport and heating and cooling sectors**
- ➢ **Provide additional PAMs to meet the ESR target, especially to address gaps in transport and building sectors**
- ➢ **Provide additional PAMs to meet the LULUCF target**

Financing gap

The NECP fails to provide all information needed for a fully comprehensive assessment of its financing gap. On the one hand, it includes a cross-sectoral estimation[14] of overall investment needs to implement WAM scenarios (EUR 690 billion between 2023-2030). On the other hand, it 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 this knowledge gap and the 2024 budgetary cuts to the Federal Climate and Transformation Fund, which jeopardise the financing and thus the implementation of planned measures.

Furthermore, the vast majority of fossil fuel subsidies listed in the plan are not paired with a phase-out date (only one fossil fuel subsidy is associated with a phase out timeline), meaning crucial financial sources are still locked into technologies not compatible with the green transition.

- ➢ **Include a thorough and more coherent assessment of sources of financing, clearly linking them with PAMs**
- ➢ **Provide a detailed and concrete timeline to phase out fossil fuels subsidies**

[14] The NECP quotes two different sources for this estimation at page 372 of the plan: (i) https://www.umweltbundesamt.de/publikationen/technischer-anhang-der-treibhausgas-projektionen, (ii) https://www.umweltbundesamt.de/publikationen/sozio-oekonomische-folgenabschaetzung

Just Transition gap

The plan includes the socio-economic assessment of impacts of planned policies and measures but a thorough analysis of the effects of the measures is missing. Rural areas and structurally weak regions are explicitly mentioned while the gender dimension is not considered in the assessment of social impacts. The reform of the joint task 'Improvement of regional economic structure' (GRW) is a positive step towards modernising the funding conditions and requirements to support transitioning regions. The NECP doesn't include a comprehensive set of targeted policies to maximize the social benefits and mitigate potential adverse impacts of the transition. Although the plan places a considerable emphasis on ETS 2 to fill the foreseen ESR target gap and acknowledges the risk for vulnerable households to be more severely impacted, it only mentions the Social Climate Fund as a way to directly address these risks.

The NECP doesn't include national objectives with regard to energy poverty, nor a timeframe for when the objectives are to be met. The plan includes a very limited amount of measures to address energy poverty, such as revenue-based subvention programs for home renovations and revenue supporting measures (Wohngeld-Plus), but fails to offer a systemic concept to address energy poverty, which is not even estimated in the NECP. Transport poverty and associated mitigation measures are not addressed. The "Deutschland Ticket" which decreases the cost of public transport can be regarded as a measure that can mitigate transport poverty, but it is a universal measure benefiting all citizens regardless of their income.

The NECP addresses the issue of the lack of skilled workers overall and it refers to the new Skilled workers strategy and to the Law and Ordinance addressing the further development of skilled labour immigration. However, these relate to the general shortage of skilled workers while no specific measures to overcome their shortage in strategic sectors are identified. The national 'Roadmap Energy Efficiency 2045' addressed the issue, but the points elaborated in this working group are not listed in the NECP.

- **Improve the socio-economic impact assessment of PAMs by adopting a systemic approach**
- **Provide a national objective and timeline to tackle energy and transport poverty**

Public Participation gap

A public consultation on the draft updated NECP did take place, but it was limited in format: participants could only respond via a "satisfaction form" with tick-box questions covering the five Energy Union dimensions, and very limited space for open feedback. While the form was available for 7 weeks (Jan–Mar 2024), this did not allow for meaningful engagement, as

it occurred after the draft had already been submitted to the European Commission. Given the timing and restricted format, it's unlikely that feedback was meaningfully incorporated into the final NECP. Furthermore, no detailed scenarios (WAM) were provided, and the regulatory context and process were poorly communicated, with limited outreach by the Ministry.

- **Improve the quality of consultations: from the design of consultation format to gather substantial feedback to the access to the necessary information (WAM scenarios) in due time to provide meaningful feedback**
- **Clarify how and to what extent the stakeholders feedback is incorporated in the final plan**

Hungary

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – HUNGARY					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	34.00%		30.00%	30.00%	
Final Energy Consumption (Mtoe)	16.17		17.67	17.13	
Primary Energy Consumption (Mtoe)	23.35		24.12	24.03	
ESR ($MtCO_2eq$)	38.86		38.34	36.81	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-5.724	-5.75	
	-5.724	-5.84			
Sources: Data from NECP Tracker and ECNO					

Energy – Even by implementing all additional policies and measures (WAMs) presented in the NECP, Hungary would fail to meet the minimum EU requirements for both renewables and energy efficiency. The **renewables** target lags behind the minimum EU requirements and is not supported by sufficient policies and measures (PAMs). Notably, the plan fails to tackle the uncertain regulation of renewable energy sources (wind power plants) and energy communities, which are hampering investments.

The plan's national contributions for **primary and final energy consumption** are not in line with the minimum obligations as per Energy Efficiency Directive (EED) and, while the additional policies scenarios (WAMs) are slightly more ambitious than the insufficient national contributions outlined in the plan, more measures are needed to align with legal obligations. In Hungary the building stock is responsible for 40% of primary energy consumption, and 16% of total energy consumption could be saved by renovating residential and public buildings. The vast majority of domestic real estates in Hungary (3.85 million households) are considered outdated from an energy perspective and are in need of energy modernization, but the plan fails to outline measures to tackle this issue, thereby undermining investment predictability and attractiveness.

Climate – According to the WAM scenarios presented in the NECP, Hungary would seemingly reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)**.

The **Land Use, Land-use Change, and Forestry (LULUCF)** target is aligned with minimum EU requirements when taking into account the 2020 dataset baseline, but the corresponding WAM scenario is not backing up the most updated requirements outlined in the 2024 dataset baseline. In addition, the WAM scenario itself is not credible, as it is based on the unrealistic assumption that the forests' growth will continue at the pace of the recent past.

- ➢ **Align the national contribution for renewables with the minimum EU requirements and provide consistent additional PAMs to reach it**
- ➢ **Align both primary and final energy consumption objectives with EU benchmarks and provide consistent additional PAMs to reach them**
- ➢ **Develop PAMs to renovate residential and public buildings**
- ➢ **Set a more realistic trajectory to achieve the LULUCF target**

Financing gap

The NECP fails to provide all information needed for a comprehensive assessment of its financing gap. The plan presents an estimate of *additional* investment needs to implement the additional PAMs compared to the "with existing measures" (WEM) scenario (the yearly net is HUF 177 billion, or EUR 288 million until 2050). However, it does not provide any figures for available sources of financing. The individual policies and measures themselves are also not associated with clear funding needs and funding sources in a systematic way: investment needs and funding sources are specified in some cases, not even mentioned in others. For example, the NECP does not specify whether public resources will be used to build the three planned CCGT gas power plants.

The risk is that essential financial streams will yet again be locked into fossil gas assets, which Hungary is expanding rather than phasing out. The NECP also fails to present a list of fossil fuel subsidies, let alone a plan to phase them out – despite public resources being directed there. One relevant national example is the controversial price cap for households' gas and electricity consumption ("rezsitámogatás"), which is very expensive and a *de facto* fossil fuel subsidy not addressing the root cause of energy poverty.

- ➢ **Provide a full and coherent list of available public and private financing resources, associated with PAMs**
- ➢ **Provide a roadmap and an exit date to phase out fossil fuels subsidies**

Just Transition gap

The final NECP doesn't provide a systematic and comprehensive socio-economic impact assessment of PAMs and it does not include the social impacts of individual measures. The plan does not list any measure to support vulnerable groups and the gender perspective is not addressed at all throughout the whole document. The NECP fails to formulate any adequate goal, plan or vision for addressing the issue of energy poverty. In addition, it frequently refers to the importance of accessible and affordable energy, which the government believes justifies maintaining the institution of the energy price cap ("rezsitámogatás") that instead contradicts the polluter pays principle and hinders the spread of effective energy efficiency measures. Furthermore, 15.5% of domestic households (over 600,000 apartments) use firewood exclusively for heating; it represents the most commonly used fuel by low-income households and the worst-performing residential buildings. This adds to the fact that firewood is not covered by the energy utility price cap bill and its price has tripled in recent years, thus the low-income households are the ones most affected by energy poverty. However, the NECP completely omits to address this issue when examining energy poverty even if the final plan sets the proportion of vulnerable households at 3%, i.e. around 300,000 people.

Finally, the plan does not consider the employment benefits of transition as a priority and although it mentions the workforce re/upskilling, no geographic areas or affected sectors are specifically outlined.

- ➢ **Assess the number of households in need and outline a clear energy poverty reduction national target with a detailed timeline to achieve it**
- ➢ **Conduct a comprehensive socio-economic impact assessment of policies and measures, including the gender perspective**

Public Participation gap

An online consultation was held during the drafting phase of the plan, but only on a 45 page summary, therefore the final NECP was not subject to public consultation as such. While a separate consultation took place for the Strategic Environmental Assessment (SEA), its deadline (22 Sept 2024) was too close to the final submission date in October to allow for any feedback to be meaningfully integrated. Thus, due to the short consultation periods (2–3 weeks for the draft, one month for the SEA) and the limited content shared, it is unclear how public input was addressed. The NECP did not present real alternatives to choose amongst and feedback mechanisms were lacking, including any explanation on the public input incorporation.

- ➢ **Improve consultation process: open the consultation on the actual plan, with enough time and information (e.g. on scenarios) to provide meaningful feedback**
- ➢ **Clarify how the stakeholder feedback has been incorporated into the final plan**

Ireland

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – IRELAND					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	43.00%		43.00%	42.72%	
Final Energy Consumption (Mtoe)	10.45		10.45	12.46	
Primary Energy Consumption (Mtoe)	11.29		11.29	13.93	
ESR ($MtCO_2eq$)	27.67		27.67	35.56	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	3.728	4.9	
	3.728	3.557			
Sources: Data from NECP Tracker and ECNO					

Energy – Even by implementing all additional policies and measures (WAMs) presented in the NECP, Ireland would fail to meet the minimum EU requirements for both renewables and for energy efficiency. The **renewables** target is aligned with EU requirements, but the WAM scenario does not fully align with it. Major infrastructure issues, such as grid capacity and energy integration, as well as rapid increases in energy demand, remain significant unaddressed challenges.

Similarly, Ireland is in line with the minimum Energy Efficiency Directive (EED) obligations for both **final and primary energy consumption**, but the respective additional policies scenarios (WAMs) would be insufficient to meet the contributions. Ireland notably contests its contributions under the EED, which it values as too ambitious. And while the plan includes various policies and measures (PAMs) addressing energy efficiency, it fails to emphasise the need to reduce overall energy demand – which will be fundamental to address the quoted population rise, "economic growth" and dependence of energy imports from third countries.

Climate – With the WAM scenario presented in the NECP, Ireland would not reach the minimum decarbonisation targets. Ireland outlines an **Effort Sharing Regulation (ESR)** target aligned with the EU requirements, however the final NECP does not provide a sufficiently

realistic trajectory and coherent data or a clear methodology to back it up. Agriculture remains a sector of major concern, as it emits 48% of Irish non-ETS emissions. The mitigation measures for the sector have relied on voluntary farmer adoption of technical efficiency measures since 2012, yet the sector now emits 10 % more GHGs.
Similarly, the **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with the minimum EU requirement only on paper: according to the WAM scenario, the proposed PAMs are insufficient to achieve it. In all likelihood, this target will have to be raised during the compliance checks scheduled for 2025 and 2032: total emissions from the sector are increasing and projections show that the LULUCF target won't be fulfilled.

- ➢ **Provide additional PAMs to meet the RES target through placing resources to key agencies, grid barriers and addressing regulatory delays**
- ➢ **Provide additional PAMs to meet national contributions for energy efficiency, including by reducing the data centres expansion and by targeting worst-performing buildings and social housing**
- ➢ **Provide a detailed plan to reduce Irish agricultural emissions without fail, requiring reductions in milk and livestock production**
- ➢ **Provide additional PAMs to meet the LULUCF target**

Financing gap

The NECP fails to provide all information needed for a comprehensive assessment of its financing gap. While it acknowledges the need for substantial investments, it does not provide a complete assessment of the investment needs. Nor does it assess the financing needs of all policies and measures, or detail how public and private investments, as well as EU financial instruments, will be aligned with climate targets.

On the other hand, substantial public resources are still being invested in environmentally harmful technologies. Notably, the NECP does not include a phaseout plan for fossil fuel subsidies, which amount to approximately EUR 3 billion annually. Also, the list of subsidies provided in the plan is incomplete, as it only refers to direct subsidies (only 10% of the total).

- ➢ **Provide a systemic and coherent assessment of investment needs, and clearly link all PAMs with financial sources allocated for their implementation**
- ➢ **Provide a detailed plan and timeline to phase out fossil fuels subsidies**

Just Transition gap

The final NECP does not provide a detailed or systematic socio-economic impact assessment of the policies it proposes. While the plan mentions socio-economic factors in broad terms, it fails to give a clear and structured evaluation of how individual policies might impact vulnerable households, sectors, or regions. The NECP also did not thoroughly assess how these policies will affect different social groups and marginalised communities. The gender dimension for example is not explicitly recognized in the assessment of social impacts. These omissions leave significant gaps in addressing the broader social consequences of the climate transition. While there are general mentions of social impacts, the NECP lacks a comprehensive set of targeted policies to maximise social benefits or mitigate adverse impact. The document doesn't provide enough detail on specific social protections, redistribution mechanisms or how to achieve social equity during the transition.

The NECP doesn't set a national objective to combat energy poverty but includes some measures to tackle the issue, like energy efficiency programs and building retrofits. On the other hand, it does not adequately address transport poverty, especially in rural areas where private vehicle use is essential. Measures such as retrofit grants for low-income households exist but are too limited in scope to meet the needs of vulnerable groups.
In addition, the NECP does not clearly include a set of policies focused on employment benefits of the transition nor clearly identify specific sectors for re/upskilling. It does not comprehensively outline policies to maximise employment benefits or mitigate job losses. The document lacks clear identification of sectors most at risk or those that would benefit from a re/upskilling focus. Although it mentions a green economy, detailed strategies for worker transitions or sector-specific training are missing, leaving the employment impacts of the transition inadequately addressed. The plan also fails to explain its consistency with the upcoming Social Climate Plan.

- ➢ **Set a national objective to tackle energy poverty and address transport poverty**
- ➢ **Improve the socio-economic impact assessment of PAMs**
- ➢ **Provide additional PAMS to support vulnerable groups, workforce re/upskilling**

Public Participation gap

The public participation process was carried out through two online consultation periods (February–March 2024 and May–June 2024), both using restrictive survey formats. These surveys primarily gathered tick-box responses and limited written feedback, without addressing sectoral, policy-specific or scenario-based options. No plain-language summaries, accessible formats or explanatory webinars were provided. The first consultation focused

only on existing measures, while the second introduced WAM scenarios, although detailed scenarios were still insufficiently shared.

The consultations were held after the submission of the draft NECP to the European Commission and there is limited evidence that citizen feedback was meaningfully incorporated into the final NECP.

- ➢ **Clarify how the stakeholders feedback is incorporated in the final NECP**
- ➢ **Improve quality of the consultation process: provide adequate information, consultation timelines and formats**

Italy

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – ITALY					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	39.00%		38.70%	39.40%	*
Final Energy Consumption (Mtoe)	93.05		93.05	101.7	
Primary Energy Consumption (Mtoe)	112.16		115	123.3	
ESR ($MtCO_2eq$)	193.17		193.17	204	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-35.758	-28.4	
	-35.758	-37.571			

Sources: Data from NECP Tracker and ECNO

** Even if, numerically speaking, Italy is in line with the Renewables Energy share in the Final Energy Consumption target, in practice the current regulatory framework for renewables has significantly worsened over the past year. The regulations have become unclear, extending prohibitions and increasing obstacles to renewable energy development. Only recently, in May 2025, the Regional Administrative Court of Lazio annulled the most important regulatory act for territorial planning of renewables, resulting in a significant regulatory vacuum. On this point, the NECP does not provide policies and measures to address these issues"*

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, Italy would meet the minimum EU requirements for renewables, but it would fail to meet the minimum EU requirements for energy efficiency. Italy has improved its estimated trajectories for the national **renewables** target, but it should have included detailed and quantified policies to back it up in a timely and cost-effective way, which is not the case. For energy efficiency, Italy is in line with the minimum Energy Efficiency Directive (EED) obligation for its **final energy contribution**, but not for its **primary energy contribution**. It shall be noted that the primary energy contribution is coherent with the EED deviation of the EED formula to calculate national contributions. WAM projections nonetheless indicate that, without additional measures, Italy would fail to achieve its commitments for both final and primary energy consumption. Current policies, such as *Ecobonus*, *Conto Termico*, and *Certificati Bianchi*, excluding the *Superbonus*, are projected to achieve a lower energy consumption reduction than the set objective. At the same time, given past trends in

renovation efforts, it remains unclear how the supposedly higher ambition proposed in the plan will be implemented.

Climate – With the WAM scenario presented in the NECP, Italy would not reach its minimum decarbonisation targets. The target presented in the NECP for sectors under the **Effort-Sharing Regulation** (ESR) is in line with the minimum EU requirements, but all available information demonstrates that the (poorly described) policies and measures (PAMs) outlined in the plan are insufficient to meet the country's obligations. Similarly, the modest **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with the minimum EU requirement only on paper. According to the WAM scenario, the proposed PAMs are insufficient to achieve it.

- ➢ **Align the national contribution for primary energy with the EED and provide additional PAMs to align with minimum EU requirements for both final and primary energy consumption**
- ➢ **Provide more PAMs to back up the minimum national contribution for LULUCF and ESR objectives**
- ➢ **Align policies and measures with targets included in the plan: provide a systematic correlation between the described policies and their effectiveness in reducing sectoral emissions based on verifiable data**

Financing gap

The Italian NECP provides only a partially sufficient assessment of its financing gap. The plan does provide an estimate of investment needs, specifically for the evolution of the energy system (EUR 174 billion of additional investments compared to the WEM scenario in the 2024-2030 period). However, the proposed policies and measures are not linked to clear funding needs and sources in a systematic way, except at an overall sectoral level.
On the other hand, public resources are still employed to reinforce the role of gas and gas infrastructure (LNG terminals and pipelines) through 2030, with significant investments and initiatives aimed at positioning Italy as a regional gas supply hub. Also, while the NECP formally reiterates the commitment to phasing out fossil fuel subsidies, it fails to provide a clear, concrete exit strategy, despite multiple specific recommendations received from the Commission (on the draft updated NECP).

- ➢ **Provide clear funding needs and sources for all PAMs**
- ➢ **Halt the expansion of fossil gas infrastructure and develop a phaseout strategy for fossil fuel subsidies**

Just Transition gap

The Italian NECP does not systematically assess the positive and adverse socio-economic impacts of the planned policies and measures, nor does it include a comprehensive set of targeted policies to maximize social benefits and mitigate potential adverse impacts of the transition.

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. The measures designed to reduce energy poverty are not linked to future Social Climate Plans and there are no measures aimed at addressing transport poverty or the social disparities it exacerbates.

The NECP considers employment impacts only in an aggregated manner and a significantly greater investment in the training sector appears indispensable. Currently, this area is insufficiently addressed in the plan, providing poor clarity on how to balance potential job losses resulting from the transition.

- ➢ **Provide additional PAMs and a national objective to address energy poverty**
- ➢ **Provide additional PAMs to address transport poverty**
- ➢ **Provide PAMs for the creation of new professional qualifications and re/upskilling pathway for workers involved in the fossil energy sector**

Public participation gap

The public participation process mainly took place through two online consultations. The first, held in May 2023, was based on multiple-choice questions without providing public access to the draft NECP. A second open-ended questionnaire was available online in February–March 2024, but again without sharing the actual NECP text or fostering real dialogue. Three closed-door thematic tables were also held with institutional stakeholders (ministries, agencies, trade unions, industry associations) but NGOs were excluded. Public communication was poor, with minimal promotion of the consultations and limited information on the NECP's content, regulatory context or decision-making process. The timing of the first consultation, only about a month before the draft NECP was submitted, left little opportunity to meaningfully incorporate public input. No real evidence was provided on how consultation feedback was taken into account.

- ➢ **Improve consultation quality: provide adequate information and time to enable meaningful stakeholders participation, including NGOs**
- ➢ **Clarify how the stakeholders feedback is incorporated into the final NECP**

Malta

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – MALTA						
	Minimum EU requirement		NECP Target / Contribution	WAM/WEM Scenario	Traffic light assessment	
RES in Final Energy Consumption (%)	28.00%		24.50%	24.50% (WAM)		
Final Energy Consumption (Mtoe)	0.68		0.68	0.774 (WAM)		
Primary Energy Consumption (Mtoe)	0.83		0.83	1.005 (WEM)		
ESR ($MtCO_2eq$)	0.81		0.81	1.4 (WAM)		
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	0.002	0.003 (WEM)	*	*
	0.002	0				

Sources: Data from NECP Tracker and ECNO

**Note that as a small island city state measuring only 316 km2, Malta has very limited forest cover and land use change, thus the LULUCF contribution and potential for emission reductions is very minimal.*

Energy – Even by implementing all additional policies and measures (WAMs) presented in the NECP, Malta would fail to meet the minimum EU requirements for both renewables and for energy efficiency. Both the 2030 target and the WAM scenario projections for **renewables** are set at 24.5%, which falls short compared to the minimum benchmark expected by the EU (28%).

For what concerns energy efficiency, Malta sets **primary and final energy** contributions that are in line with the minimum Energy Efficiency Directive (EED) obligation, but does not seem to clearly commit to them. It justifies such lack of commitment mainly on the basis of its growing population, economic development and the use of a different model scenario (up to date compared to PRIMES). The respective WAM and existing measures (WEM) scenarios for both primary and final energy are insufficient to reach the national contributions outlined, meaning that more measures need to be planned to fulfil the legal obligations.

Climate – With the WAM scenario presented in the NECP, Malta would not reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)**. After a marginal decline, Malta's WAM scenario actually foresees a small increase in emissions after 2027 (pp. 328). On the other hand, the **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with the minimum EU requirement, but only on paper. According to the WAM scenario, the proposed policies and measures (PAMs) are insufficient to achieve it.

- ➢ **Align the renewables contribution with the EU benchmark and provide consistent additional PAMs to reach it**
- ➢ **Provide additional PAMs to align both final and primary energy consumption contributions with EU benchmarks**
- ➢ **Provide additional PAMs to meet both the ESR and LULUCF minimum EU targets**

Financing gap

The NECP fails to provide all information needed for a fully comprehensive assessment of its financing gap. The plan provides an estimate of *additional* overall investment needs (over EUR 100 million up to 2030). However, it is unclear to which extent the estimate is actually based on *all* planned policies and measures – which, on the other hand, are not associated with clear funding needs or funding sources in a systematic way. Additional investment needs are only available for PV capacity and sustainable mobility, while the volume of funding sources is never identified (the plan only mentions public sources will come from both EU and national funds).

At the same time, the plan does not make any progress in diverting public resources away from fossil fuels. Malta has a long-term agreement for the import of LNG and no plans to phase out the fossil gas power station, and it also provides fuel and energy subsidies to households and businesses, without any links to energy poverty, energy efficiency or renewable energy measures. The plan itself does not include any list of fossil fuel subsidies, nor any plan for their phaseout. As a matter of fact, the NECP says that "there are no plans to phase out any energy subsidies at this particular juncture".

- ➢ **Provide a full assessment of investment needs, taking into account all PAMs, and clearly identify financial resources for their implementation**
- ➢ **Develop a plan to phase out fossil fuels subsidies**

Just Transition gap

The NECP provides only a partial assessment of the socio-economic impacts of policies and measures, without a comprehensive vision. The assessment describes the health, environmental, employment,education, and social impacts, including just transition aspects of the proposed policies and measures but it fails to integrate gender-based considerations.

The potential positive and negative socio-economic impacts are described in a set of tables tackling different sectors (e.g. buildings, energy, transport). However, the impacts are only described qualitatively and lack quantitative assessment to measure the impacts.

Although it recognizes the need for a just transition, the NECP lacks a clear and cohesive set of targeted policies to maximize social benefits or mitigate adverse effects of the PAMs.

The plan does not include a national objective with regard to energy poverty, nor any targets or timeframes for achieving the proposed measures in this regard. Measures to reduce energy and transport policy are in fact included in the plan and the Social Climate Plan is mentioned as a vehicle to deliver such support (especially for what concerns additional support to vulnerable households, vulnerable transport users and/or vulnerable enterprises). While a number of these measures are in place to support vulnerable households and tackle energy poverty, several of them are instead not properly targeted. For example, since the current energy and fuel subsidies are available to everyone and lack capping, they promote energy squandering and subsidise large energy users.

The NECP does not provide holistic information on the employment impacts of the transition such as on green jobs, retraining or up/reskilling. There is just a mention of a training programme for tradesmen on climate change and sustainability and references to required skills and jobs in the building sector, i.e. "*creation of new jobs in construction, retrofitting and maintenance sector*" and to "*An increased demand for a workforce with specialised skills in areas such as green construction, retrofitting, energy auditing and sustainable design*".

- ➢ **Provide a national objective to tackle energy poverty**
- ➢ **Provide comprehensive information on the impacts the transition will have on employment and upskilling/reskilling needs**

Public Participation gap

Malta did not ensure an inclusive public participation and the process presented several shortcomings. To begin with, the draft NECP was not available to the public prior to the consultation, the stakeholder consultation excluded both the public and civil society and Malta did not establish a multilevel climate and energy dialogue as required. When the public consultation was eventually held (after the official NECP submission deadline in June

2024), the timeframe for participation was too short and scheduled during the peak summer period.

In addition, there was no information about the decision-making procedure and no follow up after the submission of public feedback. Furthemore, the summary of views expressed was inadequate and the final NECP does not provide sufficient information on how the feedback was taken into account in the final plan.

- **Elaborate a meaningful public consultation process aligned with EU requirements by ensuring the participation of all stakeholders including civil society, providing enough time to contribute, transparent information on the plan content and overall decision-making process**
- **Clarify how the stakeholders feedback is incorporated in the final NECP**

Poland

Almost a year after missing the deadline, Poland has still **not submitted its final NECP** to the European Commission. **For this delay, the European Commission opened an infringement procedure against Poland in Autumn 2024.**

Context of the revision process

The revision of the draft NECP began under the previous government in 2023 and has been slowed down by the **significant discrepancies between EU requirements and the conservative government's stance**. In addition, attempts to involve civil society in the process and to accelerate it were unsuccessful – despite the early exchanges with the Ministry of Climate and Environment.

The new government was formed in **late 2023** and, as Poland still didn't submit its draft NECP, the European Commission started an infringement procedure against the country. To avoid legal action, **a preliminary version of the NECP** (providing only existing policies and measures) **was submitted in February 2024**, leading to the closure of the infringement procedure on 24 April. A more ambitious draft, including both existing and additional measures, was made public in October 2024, followed by a broad public consultation and over 3,000 submissions, which is still ongoing.

Although work on a revised version of the NECP has been ongoing since October 2024, the new draft remains unpublished and is not available for further public scrutiny. Notably, the Strategic Impact Assessment was only presented in February 2025 – four months after the publication of the draft NECP – despite the requirement for them to be published together. Throughout this process, stakeholders presented several disagreements on the ambition level, and the Ministry of Climate and Environment did not publicly respond to the feedback received.

Meanwhile, the European Commission escalated its infringement case in March 2025, warning Poland of a possible referral to the Court of Justice of the EU if the final NECP submission delay persists.

Key concerns

Poland is still struggling with the legacy of a **fossil-fuel-heavy energy system**, though it has a significant potential for expanding renewables and improving energy efficiency. The share of renewables in final energy consumption is expected to rise but this jump is uncertain due to

financial and formal constraints. The national energy policy still prioritises new generation capacity over the “efficiency first” principle, despite substantial untapped potential for the latter.

In addition, Poland **tends to postpone the majority of greenhouse gas emissions reductions beyond 2030**, also relying on unrealistic projections on CO_2 removals by carbon sinks according to experts.

Poland is also investing in its first nuclear plant, despite investments in energy efficiency and renewables might deliver more cost-effective emissions reductions.

In general, Poland's NECP took into account social issues such as: promoting a fair energy transition, combating energy poverty, supporting regions, local and energy communities (through the Social Climate Fund). **However, the scale of energy poverty in 2030 is still expected to be significant**, the transition of traditional mining regions is progressing too slowly, and the draft Social Climate Plan is currently delayed.

Portugal

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – PORTUGAL					
	Minimum EU requirement		NECP Target / Contribution	WAM/WEM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	51.00%		51.00%	51.00% (WEM)	
Final Energy Consumption (Mtoe)	14.37		14.4	14.22 (WAM)	
Primary Energy Consumption (Mtoe)	16.7		16.71	23.75 (WAM)	
ESR ($MtCO_2eq$)	34.65		34.65	29.48 (WAM)	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	NA*	-6.535 (WAM)	
	-1.358	5.374			

Sources: Data from NECP Tracker and ECNO

**The NECP does not mention the LULUCF 2030 net removal objectives. It only mentions the 2030 relative target (0.968). Therefore, it is not possible to make a comparison with the WAM scenario.*

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, Portugal would meet the minimum EU requirements for renewables, but it would partly fail to meet the minimum EU requirements for energy efficiency. The existing measures (WEM) scenario seems to back up the **renewables** target, nevertheless outlined measures are generally vague and with uncertain effects.

While Portugal's national contributions for both **final and primary energy consumption** for 2030 are aligned with the minimum Energy Efficiency Directive (EED) obligations, the WAM scenario shows an increase in primary energy consumption instead of the needed decrease compared to 2023. The plan attributes the expected rise in primary energy according to projections to the electrification and the energy demands of the green industry, mainly linked to hydrogen production for export via the H2MED project. The missing alignment of projections with additional measures compared to the national contribution for primary energy however indicates that more measures need to be planned.

Climate – With the WAM scenario presented in the NECP, Portugal would seemingly reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR).** However, while the scenarios foresee a sharp decrease in emissions in the energy and industry sector, planned policies and measures (PAMs) seem in practice insufficient to reach specific sectoral targets for the transport and agriculture sectors. The plan includes a 2030 reduction target of 40% in transport and 11% in agriculture (compared to 2005 levels), while the corresponding WAM scenarios for the specific sectors achieve only 30% and 6%, respectively. The transport sector is particularly worrysome due to its weight in national emissions (34.3% in 2023) and the current upward trend in emissions.

On the other hand, the WAM scenario presented for the **Land Use, Land-use Change, and Forestry (LULUCF)** sector seems to be sufficient to align Portugal with the minimum EU requirements for 2030 (the target itself could not be assessed as it is expressed only in relative terms (-0.968)).

- ➢ **Align the primary energy contribution with minimum EED obligations and provide additional PAMs to achieve it**
- ➢ **Provide additional PAMs for transport and agriculture to ensure that the minimum EU requirement for the Effort-Sharing sector is achieved; prioritise the electrification of all duty vehicles and heavy passenger vehicles, combine energy storage in batteries with logistics and public transport platforms**

Financing gap

The NECP fails to provide all information needed for a comprehensive assessment of its financing gap. The plan does not provide an estimation of overall investment needs required to implement the planned PAMs. It provides an overview of potentially available sources of financing, but it does not clearly associate them with specific policies and measures presented in the plan. Individual policies and measures often feature funding sources, but the amount is never mentioned.

On the other hand, the plan does not make significant progress in diverting resources away from fossil fuels subsidies. Subsidies are discussed in a few sections of the plan, including one measure addressing the phaseout of coal-generated electricity before 2030. However, the plan only provides an incomplete list of fossil fuels subsidies, and has no clear exit strategy or date for their phaseout.

- ➢ **Provide detailed information on investment needs of PAMs**
- ➢ **Provide a clear timeline to phase out fossil fuel subsidies and redirect funds to the green transition**

Just Transition gap

The NECP does not systematically assess the positive and adverse socio-economic impacts of individual policies and measures. A general socio-economic impact assessment exists for the overall WAM scenario but lacks detailed analysis per measure. Impacts on vulnerable households and specific territories are acknowledged but not thoroughly assessed, with some references to Just Transition initiatives. There is no integration of the gender dimension, and the NECP postpones a comprehensive social risk analysis to a future Just Transition Strategy, planned over a 2020–2030 timeframe, which is inadequate to address immediate impacts.

The plan includes some measures to reduce energy poverty, notably through the Long-Term Strategy to Combat Energy Poverty (ELPPE) and the creation of the National Energy Poverty Observatory (ONPE-PT). However, inconsistencies and unclear progress on implementing the related Action Plan (PACPE 2024–2030) weaken credibility. Existing measures on energy poverty often remain too generic and are not always adapted to the realities of vulnerable groups, needing stronger funding, technical support and communication. While objectives and timeframes for reducing energy poverty are clearly listed, transport poverty is not addressed systematically — and measures like public transport incentives are not specifically targeted at low-income citizens.

The NECP mentions the sectors where re/upskilling should focus but does not offer a comprehensive, immediate set of policies to protect workers displaced by the transition. It refers broadly to the Just Transition Fund and past retraining efforts but lacks structured, forward-looking plans for income maintenance or proactive re/upskilling. The planned Just Transition Strategy is key but lacks specific dates for delivery, making it insufficiently urgent.

- ➢ **Conduct detailed socio-economic assessments for all key measures addressing gaps such as gender and territorial analysis**
- ➢ **Enhance PAMs to combat energy and transport poverty**
- ➢ **Develop structured re/upskilling and income protection programs**

Public Participation gap

Two online public consultations were conducted. The first, held early in the update process, gathered feedback via a questionnaire based on the 2019 NECP version, rather than a draft updated version. The second consultation allowed free-format document submissions and took place shortly before the final updated NECP submission deadline. In addition, five in-person participatory assemblies were organized across the country early in the process, involving public authorities and civil society. The first consultation happened early enough but was not based on a relevant draft, while the second came too late for meaningful

changes. Information on WEM and WAM scenarios was shared only in the second round. Although some regulatory context was provided, details on the decision-making process were missing, especially at the start of the update.

- **Improve consultation quality: share adequate information on the plan with stakeholders on content and on the procedure to allow for a meaningful consultation**
- **Clarify how the stakeholders feedback has been incorporated in the final NECP**

Slovenia

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – SLOVENIA					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	46.00%		33.00%	36.70%	
Final Energy Consumption (Mtoe)	4.32		4.32	4.316	
Primary Energy Consumption (Mtoe)	5.79		5.98	5.977	
ESR ($MtCO_2eq$)	8.61		8.54	8.45	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-0.146	-2.089	
	-0.146	0.529			
Sources: Data from NECP Tracker and ECNO					

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, Slovenia would not meet the minimum EU requirements for renewables, and it would partly fail to meet the minimum EU requirements for energy efficiency. The **renewables** target is set to 33% by 2030, which is 13 percentage points below the minimum EU benchmark, and is not even backed up by the corresponding WAM scenario.

For what concerns energy efficiency, Slovenia's national contribution is in line with the minimum Energy Efficiency Directive (EED) obligation for **final energy consumption**, however this is not the case for **primary energy consumption**, whose WAM scenario confirms that additional measures are needed to fulfil the EED obligations. Additionally, the reduction of final energy consumption is planned in all sectors except for industry, which causes a majority of the burden to fall on the wide-use sector, including households. This is not in line with the just transition principle, which the Slovenian NECP mentions as one of its key objectives.

Climate – With both WAM scenarios presented in the NECP (which also include sectoral projections), Slovenia would reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR)**. Nonetheless, significant additional potential

remains in the transport and agriculture sectors, as emissions are projected to decline by only 1% in the transport sector and by only 2.8% in the agriculture sector (compared to 2005 levels).

Similarly, the **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with minimum EU requirements for 2030, and so do the projections of its WAM scenario.

- ➢ **Align the renewables target with EU benchmarks and provide additional policies and measures (PAMs) to achieve it, including a detailed financial assessment and feasibility analysis compared to the nuclear scenario. Measures to support energy communities should be improved, given the increasing interest of municipalities and citizens to participate in community self-supply projects**
- ➢ **Align the primary energy contribution with EU benchmarks and provide additional PAMs to achieve it**
- ➢ **Include additional measures for the industry sector and introduce stricter criteria to allocate financial incentives for industry**

Financing gap

Slovenia provides a clear assessment of the investment needs required to implement the WAM scenario (EUR 57 billion for the 2021-2030 period, which would still be insufficient to align with the Paris Agreement goals, due to the poor ambition of the plan). The NECP also provides the figures to estimate a public investments gap (around EUR 1 billion for the 2024-2030 period), but it fails to detail how private investments will be mobilised. Also, investment needs and the allocation of funding sources are not identified for the individual policies and measures.

At the same time, the final NECP weakens previous commitments to phase out fossil fuel subsidies, with significant backtracking after public consultations due to industry pressure. While it mentions the intention to phase them out, the latest version of the NECP removed or watered down key provisions related to ending fossil fuel subsidies, particularly around transport and industry. This weakens the credibility of Slovenia's commitment to a fossil-free future and still locks essential funding sources into incompatible assets with the green transition.

- ➢ **Allocate investment needs and funding sources to individual policies and measures**
- ➢ **Do not weaken previous commitments to phase out fossil fuel subsidies**

Just Transition gap

The NECP provides only a partial assessment of the socio-economic impacts of policies and measures, without a comprehensive vision. Although it recognizes the need for a just transition, particularly in coal and carbon-intensive regions, it lacks a clear and cohesive set of targeted policies to maximize social benefits or mitigate adverse effects. The gender dimension and broader impacts on vulnerable groups are insufficiently addressed. The final plan sets national targets to reduce energy poverty (to 3.8–4.6% by 2030) and achieve 8000 energy efficiency and renewable energy investments in energy-poor households. It also sets a cumulative energy savings target of 573 GWh for vulnerable households by 2030. Measures to tackle energy and transport poverty are included, notably through the Energy Poverty Action Plan (2023–2026), but they remain fragmented and not fully integrated into a broader social strategy. In fact measures to address transport poverty are mentioned but detailed actions are postponed to the forthcoming Social Climate Plan. On employment impacts, the NECP mentions re/upskilling needs but does not specify target sectors or offer adequate measures to address skills shortages for the clean energy transition.

- ➢ **Improve the socio-economic assessment of PAMs, including impacts on vulnerable groups including the gender perspective**
- ➢ **Provide more detailed PAMs on re/upskilling initiatives comprehensive socio-economic strategy integrating all social impact measures, including clear links to funding sources like the Just Transition Fund**

Public Participation gap

The NECP revision was technically well prepared. A preliminary online consultation took place in 2022, followed by two online consultations on the draft NECP in 2023 and one formal consultation on the final document in 2024. Workshops were also held as part of the Strategic Environmental Assessment (SEA) process, alongside meetings with selected stakeholders.

The preliminary consultation lasted 8 weeks; the others lasted one month each. The consultation process started early enough for public input to meaningfully influence the plan. However, information about new measures (WAM) was delayed and only made available in December 2023. On another note, the regulatory context and decision-making procedure were well explained, with a dedicated webpage centralising all information for the public. Despite a technically well-executed participatory process, many calls for strengthening the targets were ignored and short-term industry interests prevailed.

- ➢ **Ensure full information, including on WAM scenarios and/or new measures, is shared from the beginning**

Spain

Ambition gap

ASSESSMENT OF THE NECP AMBITION TO 2030 – SPAIN					
	Minimum EU requirement		NECP Target / Contribution	WAM Scenario	Traffic light assessment
RES in Final Energy Consumption (%)	43.00%		48.00%	47.86%	
Final Energy Consumption (Mtoe)	66.28		71.7	71.709	
Primary Energy Consumption (Mtoe)	82.19		98.4	98.448	
ESR ($MtCO_2eq$)	150.77		140.34	134.1	
LULUCF ($MtCO_2eq$)	**2020 Baseline**	**2024 Baseline**	-43.635	-38.52	
	-43.635	-52.531			
Sources: Data from NECP Tracker and ECNO					

Energy – By implementing all additional policies and measures (WAMs) presented in the NECP, Spain would meet the minimum EU requirements for renewables, but it would fail to meet the minimum EU requirements for energy efficiency. On **renewables**, Spain is projected to be beyond the minimum EU requirements, but effective implementation must consider that only 35% of the economy is expected to be electrified by 2030, despite rising electricity demand. On the other hand, Spain's national contributions for both **primary and final energy consumption** and the WAM scenario by 2030 is not in line with the minimum Energy Efficiency Directive (EED) obligation. More measures need to be planned to align with the EED.

Climate – According to the WAM scenario presented in the NECP, Spain would reach the minimum decarbonisation target for sectors falling under the **Effort-Sharing Regulation (ESR).** Nonetheless, significant additional potential remains in all ESR sectors. On the other hand, the **Land Use, Land-use Change, and Forestry (LULUCF)** target set in the NECP is aligned with the minimum EU requirement only on paper. According to the WAM scenario, the proposed policies and measures (PAMs) are insufficient to achieve it.

- ➢ **Provide additional PAMs to align with minimum EU requirements for primary and final energy contributions. Include measures to reduce energy consumption across all sectors, including buildings' renovation, effective mobility plans and railway traffic of goods**
- ➢ **Provide additional PAMs to meet the LULUCF target by acting upon carbon sinks, nature restoration and the agriculture sector and reducing nitrous oxide emissions from fertiliser use and methane from livestock**

Financing gap

The NECP includes an estimation of the overall investment needs to achieve the objectives of the plan (EUR 308 billion between 2021-2030), with an overview per sector and per contributor (82% of the total is expected to come from the private sector, while EU funds are expected to cover most of the remaining 18% public sector investments). Unfortunately, it does not provide an equally thorough overview of available sources of financing, therefore preventing the assessment of the existing financing gap. In addition, not all individual policies and measures include a clear and robust explanation of their financing needs and sources. Those related to energy efficiency, energy security and the internal market tend to have more detailed explanations than decarbonisation measures.

On the other hand, the NECP does not make significant progress in diverting money away from fossil fuels. The plan does not foresee a gas phaseout date, and actually includes several measures that perpetuate the use of fossil gas, either directly or indirectly. In addition, while it presents a list of fossil fuel subsidies, it does not include a clear exit date or a plan for their phaseout.

- ➢ **Address the financing gap by assessing the available sources of financing, which have to be linked systematically to all individual policies and measures**
- ➢ **Establish a clear timeline for the phase out of fossil gas and the end of fossil fuels subsidies to achieve a 100% renewable electricity sector in 2030**

Just Transition gap

The final NECP does not systematically assess the positive and adverse socio-economic impacts of all planned policies and measures. However, it incorporates specific measures that provide greater support to vulnerable consumers and measures that generate positive socio-economic impacts in rural territories. The Spanish NECP includes a very positive new measure in the additional dimension on transversal aspects of the ecological transition dedicated exclusively to the gender perspective. Which makes, however, that the gender dimension is not well reflected in each planned policy and measure.

The plan does not include a national objective nor a timeframe to tackle energy poverty but includes a measure focusing on this issue. It features a set of 4 indicators of energy poverty for 2019 and, based on these indicators, the NECP concludes that 12.35% of the total final accumulated energy savings objective should come from actions aimed at mitigating energy poverty or aimed at vulnerable groups. Measures to tackle energy poverty include strengthening the electricity social bonus and plans to update the national Energy Poverty Strategy (2024–2029).
Regarding transport poverty, the updated plan mentions the "Strategy on Sustainable Mobility 2030" and points out the integration of the specific needs of rural, remote, low-density, island areas, etc., plus issues related to gender and poverty in transport and mobility with support for vulnerable users.

The NECP outlines several measures targeting employment benefits and mitigating adverse impacts and it emphasizes the workers re/upskilling, especially in vulnerable groups, although specific sectors are only partially identified. The plan forecasts 560,000 net new jobs by 2030 and major economic benefits, including a EUR 44 billion annual GDP increase and substantial public health improvements.

- ➢ **Provide a clear energy poverty objective and respective timeline**
- ➢ **Improve the socio-economic impact assessment of PAMs**

Public Participation gap

The revision of the NECP combined both online and in-person consultations. A preliminary online consultation was held in summer 2022 without a draft NECP. In spring 2023, three (upon invitation-only) in-person sessions discussed pre-set questions without draft texts. A second public consultation on the draft NECP followed online in summer 2023. In spring 2024, further sessions on renewable deployment were held, with livestreams and online contributions. Finally, a third online consultation on the Strategic Environmental Study took place in summer 2024, based on the updated draft NECP. The consultation process started early enough to be meaningful, with the first round launched in summer 2022. However, it remains unclear how the input received, over 2,000 contributions in the first phase and over 10,000 in the second, was actually incorporated in the final NECP. During the first phase, the public only had access to information about WEM scenarios, while WAM scenarios were only shared later with the draft NECP.

- ➢ **Clarify how the stakeholders feedback has been incorporated into the final plan**
- ➢ **Improve participation process: provide comprehensive and timely information to stakeholders**

Together for 1.5

ACCELERATE CLIMATE ACTION IN EUROPE

METHODOLOGY

Methodology

This report assesses the ambition of the final 2024-2025 NECPs for 16 European Member States, and provides an update and a brief assessment of 3 Draft NECPs (Belgium, Estonia[15], Poland) whose final versions are yet to be submitted. All these documents are publicly accessible on the European Commission's website as well as on preliminary plans that were open for consultation on a national level.

The assessment of the 16 final NECPs focuses on five main dimensions: Ambition, Financing, Just Transition, Public Participation and Enforcement. For each of these dimensions, we provide a **qualitative analysis** based on contributions and assessments of national NGOs – part of the CAN Europe network – that have analysed the final NECPs. For the ambition gap, the report also provides a **quantitative assessment**, whose parameters are discussed in greater detail below.

Ambition gap assessment

The quantitative assessment of the ambition gap covers four dimensions: Renewable Energies Share in Final Energy Consumption, Energy Efficiency, GHG emissions in non-ETS sectors, and GHG emissions in the LULUCF sector. These dimensions have been selected on the basis the main 2030 national climate targets and energy benchmarks set in key EU legislation: the Renewable Energies Directive III (RED III), the Energy Efficiency Directive (EED), the Effort-Sharing Regulation (ESR) and the LULUCF Regulation.

The report compares the national climate targets and energy benchmarks defined in the EU legislation with the policy-based scenarios (based on additional measures, WAM, or on existing measures, WEM) provided by EU Member States in their NECPs.

For what concerns the national 2030 climate targets and energy benchmarks set in EU legislation:

- The **renewables benchmarks** were retrieved from Annex I to the Commissions Communication COM(2023) 796, *EU wide assessment of the draft updated National Energy and Climate Plans,* Table 2;
- For the **energy efficiency benchmarks**, the corrected contribution by the European Commission for final energy consumption and the least ambitious result of the formula for primary energy consumption of the 2023 Energy Efficiency Directive from the EED recast Annex I formula results (Table 13: EU Reference Scenario 2020 &

[15] The Estonian government approved the final updated NECP during the completion of this analysis. However, as of the publication date of this briefing, the plan was not yet available on the European Commission website and therefore it is not included.

updated EU Reference Scenario 2020" were used as benchmarks and marked as the minimum EU requirement for final and primary energy consumption.

- The **targets for Effort-Sharing** sectors were retrieved from the Annex I of the Effort Sharing Regulation and calculated in absolute values using the 2005 historical data baseline used by the European Commission in his "*EU wide assessment of the draft updated National Energy and Climate Plarns",* Annex 1, Table 1;

- For **LULUCF net removal targets,** the report includes two different sets of values, based on two different baselines. The first set of values, whose baseline was calculated on the basis of an old 2020 dataset, is the official list of national net removal objectives for 2030 as per the updated LULUCF Regulation (2023/839). They were retrieved under Annex IIa, column D. The second set of values, instead, were calculated by summing the binding relative target (Annex IIa, column C of the LULUCF regulation) to a more updated 2024 baseline, retrieved in the Environmental Energy Agency dataset.

For what concerns both the climate and energy contributions and their respective policy scenarios (WAM/WEM) outlined in the NECP:

All values used in this assessment are the result of previous elaborations conducted during the last year on the available final updated NECPs. **In particular, the values where retrieved from two sources:**

- The LIFE Together for 1.5 Project "**NECP Tracker**" tool

- **The ECNO assessment** "Delivering the EU's 2030 climate and energy targets: Gaps in national contributions and policies"

Considering that many NECPs often leave large margins of interpretation to identify which are the goals and PAMs, for some specific values when discrepancies were identified among the two sources, an additional control of the NECP was conducted to identify which value to use.

Methodology for the Traffic Light Assessment

This report includes two Traffic Light Assessments. For each indicator, the assessments assign different colors to highlight whether the policy-based scenarios described in a given NECP are in line with the respective national targets or benchmarks set in EU legislation.

The color-coding is therefore the result of a comparison between the WAM scenarios and the respective minimum EU requirements. When WAM scenarios were not available, WEM scenarios were used instead. The assessment follows the following ratio:

- If the NECP provides no policy-based scenarios, the box is colored in **BLACK**.
- If the 2030 value of the NECP's policy-based scenario is less ambitious than the minimum EU requirements (either targets or benchmarks) the box is **RED**.
- If the 2030 value of the NECP's policy-based scenario is sufficiently ambitious to achieve the minimum EU requirements (either targets or benchmarks) the box is **GREEN**.

Two different traffic light assessments were developed in this briefing:

The first one (Table 1) provides an overview of all the EU level targets and benchmarks for all the countries. In this case, a more in depth analysis was conducted to define *by how much* each country is below or above the minimum EU target or benchmark. In order to account for the countries' different sizes, **a relative deviation (expressed in %) was defined ranging from "significantly below" and "significantly above"**. Seven ranges were then identified, each one corresponding to a specific **shade of Red and Green** (See Table 2 – Legend). This methodology was inspired by the Commission's own assessment of Member States' national contributions for renewables in its *EU wide assessment of the draft updated National Energy and Climate Plans (2023).*

The second one, available under the ambition gap section in each country sheet, is a simplification of Table 1, in which no shades were used and **only three colors were considered: RED**, not in line; **GREEN**, in line; **BLACK**, value not available. In few cases, when the difference between the EU benchmark/target and the policy-based scenario is marginal – and thus when the assignment of Red and Green is less intuitive – **the qualitative assessment was taken into account** to decide which color to allocate.

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