

Briefing: Advancing Long-Term Energy Planning in Central and Eastern Europe

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The European Union and its Member States are currently defining their climate ambition for 2040 – a crucial milestone towards the politically agreed 2050 climate neutrality target. Once agreed, it will shape post-2030 climate and energy policies, building on the implementation of the Fit for 55 and REPowerEU packages, and create a legal framework to ensure citizens benefit socially and economically from climate action. 2030, 2040 and 2050 are not just milestones to link together, but require science-based, comprehensive planning to ensure a fair energy transition that improves people's quality of life. The perspective of the Central and Eastern European region should be central to this discussion – and it must be constructive and responsible.

However, as seen in the past, Central and Eastern European (CEE) countries tend to take a reactive rather than proactive approach in response to developments at the EU level. Instead of taking responsibility and shaping a change they need, they wait for external impulses, which results in missed opportunities and higher costs. This approach also leads to delays in implementation, low ambition, unclear targets and lack of effective tools. There is little cross-sectoral analysis of challenges, no clear vision for socio-economic development and no use of scenarios to guide planning. Additionally, CEE countries miss proper systems for monitoring and evaluation. As a result, the region has a limited influence on the EU policies and struggles to promote their interest at the European level².

How can we secure comprehensive, long-term climate and energy planning in CEE? How can we make it fair, cross-sectoral, and politically integrated? What narratives resonate best in the region, and how can strategies be embedded in national policy while remaining relevant and actionable for people, businesses, and communities?

In this briefing, we analyse how the reactive approach of Central and Eastern European countries to EU-level developments leads to missed opportunities, weak implementation, and limited influence, highlighting the need for proactive, strategic planning grounded in cross-sectoral analysis, clear socio-economic vision, and robust monitoring systems. We also showcase best practices and propose improvements.

² https://ireform.eu/s/uploads/Strategia czv stagnacia Polska wobec wyzwan transformacii.pdf

¹ <u>1point5.caneurope.org/report-paris-pact-payoff-socio-economic-co-benefits/</u>

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The European context: shaping climate action

In 2021, the EU adopted its first <u>Climate Law</u> aiming for climate neutrality by 2050 and a 55 % cut in greenhouse gas emissions by 2030. No 2040 target was set then, as EU policy makers wanted the Paris Agreement's first <u>Global Stocktake</u> at COP 28 in 2023 to inform the 2040 objective. Based on that assessment, the law requires the European Commission to propose a 2040 target by June 2024.

Based on two reports prepared by the European Scientific Advisory Board on Climate Change (ESABCC) on the 2040 target³, the European Commission adopted a communication on the 2040 target in February 2024. The Commission endorsed a 90% emissions reduction target, despite the ESABCC showing up to 95% is achievable. The Commission's communication also explained that a formal legislative proposal would be adopted by the new Commission formed after the June 2024 elections. However, after the elections, most of the political focus shifted to the formation of the new Von der Leyen Commission. In addition, the Polish Presidency of the European Council (January-June 2025) has not proactively advanced on this file.

On 2 July 2025, more than a year after the legal deadline set in the European Climate Law, the European Commission adopted its legislative proposal for the 2040 target. The proposal was adopted shortly after a shift in the European Council presidency, where Denmark took over from Poland for the period from July to December 2025. It encompasses a 90% emissions reduction target, but with the inclusion of flexibilities such as the use of international carbon credits (under Article 6 of the Paris Agreement) to achieve the 90% objective. These flexibilities are seen as dangerous shortcuts by civil society. The ESABCC itself has reiterated in June 2025 that the EU should adopt a net domestic GHG emission reduction target for 2040 in the range of 90–95 %⁴. In addition, various assessments – including the European Commission's own Impact Assessment on the 2040 target – stress that an ambitious domestic decarbonisation target would benefit the EU in economic, social, environmental and security terms.⁵

³ European Scientific Advisory Board on Climate Change, <u>Setting climate targets based on scientific evidence and EU values: initial recommendations to the European Commission</u>, January 2023; and European Scientific Advisory Board on Climate Change, <u>Scientific advice for the determination of an EU-wide 2040 climate target and a greenhouse gas budget for 2030–2050</u>, June 2023.

⁴ ESABCC, <u>Scientific advice for amending the European Climate Law - Setting climate goals to strengthen EU strategic priorities</u>, June 2025.

⁵ In CAN Europe's view, the EU should strive for climate neutrality already by 2040 to contribute its fair share to required emission reductions. See here for more details:

Zoom on Member States: climate obligations

While the EU works on setting a new climate target, Member States are also legally required to take action on climate. Under the EU Governance Regulation, all countries must follow common rules on climate and energy planning, reporting and monitoring. When it comes to planning, each Member State must adopt two planning instruments outlining policies and measures to reach their climate and energy objectives:

The National Energy and Climate Plans (NECPs)	10 years long planning instruments, which need to be updated every 5 years. Furthermore, the countries must report on the implementation of the policies and measures stated in their NECPs via biannual progress reports.
The National Long-Term Strategies (nLTS)	30 years-long planning instruments.

In addition, most Member States also have **national climate laws** that set legally binding long-term targets. They also include the necessary processes, institutional responsibilities, and other mechanisms to achieve these goals⁶. These laws generally go beyond the EU rules by adding country-specific climate targets, planning and monitoring requirements, expert advisory bodies, institutional agreements and public participation. These mechanisms help ensure that climate issues stay high on the political agenda during the various planned governance stocktakes. This not only increases public awareness, but also creates a predictable cycle of national debate that engages citizens, media and political leaders from all sides⁷.

Long-term planning: LTSs and National Climate Laws

Long-term climate and energy planning is a vital tool for driving effective climate action. Far from being a mere "box-ticking exercise," it has the potential to steer complex transitions and spark a socially just transformation of the economy. Successful planning means also taking ownership of the climate targets, pathways and milestones – and translating them into actionable national strategies, policies and measures.

EU Member States can use two frameworks to implement long-term planning:

Long-Term Strategies (LTSs)

https://caneurope.org/content/uploads/2024/02/2024.09.24-Updated-Position-Paper-on-EU-climate-targets-and-equitable-GHG-budget.docx.pdf

⁶ N. Evans, D. Kocher, N. Kögel and M. Duwe, <u>The landscape of national climate framework laws in Europe: A status update</u>, <u>Ecologic Institute</u>, September 2023.

⁷ CAN Europe, Climate laws in Europe - Essential for achieving climate neutrality, December 2023.

All EU Member States were required to submit their national Long-Term Strategies by January 1st 2020 and update them every ten years or every five years. Given the major developments of the past five years, ranging from the Covid 19 pandemics, costs of living crisis, Russian war against Ukraine, and European reactions to all these processes – European Green Deal, Fit for 55 and REPowerEU – it would make sense to update these strategies in 2025. However, no such updates are planned in Czechia, Slovakia, Hungary, Romania or Bulgaria. Poland is the only EU country that still has not submitted its LTS at all.

National Climate Laws

More than half of EU Member States, along with several neighbouring countries, have climate framework laws. These laws provide an integrated, long-term policy approach and signal governments' clear commitment to EU climate targets, helping ensure enforceable climate action. Climate framework laws differ widely in scope and content. The strongest include governance mechanisms such as monitoring, public participation, and independent expert advice. Examining the law's content closely is essential to assess its practical strength.

National climate laws link the EU-level regulatory framework with strategic planning and practical national climate action by defining:

WHAT needs to be done	Translating targets and plans into real action, by making them nationally binding and enforceable (and thus politically independent, resilient to political changes) to create a stable framework for various stakeholders to act. This creates also a basis for an analysis of WHEN and WHERE action is needed.
WHO needs to do it	Defining institutions responsible to deliver on the WHAT, assigns accountability. Clearly defined responsibilities, for example related to targets, enforce cooperation, crucial for a socially just transformation.
HOW to do it	Setting relevance of data and analysis based action, accompanied by regular and transparent monitoring and reporting.
WITH WHOM to do it	Ensuring a participatory process including all relevant stakeholders (ideally explicitly mentioning – not to be missed – NGOs, municipalities and trade unions) as well as the general public to be involved at some

stage, to support planning and the correct and timely implementation of the plan.

However, among the six CEE countries, only Hungary and Bulgaria have this kind of legislative tool in place – while there has been a political debate on the adoption of a climate law in several other CEE countries.

Czechia

The Supreme Administrative Court (SAC) ruled that without a legal act setting quantified GHG reduction obligations, the government's insufficient action cannot be deemed unlawful. The court emphasized the need for a national climate law with binding targets to give courts a clear basis for assessing government action and ensuring legal protection.

Hungary

Hungarian Constitutional Court Case on Climate Law: In its <u>decision</u> published on June 4th 2025, the Hungarian Constitutional Court ruled that the 2030 national GHG reduction target (40%, coming from the HU NECP 2020) section of the Hungarian Climate Law is unconstitutional and repealed that section. The court also found that the National Parliament violated the Constitution by failing to fully regulate GHG reduction, adaptation, resilience, and sustainable development tailored to Hungary and the Carpathian Basin. It ordered Parliament to improve the climate law by June 30, 2026. / <u>The Hungarian Climate Law</u> (2020) is the legislation that set national climate neutrality by 2050. /

The court also ruled that climate protection measures must be adopted in binding laws that are clear, enforceable and accessible to everyone. They should include emission reduction targets based on the latest climate science and reviewed regularly. The decision also emphasised that climate protection rules must follow key principles: precaution, prevention, public trust towards future generations, and the "polluter pays" principle. Adaptation and resilience of the socio-environmental system must include the protection of natural capital (e.g. water, soil, forests, biodiversity). NSC-FoE Hungary has been and is involved in the improving process of the HU Climate Law.

Civil society's proposals

In 2023, the **Polish ClientEarth** developed a legislative proposal for a national climate law and presented it in the Polish Parliament. Its main elements include the binding 2050 climate neutrality target (incl. Clear pathway and GHG budget), the obligation for the government to protect citizens against climate change (adaptation), the introduction of the rule of the DNSH principle for all investments,

the establishment of the Climate Protection Board as an independent advisory body and the obligation to spend at least 1% of the national GDP for climate action.

Slovakia

In 2023, the Slovak Ministry of Environment put forward a draft national climate law, which was announced by the Slovak president at the COP 27. The document was significantly shaped by NGOs and included many key elements of a strong climate law: sectoral targets, preparation of long term strategies (NECP, nLTS), governance structure with clearly defined responsibilities and cross-sectoral collaboration system, transparent reporting, relevance of data-collection, independent expert body and public climate litigation. However, despite its ambition, the draft law never completed the legislative process and it is on hold, waiting for a more favourable political situation for its adoption. Despite this, many high profile stakeholders are still calling for its adoption and the current government included such a plan in its political program.

One major issue was that the Ministry failed to include relevant stakeholders early into the law-drafting process, which generated opposition, including from key ministries. An important lesson learnt here is to facilitate, communicate and collaborate from the beginning, particularly if the draft law is ambitious and progressive, otherwise all efforts may stall.

Slovenia

After two failed attempts, a national climate law has been adopted in July 2025. However, several important articles were removed from an earlier draft (e.g. on green budgeting and the phase-out of harmful subsidies). The law sets the climate neutrality target to 2045 – five years earlier than Slovenia's LTS. Neither sectoral nor intermediate targets (for 2035 or 2040) are set by the new climate law. The law transposes the new EU Emissions Trading System (ETS1 and ETS2) directive to national law.

Ukraine

In 2024, as part of its EU integration efforts, Ukraine adopted its first-ever climate law, setting a cornerstone for a systematic approach to climate policy. The law embedded the country's 2050 climate neutrality target into national legislation and defined the architecture of climate governance in the country. It also mandated the establishment of a national ETS. However, it is a framework law and still needs to be specified. So far, there is no 2040 target set for Ukraine, neither in the law, nor in other strategic documents. Still, the EU climate goals play a significant role in shaping Ukraine's direction, as the country needs to align its legislation with the European dynamics.

CEE and climate policy: the price of procrastination

Most CEE countries lack a coordinated, long-term vision for climate planning. Few treat their 2030 National Energy and Climate Plans as strategic tools, and even then, they rarely use them to drive reforms or guide EU-funded investments. Strategies for 2040 or 2050 are often viewed as abstract rather than actionable. Many CEE governments avoid meaningful debate on the 2040 target – often dismissing it as simply a midpoint between 2030 and 2050. At the EU level, Poland, Czechia, Slovakia, and Hungary have voiced concerns about the 2040 target's ambition, while Romania and Bulgaria remain noncommittal. Domestically, the focus remains on meeting 2030 targets, which will likely influence the region's longer-term climate trajectory.

Central and Eastern European countries have consistently struggled to deliver effective long-term climate and energy planning.

This is largely due to a combination of persistent challenges, including a lack of political continuity, limited cross-party consensus, insufficient analytical capacity, and the absence of clear strategic visions and milestones. Political barriers further complicate the development of coherent and forward-looking plans.

Despite the complex political landscape in the region, recent Eurobarometer data⁸ clearly shows that citizens across CEE support climate goals and are calling for more decisive action. It is therefore imperative that policymakers acknowledge this public support, assume ownership of national climate strategies, and take responsible, forward-looking action. To achieve this, consistent and vocal engagement from stakeholders, civil society, and voters is essential to maintain pressure and ensure climate action remains a political priority.

Also industry and business leaders – including in CEE – are calling for long-term planning. They see it as essential for economic stability, security and competitiveness and enabling Europe to become an important producer of green technologies and lower costs of energy. Part of the business community also recognises that without clear legal responsibility for climate and decarbonisation policies ("no one is responsible for the climate without a climate law"), such stability would not be possible to achieve.

What does the implementation of climate strategies look like across CEE countries?

Czechia

All three major climate and energy strategies – the NECP, LTS and the national State Energy Policy – were part of one coordinated revision process starting in 2022. Such a coordinated revision would have helped ensure that targets and scenarios are consistent with each other in all strategic documents, increasing the chance of their successful implementation. The government approved the basic goals for all the three , and they were then discussed by ministries and other stakeholders, including civil society. However only the NECP was ultimately approved in December 2024. The other two draft strategies remain stalled, following a political backlash against climate policy.

⁸ https://europa.eu/eurobarometer/surveys/detail/3472

Poland

Poland has committed to climate neutrality by 2050 as part of the broader EU goal, but secured an exemption at the European Council, citing its heavy reliance on coal and the need for a significant transition. It remains the only Member State yet to submit its national Long-Term Strategy, due in January 2020. *The Polish Energy Policy by 2040* published in 2021 and updated in 2023, was criticised for being outdated. Poland has not yet set the coal phase-out date, although the "social agreement" between the mining sector and government foresees 2049 as an end of hard coal extraction – an unrealistic timeline. Considering all that, the country's energy transition is unfolding rather by circumstances than by design.

Barriers to Implementing long-term planning in CEE

When developing climate and energy strategies, Central and Eastern European countries often tend to perceive it as **a "box-ticking" exercise**, only fulfilling the European Union's obligations. These strategies usually lack a clear long-term vision and focus on short-term developments, allowing the postponement of any ambitious climate action indefinitely. To avoid any long-term obligations as well as public discussion and possible concerns, many CEE governments do not define clear pathways. As a result, climate action tends to drift without strong direction or planning.

Lack of concrete vision for a long term, people-centred climate action

Long-term climate and energy planning in CEE often responds to EU obligations and remains very general. While visions may set end goals like 2050 climate neutrality, they lack milestones, concrete policies, investment assessments, and clear guidance for stakeholders. This also prevents proper monitoring, evaluation, and course corrections. There is a need to jointly design a vision that would benefit national economies and people.

Lack of continuity and political consensus

In the CEE region, long-term planning faces political challenges, as successive governments pursue only their own ideas without cross-party consensus. Governments only consider the timeframe of their current mandate and ignore the importance of long-term planning. A climate law is crucial here, providing regulatory stability for policies that deliver results over decades.

Lack of analytical capacities

Turning a vision and strategy into law and concrete action requires strong analytical capacities, including identifying challenges, opportunities, and priorities. In the region, many public institutions lack this ability, often outsourcing strategy development to external actors whose perspectives dominate the outcomes.

Lack of coherence

Many CEE countries have numerous general strategies from different administrative bodies, often lacking coherence at national, regional, and local levels. Without an overarching vision, measures can contradict or conflict with each other. An expert advisory body could help address this.

Lack of engagement of relevant actors

Relevant stakeholders are often poorly involved in the process. The process of the development of particular strategy needs to not only be open for inputs of various groups - ranging from policy and decision makers at the local and regional level, through business and trade unions, to local communities, citizens and civil society - but also a broad dialogue with them is needed as well as mechanisms to include their perspectives into the document.

Lack of coordination

Even when a concrete strategy is developed, usually by one ministry, collaboration with other public institutions is weak or competitive. Lacking a horizontal approach and clear authority, actors work in silos, with no central body to coordinate progress toward a shared vision.

▲ Lack of targeted communication

There is a need to explain, using well-defined arguments and narratives, how certain industries, business sectors, regions, and social groups can become part of the transition. When communication does happen, it is often driven by short-term political goals rather than any clear strategy. For policymakers, it seems easier to let the transition appear as something "just happening on its own" (or not happening at all), rather than discussing challenges and reforms required. This approach allows them to avoid taking responsibility for developing and implementing particular policies, reforms, measures and tools.

Solutions: Recommendations for climate planning in CEE

A coherent climate planning, which results in an impactful strategy (set of strategic documents), translated into real measures at the national / regional / local level is fundamental for clarity and predictability. This is beneficial for both the citizens and businesses, including industrial actors, which need to make investment decisions based on a longer-term outlook. Providing more certainty about the future to all significantly helps boost competitive green business across CEE.

We are calling for an increased political ownership of this crucial issue and propose the following recommendations on national and EU levels:

1. National level

How to plan – informed and transparent process, engaging diverse stakeholders:

- Climate strategies should be prepared in a process with meaningful participation of all relevant stakeholders. To ascertain quality and coherence among the key planning instruments (LTS, NECP, SCP) the process must engage actors across different departments, with multi-disciplinary expertise and approach, on national, regional and local levels. In order to provide for continuity it is advised to also engage a wide political spectrum.
- Planning must be based on publicly available and relevant data including modelling scenarios, monitoring and evaluation of progress of implementation, criteria for financing decisions. National climate laws should contain a section related to procedural rights to strengthen their enforceability.
- Updated nLTS must be adopted, in line with the updated NECPs and the current EU 2030 climate and energy targets and the EU climate neutrality target by 2050. A coherent strategy would provide a much-needed clarity and predictability for both the citizens and businesses. Industrial actors especially need to make investment decisions based on a longer-term outlook and providing them with more certainty about the future would significantly help boost competitive green business across CEE.

How to implement the plan – make it part of the system

- Strong national climate laws must be adopted. Implementation of NECPs and LTSs needs to be guided by a legal framework, which outlines sectoral allocation of targets, sets clear institutional accountability, regular monitoring and evaluation via an independent scientific advisory body, tasked also with providing policy recommendations. National climate law should also stipulate related procedural rights (transparency, participation, access to justice) to strengthen enforceability of these rights, support quality planning and ascertain its implementability.
- Strengthen national capacities: Build a national analytical body with sufficient and relevant expert capacity to ensure independent and continuous background for a coherent planning. Enhance and increase capacities of national, regional and local institutions. Develop facilitation capacities to maintain dialogue with experts and to lead stakeholder participation within planning processes.
- Update funding mechanisms: Adjust relevant financing mechanisms (e.g. programmes funded by EU ETS revenues, JTF, Modernisation Fund, SCF) to reflect the targets and goals defined in climate strategies. Decision making about the use of such financing should be done in a transparent way and based on criteria including climate and social impact. Public funding of fossil fuels should be excluded from any instruments as it runs contrary to the strategic goal of climate neutrality.

- Make communication part of the system: The importance of climate planning and implementation (decarbonisation, green transformation measures) for the national economy must be clearly and consistently communicated to the society. The role of government and political leaders, as a test to true ownership of this task, is crucial. And so is the right form - narratives, channels, messages, communicators – to avoid confusion and boost climate action.

2. EU level

- Guide Member States by using planning instruments wisely: Regular update cycles of strategies and plans, made obligatory for MS by the Governance Regulation, provide a good framework for planning and implementation. However, some form of simplification and unification would help to make climate planning in the CEE region more real (less a box-ticking-exercise) with a more coherent outcome, which ties all together planning-funding-implementation.
 - In parallel of ensuring the full implementation of the 2030 climate and energy framework, finding an optimal moment to revise the Governance Regulation in a spirit of getting a simplified framework towards 2040 while safeguarding its core functions (planning, reporting) and ensuring its revision allows Member States to prepare their NECPs for 2030-2040 and nLTS for 2030-2060.
 - Making a stronger link between MFF and future NECPs, possibly integrating nLTS into NECPs. Enhancing the use of digital tools for reporting, for example aligning with ESG/CS3D reporting debate; modifying NECPs into more dynamic databases; making NECPs progress reports more easily accessible and readable; avoiding duplication between the NECPs and the reporting to reduce administrative burden.
- Support MS by well-designed (but not over-used) TSI: Make a good use of Technical Assistance where appropriate, where it is clear that the MS government will not be able to deliver in a given time-frame needed quality. However, a sustainable mid and long-term solution is strengthening national, regional and local capacities (government and non-government), rather than outsourcing the development of strategies to commercial actors.

The European Commission should motivate MS to build sufficient capacities for the entire repeated planning cycle, including a proper multi-level and multi-actor participation process. Design TSI for this purpose as a tool to help deliver as well as guide and teach MS governments to be able to do it independently.

- **Demand quality by conditionalities:** EU funding must be tied to a proper climate strategy and its implementation. A set of crises - climate, geopolitical, energy - which we are still facing does not allow for lenience and EC should

apply conditionality to EU funds, use infringements and other enforcement procedures to guide strong implementation action.

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