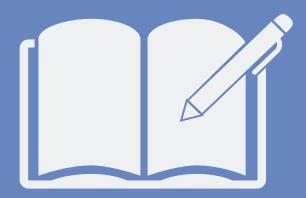


THE CLOCK IS TICKING!

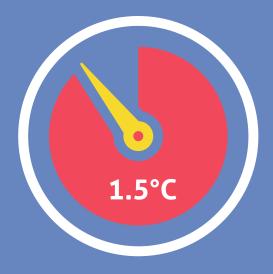
Insights into progress made by Member States so far in improving their draft National Energy and Climate Plans (NECPs)



KEY ELEMENTS & RECOMMENDATIONS





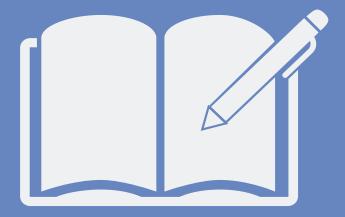


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NECPs: from developing drafts to preparing final versions

According to the new Governance Regulation adopted last year (1), Member States had to prepare their draft National Energy and Climate Plans (NECPs) by 31st December 2018, while the final version needs to be prepared by 31st December 2019. In these plans, each Member State has to describe, in an integrated manner, its climate and energy objectives, targets, policies and measures for the period from 2021 to 2030, ensuring that the EU's 2030 targets for greenhouse gas emission reductions, renewable energy and energy savings will be met. In June 2019, the European Commission assessed the draft NECPs. The assessment identified a gap between the national ambition levels and the EU's 2030 targets for energy efficiency and renewable energy.

The gap stems from the insufficient ambition of the national energy contributions for 2030 and the lack of informed policies and measures to scale up renewable energy, boost energy savings and phase out fossil fuel subsidies. Also, in many cases commitments to phase out coal are missing, even though these are crucial to provide proper support for the just transition of the regions and communities affected by the energy transformation.

The assessment also included country specific recommendations, providing guidance to the Member States on which improvements they need to make in their plans. Consequently, the Member States which have until the end of the year to finalise their NECPs need to show how the recommendations of the European Commission have been taken into account.

The NECPs should set clear pathways to shift away from fossil fuels and promote the rapid development of sustainable energy at the scale needed for steep emissions cuts as soon as possible. As such, implementing these recommendations is just a starting point. Member States should seize this opportunity and considerably increase the ambition of their plans in order to allow the EU to stick to its engagement under the Paris Agreement to limit temperature rise to 1.5°C.

In this context, this report provides a progress snapshot of the improvements made so far in the draft NECPs. This includes, to the extent possible, an NGO assessment of how far Member States are with the implementation of the Commission's recommendations and whether they plan to go beyond those. It is not meant to be a comprehensive analysis; instead it provides a first overview of improvements made and issues that still need to be addressed by the Member States before they submit their final plans in December 2019. The analysis is based on publicly available information such as governmental announcements or new drafts presented at the national level for consultation purposes, as well as the NGOs' expert opinion.

This report comes after the publication of a series of CAN Europe reports (2) on the draft NECPs, where NGO views on key issues for improvements were presented.

^[1] https://eur-lex.europa.eu/legal-content/EN/TXT/? uri=COM:2016:759:REVI

^[2] http://www.caneurope.org/publications/reports-and-reports/1808-fossil-fuel-subsidies-in-draft-eu-national-energy-and-climate-plans-shortcomings-and-final-call-for-action

http://www.caneurope.org/publications/reports-and-briefings/1779-just-transition-or-just-talk http://www.caneurope.org/publications/reports-and-briefings/1760-report-time-to-pick-up-the-pace-insights-into-the-draft-national-energy-and-climate-plans

PROGRESS ON CLIMATE AMBITION

The CAN Europe report "Time to pick up the pace" highlighted that Sweden, Portugal, Denmark, the Netherlands, Finland and France have a long-term target to reach net-zero emissions by 2045 or 2050 at the latest, going beyond the minimum requirements of the Governance Regulation. NGOs are calling for the EU to achieve net-zero emissions by 2040. Furthermore, Luxembourg and Sweden have explicitly set a higher national 2030 target for emission reductions in sectors such as transport, buildings, agriculture, and waste (non-ETS sectors) compared to their binding target under EU law. Spain also has a higher non-ETS target but the country's overall emission reduction target for 2030 is still only 20%, which is only half of the already insufficient EU objective of reducing emissions by at least 40%.

In its June 2019 assessment, the Commission made recommendations for different Member States on how they could further elaborate the measures needed to achieve their greenhouse gas emission reductions in the sectors not covered by the ETS. These included countries such as Cyprus, Denmark, Estonia, Germany, Ireland, Malta, Poland and Slovenia. Furthermore, some countries provided projections of emission reductions with existing measures only, while information on the impact of their planned policies and measures was missing. Even Sweden and Luxembourg, which have set higher non-ETS targets than required by the Effort Sharing Regulation, also did not present a full range of measures on how to achieve their targets.



Since the draft NECPs were submitted, Denmark has made a significant development by committing to increase its economy wide greenhouse gas emission reduction target for 2030 to 70%. It is estimated that this will mean a reduction of emissions between 47-53.6% in the non-ETS sectors (3), representing a target exceeding its requirement under the Effort Sharing Regulation. This will need to be reflected in the country's revised NECP.

Other countries among those covered in this report are working to provide more information regarding their projections on greenhouse gas emission reductions.



In Greece, for example, the Prime Minister recently announced a phase out of lignite by 2028 at the latest. Since lignite accounted for 34% of all greenhouse gas emissions in the period 1990-2017, it is expected that putting such a commitment into action will significantly affect national greenhouse gas emissions. This still needs to be enshrined in the final NECP. It is not yet possible to assess the extent of the overall emission reductions due to the lignite phase out, as this depends on the final electricity mix chosen. Replacing coal with gas will lower the positive impact of the lignite phase out on emissions and keep the Greek economy locked into the use of fossil fuels.



Slovakia's revised draft, presented in October 2019, shows that Slovakia's projections for overall greenhouse gas emission reductions are also being updated. The emissions with under 'existing measures' are projected to be a bit higher than the previous draft, while the reductions under the 'additional measures' scenario are further enhanced. According to Slovakia's revised draft, the main quantified target is to reduce greenhouse gas emissions for non-ETS sectors by 20% (the non-ETS target is currently set at 12%). There is still potential to develop the projected emission reductions under additional measures in the non-ETS sector as a whole for 2030. For example, plans to support waste incineration are counterproductive; the transport sections are not properly developed for a shift to public transport, cycling and walking; and parts covering long term plans for the renovation of residential and non-residential buildings should be added.

^[3] https://www.greenpeace.org/denmark/vi-arbejder-med/klima/halvt-saa-mange-koeer-og-svin/ table 7, page 18 (report in Danish)

PROGRESS ON CLIMATE AMBITION



Slovenia's revised draft NECP published in August 2019 contains a new analytical background section. The section includes projections for different scenarios: existing measures, additional measures and additional ambitious measures. According to the scenarios included in the revised draft NECP, Slovenia would achieve its non-ETS target only under the 'additional ambitious measures' scenario (22%). In the 'additional measures' scenario, Slovenia would get close to its target of 15% emission reduction, while under the 'existing measures' scenario, Slovenia would only achieve a 7% reduction.



In the former draft of Latvia's NECP, the greenhouse gas emissions projections in the non-ETS sectors for 2030 slightly exceeded the 6% greenhouse gas emission reduction target. The new draft includes an update from the most recent emissions data. In accordance with the recommendations from the Commission, additional measures in transport, agriculture and energy sectors have been proposed. The work on the new projections with existing and additional measures is not yet complete and more information will be included only in the final NECP.



The European Commission recommended that Ireland puts forward additional measures to reduce the significant projected shortfalls in meeting its 2030 greenhouse gas target for sectors not covered by the ETS. The Irish Government published a Climate Action Plan around the same time that the European Commission published their NECP recommendations. The Climate Action Plan does explicitly state that it builds on the draft NECP, but it did not describe how the final NECP will build on the Climate Action Plan to close Ireland's emissions gap. Therefore, it is not possible to say how the emission projections in the final NECP will be affected by the measures foreseen in the Climate Action Plan. The Plan contains some new measures across sectors and proposes a 2% decline in emissions per annum from 2021 to 2030 to meet the EU targets. However, the 2030 target is not Paris-aligned and this 2% reduction in the short term is insufficient to achieve net zero emissions by mid-century.



Germany's government has adopted in November 2019 a Climate Law under which Germany intends to reach climate neutrality by 2050. The law confirms the current 2030 national overall climate target (-55% greenhouse gas emission reduction) and is accompanied by a package of measures in particularly for the non-ETS sectors. Although a number of these measures have transformative potential, the overall package is quite weak. According to many stakeholders and scientists, the measures in the package are not enough to reach even the current national emissions reduction target for 2030. The Federal Government has said that it will conduct an impact assessment analysis specifically for the final NECP to comply with the recommendations of the European Commission. This should include emission reduction projections under the additional measures, but further information is not available yet.



For Estonia, the revised draft NECP includes updated greenhouse gas emission reduction projections with additional measures but it currently is not in a format that clearly presents the emission reductions in the non-ETS sectors as a whole. The new 2019 EEA report on trends and projections also includes updated greenhouse gas emission reduction projections with existing and additional measures for the non-ETS sectors. The EEA indicates that even with additional measures, Estonia's emissions will be higher than their non-ETS target in 2030. However, the overall emission projections under additional measures in the EEA report seem to be higher than those included in the revised draft NECP.

^[4] EEA, 2019, Trends and projections in Europe 2019 - tracking progress towards Europe's climate and energy targets, EEA Report No 15/2019, European Environment Agency

PROGRESS ON CLIMATE AMBITION



Austria published a revised draft NECP in November 2019. The draft focuses solely on the current non-ETS target and there is a vague reference to the long-term strategy that will be presented soon. The draft still includes projections with existing measures alone, however, the government has announced that projections of emissions reductions with additional measures will be presented in a few weeks.

Table 1. Expected/noticed differences in projected greenhouse gas emissions compared to the draft NECPs submitted

Country	Changes	Comments	
Denmark	Emission projections expected to reflect recent commitments which go far beyond current set targets	Based on recent political decisions	
Greece	Emission projections expected to most likely be even lower than current projections which already go beyond the set targets	Based on recent political decisions	
Germany, Ireland, Latvia	Most likely updated projections to show decreased emissions but possibly only with a view to achieve the current EU targets	Based on new legislation and measures adopted (the Climate Law/Klimaschutzgesetz and the climate measures programme 2030/Klimaschutzprogramm 2030 in Germany), new action plan proposed (the Climate Action Plan in Ireland) or information from recent version of draft NECP (Latvia)	
Slovakia, Slovenia	Updated emission projections which indicate that it is possible to go beyond the set targets with additional measures	Based on information from recent version of draft NECP	
Estonia	Updated projections which indicate further emission reductions with additional measures but without the possibility to check achievement of the non-ETS target	Based on information from recent version of draft NECP	
Austria	Currently emissions similar to the previous version of the NECP, waiting for new estimates and projections	Based on information from recent version of draft NECP	

In light of the intentions of the new European Commission to increase the 2030 climate target, all Member States need to use the opportunity provided by the NECPs to substantially increase their national 2030 emission reduction commitments and deliver the required reductions.

RENEWABLE ENERGY AND ENERGY EFFICIENCY NATIONAL CONTRIBUTIONS

According to the European Commission's assessment from June 2019 (5), under the draft plans submitted, the share of renewable energy would reach between 30.4% and 31.9% in the EU by 2030 instead of at least 32%. Based on the same analysis, 15 countries need to increase their renewable energy contribution. One Member State did not indicate any national contribution for renewable energy in the draft NECP.

For energy efficiency, Member States have to set two types of contributions, one on primary energy and one on final energy (6). According to the European Commission, the aggregate assessment shows a substantial gap to the EU 2030 energy efficiency target for both primary and final energy consumption. For primary energy consumption, the gap corresponds to attaining a target of 26.3 % to 30.2 %, while for final energy consumption the gap corresponds to attaining a target of 26.5% to 30.7 %, instead of at least 32.5 %. Twenty-three countries need to review and increase one or both of their energy efficiency contributions to achieve the EU's 2030 energy targets. Two Member States did not indicate any national contribution (primary and final) for energy efficiency in the draft NECP.

Member State	2030 contribution (according to the formula of the Governance Regulation)	2030 contribution in draft NECP	Comparison to benchmark
Belgium	25%	18.30%	1
Bulgaria	27%	25%	1
Czechia	23%	20.80%	1
Denmark	46%	55%	1
Germany	30%	30%	→
Estonia	37%	42%	1
Ireland	31%	Between 15.5% and 27.7%	1
Greece	31%	Between 31% and 32%	→
Spain	32%	42%	1
France	33%	32%	↓
Croatia	32%	36.40%	1
Italy	29%	30%	1
Cyprus	23%	19%	↓
Latvia	50%	45%	↓
Lithuania	34%	45%	1
Luxembourg	22%	23% - 25%	1
Hungary	23%	20%	1
Malta	21%	Between 10.6% and 13.3%	1
Netherlands	26%	27% - 35%	1
Austria	46%	45% - 50%	1
Poland	25%	21%	1
Portugal	42%	47%	1
Romania	34%	27.90%	1
Slovenia	37%	27%	1
Slovakia	24%	18%	1
Finland	51%	50%	Ţ
Sweden	64%	65%	1
UK	27%		

Table 2. Overview
of the 2030
national
renewable
energy
contributions in
the draft NECPs
and their
benchmarks
(source:
European
Commission)

(5) European Commission, 2019. Communication from the Commission "United in delivering the Energy Union and Climate Action: setting the foundations for a successful clear energy transition". COM(2019) 285 final (6) Primary energy consumption measures the total energy demand. It covers consumption of the energy sector itself, losses during transformation and distribution of energy, and the final consumption by end users. It excludes non-energy uses. Final energy consumption is the total energy consumed by end users, such as industry, transport, households, services and agriculture. It is the energy which reaches the final consumer's door and excludes energy used by the energy sector itself. https://ec.europa.eu/eurostat/statisticsexplained/index.php? title=Category:Energy_glossary

RENEWABLE ENERGY AND ENERGY EFFICIENCY NATIONAL CONTRIBUTIONS

	2030 contribution (mtoe) in draft NECP		Commission assessment of the contribution	
Member State	PEC	FEC	PEC	FEC
Belgium	39	33.1	modest	low
Bulgaria	17.7	8.7	low	low
Czechia	41.3	23.7	low	modest
Denmark	18.6	15.8	very low	very low
Germany				
Estonia	5.5	2.7	low	low
Ireland	15.9	13	very low	very low
Greece	25	18.1	very low	very low
Spain	98.2	74.4	sufficient	sufficient
France	201.8	124.9	modest	sufficient
Croatia	8.2	6.9	low	low
Italy	125	103.8	sufficient	sufficient
Cyprus	2.6	2.2	very low	very low
Latvia	4.3	3.6	low	modest
Lithuania	10.2	8	very low	very low
Luxembourg	3.5	3.3	sufficient	sufficient
Hungary	27	18.6	very low	very low
Malta	1.2	0.9	very low	very low
Netherlands	46.6	44.5	sufficient	modest
Austria	30	25	modest	modest
Poland	90.9	66.2	modest	modest
Portugal	20.2	17.7	modest	very low
Romania	36.7	27.5	very low	very low
Slovenia	7.1		very low	
Slovakia	16.2	10.8	low	low
Finland	36.1	26.2	very low	very low
Sweden	42.5	32.3	modest	low
UK				
EU 28 target	1273	956		

Table 3. Overview
of the 2030
national energy
efficiency
contributions
derived from the
draft NECPs and
their assessment
(source:
European
Commission) (7)

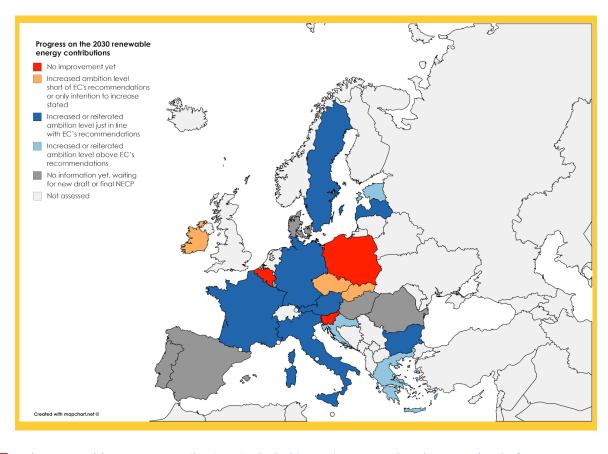
PEC: Primary energy consumption in Mtoe (million tons of oil equivalent) FEC: Final energy consumption in Mtoe

Since the recommendations were issued, some progress regarding the national renewable and energy efficiency contributions has been made but additional effort will be needed to ensure that the EU 2030 energy targets are not only met but also exceeded. At the Energy Council on 24th September 2019, Member States acknowledged the need to improve their 2030 climate and energy plans. However, only a few countries such as Ireland, France, Latvia, Slovenia, Cyprus, Bulgaria and Greece have committed to increase their contributions for renewable energy, energy efficiency or both to help close the gap towards the 2030 EU energy targets.

^[7] The values presented in the table were not necessarily all included in the draft NECPs submitted but are those that were considered in the analysis of the EU Commission. They may also come from additional information provided by Member States or EU Commission calculations.

RENEWABLE ENERGY CONTRIBUTIONS

Figure 1 shows indicative progress Member States have made so far in improving their renewable energy contributions.





The renewable energy contributions included in Spain, Portugal and Denmark's draft NECPs were among those that were above the level indicated by the Commission's assessment. Although Portugal is most likely to present its final NECP soon, Denmark is expected to present a revised draft for consultation in the coming weeks. For Spain, it remains unclear whether or not the proposed new coalition government, if successful, will propose a further draft NECP. Even so, much greater progress on renewable energy is needed to bring the country's emissions below the 1990 baseline (in 2018, overall Spanish emissions were still 15% higher than in 1990) (8). In all cases, no further information is publicly available yet.



Croatia and Estonia also had set a renewable energy contribution higher than the level indicated by the Commission's assessment and it seems there is no intention to increase it further. Estonia will already be at a share of 34% renewable energy by 2020, so just an additional 8% in the next 10 years seems rather weak.



Italy, which had set a renewable energy contribution slightly above the level indicated by the Commission's assessment and Germany, which presented a renewable contribution in the draft NECP just in line with the recommendations also seem not to have any intention to improve their contributions. Luxembourg also had included a renewable energy contribution slightly above the level of the Commission's recommendations in its draft NECP. This is likely to stay the same, but a revised NECP is not yet available.

 $^{[8] \} https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei-/190610npavanceemisionesco22018_tcm30-497587.pdf$

 $https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-espanol-de-inventario-sei-/avance-gei-2018_tcm30-496677.pdf$

RENEWABLE ENERGY CONTRIBUTIONS



At the Energy Council on 24th September, Greece, France, Latvia and Bulgaria announced they will increase their contributions. Only Greece, however, is going beyond the recommendations issued by the European Commission, announcing that a contribution of 35% will be put forward. France included a 33% renewable energy contribution for 2030 instead of 32% in the recently adopted Energy and Climate law. This level of ambition complies with the Commission's recommendations but seems extremely low compared to the high potential of renewable energy in France.



In its draft plan submitted in December 2018, Austria presented a range between 45-50% for its overall renewable energy contribution in 2030. In its new draft presented in November 2019, Austria increased the lower share of this range to 46%, only in order to comply with the Commission's recommendations.



In Slovakia's new draft NECP, the share of renewables slightly increased from 18% to 19.2% with an option to increase it further to 20% by 2030. This is still below the 24% share recommended by the European Commission.



In its revised draft, Czechia includes an increase of its renewable energy contribution from 20.8% to 22%, a level of ambition which is still below the level indicated in the assessment from the Commission.



Sweden's draft NECP suggested that the renewable energy share in final energy will be 65% in 2030 but it did not explicitly indicate that this is Sweden's contribution to the EU target. It is likely that Sweden will now confirm the 65% as its contribution in the final NECP, following the Commission's recommendation (9).



Ireland's draft NECP contained a very low share of renewable energy compared to the level indicated by the Commission's assessment. However, at the 24th September Energy Council, Ireland indicated that it is considering an increase of its contribution, but there have not been any announcements yet. Slovenia is further analysing the situation with its renewable energy contribution, but no changes have occurred so far.



Belgium has not indicated any plans regarding its renewable energy contribution. The level of ambition for the renewable energy contribution in the draft NECP is considerably lower than the level indicated by the Commission's recommendations. Addressing the shortcomings of the draft energy and climate plan has encountered a serious delay in Belgium due to the federal and regional elections in May 2019, and the subsequent government formations. Two of the three regions, Brussels and Wallonia, have committed to improve their part of the national climate and energy plan, while Flanders and the federal government have not given any indication about improving their part of the draft NECP.

^[9] A new report published by the Swedish Society of Nature Conservation - SSNC indicates that with strong policies and measures it is possible to reach an 85% share of renewable energy by 2030 https://www.naturskyddsforeningen.se/vad-vi-gor/klimat/rapport-hallbarenergi

RENEWABLE ENERGY CONTRIBUTIONS

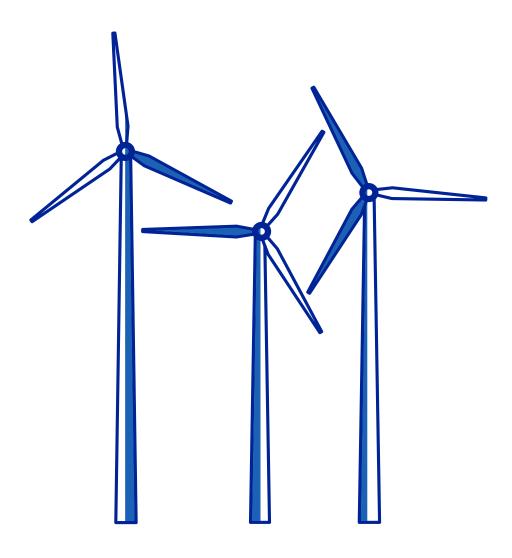


At the 24th September Energy Council, Poland has said that it is not going to increase the level of ambition of its contribution. However, in its recently published draft energy strategy for 2040, Poland foresees a range in the share of renewable energy between 21% and 23% (dependent on EU support). This should be further increased and reflected in the final NECP.



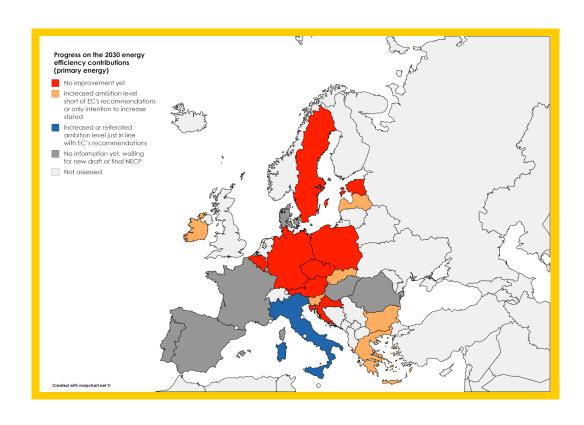
In Hungary and Romania, national NGO stakeholders did not have access to official information regarding progress or content changes on the update of the draft NECP after its submission and until the moment of consolidating this report (mid-November 2019).

Based on current information, including the Member States that have said they are going to increase their contribution, the gap towards the 2030 EU renewable energy target will probably decrease. But it is still not clear whether the contributions from Member States will be enough to close the gap.



ENERGY EFFICIENCY CONTRIBUTIONS

Figure 2
shows
indicative
progress
Member
States have
made so far
in improving
their energy
efficiency
contributions
in terms of
primary
energy.



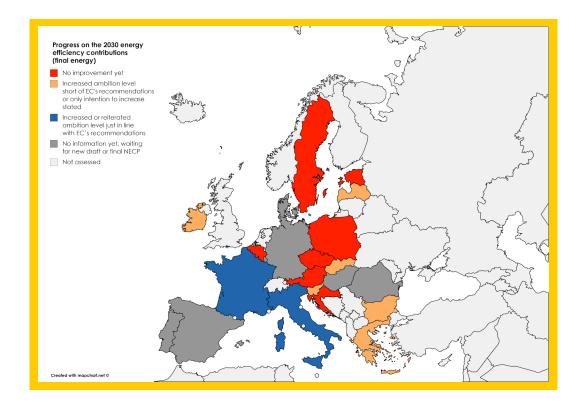


Figure 3 shows indicative progress Member States have made so far in improving their energy efficiency contributions in terms of final energy.

ENERGY EFFICIENCY CONTRIBUTIONS





According to the Commission's assessment, Spain was among the countries with sufficient energy efficiency contributions. However, no further information is publicly available at the moment as a revised NECP is expected but has not yet been published and it is unclear whether this will be subject to further public consultation. Luxembourg had the highest relative reduction in final energy consumption compared to 2017 levels in its draft NECP. This is likely to stay the same, but a revised NECP is not yet available.



Italy, which was also among the countries with sufficient energy efficiency contributions according to the Commission, has shown no intention to increase them. Furthermore, the Commission assessed that France presented a sufficient level of ambition for its final energy contribution. The final energy contribution of France has now been locked-in in the recently adopted Energy and Climate Law. There is no new information regarding the primary energy contribution, which the European Commission assessed as modest, but the slight increase in the renewable energy contribution might potentially affect the level of ambition for the overall primary energy consumption. This will only be known when the final NECP is publicly available.



Greece and Ireland clearly indicated their intention to increase their energy efficiency contributions during the Energy Council on 24th September. According to the Commission, their contributions were very low. However, until now there has been no publicly available information on the level of the increased ambition. Bulgaria also made a general statement on higher levels of ambition on its energy efficiency contribution at the Energy Council on 24th September but there is no further information publicly available.



Slovenia, Slovakia, Latvia and Czechia have indicated new levels of ambition in their revised drafts that are or have been under consultation. This is welcome, as providing concrete information before the plans are finalised increases transparency and allows for greater participation and input from stakeholders. Slovenia (10), Slovakia and Latvia have indicated improved levels of ambition. Despite this being a step in the right direction, Slovakia's and Slovenia's new levels of ambition for energy efficiency still seem far from sufficient, if assessed on the basis of the Commission's methodology used for checking national contributions in the draft NECPs (11). Latvia's updated energy efficiency contributions seem to be closer to the Commission's recommendations, even though they improved slightly in comparison to the previous level. In Czechia's new draft NECP, the level of final consumption for 2030 remains the same as in the previous draft, while the primary energy level is slightly higher.



According to the statement made during the Energy Council on 24th September, Poland is not planning to increase the country's energy efficiency contributions. Estonia includes the same consumption levels for 2030 in its revised draft under consultation as in the draft NECP submitted back in December 2018. The same practically applies to Austria.

^[10] Slovenia expressed its national contribution only in terms of primary energy consumption in its draft NECP.
[11] Based on own calculations. The Commission assessed the energy efficiency contributions in the draft NECPs comparing them to both the national 2020 targets and the 2017 statistical data. It also considered, national circumstances to the extent possible. In this report, the few available new levels of ambition for 2030 were compared to those criteria without going into further details, as this analysis aims to provide only an indication on how much the contributions have improved. The methodology used by the Commission to assess the energy efficiency contributions in the draft NECPs can be found here: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52019SC0212&from=EN

ENERGY EFFICIENCY CONTRIBUTIONS



Sweden has a national energy intensity target (50% more efficient by 2030 compared to 2005 expressed in primary energy use in relation to GDP) and there has been no change to the contribution that was included in an updated version of the draft NECP. The primary and final energy use in the new version are even a bit higher than those stated in the draft plan submitted (12). This is despite the Commission's recommendation to Sweden to "increase the level of effort towards reducing final energy consumption".



Croatia has indicated some intention to increase energy savings by clarifying details on the impact of the implementation of energy efficiency measures. However, according to the available information, this is not reflected in the overall national energy efficiency contributions, which currently seem to remain the same as the draft NECP submitted.



Germany and the UK were the only two countries that did not submit any national energy efficiency contribution for 2030 within their draft NECPs (13). Nevertheless, Germany's submitted draft plan did include an indicative reference to a 30% reduction of gross inland consumption from 2008, which was said to be in line with the national goal of halving energy demand by 2050, based on a linear trajectory. According to the available information, the German government has now started a consultation to update its 2050 energy efficiency strategy, which only includes a 28% reduction of gross inland consumption from 2008, a lower level of ambition than the one indicated in the draft NECP. There is no information yet on the level of consumption in terms of final energy for 2030.



Belgium has not indicated any plans on its energy efficiency contributions, similarly to its renewable energy contribution, due to delays in finalising the country's NECP, following the regional and national elections in May 2019.





Portugal is expected to present its final NECP soon and no further information is publicly available yet. Similarly, for Denmark, no information is publicly available yet, with a revised draft NECP expected to be presented in the coming weeks.



In Hungary and Romania, national NGO stakeholders had no access to any official information regarding progress or content changes related to the update of the draft NECP after its submission and until the moment of consolidating this report (mid Nov 2019).

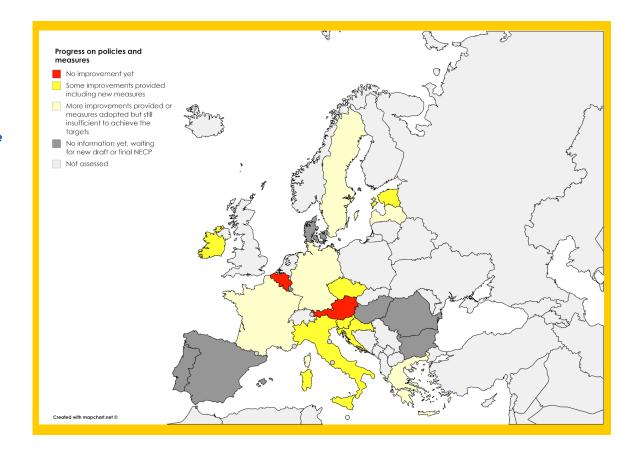


^[12] The levels of consumption in the new version of the draft NECP are 516TWh and 384TWh of primary and final energy in 2030 respectively (based on EU reference scenario 2018) compared to 482TWh and 364TWh of primary and final energy in 2030 in the draft NECP submitted (based on EU reference scenario 2016). A new report published by the Swedish Society of Nature Conservation - SSNC indicates that with strong policies and measures it is possible to reach a level of final energy consumption of at least 343TWh in 2030. https://www.naturskyddsforeningen.se/vad-vi-gor/klimat/rapport-hallbar-energi

^[13] In its analysis, the Commission had to assume a range for Germany's contribution in order to calculate the overall gap towards the EU energy efficiency target. A range of 201-251.7Mtoe for primary energy use and 156.5-197.4Mtoe for final energy use was assumed.

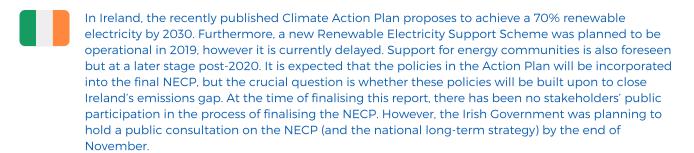
In its assessment, the Commission highlighted the lack of comprehensive policies and measures in the draft NECPs which would deliver the 2030 targets. The Commission's recommendations on the need to further elaborate policies, measures and their impact targeted the main sectors of the economy such as buildings, transport and agriculture. They also covered issues that Member States need to address in their NECPs such as alleviating energy poverty and providing enabling frameworks for the development of renewable energy communities. Based on available information, some progress has been made in addressing the Commission's recommendations, but more details and measures are needed to ensure the delivery of the targets.

Figure 4
shows
indicative
progress
Member
States
have made
so far in
improving
their
policies
and
measures.





Croatia, for example, is currently elaborating policies and measures and providing more information on their impact, especially on energy efficiency measures, as requested by the European Commission. However, an extended analysis of investment needs and resources for transport and energy efficiency measures is still missing. Furthermore, it is important to note that the implementation of the NECP will require an appropriate policy monitoring system.



In Estonia, the new version of the draft NECP provided for consultation includes an increase in the share of wind, solar and hydro from 10% to 25% in electricity consumption compared to the draft NECP submitted to the Commission at the end of 2018. On renewable energy, there are new measures added in the updated version of the draft NECP, which could unlock Estonia's renewable energy potential (especially wind), but these measures are not yet decided or planned in detail. The Commission's recommendations on the use of biomass in the energy sector and the measures to enable renewable self-consumption and renewable energy communities still need to be addressed properly.

In Germany, the recently adopted climate package includes in particular measures for non-ETS sectors (building and transport). One of the main elements of this package, which is rather weak, is the introduction of a carbon price in the transport and buildings sectors. According to national stakeholders, welcome planned measures include the cancellation of the existing 52GW-cap on the support scheme for PV installations and an increase in the support for energy efficiency renovations of buildings. A ban on old oil boilers is unfortunately foreseen only from 2026. An increase in the support for railway investments and the future transformation of the state-owned KfW development bank into a sustainability bank that supports the transition to climate neutrality are also positive steps. However, it is still not clear what the exact impact of these measures related to the 2030 climate and energy targets will be.

In its analysis, the Commission highlighted that with existing policies and measures France is projected to fall short of its 2030 non-ETS target by 11 percentage points. This is still the case despite the Mobility and Energy and Climate laws that were recently adopted. The policies and measures included in the new legislation are not in line with a 40% emission reduction by 2030 nor the climate neutrality goal. Regarding energy efficiency, measures are extremely limited and optional. On transport, the Mobility Law provided limited additional measures to support a modal shift. For example measures such as financial incentives for employers to encourage cycling to work or carpooling are overlooked. Moreover, although the ban on the sale of vehicles running on fossil fuels by 2040 was included in the law, measures to implement this goal, such as fiscal incentives for the replacement of these vehicles, are missing. Last but not least, the price level of the carbon tax has been frozen since 1st January 2019, further endangering the achievement of the climate and energy efficiency targets. New measures are needed, and a Citizens' Assembly has been established, to propose solutions on how the 2030 climate target can be achieved, without however any guarantee of the results.



In Italy, it has been announced that the final NECP will take into account the European Commission's recommendations. However, the government is still discussing with regions and other stakeholders how to detail the policy measures to align with the recommendations.



In Slovenia, some new policies have been announced, for example, increased funding for research and development for supporting the transition to a low carbon society and a legal ban on the use of fossil fuels for heating in buildings. But this does not apply to all areas. No new policies have been announced on energy poverty and agriculture. Also measures for the industry and transport sectors are lagging, although some provisions for additional resources for a faster and more intensive development of railway infrastructure are provided.



In Latvia, the new draft NECP presented for consultation elaborates on the structure and scope of the measures in transport, agriculture and energy sectors. These measures are complemented with references to the "energy efficiency first" principle, where the aim to implement the principle in a systematic way is indicated. The updated draft plan also aims at installing more on-shore and offshore wind turbines. Despite progress, Latvia's proposals may still allow for investments in fossil gas-related infrastructure and intensive agriculture.



Following the Commission's recommendations, Sweden will include more information and details on measures in its final NECP for example on energy efficiency. Information on the impact of the policies, which was also missing from the draft NECP, will be included in the final version of the plan. However, Sweden has made it very clear that it does not intend to use the NECP process to propose or adopt any new policies and measures. It will only list those that have been adopted before the NECP process started, and to some extent those that have been adopted between the draft and the final NECP.



The government in Greece has announced and is in the process of developing, the simplification of the permitting process for renewables to achieve a higher share of renewables by 2030. The government is also in the process of developing a new strategy for increasing electromobility, although the actual targets for 2030 have not changed compared to the previous draft of the NECP (10% EV in cars).



For Belgium, the discussions on policies and measures are ongoing, mainly at the regional level but how they will be included in the final NECP is also affected by the same delays as for the national renewable energy and energy efficiency contributions. The draft plan lacked clear measures for a faster transition to emission-free transport. The foreseen extended use of biofuels, instead of focusing on solutions such as improving high-quality public transport, is concerning and will not lead to a real mobility shift. In Flanders in particular, effective instruments to stimulate the renovation of the building stock are missing. Measures featured in the draft plan, such as a requirement for renovations within five years of purchasing a house, have even been withdrawn from the Flemish governmental coalition agreement.



In Austria, a new draft NECP was presented to stakeholders for consultation. However, the current government is communicating that this plan includes options only, and any decisions on instruments and their financing is the responsibility of the subsequent federal government. Therefore, the plan and any possible improvements made in the details of the measures are effectively undermined. Furthermore, the impact assessment of the policies and measures included in the new draft is still missing, but it is meant to be presented soon.



Czechia added a list of policies and measures to achieve emission reductions in the transport, agriculture, waste management, industry, energy and households sectors. However, most of the policies listed are part of already agreed strategic plans, or plans that are already in the pipeline. Therefore, additional policies and measures are limited.

Concrete information is also not available for Poland, Hungary, Romania, Bulgaria, Denmark, Portugal and Luxembourg, as revised NECP documents have not been presented yet. This makes the assessment of potential improvements for policies and measures more challenging.



This also applies to Spain, where it is especially important that the final NECP indicates how regional and municipal authorities will put in place and fund the necessary policies and measures. For example, much depends on whether the 17 autonomous communities and thousands of municipalities will act with the necessary speed and ambition in key sectors within their competence e.g. certain aspects of renewable energy and industry; urban and rural transport; agriculture and forestry; waste management; direct emissions from energy use in buildings; conservation, restoration and management of natural carbon sinks.



PROGRESS MADE IN TACKLING

FOSSIL FUEL SUBSIDIES

As part of their NECPs, Member States are required to report on their fossil fuel subsidies and their plans to phase them out. However, none of the draft NECPs submitted provides a comprehensive overview of the country's fossil fuel subsidies together with a comprehensive plan on how a phase-out will happen. Therefore, the Commission made the same recommendation to almost all Member States. In the final NECPs, they will need to provide a list of all energy subsidies and actions undertaken and planned to phase them out, in particular for fossil fuels. According to the European Commission, three Member States - Estonia, Ireland and Italy - have provided information on energy subsidies in their draft NECPs. They have received a recommendation only on the need to list the actions undertaken and planned to phase them out, in particular those for fossil fuels.

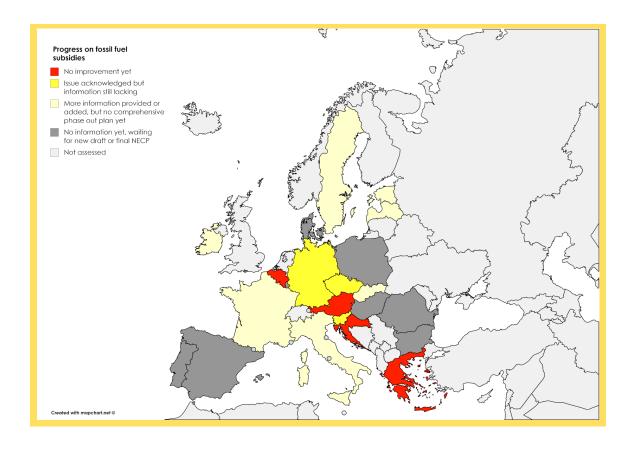


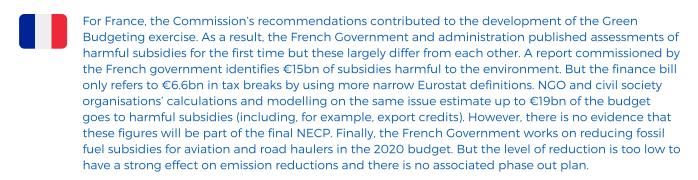
Figure 5 shows indicative progress **Member States have** made so far in providing further information on fossil fuel subsidies and the strategies to phase them out.

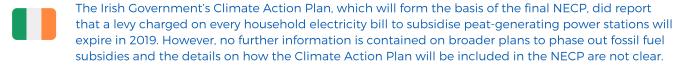


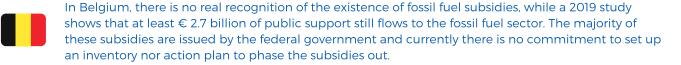
According to the available information, Croatia is not preparing to provide more information on this issue compared to the draft.

PROGRESS MADE IN TACKLING

FOSSIL FUEL SUBSIDIES







In Greece, nothing has yet been mentioned in public regarding fossil fuel subsidies and no intention to phase them out in full has been announced. Also, a new capacity mechanism is reportedly under development and until the details of this are publicly known, it is difficult to say to what extent fossil fuels will be subsidised in the future.

In Estonia's new draft version of the NECP, there is new information about an existing oil shale resource tax. This is not considered a subsidy according to the OECD definition, however when the oil price is low the resource tax is also very low, giving companies the opportunity to continue their production. This would not be economically viable with a fair resource tax which would account for externalities.

In a reply to a request from the Parliament, the German government said it will examine how far fossil subsidies can be aligned with climate targets. However, no specific list or action plan is currently available and it is still not clear how the Commission's recommendation on this issue will be addressed.

Latvia's revised draft NECP now provides more detailed information on taxes, direct and indirect payments considered as energy subsidies, including fossil fuels. It has a new additional chapter entitled "Greening of Taxes" which states that "an ultimate decrease of fossil fuel subsidies and ending of tax exemptions" are to be aimed for by 2030. However, it does not have a clear timeline for the subsidies' termination neither does it have information about the plans for ending the mandatory procurement scheme for electricity.

PROGRESS MADE IN TACKLING

FOSSIL FUEL SUBSIDIES



Italy seems to plan to include a roadmap to phase-out subsidies in its final NECP, with some provisions already featuring in the 2020 budget law.



The Swedish draft NECP did not include any information on fossil fuel subsidies. The Commission's recommendation was to "list all energy subsidies, in particular for fossil fuels, and actions undertaken as well as plans to phase them out". According to the available information, the final version of the NECP will include an overview of fossil fuel subsidies, but no comprehensive plans to phase them out.



Slovakia's revised draft NECP also includes a list of different energy subsidies and only very few statements to phase out a small number of them.



Czechia's updated draft NECP uses the IEA's definition of fossil fuel subsidies. According to this definition, the Czech government identified only one type of fossil fuel subsidy, which is the housing allowance for socially disadvantaged people, often used for housing with coal-burning stoves. The government is planning to amend the rules of this allowance to support more environmentally friendly ways of household heating. However, the NECP does not include any information on other (indirect) fossil fuel subsidies that benefit fossil companies, even though these are substantial.



In Austria's new draft, there is only a vague reference to phase out environmentally harmful subsidies up until 2030. Neither a list, nor a phase out plan is provided despite the actual climate strategy #Mission2030 which says that there should have been a list of environmental harmful subsidies by June 2019.



Slovenia includes a new paragraph about the gradual phase out of subsidies by 2030 in its revised NECP but not further information.

There is no information available on this issue yet for Poland, Hungary, Romania, Bulgaria, Spain, Denmark, Portugal and Luxembourg.



COAL PHASE OUT BY 2030

In their initial draft NECPs, some countries put forward much needed goals to phase out coal in the power sector by 2030 at the latest, namely: France, Denmark, Ireland, Italy, Netherlands, Finland and Portugal. Since then three more Member States committed to phasing out coal in the power sector by 2030 in public statements by their Heads of State or Government, these are: Greece (by 2028), Hungary (by 2030) and Slovakia (by 2023). Furthermore, although Portugal already had a coal phase out date by 2030, after the general elections the closure dates of the last two coal power plants in Portugal were brought forward. Pego is to close by 2021 instead of 2030, and Sines by 2023.

It is now crucial that these coal phase out commitments are included in the final NECPs. Slovakia has not sufficiently updated all relevant parts related to a coal phase out in the revised draft NECP, while the coal phase out commitment itself is not always mentioned in a coherent way.

Further intended coal plant closures have been announced in Spain, including the country's highest emitting installation, but there is still no indication of a revised NECP commitment to bring a full coal phase out forward from 2030. Germany has a coal phase out commitment between 2035 and 2038 at the latest, which is not ambitious enough. In order to fulfil the Paris Agreement in the most cost-efficient manner, the EU must phase out coal by 2030 the latest.

According to Slovenia's revised draft NECP - a country with a small coal capacity - two units (1 and 2) of a smaller combined heat and power coal plant in Ljubljana (TE-TOL) will be closed by 2022, while unit 3 will operate until 2035. Under 'additional' and 'ambitious additional' measures scenarios, unit 3 will be closed by 2030 and replaced with biomass and synthetic natural gas. In the second coal plant in Šoštanj (TEŠ), unit 5 will be closed by 2035, while unit 6 will operate until 2054. Under 'additional' and 'ambitious additional' measures scenarios, unit 5 will be closed by 2030, but there is no information for unit 6.

Member States with coal phase out commitments must also decide on how to deliver them. For example, Italy is still consulting on the measures that will underpin the phase out of coal by 2025. The Sardinia Region, for example, is calling for a postponement of the closure of their coal plants and/or their conversion to gas power plants. The government has confirmed the phase out for all coal plants by 2025, but it seems open to explore alternative options instead of their conversion to gas power plants, at least for some of them. The final decision has not yet been taken.

If only the current public coal phase out commitments are confirmed in the final NECPs, the vast majority of the remaining coal in 2030 will be located in just five Member States: Bulgaria, Czechia, Germany, Romania and Poland.

Oil shale in Estonia

Although not among the countries dependent on coal, a specific case that deserves attention is Estonia, which is the only European country to produce and use oil shale as its main energy source. Estonia foresees the reduction of electricity production from oil shale by 2030 but an increase in oil production from oil shale for export and an increase in electricity production from retort gas which is a side product of the oil production process. New oil production plant and pre-refinery for oil are planned based on state financial support, but information is not included in the revised draft NECP. There is no commitment to an oil shale phase out.

CONCLUSIONS AND RECOMMENDATIONS

This report provides an indication of the current progress Member States have made in improving their draft NECPs, including, to the extent possible, how far they are with the implementation of the Commission's recommendations issued in June 2019 and whether they plan to go beyond those.

Our analysis shows that the changes still do not go far enough. Based on the available information, it is clear that there is still much work to be done:



Increase the level of climate ambition

On climate ambition, Denmark has committed to increase its greenhouse gas emission reduction target for 2030 to 70%, since the draft NECPs were submitted. Further changes in Member States greenhouse gas emission reduction projections are expected due to, for example, new legislation or new political commitments but it is hard to assess the impact this can have on the overall EU level of ambition. In any case, all Member States need to substantially increase their national 2030 emission reduction commitments and deliver the required reductions.



Go beyond the minimum requirements for renewable energy and energy savings

Some progress has been made on the national renewable and energy efficiency contributions. So far, a few Member States have made specific statements on increasing their national contributions. Moreover, only a few seem to go beyond the bare minimum required to reach the EU 2030 energy targets, notably on renewable energy. Therefore the risk of not closing the gap towards the EU 2030 energy targets remains, particularly for energy efficiency. Higher ambition is required to be in line with the EU engagement under the Paris Agreement to limit temperature rise to 1.5°C.



Develop robust policies and measures to underpin the delivery of the energy transition

There is some progress in addressing the Commission's recommendations on the policies and measures. More details and measures are needed in all sectors to address the Commission's recommendations, ensure the delivery of the targets and achieve greater climate ambition.

CONCLUSIONS AND RECOMMENDATIONS



On coal phase out, three more countries have committed to phase out coal in the power sector by 2030. If only the current public coal phase out commitments are confirmed in the final NECPs then the vast majority of the remaining coal in 2030 will be located in just five Member States: Bulgaria, Czechia, Germany, Romania and Poland.



Shift financial flows away from fossil fuels

On fossil fuels subsidies, where information is available, it mostly covers an overview of energy subsidies rather than the actions planned and undertaken to phase them out, in particular for fossil fuels.



In general, it seems the process of finalising the plans has not been sufficiently inclusive. Either governments have not sufficiently involved stakeholders in the process after the Commission presented its recommendations, or there have been delays in presenting new drafts for consultation, many of which come late in the process. All interested individuals and organisations should be offered the time and the opportunity to participate in this process.

Even though the process of developing the final NECPs is in its final stages, Member States should not shy away from seeking the input and the involvement of their stakeholders on how to improve their NECPs and actively disseminate relevant information and data.

CONCLUSIONS AND RECOMMENDATIONS

Member States still have one month to ensure higher ambition in their final NECPs. It is high time for them to bring their plans closer to the Paris Agreement goals. The clock is ticking as the deadline for the finalisation of the plans - the end of this year - is approaching.

The European Commission needs to stay strong on the recommendations issued in June 2019 and continue pushing Member States to increase their ambition and come forward with the additional measures that will underpin the delivery of their climate and energy targets.

During the adoption of the Clean Energy Package, Member States opted for the iterative process of the Governance Regulation instead of national binding targets, committing to deliver the EU energy targets collectively. Currently there is a risk of an ambition gap even before the implementation of these plans begins. Therefore, if after assessing the final plans, it still turns out that the collective ambition does not add up to the required level, the Commission needs to propose additional measures, including national binding targets to ensure that, at the minimum, the 2030 EU targets are met. The assessment of the final plans should be accompanied by the update of the recommendations to Member States and proper reporting requirements should be developed on the basis of the Governance Regulation.

Furthermore, the upcoming EU Regional Development Funds spending plans for 2021-2027 to be prepared by the Member States in the course of 2020 offer a range of opportunities to increase the ambition and the implementation of the measures foreseen in the NECPs.

In any case, an increase in the ambition of the 2030 greenhouse gas emission reduction target, as the Commission President-elect Von der Leyen promised, also entails an increase in the 2030 renewable energy and energy efficiency targets, underpinned by appropriate policies and measures. Member States should use their NECPs to immediately increase climate ambition and go beyond the minimum requirement for meeting the current EU climate and energy targets for 2030.



This report provides a progress snapshot of the improvements made so far in the draft NECPs. This includes, to the extent possible, an NGO's assessment of how far Member States are with the implementation of the Commission's recommendations and whether they plan to go beyond those. It is not meant to be a comprehensive analysis, but it provides an overview of where Member States stand with improvements made and some of the issues that still need to be addressed before they submit their final plans in December 2019. It also needs to be noted that this analysis does not replace the assessment of the final NECPs that needs to take place after the end of the year. The final NECPs will be those that will include the official information on national contributions and policies and measures communicated by the Member States to the European Commission.

The analysis is based on publicly available information such as governmental announcements or new drafts presented at the national level for consultation purposes, as well as NGOs' expert opinion. It was concluded in mid-November 2019. Any developments after that date have not been taken into account.

The report includes analysis on key issues related to climate ambition including improvements on climate and energy targets, improvements on policies and measures, developments regarding coal phase out commitments and improvements related to fossil fuel subsidies.

An overview of the sources of information used for the analysis of each country is provided below:

Member State	Source of information	Comment
Belgium	NGOs' expert opinion and national discussions	Finalising the NECP has encountered a serious delay in Belgium due to the federal and regional elections in May 2019, and the subsequent government formations. Two of the three regions, Brussels and Wallonia, have committed to improve their part of the national climate and energy plan, while Flanders and the federal government have not spoken out about improving their part of the draft NECP. Therefore it is difficult to assess how everything will come together in one final NECP
Bulgaria	Public statements during the Energy Council on 24th September and NGOs' expert opinion	A revised version of the NECP is expected soon, so no information is available at the moment. However, there were some statements regarding the energy contributions at the Energy Council on 24th September and those have been used in this analysis
Czechia	Revised draft NECP available for consultation	Provided in November 2019
Denmark	No available information yet	A fully revised version of the draft NECP is expected soon for consultation, following the political commitment to increase the economy wide greenhouse gas emission reduction target for 2030 to 70%. So no information is available at the moment.
Germany	NGOs' expert opinion, national discussions and new legislation put in place	Germany's government has recently adopted a Climate Law, accompanied by measures in particular targeting the non-ETS sectors. The Federal Government has said that they will conduct an impact assessment specifically for the final NECP to comply with the recommendations of the European Commission, but since nothing is publicly available yet, it is difficult to assess progress

Estonia	Revised draft NECP	Provided in October 2019
	available for consultation	
Ireland	NGOs' expert opinion, public statements during the Energy Council on 24th September, national discussions and a new action plan proposed	The Irish Government published a Climate Action Plan around the same time that the European Commission published their NECP recommendations. The Climate Action Plan does explicitly state that it builds on the draft NECP, but it did not describe how it intends to improve the final NECP. At the moment of consolidating the report, the Irish Government was planning to hold a public consultation on the NECP (and the national long-term strategy) by the end of November. There were some statements regarding the energy contributions at the Energy Council on 24th September and those have been used in this analysis
Greece	NGO's expert opinion, public statements during the Energy Council on 24th September, national discussions and new	The Greek Prime Minister recently announced a phase out of lignite by 2028 at the latest. This still needs to be enshrined in the final NECP. Discussions about the revisions in the NECP are ongoing and a consultation on a revised draft NECP is expected soon. There were
	commitments announced	some statements regarding the energy contributions at the Energy Council on 24th September, as well as in official press releases by the Greek Ministry of Environment and Energy and those have been used in this analysis
Spain	No available information yet	Although there is no available information yet, informal indications from government sources suggest that the Commission's recommendations, and some of the issues raised in the consultation exercise, will be addressed in the final NECP. A final or revised draft NECP is expected soon, depending in part on whether a new Spanish government is formed successfully following the recent general election, and the priorities and position adopted by a new government.
France	NGOs' expert opinion, national discussions and new legislation put in place	France recently adopted the Energy and Climate Law, which enshrined in legislation most of the elements of the NECP
Croatia	Revised draft NECP available for consultation	Provided in November 2019
Italy	NGOs' expert opinion and national discussions	
Cyprus	Not assessed	
Latvia	Revised draft NECP available for consultation	Provided early October 2019
Lithuania	Not assessed	
Luxembourg	No available information yet	There is no revised version of the NECP yet, so no detailed information available at the moment.
Hungary	No available information yet	In Hungary and Romania, national NGO stakeholders had no access to any official information regarding progress or content changes related to the update of the draft NECP after its submission and until the moment of consolidating this report (mid Nov 2019)
Malta	Not assessed	
Netherlands	Not assessed	
Austria	Revised draft NECP available for consultation	Provided in November 2019

Poland	Public statements during the Energy Council on 24th September	No revised version of the NECP yet. The main source of information was statements regarding the energy contributions at the Energy Council on 24th September, which have been used in this analysis. A revised energy strategy for 2040 was recently published, however due to timing limitations, it was not possible to fully include information from this draft strategy.
Portugal	No available information yet	Portugal is expected to present its final NECP soon
Romania	No available information yet	In Hungary and Romania, national NGO stakeholders had no access to any official information regarding progress or content changes related to the update of the draft NECP after its submission and until the moment of consolidating this report (mid Nov 2019)
Slovenia	Revised draft NECP available	A revised version of the draft NECP has been available since August
Slovakia	Revised draft NECP available for consultation	A revised draft NECP became available in late October. Due to timing limitations, only information about the greenhouse gas emission projections, the energy contributions, coal and fossil fuel subsidies were considered in this report
Finland	Not assessed	
Sweden	Revised draft NECP available	A revised draft from the Energy Agency is available but the government is still planning to make some final additions (and to take into account the public consultation on the final draft) before it can be considered the final version.
UK	Not assessed	

On climate ambition, developments since the submission of the draft NECPs are presented and a first attempt is made to provide an overview of the changes that could be expected in the greenhouse gas emissions projections of the Member States that were covered.

Regarding renewable energy contributions, where there was specific information available, intentions to increase the contribution or updated levels of ambition by a Member State at least in line with the share indicated by the Commission resulting from the formula in the Governance Regulation, was checked. For countries with a contribution slightly above the Commission's assessment it was assumed that this contribution was just in line with Commission's recommendations.

For the energy efficiency contributions, whether a Member State has expressed its intention to increase its contribution, has been taken into account. However, on the contrary to the renewable energy contributions, there is no formula described in the Governance Regulation providing quantitative benchmarks on how to assess the energy efficiency contributions. Thus, the European Commission had to develop a methodology (14) to assess the energy efficiency contributions in the draft NECPs. In its Communication (15) assessing the 28 draft NECPs as a whole, the European Commission recommended to all Member States whose contributions were not assessed as sufficient, to review them and consider increasing the contributions in order to close the "ambition gap" in their final NECPs. As such, in this report, it was considered that an improved level of ambition should be sufficient in order to be in line with the Commission's recommendations (16). Furthermore, overall it was considered that there has been no improvement, where there are indications that a Member State might lower its level of ambition for 2030 in comparison to the level of ambition indicated in the draft plan or presented in table 3, regardless of the Commission's assessment.

On policies and measures, the analysis of progress made is based on information that is available and the expert opinion of national NGOs. In this case, a first attempt has been made to check the extent to which more details on already stated measures have been added and/or new measures have been proposed to improve the credibility of the plan, depending on the priorities of national NGOs. This also takes into account whether the follow up on these proposals at the national level is still rather uncertain or whether there are indications of a solid commitment. Furthermore, other information considered includes whether improvements and new measures are presented in a new updated draft, whether policies have already been adopted even if there is still not a draft available, or whether nothing has been presented yet in a comprehensive way and the discussions on measures and improvements are still ongoing.

On coal phase out in the power sector by 2030, developments on new commitments since the submission of the draft NECPs are presented.

On fossil fuel subsidies, indications that a Member State has made any progress on this issue, the availability of quantified information, the existence or planned existence of lists of fossil fuels subsidies and finally whether action is foreseen to phase them out was checked.

^[14] European Commission, 2019. Commission Staff working document accompanying the Communication "United in delivering the Energy Union and Climate

 $Action - Setting the foundations for a successful clean energy transition". SWD(2019) 212 final (pages 11 to 13) \\ https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52019SC0212&from=EN$

In short, the energy efficiency contributions were compared to both the national 2020 targets and the 2017 statistical data, also considering to the extent possible, national circumstances.

^[15] European Commission, 2019. Communication from the Commission "United in delivering the Energy Union and Climate Action: setting the foundations for a successful clean energy transition". COM(2019) 285 final

^[16] As this report mainly aims to provide an indication of how much the contributions have improved, the few available indicated new levels of ambition for 2030 were compared only to the two criteria used in the Commission methodology without going into further details. A more precise analysis should be done once the national contributions are final and the NECPs have been submitted at the end of the year.

COLOURS IN THE MAPS

EXPLAINED

Contributions	No improvement yet	
	Increased level of ambition short of the European Commission's (EC's)	
	recommendations or only intention to increase available so far	
	Level of ambition increased or reiterated just in line with the European	
	Commission's (EC's) recommendations	
	Level of ambition increased or reiterated above the European	
	Commission's (EC's) recommendations	
	No information yet, waiting for a revised draft or final NECP soon	
	Not assessed	
Policies and	No language and containing	
Measures	No improvement yet	
	Measures/improvements announced and/or presented in detail to some	
	extent. No concrete decisions on adoption or implementation yet	
	In short:	
	Some improvements provided including new measures	
	More measures/improvements presented in detail to a larger extent but	
	still seem insufficient to achieve the targets. Policies may have also been	
	adopted	
	daspied	
	In short:	
	More improvements provided or measures adopted, but still insufficient	
	to achieve the targets	
	No information yet, waiting for new draft or final NECP	
	Not assessed	
Fossil Fuel		
Subsidies	No improvement yet	
	Issue acknowledged but information still lacking	
	More information provided or recently added, but no comprehensive	
	phase out plan yet	
	No information yet waiting for revised draft or final NECP soon	
	Not assessed	



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