

POLICY OPTIONS for FUTURE-PROOF NECPs

Recommendations from
the national level ahead
of the revision of the
Governance Regulation



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Introduction

Discussions on the **post-2030 climate and energy framework** start at a crossroad moment for the European Union. Domestically, the cost-of-living crisis and the rising impacts of climate change are both increasingly felt by citizens¹. At the same time, the violent conflicts in Ukraine and in the Middle East have exposed the risks of fossil-fuel dependence, making the transition to renewable energy not only a climate imperative, but a strategic necessity². Further, the enshrining of the 2040 target for 90% net reductions into the European Climate Law reflects the EU's commitment to continue reducing carbon emissions. In this context, discussions on the post-2030 climate and energy framework offer a vital opportunity to determine Europe's course, as they will shape the EU's shared vision on climate and energy for decades to come.

The Regulation 2018/1999 on the Governance of the Energy Union and Climate Action Regulation – or "**Governance Regulation**" – sits at the very core of the post-2030 EU climate and energy framework. Since its entry into force in 2018, the Governance Regulation has been one of the legislative backbones of the 2030 framework – shaping the EU's Energy Union long-term direction as well as providing common, predictable rules for national planning, reporting, and monitoring to achieve the EU 2030 climate and energy objectives. At a time of instability, its revision is therefore the opportunity to provide a long-term, stable, and credible strategic framework in a crucial decade for the EU's energy transition and its path towards climate neutrality.

In December 2025, the European Commission opened a **call for evidence** and a **public consultation**³ on the revision of the Governance Regulation (with a deadline on March 19). As part of its public consultation process, the Commission also conducted **two stakeholder workshops** – on March 3 and May 7, respectively^{4 5}. Stakeholders were asked to intervene, among others, on the post-2030 targets energy architecture and on the streamlining of planning and reporting obligations for Member States.

CAN Europe intervened in both stakeholder workshops and provided its input to both the public consultation and call for evidence⁶ based on its position papers⁷, developed with its over 200 members representing over 40 million citizens across Europe. Our key points on the post-2030 climate and energy governance framework include:

- Placing binding EU and national targets for renewables, energy efficiency and climate at the heart of the post-2030 framework;
- Introducing a robust and binding framework for the phase-out of all fossil fuels and fossil fuel subsidies;

¹[CAN Europe et al. \(2026\)](#). Letter to the President of the European Commission and President of the European Council ahead of the European Council of 19-20 March.

²[CAN Europe et al. \(2026\)](#). Energy Security and Affordability in a New Geopolitical Era: A Future-Proof Post-2030 EU Energy Framework.

³[European Commission \(2025\)](#). Update of the governance of the Energy Union and climate action.

⁴[European Commission \(2026\)](#). Workshop on the revision of the governance of the Energy Union and Climate Action (3 March).

⁵[European Commission \(2026\)](#). Second workshop on the revision of the governance of the Energy Union and Climate Action (7 May).

⁶[CAN Europe \(2026\)](#). Update of the Governance of the Energy Union and Climate Action – CAN Europe's response.

⁷[CAN Europe \(2026\)](#). General principles that should be followed when revising the Governance Regulation (January 2026); [CAN Europe \(2026\)](#). The revision of the Governance Regulation: support for an ambitious and solid post-2030 energy framework (March 2026).

- Reinforcing national planning and reporting, to accelerate implementation while keeping in place and improving essential compliance mechanisms;
- Reinforcing meaningful spaces for public participation and multilevel governance.

This briefing goes a step further, as it **provides technical feedback to specific policy options and measures** foreseen for the revision of the Governance Regulation. These policy options were presented during the second stakeholder workshop by Ramboll and Ecologic Institute, the consultants leading on the impact assessment of the Governance Regulation. While the target architecture is considered, most of them focus on Member State's planning – notably via National Energy and Climate Plans ("NECPs") – and their related progress reports ("NECPRs"). The Commission will select some of them as guidance for the revision, aiming to:

1. Ensuring fitness of the Governance Regulation for the post-2030 framework
2. Simplification and streamlining
3. Improving multi-level governance and cooperation

The technical feedback provided in this briefing is organized around the 7 intervention areas presented by Ramboll and Ecologic, to be as informative as possible for decision-makers who will have to select among different policy options. The intervention areas include:

1. Target Architecture
2. Content of the NECPs
3. Structure of planning and reporting
4. Timing of planning and reporting
5. Iterative process – Preparation and assessment
6. Iterative process – Monitoring and compliance
7. Cooperation and consultation

The goal of this briefing is to **share the perspective of national experts from civil society, who have been involved in the drafting and implementation of NECPs** – and their related progress reports – since they were first drafted in 2019. [LIFE Plan4Climate](#) builds, in fact, on previous work conducted by [LIFE Unify](#) (2019-2022) and [LIFE TogetherFor1.5](#) (2022-2025), two EU-funded projects which have ensured continuous, on-the-ground monitoring of NECPs in over 25 EU Member States throughout the years.

The technical feedback provided in this briefing has been collected across 13 EU countries, including: Belgium, Bulgaria, Croatia, Czechia, Estonia, France, Germany, Hungary, Italy, Poland, Portugal, Slovenia and Spain.

Summary matrix: our position on each policy option

The table below summarises CAN Europe’s position on each of the policy options put forward for the impact assessment, across the seven intervention areas. It is intended as a quick-reference guide: each row corresponds to a single policy option, identified by its code (e.g. **TA1**, **CP3**, **SPR5**). The colour coding signals the nature of that position — green where we support the option, grey where our support is conditional or qualified (i.e. contingent on specific safeguards or design choices), and red where we oppose it. The sections that follow set out the full reasoning behind each verdict. Read together, the table reflects a consistent underlying logic: we support measures that improve planning and reporting provided they build on — rather than weaken — binding targets, robust scenarios, and existing compliance obligations.

1. Target architecture	TA1	TA2			
2. Content of NECPs	CP1	CP2	CP3	CP4	
3. Structure of planning and reporting	SPR1	SPR2	SPR3	SPR4	SPR5
4. Timing of planning and reporting	TP1	TP2			
5. Iterative process – preparation and assessment	IPA1	IPA2	IPA3	IPA4	
6. Iterative process – monitoring and compliance	IPC1	IPC2	IPC3		
7. Cooperation and consultation	CC1	CC2	CC3	CC4	CC5

SUPPORT Support **CONDITIONAL** Conditional / qualified **OPPOSE** Oppose

1. Target Architecture (TA)

DESCRIPTION OF THE INTERVENTION AREA

- Specifies how targets factor into national planning and how they are monitored
- Refers to overarching climate and energy objectives, targets, and metrics
- Supports post-2030 fitness of the Regulation and simplification and streamlining
- National climate targets will be taken as an external input

RELATED POLICY MEASURES

- **SUPPORT** **TA1: Continuation of existing energy target architecture** – Maintains the current framework while updating targets for the post-2030 period
- **OPPOSE** **TA2: Simplified energy target architecture** – Reduces the number of targets to a smaller, more focused set

The two policy measures presented under the first intervention area (TA) are mutually exclusive. We **strongly support the continuation of the existing energy target architecture** in the post-2030 framework (**TA1**) over its simplification (**TA2**).

First, albeit not perfect, the current structure based on **binding overall EU targets for both renewable energy and energy efficiency has clearly delivered** important results in the past decades. Without the deployment of renewable energy, cumulative GHG emissions in the 2005 to 2022 period in the energy sector would have been about 18% higher⁸. At the same time, long-term energy efficiency measures implemented in the EU between 2015 and 2024 cumulatively reduced energy demand by 4.8%, significantly easing the pressure on energy prices during the recent energy price crisis⁹.

Second, **there is no evidence supporting the need for a change in the current energy target architecture**. The evaluation of the Governance Regulation, conducted by the Commission in 2024, while concluding that room for improvements exists, does not mention¹⁰ any concerns on the current target architecture. The results of the public consultation, presented during the workshop on May 7, indicate wide preference among stakeholders for keeping the current architecture. 78% of respondents¹¹ from businesses, business associations, civil society and academia voted in favor of keeping, rather than changing, the current target architecture (with a majority supporting the addition of KPIs). This message was clearly echoed during the two stakeholder workshops, where the **need for continuity, rather than disruption** ("do not rock the boat"), was emphasized also by several Member State's officials. Consistency post-2030 is also important to keep delivering on existing efforts on both renewables and energy efficiency before 2030.

Third, **the alternatives for simplification** of the target architecture – which basically entails reducing the amount of binding energy targets – **have significant shortcomings**.

An **electrification** target has been considered as an alternative. While electrification is an essential enabler of a 100% renewables-based energy system and an accelerated path towards net zero, as well as for energy security and resilience, electrification alone cannot drive the speed and scale without action on renewable energy, energy savings and fossil fuel phase out. An electrification-only

⁸[Ecologic and Öko-Institut \(2024\)](#). EU 2040 Climate Target: Contributions of the Energy Supply Sector.

⁹[Coalition for Energy Savings \(2025\)](#). Energy Savings Deliver : turning policy into impact.

¹⁰[European Commission \(2024\)](#). Report on the Review of the Regulation on the Governance of the Energy Union and Climate Action. Commission Staff Working Document. Evaluation. SWD(2024)200.

¹¹CAN E calculation based on findings from Ramboll (as presented during the stakeholder workshop on May 7).

approach, without ensuring a strong regulatory framework on energy savings and renewable energy deployment entails three key risks:

- Electricity demand that outpaces renewables supply capacity, locking in fossil generation – which would undermine both climate and energy security objectives¹²,
- Cost overruns from oversized infrastructure;
- Failure to reduce non-electric fossil fuel use¹³.

Hence, if the EU is to set an electrification target, it should be an addition to, rather than a replacement of, renewables and energy efficiency targets – and should be combined with strong regulatory measures and fossil gas phase out.

A broader target such as ”**clean energy target**”, which lacks a clear legal definition and represents an umbrella concept that can be interpreted in different ways, would risk diluting investment signals and slowing deployment of renewable energy and energy efficiency solutions.

In short, while the Commission should address existing shortcomings in implementation, enabling conditions and compliance, it should do so by building on the successes of the current framework. The request for simplification – and consequent reduction of administrative burden for Member States – can be met by streamlining planning and reporting procedures and platforms (see below), rather than by reducing the amount of binding targets.

¹²[négaWatt \(2026\)](#). Make electrification 'Fir for 90'.

¹³[négaWatt \(2026\)](#). Make electrification 'Fir for 90'.

2. Content of the NECPs (CP)

DESCRIPTION OF THE INTERVENTION AREA

- Improves the structure, clarity, and quality of information in NECPs
- Strengthens projections with clearer assumptions and focus on key policies
- Enhances investor certainty by detailing investment needs and financing sources
- Supports post-2030 fitness of the Regulation while contributing to simplification and streamlining

RELATED POLICY MEASURES

- **CONDITIONAL CP1: Focus NECPs on enabling framework** – Strengthens NECPs through a forward-looking performance framework based on consistent projections
- **CONDITIONAL CP2: Restructure NECPs around horizontal priorities and sectoral pathways** – Re-organises NECPs around economic sectors and overarching priorities to improve clarity and comparability
- **SUPPORT CP3: Inclusion of additional investment data** – Adds high-level estimates of transition investment needs across sectors to improve transparency
- **SUPPORT CP4: Inclusion of policies mobilising investment** – Links investment needs to supporting policies and financing frameworks to strengthen investor certainty and a roadmap to fossil fuel subsidy phase-out

The second intervention area presented in the impact assessment relates to the content of NECPs – in practice, they look at the NECP template and how it should evolve. As the policy measures presented are not mutually exclusive, we will comment on them one by one.

CP1 looks at how **indicators, projections, and benchmarks should be revised in the new NECP template**. It seems to suggest refocusing the NECPs away from monitoring compliance towards climate and energy targets and towards monitoring the enabling conditions for the transition (by introducing a KPI framework, see Intervention Area 3, **SPR5**). Our support for it is conditional.

To begin with, **the new NECP template should still be structured to achieve binding targets for climate and energy**. While a greater focus on the implementation and its enabling conditions are necessary to accelerate the delivery of the transition on the ground, the future NECPs cannot do without clear binding targets – also at the national level – providing a clear direction of travel and certainty to public and private investments. Any revision of indicators, projections and benchmarks should still revolve around binding targets – and not used to weaken them.

Climate and energy scenarios should also be preserved. The scenarios with existing and additional measures ("WEM" and "WAM", respectively) are a key transparency feature of the current NECPs, as they show the true level of ambition – and expected action – of Member States. For instance, their presence in current NECPs has allowed experts to identify a gap¹⁴ between the sum of policies and measures (PAMs) and the respective 2030 climate and energy targets. They should therefore be preserved and requested more consistently (for instance, for each climate and energy sector) to reinforce monitoring and better identify bottlenecks slowing down implementation.

¹⁴[CAN Europe et al. \(2025\)](#). Climate goals at risk: NECPs' ambitious implementation must close the gaps; [ECNO \(2026\)](#). Delivering the EU's 2030 climate and energy targets: Gaps in national contributions and policies An analysis of 27 final National Energy and Climate Plans.

At the same time, **modelling of WEM and WAM scenarios should be significantly improved**¹⁵. Despite the Commission relying heavily on them to assess the EU-wide trajectory towards 2030 targets, the current scenarios are significantly flawed and have significant margins for improvement, notably by:

- **Linking WEM/WAM scenarios more strongly with policies and measures (PAMs)**¹⁶. Too often, the link is too weak in current NECPs. One of the reasons is that PAMs themselves are expressed in a qualitative way – i.e. with long narrative descriptions without quantified estimates of their contribution to emissions reductions, energy savings or renewable deployment. There is insufficient ex-ante and ex-post granular data to make such assessments. As a result, current WEM/WAM scenarios become unusable for monitoring and reporting purposes (including for a credible EU-wide assessment), and NECPs are perceived by national authorities as "one-off", "aspirational", and ultimately burdensome compliance exercises¹⁷, rather than implementable roadmaps. This is not just a content issue, but a structural flaw of the template that needs correction.
- **Requesting granular, quantifiable data on PAMs in the new NECP template**. Standardized "policy fiches" could be introduced for each measure¹⁸, covering the timeline and implementation status, financing needs and sources, and the expected quantitative impact (which would require conducting SEAs¹⁹ and public consultations before including PAMs in the NECP). In the same spirit, if a KPI system is developed to monitor progress (see Intervention Area 5), its indicators should be based on the quantifiable impact of PAMs, while at the same time informing WEM/WAM modelling and keeping their projections up to date.
- **Standardising frameworks and methodologies for modelling WEM and WAM scenarios**. At present, they vary significantly and have different degrees of quality across countries (if not within the same plan). This raises a comparability issue, but also undermines the EU's credibility in complying with its overall climate and energy targets. The future Governance Regulation should therefore include common scenario-modelling frameworks and methodologies – or at least common binding standards – and the Commission should foresee technical assistance to Member States in developing them.

With **CP2**, the NECP template would move away from the Energy Union dimensions, to be organized around new **cross-cutting priorities** and **economic sectoral pathways**.

There is no need to drastically move away from the existing five Energy Union strategic priorities (see Intervention Area 1) – which, as indicated in the Commission's own evaluation, have become even more relevant in light of the recent geopolitical and fossil fuel crises²⁰. To preserve coherence and comprehensiveness, the three **cross-cutting priorities** presented during the second stakeholders' workshop – i.e. competitiveness, affordability and security – could also be addressed as part of the current architecture.

On the other hand, the structure of NECPs could be reorganized around **sectoral pathways**. This would be especially relevant if the post-2030 EU climate legislation complements – as it should, to maintain targeted pressure on individual sectors²¹ – binding national climate targets with national

¹⁵ Mentioned as a priority by, among others, national experts from Croatia, Germany, Bulgaria and Hungary.

¹⁶ Mentioned as a priority by over 70% of national experts who contributed to this briefing.

¹⁷ Quotes in brackets have been collected by national experts from Bulgaria, Croatia and Germany.

¹⁸ Mentioned as a priority by, among others, national experts from Czechia, Italy and Poland.

¹⁹ Mentioned as a priority by, among others, national experts from Hungary and Portugal.

²⁰ [European Commission \(2024\)](#). Report on the Review of the Regulation on the Governance of the Energy Union and Climate Action. Commission Staff Working Document. Evaluation. SWD(2024)200.

²¹ [CAN Europe \(2026\)](#). Post-2030 Climate Policy Framework

sectoral roadmaps. This reorganization could reduce Member States' planning efforts, as many of them already develop sector-based decarbonization and energy scenarios. To be truly effective, the reorganization around sectoral pathways should:

- **Reduce fragmentation within the template.** There is an excessive fragmentation²² of key sectors across different parts of the plan, which makes it impossible to assess their cumulative impact as part of a coherent sectoral strategy (for instance, on fossil fuels). To improve planning clarity and cut redundancies, current Chapters 2-4 could be reorganized per sector to allow for better integration between sectoral objectives, projections and related PAMs (all currently in different sections).
- **Improve integration with other national plans.** NECPs are largely drafted and implemented in isolation from other plans and strategies²³, rather than functioning as the central coordination mechanism of national energy and climate governance. This includes several EU planning and financing instruments (see **CP4**) such as Social Climate Plans, National Building Renovation Plans and Adaptation Plans. Cross-referencing may occur, but the current template does not require Member States to map measures or budgets across documents. To foster integration, each sector-specific section of the NECP should address relevant planning and financing tools – not only qualitatively, but through quantitative and standardised cross-referencing (e.g. policy fiches).
- **Include dimensions currently neglected.** The sectoral reorganization of the NECP template should not exclude crucial aspects of the energy transition neglected in the current template. Most notably, it should address the phaseout of all fossil fuels – largely absent from the current governance architecture, – strengthen the existing framework for the phaseout of fossil fuel subsidies (see **CP4**), integrate resource efficiency as a major avenue to both curb climate change and strengthen economic security, and operationalize indicators for a socially just transition and industrial decarbonisation across sectors²⁴.

CP3 and **CP4** aim at **making the NECPs more "investable"**, by including more details on investment needs across sectors (**CP3**) and linking it better with public and private finance, including EU financing instruments (**CP4**).

The current template is inadequate²⁵ when it comes to investment needs and financing sources. One of the main issues is the template's design, which does not require the information to be provided in an actionable or verifiable way. Section 5, in particular, works as a narrative annex – i.e. presenting in aggregated, narrative form, without links to specific measures, timelines or funding certainty – rather than a planning instrument²⁶. Policy options improving the current situation are therefore welcomed. To ensure they will work, a few elements are worth considering.

- **Binding targets** for 2040 remain the cornerstone of any "investable" NECP, as they provide private and public investors with a clear, credible trajectory and the predictability required to mobilise resources in the longer-term (see **CP1**).
- **Granular information on investment needs and financing sources is essential.** While "higher-level estimates per sector" would be a useful addition to provide clarity to investors (see **CP3**), they must be based on investment needs and financing sources available for individual PAMs.

²²Mentioned as a key issue, among others, by national experts from Czechia and Italy.

²³Mentioned as a key issue, among others, by national experts from Croatia, Italy, Germany and Slovenia.

²⁴Sectoral roadmaps should be informed by distributional impact assessments, take into account existing vulnerabilities and intersecting forms of discrimination, and use gender-disaggregated data. See [CAN Europe \(2026\)](#). Post-2030 Climate Policy Framework

²⁵Mentioned as a key issue, among others, by national experts from Bulgaria, Croatia, France, Hungary, Italy, Poland and Spain.

²⁶[CAN Europe \(2025\)](#). Climate goals at risk: NECPs' ambitious implementation must close the gaps, pp. 27-31.

Granular data — especially if gathered with a common methodology across Member States — remains crucial to ensure that the higher-level estimates are credible, but also to identify investment gaps more accurately. This directs private and public investments where most needed, and makes the plans more action-oriented. Granular information on investment needs and financing could be made available in standardized "policy fiches" (see **CP1**). A standardised template and methodology would be particularly relevant to streamline information on public investments needs, which also have to be reported every four or seven years under the European Semester — in Medium-Term Fiscal-Structural Plans²⁷ — but without a systematised approach.

- **Enforcement should be stricter.** While investment information under Section 5 is too generic, this is not the case for Section 3, where Member States are supposed to provide details on investment needs and financing sources for each policy and measure. In this case, the main issue is not the template's structure, but rather Member States' neglecting it. A technical solution could be to digitalize the standardized "policy fiches", not allowing their submissions until all information — including financial estimates — is provided. More generally, the revised Governance Regulation should provide stronger enforcement rules and incentives for Member States. In this light, stronger links with Mid-Term Structural Plans, European Semester (via CSRs) and MFF (see **SPR5** on KPIs) should be envisaged.
- As emphasized under **CP4**, **a stronger framework for the phaseout of fossil fuel subsidies must be introduced.** Right now, Member States' reporting through NECPs is inconsistent and incomplete²⁸: they can list subsidies inconsistently, without a full inventory, harmonised definitions, or any binding phase-out deadlines. The use of green budgeting tools has been progressing over time in Member States, and the Commission should continue to encourage progress and harmonization of methodologies. However, the recommendations under the European Semester and Governance Regulation have yielded limited compliance. The stalled revision of the Energy Taxation Directive has further delayed the removal of preferential treatment for fossil fuels. In this context, the revised Governance Regulation should:
 - Set a harmonized EU-wide definition of fossil fuel subsidies (e.g. providing a list of subsidy types, including implicit ones);
 - Impose a mandatory, transparent and regular reporting framework for Member States via their NECPs and NECPRs, which must include mandatory phase-out deadlines and an assessment of affected vulnerable groups. These should be backed up by a robust monitoring and enforcement mechanism²⁹.

²⁷Public investment needs for the green transition to be reported, include climate objectives set out in the European Climate Law, [European Commission \(2024\)](#). Regulation (EU) 2024/1263, Article 13(g).

²⁸[CAN Europe et al. \(2025\)](#). Climate goals at risk: NECPs' ambitious implementation must close the gaps, pp. 27-31.

²⁹[Stop Fossil Subsidies \(2026\)](#). A framework for the phase-out of fossil fuel subsidies in the European Union Input paper for the European Commission.

3. Structure of planning and reporting (SPR)

DESCRIPTION OF THE INTERVENTION AREA

- Streamlines and reorganises planning and reporting to reduce duplication and improve consistency across planning horizons
- Primarily supports simplification and streamlining

RELATED POLICY MEASURES

- **CONDITIONAL** **SPR1: Streamline and align planning & reporting** – Streamlines planning and reporting by aligning processes, reducing duplication, and improving consistency across plans
- **SUPPORT** **SPR2: New format merging NECPs and LTSs** – Merges NECPs and LTSs into a single integrated submission with aligned short- and long-term pathways
- **CONDITIONAL** **SPR3: NECP with separate quantitative and qualitative components** – Splits NECPs into qualitative strategy and quantitative data components to improve clarity and flexibility
- **SUPPORT** **SPR4: Fully integrated planning and reporting** – Creates a fully integrated, digital system combining strategic planning and progress tracking
- **CONDITIONAL** **SPR5: KPI framework** – Introduces an indicator framework for planning and reporting with a digital platform to track progress

The third intervention area looks at the streamlining of NECPs planning, monitoring, and reporting, to reduce duplication and improve consistency. Overall, alignment between planning and reporting must be improved. Specifically, current **reporting** mechanisms³⁰ are based on scattered national data, are disconnected with planned policies and measures (PAMs), and are inconsequential in case of undercompliance. The key question is how the streamlining should be carried out.

SPR1, **SPR4** and **SPR5** all deal with streamlining planning and reporting at different levels of intensity. Most notably, **SPR5** introduces a framework of **Key Performance Indicators** (KPIs) for planning and reporting. Using the same set of indicators would improve data standardization and allow for better monitoring of implementation, earlier identification of bottlenecks and more dynamic course-correction. If integrated with the EU economic governance (see **CP3** and **CP4**), a KPI framework could also prove effective in linking implementation hurdles with technical support and EU financing sources. For instance, NRPPs could plan for investments and reforms based on KPIs performances, to target climate action bottlenecks more effectively. At the same time, persistent KPIs underperformance could be addressed via requests for targeted reforms and corrective actions, for instance in the NRPPs or in Country Specific Recommendations (European Semester)³¹.

However, the introduction of a KPI framework is not a silver bullet: streamlining of planning and reporting must not come at the expense of what currently makes NECPs credible.

On the **planning** side, NECPs must continue to be built around clear binding targets, robust scenarios demonstrating how those targets will be achieved, and detailed PAMs with associated investment needs (see Intervention Area 2). These are not administrative formalities — they are what gives plans their credibility towards institutions, citizens and investors. A KPI framework can complement and operationalize good-quality planning, but cannot replace it.

³⁰Mentioned as a key issue, among others, by national experts from Bulgaria, Croatia, Germany, Italy, Poland and Slovenia.

³¹[CAN Europe \(2026\)](#). The revision of the Governance Regulation: support for an ambitious and solid post-2030 energy framework (March 2026).

On the **reporting** side, a fundamental distinction must be maintained between the two existing reporting streams – both of which must remain in the post-2030 architecture. On the one hand, reporting on PAMs – currently taking place in the progress reports, or NECPRs (Articles 17-25) – could benefit from the introduction of a KPI framework, which could improve the current disconnection between planning and reporting data – leading to poor progress monitoring – and transparency towards the public. On the other hand, **the introduction of a KPIs framework must not alter** the other existing reporting stream, i.e. **annual greenhouse gas reporting** (Article 26). These reporting obligations have proven good practice and remain the primary data source to monitor compliance with national climate targets (ESR and LULUCF) and UNFCCC commitments. Related compliance mechanisms towards climate targets should also remain unchanged.

In the same spirit, we support the **development of a single digital platform** for planning and reporting as suggested under **SPR4**. This implies moving away from a PDF-based template, dominated by qualitative, unmeasurable information, to a system that supports more standardized and quantitative data gathering. It would also reduce administrative burden and improve the current fragmentation of digital infrastructure, i.e. data being split between Reportnet3 (EEA), ReportENER (DG ENER), and other platforms (notably Eurostat). Data should be publicly available on a user-friendly platform (with downloadable datasets), to foster comparability and transparency. In addition to KPIs, the platform should also display Member States' progress towards binding targets, alignment with sectoral and energy trajectories and, where relevant, measure-level implementation data.

SPR3 would **split NECPs into a qualitative** (i.e. strategy and narrative) **and a quantitative** (i.e. data) **section**. The objective is to turn NECPs into modular documents, adjustable to changing political dynamics: Member States could update the quantitative components more easily than with the current framework. This modular approach would enable the implementation of other policy options suggested in the impact assessment, e.g. around the reporting framework (see other measures in this section, but also in Intervention Areas 4 and 5).

The current framework already allows Member States to update their NECPs at any stage, provided that the update is aligned with the progression principle (Article 14(3) of the Governance Regulation). Our support to this policy option is therefore conditional on certain criteria.

First, the qualitative versus quantitative distinction proposed by the Commission is not necessarily the best axis for a modular division of the NECP template. **What truly matters is not whether a component is narrative or numerical, but whether it is structural (and therefore should be binding) or operational (and therefore could be adjustable)**. Targets and trajectory commitments belong to the first category: they anchor the plan's credibility and its value as a long-term investment signal, and they cannot be made more flexible without undermining both. On the other hand, the specific mix of PAMs through which Member States deliver on those commitments can evolve as implementation progresses – e.g. as PAMs are phased out, implemented or added, and as new EU or national instruments come into force.

Second, and most importantly, improving **dynamicity must not come at the expense of the progression principle**. If the modular structure makes certain components easier to revise, the governance framework around those revisions must become correspondingly more demanding — including a mandatory Commission review of any proposed update and an explicit requirement that revisions remain consistent with the progression principle under Article 14(3). Any update that would weaken the overall ambition of the plan – i.e. that weakens the climate or energy trajectories, as well as national targets and objectives – must be automatically inadmissible.

If these criteria are considered, a well-designed modular structure could deliver improvements. Both "layers" would be updated every five years – as it is in the current NECP cycle – and the more dynamic layer would also be updated annually to adjust for political and social transformations. This would keep NECPs relevant for investors between submission cycles and improve comparability across countries. It would also make NECPs more operational: by focusing on the impact of policies

and measures, it would make it possible to better identify and address implementation bottlenecks without reopening the entire plan.

Finally, **SPR2 merges NECPs and Long-Term Strategies (LTS)** in one single integrated submission. Overall, we support this policy option. Assessments conducted in the past years highlight³² that separate planning processes led to large misalignments between NECPs and LTS – often, the two documents are developed by different ministries – and have made the LTS largely irrelevant, including in the eyes of the Commission. Merging the two could improve 2040 and 2050 alignment as well as interministerial coordination (see Intervention Area 5).

However, the revised Governance Regulation should ensure that **the future NECP includes both short- and long-term targets and trajectories**. Binding short-term targets (i.e. by 2040) for both climate and energy, with their respective trajectories, ensure that the transition is delivered in the next decade and is not postponed towards 2050 – which is relevant for the EU's carbon budget, but also to make sure that promises of late decarbonization (e.g. with nuclear power) do not end up in fossil fuels lock-ins. On the other hand, long-term pathways ensure that the EU achieves climate neutrality by 2050. A procedural check should be introduced to ensure that NECPs not leading to climate neutrality by 2050 – i.e. fundamentally contradicting EU law – are not accepted.

³²[Institute for Sustainable Development Foundation \(2025\)](#). Is the Long-Term Strategies process working? Evidence and recommendations from selected national cases.

4. Timing of planning and reporting (TP)

DESCRIPTION OF THE INTERVENTION AREA

- Aligns timing of planning and reporting with EU and international processes
- Addresses inconsistencies caused by misaligned submission schedules
- Reduces duplication and improves external coherence
- Supports simplification and streamlining

RELATED POLICY MEASURES

- **CONDITIONAL TP1: Biennial NECPRs, aligned with UNFCCC cycles** – Aligns biennial progress reports with international reporting cycles to improve consistency and efficiency. NECPR submission deadlines shifted to even years and potentially later in year to alleviate reporting burden.
- **SUPPORT TP2: Align NECPs and NECPRs with the European Semester** – Aligns national planning and reporting with the European Semester by introducing annual reporting and synchronised timelines. It also establishes a common digital format to integrate planning, reporting, and policy coordination.

Both **TP1** and **TP2** focus on the **timing of planning and reporting processes**. **TP1** would likely materialize in a scenario where the NECPRs remain in place, while **TP2** would imply their replacement by a digitalized KPI framework that can be applied to NECPs planning and reporting, as well as policy coordination with other EU planning strategies and financing instruments. Overall, we support the creation of a KPI framework (see Intervention Area 3) provided it does not replace targets and the PAM-based climate and energy scenarios to achieve them.

In a scenario where **TP1** is implemented, it would be crucial to distinguish between the biennial NECPRs reporting – which monitor the implementation of PAMs and can be aligned with other reporting processes to alleviate reporting burdens – and the annual greenhouse gas reporting (Article 26 of the Governance Regulation). The latter must remain in place and on an annual basis, not just to respect biennial UNFCCC commitments, but also to monitor compliance towards national climate targets (currently, ESR and LULUCF). Similarly, annual GHG reporting must remain in place also in a scenario (**TP2**) where a KPI framework is developed (see Intervention Area 3).

On the other hand, **aligning the NECPs and NECPRs processes with the European Semester (TP2) could make sense if a KPI framework is developed** that also extends **beyond the Governance Regulation**, including onto financing and fiscal mechanisms. This could bring benefits especially if clear consequences are attached in case of non-compliance (late submissions, lack of ambition etc.)³³. Two aspects should be taken into account when designing this policy option.

First, in past NECPs cycles, **the main timing bottleneck was the misalignment between EU and national planning and budget cycles**, rather than with other EU processes. This misalignment led some countries to miss EU planning and reporting deadlines even in circumstances where processes were overall well-structured. While an annual reporting deadline linked to the EU semester could facilitate the streamlining of the two levels of governance, it may not be sufficient to overcome this bottleneck. Enhancing EU-Member States dialogues (see Intervention Area 5) could be essential.

The second bottleneck resides in the **timing disconnection between NECPs and NECPRs**. Past reporting cycles did not feed into planning NECP cycles (and vice versa). While this is largely due to poor national governance – i.e. lack of coordination across national ministries – the timing of planning and reporting also turned out to be an issue. For instance, the three-month time gap

³³Mentioned as a key issue, among others, by national experts from France, Germany, Hungary and Portugal.

between the submission of NECPRs and the updated draft NECPs (respectively due in March and June 2023) was insufficient to carry out an evidence-based course correction. Similarly, new planning documents (e.g. building renovation plans, Social Climate Plans) were introduced at a later stage, which made their integration into NECPs challenging. More regular (i.e. annual) PAMs reporting could improve streamlining for planning and reporting, but should be developed to ensure a better integration of planning and financing tools beyond the Governance Regulation.

5. Iterative process – Preparation and assessment (IPA)

DESCRIPTION OF THE INTERVENTION AREA

- Strengthens iterative dialogue between the Commission and Member States.
- Enables earlier identification of gaps in ambition and implementation.
- Introduces more continuous and structured technical exchanges.
- Enhances multi-level governance.

RELATED POLICY MEASURES

- **SUPPORT** **IPA1: Draft/final NECP submissions with periodic, partial updates** – Introduces biennial partial updates alongside draft and final plans to improve flexibility and data timeliness
- **OPPOSE** **IPA2: Single NECP submission with periodic, partial updates** – Replaces draft plans with a single submission complemented by biennial partial updates
- **CONDITIONAL** **IPA3: Technical dialogue on NECPs** – Introduces a technical dialogue with the Commission to improve plan quality and address issues early prior to submission
- **SUPPORT** **IPA4: Dynamic technical dialogue on NECPs** – Establishes a recurring technical dialogue to support continuous improvement and alignment of NECPs

Policy options **IPA1** and **IPA2**, which deal with the NECPs submission process, are mutually exclusive. **We strongly support the continuation of a two-step process** – i.e. the submission of both a draft and a final NECP every five years (**IPA1**) – over a single NECP submission (**IPA2**).

First, **the current process works**: both in 2018-19 and in 2023-24, the final NECPs were significantly better than the drafts, both in terms of ambition and level of details (e.g. of projections, policies and measures, impact assessments). This has been explicitly recognized by the Commission³⁴ and confirmed on multiple occasions by independent assessments³⁵. Even in a scenario where partial updates are provided biennially, submitting a complete draft NECP provides the Commission with the opportunity to develop recommendations and open a dialogue with Member States based on a comprehensive plan and practical implementation steps. Since this draft-final dynamic has proven effective, we see no need to change it.

Second, **a two-step process provides more opportunities for meaningful public participation**³⁶ (see Intervention Area 7). In the last round of NECPs updates, public participation spaces were available either before the draft or the final plan – instead of both – and the most meaningful feedback could only be gathered during the in-between period, once it could be based on a concrete, detailed plan. A one-step NECP submission, on the other hand, would disincentivize Member States to engage in public participation processes, delivering even worse results than the sub-optimal ones obtained in the 2023-24 round of updates.

On the other hand, the submission of both a draft and a final NECP every five years could be coupled with more frequent partial updates (see Intervention Area 4), provided that such updates are aligned

³⁴[European Commission \(2025\)](#). EU wide assessment of the final updated national energy and climate plans Delivering the Union's 2030 energy and climate objectives. COM(2025) 274.

³⁵[CAN Europe et al. \(2025\)](#). Climate goals at risk: NECPs' ambitious implementation must close the gaps; [ECNO \(2026\)](#). Delivering the EU's 2030 climate and energy targets: Gaps in national contributions and policies. An analysis of 27 final National Energy and Climate Plans.

³⁶Mentioned as a key issue by over 80% of national experts who contributed to this briefing. For further reference, also see: [CAN Europe and WWF EPO \(2025\)](#). Struggling for a Voice: The Mixed Reality of Public Participation in National Energy and Climate Plans.

with the progression principle, now enshrined in Article 14(3). This means that any update, while aiming to reflect new realities on the ground or changes in political and implementation dynamics, must not alter the overall ambition of the plan and its targets.

IPA3 and **IPA4** support the **enhancement of technical dialogues between the Commission and Member States**. **IPA3** would introduce technical dialogues prior to the submission of NECPs, while **IPA4** would create a more dynamic, recurring dialogue, which takes place regardless of approaching deadlines. Both options would reinforce the existing NECP process by enhancing mutual understanding, preventing potential administrative bottlenecks, and building capacity. Of the two, **IPA4 would be more impactful**: recurring dialogues would reinforce the feedback loop between planning and reporting – i.e. implementation bottlenecks or opportunities identified in the NECPs reports could feed into the partial updates.

Some suggestions for successful technical dialogues include:

- **Encouraging a "whole-of-government"³⁷ approach.** The lack of coordination across ministries is one of the main factors³⁸ behind planning gaps and implementation failures. Notably, the lack of involvement of Ministries of Economy and Ministries of Finance – sometimes due to the non-binding nature of NECPs – is a major factor behind the poor quality of the sections on investment needs and financing sources. In the technical dialogues with Member States, the Commission should promote a "whole-of-government" approach that proactively encourages the involvement of all relevant ministries. It should also develop a common methodology for Member States to measure investment needs.
- **Supporting the development of Strategic Environmental Assessments (SEAs).** In the current framework, SEAs are too often conducted (if at all) after the draft or even the final plans are submitted³⁹, which defeats their very purpose. As part of the technical dialogues, the Commission should encourage Member States to develop SEAs for policies and measures before they are incorporated into the plans – i.e. when all options are still open, be it during the partial or full updates – and provide technical support if needed.
- **Using the experience of National Recovery and Resilience Plans.** Despite some difficulties, some positive lessons were learned in the technical dialogues set up for the Recovery and Resilience Facility, which should be considered. Notably, country missions allowing officers from the Commission and Member States' ministries to meet in-person were quite useful in improving mutual understanding, fostering dialogue and finding implementable solutions.

³⁷[E3G and ECCO \(2025\)](#). Making National Strategies in the EU Investable. Closing the feedback loop between national strategies and private sector transition plans.

³⁸Mentioned as a key issue, among others, by national experts from France, Germany and Spain.

³⁹Mentioned as a key issue, among others, by national experts from Hungary and Portugal.

6. Iterative process – Monitoring and compliance (IPC)

DESCRIPTION OF THE INTERVENTION AREA

- Establishes a more structured and integrated compliance framework.
- Improves links between planning, monitoring, and financing tools.
- Enhances timeliness, relevance, and enforceability of recommendations.
- Strengthens multi-level governance.

RELATED POLICY MEASURES

- **CONDITIONAL** **IPC1: Consolidate Commission recommendations** – Establishes a more structured system of country recommendations based on assessments of planning ambition and implementation
- **SUPPORT** **IPC2: Formal Commission decision following the appraisal of NECPs** – Introduces a formal COM decision following the appraisal of NECPs, clearly determining whether national plans meet the required level of ambition
- **CONDITIONAL** **IPC3: Council-endorsed recommendations** – Introduces a formal step in which country recommendations based on COM assessments of ambition and progress are endorsed and adopted by the Council

All policy options proposed under Intervention Area 6 go in the direction of **strengthening the NECPs compliance mechanisms**. This is a positive step forward, as the current framework lacks the teeth to ensure Member States respect planning and reporting commitments. On many occasions during the 2023–24 update cycle, the Commission's recommendations between the draft and final plan stages were partially or fully ignored, and plans were submitted late, without substantial consequences⁴⁰; the gap-filling mechanism under Article 32 was also left unused despite proven underperformance. The absence of binding consequences for non-compliance is the single most frequently cited structural weakness of the current Governance Regulation according to national experts⁴¹. Any revision that fails to address it will reproduce the same weaknesses in the next cycle.

Of the three options, **IPC2** — a **formal Commission decision following the NECPs assessment** — is probably the most effective. **IPC1** builds on the existing recommendation-based architecture, which is non-binding and therefore vulnerable to the same political dynamics that have limited its effectiveness to date. **IPC3**, which introduces a formal adoption step by the Council, would give NECPs meaningful political weight — but it introduces a dependency on Council majority dynamics that could dilute ambition and slow down action. A formal Commission decision under **IPC2** is legally binding, less exposed to inter-governmental negotiation, and consistent with the Commission's existing role as guardian of EU law. It would also be the option most compatible with more

To further reinforce the compliance framework, the Governance Regulation should explicitly establish that, where not produced in accordance with environmental law, **NECPs are acts capable of being challenged before national courts** — in accordance with the requirements of Articles 9(2) and 9(3)

⁴⁰An [infringement procedure](#) was only carried out for Poland, whose final updated NECP still has not been officially submitted as of June 2026.

⁴¹Mentioned as a key issue by over 80% of national experts who contributed to this briefing.

of the Aarhus Convention⁴². This would provide citizens and civil society with a direct enforcement avenue at national level — where judges are better placed to assess compliance with both EU and national environmental requirements. This option would also reinforce national ownership as it would create a layer of accountability that does not depend solely on Commission action.

⁴²See [M. Mähönen \(2024\)](#). Access to justice in the EU's procedural climate governance framework: a case study for the NECPs; [CAN Europe & EEB \(2024\)](#). A revised and responsive Governance Regulation: respecting environmental democracy rights in climate planning.

7. Cooperation and consultation (CC)

DESCRIPTION OF THE INTERVENTION AREA

- Improves multi-level governance through cooperation and participation (objective 3).

RELATED POLICY MEASURES

- **CONDITIONAL CC1: Alignment on NECP cross-border impacts** – Requires MSs to align on NECP aspects with significant cross-border impacts
- **CONDITIONAL CC2: Mandatory joint NECP components for cross-border aspects with EU-wide impact** – Embeds more strongly the alignment on NECP cross-border impacts
- **SUPPORT CC3: Strengthened sectoral cooperation and Member State focused discussions** – Facilitates regular discussions among MS and COM through existing or new structures
- **CONDITIONAL CC4: Consultation guidance for neighbouring MS and stakeholders in all NECP phases** – Introduces COM guidance on timely consultation with neighbouring MS and stakeholders in the NECP process
- **SUPPORT CC5: Targeted guidance on minimum stakeholder involvement standards** – Supports ongoing engagement with MSs and offers guidance on minimum standards for involving stakeholders

CC1, **CC2**, **CC3** and **CC4** relate to the cooperation between Member States and neighbouring stakeholders in the preparation of the NECP (Article 12 on regional cooperation), while **CC5** relates to the involvement of other stakeholders (Articles 10 and 11 on public consultation and multilevel dialogues).

CC1 and **CC2** address improvements to **regional cooperation in the content of the NECP**, with **CC1** suggesting a softer approach (requiring Member States' alignment on cross-border impacts) and **CC2** suggesting a stronger one (mandatory joint NECP components for cross-border aspects). Regardless of which approach is selected, there is definitely space for improvement in the area of regional cooperation. The Governance Regulation review report highlighted an uneven use of regional consultation in preparing the NECPs⁴³ and, even though Member States' collaboration is improving in certain thematic areas (e.g. on offshore wind deployment), it needs to be further enhanced.

CC3 and **CC4** address improvements to the **process for regional cooperation** in the preparation of NECPs. **CC3**, which focuses on improving regular discussions among Member States and the Commission, is the most likely to bear fruits. In particular, these structures should be the place to share good practices across Member States, and offer additional technical support where needed. For simplification purposes, enhancing existing structures should be favoured over the creation of new fora.

Nonetheless, improving existing fora (or creating new ones) alone will not be sufficient. Other incentives should be considered, including dedicated support. The European Commission should also enhance country visits to national civil servants, similarly to what happened throughout the RRP process (see **IPA4**). Finally, it is important to ensure that regional consultation goes beyond EU Member States, to include neighbouring non-EU countries when relevant.

CC5, which aims at adopting targeted **guidance on minimum stakeholder involvement standards**, is a crucial policy option to pursue.

⁴³European Commission (2024). Report on the Review of the Regulation on the Governance of the Energy Union and Climate Action.

The two existing dimensions for stakeholder involvement – public consultations (Article 10) and Multilevel Climate and Energy Dialogues (MCED, Article 11) – **should continue to be legally distinguished**, as they do not serve the same purpose. The public consultation is punctual, broad, and open to everyone, in line with the requirements of the Aarhus Convention; the MCED is a more permanent structure, gathering of stakeholders interested in the preparation and implementation of the NECP. The Commission should therefore develop a guidance framework for each of these processes. This is particularly important given that both Article 10 and 11 were poorly executed: MCEDs suffered substantial implementation weaknesses⁴⁴, while public participation was carried out with suboptimal standards⁴⁵. However, in both cases, **a guidance document should not come as a replacement for a potential legislative fix.**

In previous NECPs iterations, **public consultations** were often conducted too late, lasted for only short periods, and in some cases took place after key decisions had effectively been made, which limited citizens' ability to influence outcomes. In addition, many governments used restrictive consultation formats and provided little transparency on how public feedback was considered, making participation feel more like a procedural exercise than meaningful engagement. Given these shortcomings, the Commission should directly **strengthen the relevant provisions of the Governance Regulation**, to offer additional procedural guarantees. Public participation should take place before the elaboration of WEM/WAM scenarios. In addition, the NECP template should include more detailed reporting requirements on how the Aarhus Convention is being upheld in national climate and energy policies covered by the NECPs. Third-party reviews could provide an independent assessment of the country's compliance with the Aarhus Convention. Also, developing **Strategic Environmental Assessments** as part of technical dialogues between the Commission and Member States (see Intervention Area 5) would achieve two goals at once: strengthen the iterative process and clarify the procedure expected for public consultations.

In this context, the **guidance** document on minimum standards suggested under **CC5** could act as a supplementary **safety net**, to cover the shortcomings that would not be directly fixed in the legislation. A key added value for the guidance document would be to clearly break down the **Aarhus Convention requirements** when applied to the preparation or revision of the NECP, with i.e. suggested public consultation timelines for each preparation or revision of the NECPs and the exact list of documents to be made available to ensure the the right of access to information is respected. The guidance document could also build on the few relatively successful experiences from selected Member States by sharing **best practices**. It would be important for the Commission to **follow-up** with Member States once the guidance document is adopted, and offer them technical support and regular opportunities to check in on their progress.

A similar reasoning applies to **Multilevel Climate and Energy Dialogues (MCEDs)**. The best option to address existing shortcomings would be to **directly clarify and strengthen Article 11** of the Governance Regulation e.g. by clearly **making MCEDs a permanent, recurring structure** and extend their role beyond the drafting of the NECP to also cover its implementation. While it is important that Member States retain flexibility in the setting up of MECDs, the current provision in the Governance Regulation has proven too blurry for MECDs to deliver the expected results. Similarly, **additional targeted guidance** could then be a **safety net** and encourage Member States for a harmonious implementation of the MECD, while also offering them technical guidance. Any guidance should also contain **examples of successful MECDs** set in the past and be accompanied by funding and capacity building support to help set up and sustain dialogues.

⁴⁴[D. Kocher et al. \(2024\)](#). Fostering transformative climate governance? The potential of multilevel climate and energy dialogues.

⁴⁵[CAN Europe and WWF EPO \(2025\)](#). Struggling for a Voice: The Mixed Reality of Public Participation in National Energy and Climate Plans.

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