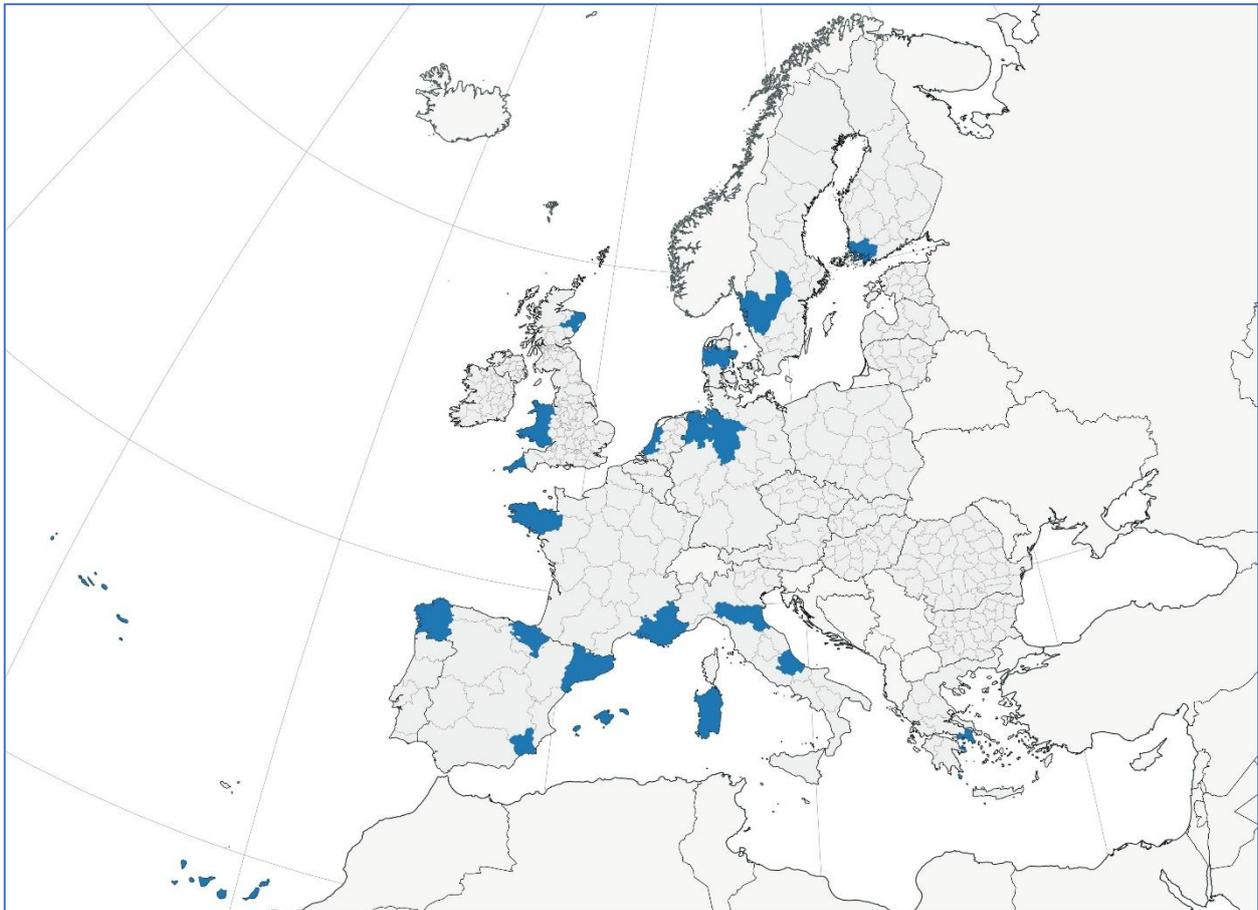




## National Energy and Climate Plans: The need for a territorial approach



**Figure 1:** Respondents to the CPMR questionnaire on the draft NECPs

This Technical Paper is based on the replies to a CPMR [questionnaire](#) on the draft NECPs by the following CPMR members:

**Aberdeenshire, Abruzzo, Azores, Attica, Balearics, Basque Country, Brittany, Canaries, Catalonia, Cornwall, Emilia Romagna, Galicia, Central Denmark, Murcia, Navarra, Lower Saxony, North-Holland, Örebro, SUD Region (Provence-Alpes-Côte d'Azur), Sardinia, South-Holland, Southwest Finland, Västra Götaland and Wales.**

## BACKGROUND

According to the [Regulation on the Governance of the Energy Union and Climate Action](#), Member States have to develop the Integrated National Energy and Climate Plans (NECPs). In the NECPs, Member States have to detail the policies and measures, from 2021 to 2030, to reach the [2030 EU climate and energy targets](#).

A first draft of the NECPs had to be sent to the European Commission by 31 December 2018. The Commission issued [recommendations](#) on the draft NECPs on 18 June by underlying the need for further ambition, in particular, in terms of renewables and energy efficiency, as well as – among others – further policy detail and better specified investment needs.

The Commission's recommendations will allow the Member States to fine-tune their draft NECPs, as the final versions of the NECPs has to be sent by 31 December 2019. Hereafter, reports on the implementation and progress of the NECPs will most likely be drawn up every two years.

In this context, the CPMR has conducted an analysis of the draft National Energy Climate Plans from the perspective of the CPMR Member Regions. The analysis is based on the replies to a CPMR questionnaire, which 24 Regional Authorities from 11 countries answered to. It comprises an analysis and recommendations on the need for:

- a territorial approach in targets, measures and policies of the NECPs;
- full involvement of Regional Authorities in policy design;
- a bold strategy for the development of marine renewable energy;
- clear and predictable policies for the transport sector that do not jeopardise connectivity.

The NECPs are not only crucial to reach the 2030 EU targets, but also to achieve carbon neutrality by 2050. Therefore, regions should be part of the design and implementation process in order to ensure a fair and just transition based on the strengths of the territories.

## In a nutshell:

This Technical Paper is structured as follows:

- **In Section 1** an overview on the target adequacy and major issues identified by CPMR Member Regions is presented;
- **In Section 2** a review of the consultation process is presented;
- **In Section 3** an analysis of policies and measures on marine renewable energy is presented;
- **In Section 4** an analysis of policies and measures for the transport sector (aviation and shipping) is presented;
- **In Annex 1** strategies, policies, projects from CPMR Member Regions are presented.

## 1. Target Adequacy and Main Issues

The targets set by the Member States – to reach the EU 2030 climate and energy targets – in terms of greenhouse gas (GHGs) emissions reduction, share of renewable energy and energy efficiency levels were considered positively by most regions.

However, a number of issues were identified by CPMR Member Regions and by the CPMR analysis:

- **The level of ambition is often considered as being too low to cope with the impact of climate change.** Some regions consider that the draft NECPs could present more ambitious measures relating to, for example, the reduction of GHG emissions or in the development of renewable energy. Several regions also pointed out that they have already put in place strategies or policies (cf. Annex 1), which could not only inspire their country's NECP, but also aim at more ambitious targets than those set at the national level.

Even though the general targets in the draft NECPs are considered positively, several issues were identified. A substantial lack of policy detail was found. Therefore, making comparisons between different draft NECPs proved to be difficult, as well as performing a thorough analysis of the measures presented in the draft NECPs, in particular for marine renewable energy, air and maritime transport.

Similar insights can also be found in the European Commission recommendations and [Communication](#) to the Member States on the draft NECPs. The European Commission asks for further ambition in terms of renewable and energy efficiency contribution to reach the 2030 targets, as well as more policy detail and better specified investment needs.

- **There is a lack of financial measures in the draft NECPs for the implementation of the presented measures and policies.** Similar conclusions were also found by other organisations, such as CAN Europe, the European Climate Foundation and Transport and Environment.

- **The draft NECPs do not include a territorial approach based on the strengths and weaknesses of the territories.** The targets and consequently the proposed measures and policies are national with little attention to the sub-national level.
- **There is a lack of targeted policies and measures for islands, outermost regions and sparsely populated areas.** Coastal and islands regions can play the role of innovation laboratories for clean renewable energy, but they need to be supported as well as involved in policy design. The lack of a territorial approach mostly stems from a general lack of involvement of Regional and Local Authorities in the drafting of the NECPs.

### CPMR recommendations

**Ensure clear, predictable and robust policies, supported by relevant financial measures, for the transport sector and for the development of marine renewable energy.**

**Ensure a territorial approach in the NECPs targets, policies and measures that should be based on the strengths, strategies and policies of Regional Authorities, and be designed with their full involvement.**

## 2. Regional Authorities' Involvement

According to Article 11 of the Governance of the Union Regulation, Member States shall establish a multi-level dialogue with citizens, businesses and of course Local and Regional Authorities. A specific section in the NECPs (that is, 1.3) is devoted to the reporting by Member States on how they consulted national stakeholders and the outcomes of such consultations. A specific sub-paragraph is devoted to the consultation of Local and Regional Authorities. However, one has to bear in mind that Member States were not obliged to consult national stakeholders for the draft NECPs.

The quality of the consultation processes – when put in place – varies greatly among Member States. In several cases, the consultation was merely formal, and Local and Regional Authorities were not able to actively contribute to the drafting of the NECPs. It is worth mentioning that in countries having a decentralised structure or autonomous regions, some territories such as islands were consulted, or had the opportunity to submit a specific part on the policies and measures related to their territory.

The consultation process was judged to be positive when round tables, meetings, thorough questionnaires or open consultations were directly held not only with Regional Authorities but also with other national stakeholders, such as industries or civil society.

CPMR Member Regions consider a good quality consultation – that involves regions ex ante and not only ex post – as an indispensable condition to draft policies and objectives that are not only achievable but also ambitious, as they would be based on their strengths. The lack of a proper involvement of Regional Authorities – as well as other national stakeholders – might jeopardise a swift implementation of the NECPs policies and measures.

### CPMR recommendations

**Ensure a full involvement of Regional Authorities through a participatory process in which regions can contribute to policies and measures, so to ensure sound policies and effective implementation.**

## 3. Marine Renewable Energy

A total share of at least 32% renewable energy is to be achieved by 2030. However, as stated by the European Commission in its Communication “under current draft plans, instead of at least 32%, the share of renewable energy would reach between 30.4% and 31.9% in 2030 at Union level”. Therefore, further ambition is needed.

The CPMR analysis focuses on marine renewable energy. Most Member States only mention offshore wind farms in their draft NECPs. Even though the mentioning of offshore wind energy is considered as positive, Member States do not always present concrete measures for their development and deployment.

As for ocean energy (wave and tidal), it is only mentioned by nine Member States (Denmark, France, Greece, Ireland, Italy, Malta, Spain, Portugal and the United Kingdom). Only six of them (France, Ireland, Malta, Spain, Portugal and the United Kingdom) go further than just mentioning it and explicitly aim at development of ocean technologies. However, a substantial lack of ambitious and detailed measures is found.

Even though there is an understanding that marine renewable energy – in particular ocean energy – is still to be fully developed, further ambition and clear measures for its development are needed. The renewable energy sector, and the development of marine energy, is key for a fair and just transition to carbon neutrality and a growth enabler for maritime regions and in particular islands and outermost regions. Furthermore, the development of marine renewable energy could help in closing the gap to achieve the 2030 renewables energy target, and should be seen as an opportunity for the whole continent.

### CPMR recommendations

**Islands and coastal regions can play the role of innovation laboratories for clean renewable energy. Therefore, the NECPs should envisage ambitious funding in research and in the development of marine renewable energy.**

## 4. Transport

Member States have to indicate policies and measures related to the transport sector in order to achieve the 2030 targets. Decarbonisation of the transport sector is crucial to reach the 2030 energy efficiency (32.5%) and GHG emissions reduction targets (40%), as it is responsible for around 25% of GHG emissions. Therefore, clear and predictable policies are needed, given also the impact that they might have on the connectivity and accessibility of peripheral regions.

Comparison between the measures in the draft NECPs is difficult, a wide array of measures was presented by the Member States. It is possible to notice a pattern towards the electrification of road transport, a modal shift to rail, promotion of public transport and the recognition of the key role of transport in innovation policies. However, a lack of policy detail as well as lack of an integrated and territorial approach were found.

Policies in the transport sector need to involve Regional Authorities and have a territorial approach to ensure a sound and efficient implementation. Furthermore, the transition towards a greener and more sustainable transport sector should not only happen for urban areas but also for islands, outermost regions and sparsely populated areas, without forgetting the need to ensure connectivity to peripheral areas.

The CPMR analysis focuses on two transport modes: aviation and shipping. The main conclusion stemming from the analysis is that both are mostly ignored in the draft NECPs and that few or no measures are presented.

As for aviation, only 11 Member States mention it (Belgium, Finland, France, Ireland, Italy, Luxembourg, the Netherlands, Slovakia, Spain, Sweden, the United Kingdom). Only a few Member States in the above list go further than just mentioning the aviation sector and/or its impact. Given the environmental impact aviation has and its predicted traffic growth, measures going beyond the development or the mentioning of biofuels were expected. Only five Member States (Belgium, France, the Netherlands, Sweden and the United Kingdom) include policy measures or proposals, such as taxes or specific objectives to be achieved in the sector.

As regards shipping, only 14 Member States mention it (Belgium, Denmark, France, Greece, Italy, Latvia, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, and the United Kingdom). Member States with no direct access to the sea do not mention inland shipping. Similarly to aviation, it is possible to notice a lack of policy detail, and only generic mentions to the sector. Most Member States include liquified natural gas development, but only few included plans aiming at electricity provision in ports or development of plans to deal with the impact of the sector (Belgium, Denmark, Greece, Latvia, the Netherlands, Latvia, Slovenia and the United Kingdom).

### CPMR recommendations

**Ensure clear, predictable and robust policies and measures to allow a greening of the aviation and shipping sector without hampering the social and economic development and connectivity of peripheral and maritime regions.**

## Annex 1 – Strategies, policies and projects reported by CPMR Member Regions in the NECPs questionnaire

### Aberdeenshire

Strategies for reducing emissions and developing renewable energies:

- [Scotland's Climate Change Act](#)
- [Scotland's Climate Change Plan 2018-2032](#)
- [Scotland's Climate Change Bill](#)
- [Scotland's Energy Strategy](#)
- [Aberdeenshire Climate Change](#)

Projects for reducing transport-related emissions:

- [World's largest demonstration of hydrogen fuel cell buses](#)

Projects regarding the development of marine energies:

- [Hywind Project](#)
- [European Offshore Wind Deployment Centre \(EOWDC\)](#)
- [Kincardine Offshore Wind Project](#)
- [Moray East](#)
- [Beatrice Offshore Wind Farm Ltd](#)

### Azores

Strategies for reducing emissions and developing renewable energies:

- [Regional Climate Change Plan](#)

Strategies for reducing transport-related emissions:

- [Regional Climate Change Plan](#)
- [Azores Electric Mobility Plan](#)

### Attica

Strategies for reducing emissions and developing renewable energies:

- [Strategic Planning of the five-year operational programme 2014-2019 of Attica Region](#)

Projects for reducing transport-related emissions

- [e-MOPOLI](#)

### Baleares

Strategies for reducing emissions and developing renewable energies:

- [Ley 10/2019, de 22 de febrero, de cambio climático y transición energética](#)

Strategies for reducing transport-related emissions:

- [Ley 10/2019, de 22 de febrero, de cambio climático y transición energética](#)

### Basque Country

Strategies for reducing emissions and developing renewable energies:

- [Klima2050 strategy](#)
- [Euskadi Energy Strategy 2030](#)
- [Law 4/2019 of 21 February on Energy Sustainability in the Basque Autonomous Community](#)

Strategies for reducing transport-related emissions:

- [Euskadi Energy Strategy 2030](#)
- [Law 4/2019 of 21 February on Energy Sustainability in the Basque Autonomous Community](#)

Objectives and concrete initiatives in terms of the development of marine energies:

- [Euskadi Energy Strategy 2030](#)

**Brittany**

Projects regarding the development of marine energies:

- <https://energies-marines.bretagne.bzh/>

**Canaries**

Strategies for reducing emissions and developing renewable energies:

- [Estrategia Energética de Canarias 2025](#)

Projects for reducing transport-related emissions:

- [Elimination of the regional VAT for acquisition of low carbon emissions vehicles](#)

**Central Denmark**

Strategies for reducing emissions and developing renewable energies:

- [Strategic Energy Planning](#)

**Cornwall**

Strategies for reducing emissions and develop renewable energies:

- [Sustainable Energy and Climate Change Action Plan](#)

Projects regarding the development of marine energies:

- [WaveHub](#)

**Emilia Romagna**

Strategies for reducing emissions and developing renewable energies:

- [Regional Energy Plan](#)

Strategies for reducing transport-related emissions:

- [PREPAIR life integrated project](#)

Projects regarding the development of marine energies:

- [Nessie](#)

**Navarra**

Strategies for reducing emissions and developing renewable energies:

- [Energy Plan](#)
- [Climate Change Roadmap](#)

Strategies for reducing transport-related emissions:

- [Energy Plan](#)
- [Electric Vehicle Transition](#)

**North-Holland**

Projects for reducing transport-related emissions:

- [CLINSH – Clean INland SHipping](#)

Projects regarding the development of marine energies:

- [North Sea Canal Area Development Strategy](#)

**Örebro**

Strategies for reducing emissions and developing renewable energies:

- [Climate plan for Örebro](#)

Strategies for reducing transport-related emissions:

- [Vägval](#)
- [Hållbart resande](#)

**South-Holland**

Strategies for reducing transport-related emissions:

- [Regional Mobility Plan](#)

**Southwest Finland**

Strategies for reducing emissions and developing renewable energies:

- [Climate and Energy Strategy](#)

**Västra Götaland**

Strategies for reducing emissions and developing renewable energies:

- [Regional climate strategy, Climate2030](#)

Strategies for reducing transport-related emissions:

- [Environment and climate strategy for public transport](#)
- [Sustainable mobility west](#)

Projects regarding the development of marine energies:

- [Offshore Väst](#)

**Wales**

Strategies for reducing emissions and developing renewable energies:

- [Active Travel Action Plan](#)

Strategies for reducing transport-related emissions:

- [TrawsCymru long-distance bus service](#)

Projects regarding the development of marine energies:

- [WaveSub Wave Energy Converter](#)
- [FLEXIS](#)
- [SPECIFIC](#)



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**The Conference of Peripheral Maritime Regions (CPMR) brings together some 160 Regions from 25 States from the European Union and beyond.**

Representing about 200 million people, the CPMR campaigns in favour of a more balanced development of the European territory.

It operates both as a think tank and as a lobby group for Regions. It focuses mainly on social, economic and territorial cohesion, maritime policies and accessibility.

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