Update of the Governance of the Energy Union and Climate Action

> Fields marked with * are mandatory.

Introduction

As announced in the Action plan for affordable energy, the European Commission plans to present a proposal to simplify, strengthen and modernise the **Regulation on the Governance of the Energy Union and Climate Action** (Governance Regulation) adopted in December 2018. This proposal aims to help the EU prepare an enabling energy and climate policy framework for the decade ahead and to support its efforts to achieve the long-term objectives of the Paris Agreement. The revision will support reaching the target to reduce net greenhouse gas emission by 90% in 2040 compared to 1990 proposed by the Commission in the European Climate Law amendment[1]. In November 2025, the Council and the European Parliament agreed their negotiating positions on the proposed amendment. Both co-legislators support a legally binding 2040 target of net 90% emission reductions with up to 5% of international credits. Ongoing initiatives, such as the review of the EU Emissions Trading System (EU ETS1) and the Market Stability Reserve (MSR), the revision of national targets and flexibilities in the EU climate policy framework, the development of the European integrated framework for climate resilience, and specific energy policy initiatives and other enabling instruments, are also part of this process.

The Governance Regulation sets out the rules for **planning, reporting and monitoring** on the Energy Union and Climate Action. It supports strategic medium- and long-term energy and climate planning through integrated national energy and climate plans (NECPs) and long-term strategies (LTSs). It provides a framework for Member States to report on their progress towards meeting the 2030 and long-term energy and climate objectives and targets to the Commission and the United Nations Framework Convention on Climate Change (UNFCCC). It also enables the Commission to assess and monitor the progress made by the EU and by Member States, and to take measures in cases where the level of ambition or progress is insufficient.

In September 2024, the Commission published the report on the review of the Governance Regulation. The report evaluated how the Regulation has functioned since its entry into force in 2018. The report finds that the Regulation has made energy and climate planning and reporting more coherent, integrated, and simpler. It also highlighted that the Regulation added value in a quickly evolving context, including increasingly ambitious and cross-cutting energy and climate policies and legislation, the COVID-19 pandemic and the energy crisis triggered by Russia's war of aggression against Ukraine. The Regulation played an important role in the EU more efficiently closing in on its energy and climate objectives and targets for 2030 and beyond. At the same

time, the review highlighted areas for further improvement[2].

Building on the review, and political priorities for 2024-2029, the Commission will assess several options to revise the Governance Regulation with a view to developing the framework needed for a true Energy Union and to deliver on the EU's climate and energy objectives in a simple and flexible manner.

In this context, the Commission is launching a public consultation to gather views from all interested parties. This is done based on a questionnaire consisting of two parts:

Part 1 collects some information about you.

Part 2 focuses on several possible policy options to revise the Governance Regulation, notably:

1. Reviewing the scope of the Governance Regulation
2. Addressing the evolution of the post-2030 policy framework
3. Making energy and climate investments happen
4. Contributing to a more resilient energy system
5. Streamlining the Governance framework
6. Strengthening cooperation between and within Member States
7. Improving public consultation and multilevel governance

You can save your replies as a draft and finish them later. Apart from some mandatory questions, you can answer questions on the sections which are relevant to you. When answering questions with a free text box for additional comments please be concise. At the end of the questionnaire, you can also upload a document with further comments and views, as appropriate.

[1] See Commission proposal of July 2nd, 2025, to amend the European Climate Law.

[2] The main conclusions of the review can be accessed here: Governance of the Energy Union and Climate Action - European Commission

About you

*Language of my contribution

- ○ Bulgarian
- ○ Croatian
- ○ Czech
- ○ Danish
- ○ Dutch
- ● English

○ Estonian

○ Finnish

○ French

○ German

○ Greek

○ Hungarian

○ Irish

○ Italian

○ Latvian

○ Lithuanian

○ Maltese

○ Polish

○ Portuguese

○ Romanian

○ Slovak

○ Slovenian

○ Spanish

○ Swedish

* I am giving my contribution as

○ Academic/research institution

◉ Business association

○ Company/business

○ Consumer organisation

○ EU citizen

○ Environmental organisation

○ Non-EU citizen

○ Non-governmental organisation (NGO)

○ Public authority

○ Trade union

○ Other

*First name

The Bioenergy Association

*Surname

of Finland

*Email (this won't be published)

info@bioenergia.fi

DO you represent an organisation?

- ◉ Yes
- ○ No

*Organisation name

255 character(s) maximum

Bioenergia ry - the Bioenergy Association of Finland

Is the organisation's main headquarter within the EU?

- ◉ Yes
- ○ No

*Organisation size

- ◉ Micro (1 to 9 employees)
- ○ Small (10 to 49 employees)
- ○ Medium (50 to 249 employees)
- ○ Large (250 or more)

In which sector do you / your members operate?

Please select all that apply and describe in a few words the nature of your activities.

- ☐ Public sector/government – National level
- ☐ Public sector/government – Regional level
- ☐ Public sector/government – sub-regional level
- ☐ Financial and insurance sector

- ☑ Research and education
- ☐ Social economy
- ☐ Construction/Buildings

Energy Sector

- ☑ Producer of energy
- ☐ Transmission system operator or distribution system operator (TSO/DSO)
- ☐ Power Exchange/Market Operator
- ☑ Energy trader
- ☑ Retailer
- ☐ Regulator
- ☐ Energy Service Company
- ☐ Data centre or Information and Communication Technology processing company
- ☑ Manufacturer of clean technologies

Energy Intensive Industry

- ☐ Steel
- ☐ Non-ferrous metals
- ☐ Cement
- ☐ Chemicals and chemical-based fertilizers
- ☐ Glass and ceramics
- ☑ Paper
- ☐ Production of hydrogen, production of gasses including low carbon, biomethane, biogases
- ☐ Other

Transport

- ☐ Aviation
- ☐ Maritime
- ☐ Road transport
- ☐ Rail

Waste management, including incineration:

- ○ Technology provider or manufacturer for waste management
- ○ Company of mission of public service

Land use/bioeconomy
- ○ Agriculture value-chain
- ● Forestry value-chain

If other, please specify.

500 character(s) maximum

> We have members involved in agriculture value-chain as well

Please provide a short description of your activities in the above-mentioned sectors:

500 character(s) maximum

> The Bioenergy Association represents the interests of the bioenergy sector in Finland.
> As the EU and Finland progress towards carbon neutrality, the Bioenergy Association aims to develop the bioenergy sector in a way that provides Finland with the world's best conditions to produce sustainable and even carbon-negative products based on biomass. Its goal is high added value, circular economy, and the export of industrial products and services. Bioenergy is captured from side streams.

If you are a civil society organisation or a public administration, please indicate your main area of focus or your area of competence.

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

> 174042620514-51

*Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- ○ Afghanistan
- ● Åland Islands
- ○ Djibouti
- ○ Dominica
- ○ Libya
- ○ Liechtenstein
- ○ Saint Martin
- ○ Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia

- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- ◉ Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada

- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia

- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

○ Bonaire Saint Eustatius and Saba	○ Guadeloupe	○ Nauru	○ Switzerland
○ Bosnia and Herzegovina	○ Guam	○ Nepal	○ Syria
○ Botswana	○ Guatemala	○ Netherlands	○ Taiwan
○ Bouvet Island	○ Guernsey	○ New Caledonia	○ Tajikistan
○ Brazil	○ Guinea	○ New Zealand	○ Tanzania
○ British Indian Ocean Territory	○ Guinea-Bissau	○ Nicaragua	○ Thailand
○ British Virgin Islands	○ Guyana	○ Niger	○ The Gambia
○ Brunei	○ Haiti	○ Nigeria	○ Timor-Leste
○ Bulgaria	○ Heard Island and McDonald Islands	○ Niue	○ Togo
○ Burkina Faso	○ Honduras	○ Norfolk Island	○ Tokelau
○ Burundi	○ Hong Kong	○ Northern Mariana Islands	○ Tonga
○ Cambodia	○ Hungary	○ North Korea	○ Trinidad and Tobago
○ Cameroon	○ Iceland	○ North Macedonia	○ Tunisia
○ Canada	○ India	○ Norway	○ Türkiye
○ Cape Verde	○ Indonesia	○ Oman	○ Turkmenistan
○ Cayman Islands	○ Iran	○ Pakistan	○ Turks and Caicos Islands
○ Central African Republic	○ Iraq	○ Palau	○ Tuvalu
○ Chad	○ Ireland	○ Palestine	○ Uganda
○ Chile	○ Isle of Man	○ Panama	○ Ukraine
○ China	○ Israel	○ Papua New Guinea	○ United Arab Emirates
○ Christmas Island	○ Italy	○ Paraguay	○ United Kingdom

○ Clipperton
○ Cocos (Keeling) Islands

○ Jamaica
○ Japan

○ Peru
○ Philippines

○ United States
○ United States Minor Outlying Islands

○ Colombia
○ Comoros
○ Congo
○ Cook Islands
○ Costa Rica
○ Côte d'Ivoire
○ Croatia
○ Cuba

○ Jersey
○ Jordan
○ Kazakhstan
○ Kenya
○ Kiribati
○ Kosovo
○ Kuwait
○ Kyrgyzstan

○ Pitcairn Islands
○ Poland
○ Portugal
○ Puerto Rico
○ Qatar
○ Réunion
○ Romania
○ Russia

○ Uruguay
○ US Virgin Islands
○ Uzbekistan
○ Vanuatu
○ Vatican City
○ Venezuela
○ Vietnam
○ Wallis and Futuna

○ Curaçao
○ Cyprus
○ Czechia

○ Laos
○ Latvia
○ Lebanon

○ Rwanda
○ Saint Barthélemy
○ Saint Helena Ascension and Tristan da Cunha

○ Western Sahara
○ Yemen
○ Zambia

○ Democratic Republic of the Congo

○ Lesotho

○ Saint Kitts and Nevis

○ Zimbabwe

○ Denmark

○ Liberia

○ Saint Lucia

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

○ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

◉ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☑ I agree with the [personal data protection provisions](#)

How many years of experience do you have dealing with the Governance Regulation?
- ○ Less than 1 year
- ○ 1-5 years
- ◉ More than 5 years

How familiar are you with the overall objectives and mechanisms of the Governance Regulation?
- ○ To a very large extent
- ◉ To a large extent
- ○ To some extent
- ○ To a small extent
- ○ Not at all
- ○ Do not know

Part 2: Options to revise the Regulation

1. Reviewing the scope of the Governance Regulation

The Commission's review found that the Regulation, in addition to aiming to achieve the EU's 2030 energy and climate targets and setting the adequate framework to achieve the objectives of the next decade, could potentially do more to help pursue a set of broader objectives. This includes accelerating the transition to climate neutrality, factoring in competitiveness, energy security and energy resilience, the need for strategic independence and tackling challenges across the supply chains for clean and net zero technologies and the infrastructure needed to deploy them. Also, it shed light on the potential for incentivising the phase-out of fossil fuels and fossil fuel subsidies, tackling energy poverty and just transition concerns, factoring in skills and jobs aspects, and putting more emphasis on climate resilience and adaptation considerations. The review concluded that there is also scope to enhance coherence and synergies with other policy areas, including on environment, agriculture, transport, industry, circular economy and macro-economic policy.

Q1: Which of the following areas should the Governance Regulation focus on more to best support a secure, independent, competitive and decarbonised energy system as well as a climate neutral and resilient EU by 2050?

Matrix

	Very Important	Important	Moderately Important	Slightly Important	Not important	Don't know
Sectoral transition pathways (energy supply, industry, transport, buildings, agriculture, land/bioeconomy, waste)	○	○	○	○	◉	○
Coherence and synergies with other policy areas	○	○	○	◉	○	○
Competitiveness, investment, innovation and clean tech supply chains and dependencies	○	◉	○	○	○	○
Just transition, social impacts, affordability, skills and jobs	○	◉	○	○	○	○
Energy security, including supply diversification away from fossil fuels, energy system flexibility and resilience	◉	○	○	○	○	○
Phasing out fossil fuels and fossil fuel subsidies	○	○	◉	○	○	○
Climate resilience, including water resilience	○	○	○	○	◉	○
Circular economy and material footprint	○	○	○	○	◉	○
Early and effective engagement of all administrative levels (local, regional) in the design, adoption and implementation of energy and climate policy	○	○	○	○	◉	○
No change - The current Regulation focuses on the most relevant areas	○	○	○	○	○	◉
Application of the energy efficiency first principle.	○	○	○	○	◉	○

How concretely should the policy aspects listed above be better reflected in the Governance Regulation?

2000 character(s) maximum

> The "No change" option above is not very logical (vs. other questions) so we marked "Don't know". We are not seeking an overhaul to the current system, but support modest simplification and update regarding topical issues.
>
> The governance regulation should focus on the implementation and reporting of the agreed key objectives for 2040. Some new and useful additions may be made, but the focus must be on a "dashboard" of energy and climate action towards their individual agreed national objectives in Member States. The regulation should not become a christmas tree of all useful and related activities in the Union, but support implementation of the agreed key objectives.
>
> It would be unwise to reopen key files such as the Renewable Energy Directive as this would give a bad signal to investors, and jeopardise achievements in the
> promotion of renewable energy sources, such as sustainable bioenergy.

Are there additional or existing aspects/areas, besides those listed above, that should be better reflected in or excluded from the Governance Regulation and how?

500 character(s) maximum

> The governance regulation relies heavily on the use of scenarios made by Member States, which have partly proven to be very optimistic. Going forward, there should be more analysis of the perceived, real rate of change.

2. Evolution of the post-2030 energy and climate policy framework

The 2024 review highlights that the Governance Regulation should continue to support the EU in meeting its energy and climate policy objectives beyond 2030. The Regulation should serve as a foundation for shaping and implementing energy and climate policies consistent with the Union's 2040 ambition and its commitments under the Paris Agreement. Its governance mechanisms should support Member States in ensuring the 2040 ambition is achieved in a simple and cost-effective manner and should drive and accelerate the transition to climate neutrality by 2050.

To fulfil this role, the Regulation, while maintaining the framework for 2030, could evolve along three key areas for the post-2030 framework: (1) the overall governance architecture, to reflect the transformation of Europe's energy system, capturing dimensions such as competitiveness, resilience, just transition, affordability and security of supply; (2) the structure of post-2030 energy targets striking the right balance between continuity and adaptation, while providing investment certainty and predictability taking into account Member States specificities, as well as offering flexibility in how they contribute to the collective ambition; (3) delivery and compliance mechanisms that secure collective achievement of post-2030 objectives while driving sufficient progress toward climate neutrality by 2050.

Member States post-2030 targets and efforts should reflect cost-efficiency and solidarity, taking into account different national circumstances and specificities, including those of islands and outermost region

Q2: As the EU's energy system continues its transformation, becoming more integrated, resilient and decarbonised, how should the overall energy and climate policy framework guide this change and track progress, while reflecting aspects such as flexibility, affordability, competitiveness, innovation, interconnectivity and security of supply?

Overall Governance Architecture

- ◉ **Option 1:** Continue with the current architecture, aligned with objectives across the five Energy Union dimensions (Energy union - European Commission).

- ○ **Option 2:** Shift the architecture's focus from Energy Union-dimensions to economic sectors (e.g. buildings; transport; industry; agriculture, land /bioeconomy, waste, and power generation, etc..).

- ○ **Option 3:** Maintain the current architecture based on the five Energy Union dimensions (Option 1) and complement it with a set of quantitative and/or qualitative key performance indicators (KPIs) monitoring performance, such as: Competitiveness (e.g. economic value added of energy consumption); Affordability and security of supply (e.g. electrification, energy system flexibility, robust infrastructure and climate resilience, domestic manufacturing capacity of clean energy technologies, interconnectivity); Decarbonisation (e.g. fossil fuel phase out).

- ○ **Option 4:** Adopt a sector-based architecture (Option 2) and complement it with the same type of quantitative and/or qualitative KPIs as described under Option 3.

What other option, or combination of options, if any, should be considered?

2000 character(s) maximum

> In option 1, we underline that the current architecture can also be modified and simplified. An increasing focus at the EU-level on GHG emission reductions and removals (in particular, technological removals) can be justified as the Fit-for-55 energy and climate framework for 2030 has already ensured a certain minimum level of improvement in many areas, such as renewable energy and energy efficiency.

Overall post-2030 energy targets structure

[Please rank the options from 1 to 5, where 1 is the most important and 5 the least important]

⠿ **Option 3:** Define a single, overarching clean energy target for the EU, with embedded minimum thresholds for key energy parameters (e.g. renewable energy, energy efficiency).

⠿ **Option 2:** Keep a similar structure with binding EU targets as in option 1 while allowing for flexibilities that reflect Member's states' specificities.

⠿ **Option 1:** Continue with the current structure of binding EU targets for renewables and energy efficiency, supported by national contributions guided by formulas (Based on the formulas for Member States contributions on renewable energy and energy efficiency under the current governance framework).

⠿ **Option 4:** Define a single, overarching electrification target for the EU, with embedded minimum thresholds for key parameters (e.g. renewable energy, energy efficiency)

⠿ **Option 5:** Option 1, 2, 3 or 4 complemented/combined with monitoring KPIs for key energy system components (e.g. electrification, waste heat reduction or re-use), while ensuring transparency and comparability.

What other option, or combination of options, if any, should be considered?

500 character(s) maximum

If a clean energy target is set, it can be aspirational, when the climate target is in place. Both cost-effectiveness and adherence to the subsidiarity principle speak for a system where Member States have more leeway in defining how they reduce GHG emissions and increase removals outside the ETS systems after 2030.

Q3: In your view, how can the Governance Regulation most effectively ensure compliance with post-2030 energy and climate objectives and drive sufficient progress toward climate neutrality by 2050 and the goals of the Paris agreement?

[Please rank the options from 1 to 7, where 1 is the most important and 7 the least important]

⠿ **Accountability mechanisms and enforcement:** Enhance accountability mechanisms to address any gaps in delivery by strengthening the connection between i) progress on the objectives and KPIs in the Regulation and ii) access to EU-level support tools.

⠿ **Improve the monitoring, reporting and verification system, in particular on projections:** better assess the effectiveness of climate and energy policies and maintain accountability and transparency.

⠿ **Cooperation between Member States and the private sector:** Enhance cooperation between national administrations, economic sectors, and relevant financial institutions in the formulation of national policies and energy and climate investment planning.

⠿ **Proactive toolbox:** Create a toolbox of delivery measures, including the allocation of EU funding, the European Semester and technical assistance, which can be activated at EU or Member State level if progress is insufficient.

:: **Capacity building:** Promote knowledge-sharing, expertise, and good practices to foster the development and implementation of climate and energy policies and projects, foster access to independent technical and financial advice.

:: **Legally binding national objectives:** Legally binding energy sector targets at Member State level to reach the energy and climate Union objectives.

:: **Investment plans:** Strengthen the role of NECPs to include robust and up-to-date investment roadmaps. These roadmaps should clearly define investment needs and corresponding funding sources, linking key Policies and Measures (PaMs)/ reforms to financing instruments and plan in a coherent manner the related infrastructure needs.

What other option, or combination of options, if any, should be considered? In particular, what kind of enforcement tools can be deployed to ensure Member States accountability?

2500 character(s) maximum

Q4: In the context of the discussions to amend the European Climate Law for the 2040 climate target, the need for flexibility across sectors to help achieve targets in a cost-effective and socially fair way has been raised. In your views, how can the Governance Regulation introduce more flexibility in achieving targets compared to the current approach?

Please select one of the following answers:

○ By simplifying the structure for national climate and energy sub-targets while still providing investment certainty and predictability.

○ By designing a mechanism that takes into account progress on enabling measures when assessing progress towards targets.

○ By defining flexibility among the sectors, allowing for overachievement in one sector to compensate shortfalls in other sectors. Please specify.

○ The current architecture (binding EU targets for renewables and energy efficiency, supported by national contributions and binding national climate targets) offers sufficient flexibility and is important for providing investment certainty and predictability.

Other (please specify)

The governance regulation should focus increasingly on meaningful outcomes, such as GHG emission reductions or progress in nature restoration. There is too much focus now on e,g, Member-State Level RES

shares and energy efficiency improvements (i.e. subtargets). When the 2030 RES and EE targets have been reached in each MS, it should be Member States' discretion how they continue greenhouse gas emission cuts.

3. Making energy and climate investments happen

One of the objectives of the Governance Regulation is to enhance regulatory certainty to foster investment predictability, consumer confidence, innovation, and market growth for clean technologies and decarbonisation investments. The review of the Governance Regulation indicated that NECPs should evolve into robust investment plans that efficiently direct public and private funding and outline impactful national reforms for the transition of each sector. This is also reflected in the Commission's MFF proposal, which explicitly lists NECPs among the plans guiding funding under the next MFF.

Q5: In your view, to what extent would the following options strengthen the Governance Regulation's contribution to a stable and predictable investment environment for private investors in the transition?

[Please assign a numerical weight from 1 to 5 to each option below]

Investment needs and sources of funding

	1	2	3	4	5
Require more granular information on medium-to-long-term investment needs and underlying assumptions (by sector and decarbonisation lever, e.g. through indications for the national sectoral decarbonisation pathways), as well as related infrastructure requirements and envisaged sources of finance, both private and public.	●	○	○	○	○
Ensure that NECPs include concrete measures to mobilise private investment and involve financial institutions and investors in preparing NECPs.	○	○	●	○	○
Set clearer, simpler and digitised templates to harmonise NECPs and provide methodologies to calculate investment needs, increasing comparability of data across Member States.	●	○	○	○	○
Ensure that NECPs place more emphasis on investments with clear EU-added value, such as cross-border energy and CO2 transport infrastructure projects.	○	○	●	○	○
Ten-Year Network Development Plans (TYNDPs) must inform NECPs on infrastructure investment needs to ensure delivery and consistency. At the same time, TYNDPs need to be consistent with the objectives and policies identified in the NECPs.	○	○	○	○	●

	1	2	3	4	5
Other relevant planning frameworks such as the planning of CCS investment under the Net Zero Industry Act must be consistent with and inform the NECPs.	○	○	○	○	●
Strengthen the coherence between the NECPs and the Medium-Term Fiscal and Structural Plans under the economic governance framework.	●	○	○	○	○
Strengthen the link between NECPs and Country Specific Recommendations under the framework of European Semester.	○	○	●	○	○
Strengthen the link between NECPs and relevant EU funding under the next MFF.	○	○	○	●	○

Timeline and frequency of updates

	1	2	3	4	5
Extend the time horizon of NECPs to 2050 by integrating Long-Term Strategies into NECPs, ensuring stable, long-term climate and energy policy frameworks.	●	○	○	○	○
Incorporate greater flexibility into NECPs' adoption and preparation to allow adaptation to uncertainties and significant policy changes, as well as better alignment with national and other EU planning cycles.	○	○	○	○	●
Strengthen and further develop the system for consultation, exchanges and support between the Commission and Member State authorities to facilitate high-quality NECPs and timely submissions	○	●	○	○	○

Key Performance Indicators

	1	2	3	4	5
Enhance investor certainty by establishing binding energy and climate objectives and targets beyond 2030.	○	○	○	●	○
Use Key Performance Indicators relevant to energy and climate investments (e.g. permitting or grid connection times or sectoral pathways) to make NECP objectives and delivery monitoring more relevant to investors and stakeholders.	○	●	○	○	○
Enhance the role and functioning of the Union renewable energy financing mechanism by simplifying the procedure for organising tenders and facilitating the contribution of the mechanism to the enabling framework set out by Article 3(5) of the Renewable Energy Directive, including for increasing the flexibility of the energy system.	○	○	○	●	○

Please substantiate your ranking choices, providing explanations and any supporting evidence and, if relevant, indicate what other options could be considered?

2000 character(s) maximum

> Binding climate objectives are necessary, binding energy objectives not necessarily. Energy objectives can be aspirational. We are not convinced NECPs are primary tools for investors. Instead, we believe binding climate objectives coupled with financing schemes can be useful tools to leverage private investment to EU's objectives.

4. Contributing to a more resilient energy system

Resilience of the energy system refers to the ability of the European energy system to anticipate, withstand, adapt to, and recover quickly from disruptions or challenges—such as natural disasters, climate impacts (heat, fires, floods), geopolitical tensions, cyberattacks, equipment failures, or sudden changes in energy demand and supply—while maintaining a reliable, secure, independent and sustainable energy supply. The review of the Governance Regulation stressed that mainstreaming climate resilience and adaptation considerations in climate mitigation and energy policy has become a prominent area of action for the Regulation.

Q6: In which areas can the Governance Regulation strengthen the resilience of the energy system, complementing existing rules?

[Please rank the potential areas from 1 to 6, where 1 is the most important and 6 the least important]

Use drag&drop or the up/down buttons to change the order or accept the initial order.

- ⁝⁝ Security and resilience of energy supplies, including diversification of supply and strategic planning of energy and critical materials' imports.

- ⁝⁝ Building up resilience of the energy system to climate change impacts (resilience by design) through strategic planning and monitoring.

- ⁝⁝ Stronger links to the internal energy market rules, particularly on non-fossil flexibility resources such as demand response and energy storage, and non-fossil capacity mechanisms.

- ⁝⁝ Adapting energy infrastructure to better integrate renewable energy sources and address the decline in domestic fossil fuel demand, facilitating the shift to lower-carbon alternatives while ensuring long-term security of supply.

- ⁝⁝ Securing critical energy infrastructures against cyber and other physical attacks.

- ⁝⁝ Economic resilience / EU's strategic autonomy / vulnerabilities in supply chains.

What other areas, if any, should be considered?

500 character(s) maximum

4. Contributing to a more resilient energy system

Resilience of the energy system refers to the ability of the European energy system to anticipate, withstand, adapt to, and recover quickly from disruptions or challenges—such as natural disasters, climate impacts (heat, fires, floods), geopolitical tensions, cyberattacks, equipment failures, or sudden changes in energy demand and supply—while maintaining a reliable, secure, independent and sustainable energy supply. The review of the Governance Regulation stressed that mainstreaming climate resilience and adaptation considerations in climate mitigation and energy policy has become a prominent area of action for the Regulation.

5. Streamlining the Governance framework

The evaluation of the Governance Regulation concluded that the regulation has reduced the administrative burden associated with energy and climate policy obligations by merging and streamlining previously scattered and partly overlapping monitoring obligations. However, the evaluation also showed that more can still be done, including to support the Commission's commitment to reduce the administrative burden from reporting obligations by 25%. In this vein, the evaluation points to barriers in areas where internal consistency can be improved.

Q7: Please rate the simplification potential of the following options.

	1	2	3	4	5
Integrating the Long-Term Strategies (LTSs) into the NECPs.	○	◉	○	○	○
Introduce a stricter split where the plans mainly set national energy and climate objectives and key policies and measures (PaMs), while progress reporting covers more detailed information on the implementation of policies & measures as well as tracking progress towards achieving the targets.	○	○	○	○	◉
Reduce the frequency of NECP updates (currently every five years, with both a draft and a final plan).	◉	○	○	○	○
Reduce the frequency of progress reporting (NECP progress reporting is biannually. In case of any substantial changes GHG reporting is annually).	◉	○	○	○	○
Streamline the different reporting cycles and timelines (e.g. long-term strategies, NECPs, NECPR, GHG Projections and inventories, PaM Reports), taking into account international obligations.	○	○	◉	○	○
Reduce the information reported by the Member States in the progress reporting by simplifying tables and limiting optional elements.	○	○	○	○	◉

Further streamline digital reporting (platforms) under the Governance Regulation.	○	○	○	○	◉
Increase the reuse of data (e.g. from Eurostat, EEA, ACER, ENTSOE) for progress reporting.	○	○	○	○	◉
Introduce fully digitalised templates for NECPs.	○	○	○	○	◉
Integrate other planning or reporting obligations in EU legislation so that they are covered in either the NECPs or progress reporting (please specify below).	◉	○	○	○	○
Use Artificial Intelligence to streamline elements of monitoring and reporting processes to reduce administrative burdens.	○	◉	○	○	○

What other simplification options, if any, should be considered?

500 character(s) maximum

6. Strengthening cooperation between and within Member States

One of the objectives of the Governance Regulation is to stimulate cooperation between Member States, including regional cooperation, to achieve Energy Union and climate action objectives and targets. The review has signalled opportunities to enhance engagement and cooperation among Member States, sub-state actors and stakeholders.

NECPs are currently developed every 10 years, with an update after 5 years. For both the original plan and the update, the Governance Regulation takes an iterative approach: Member States first submit a draft plan, to which the Commission issues recommendations. Member States must then take these recommendations into account in developing their final NECPs. The Commission monitors the implementation of the NECPs through NECP Progress Reporting (NECPR) generally every two years or annually for GHG emissions.

Q8: In your view, what are the main strategic areas where stronger cooperation between Member States is needed - including those outside of the scope of current cooperation mechanisms?

[Please assign a numerical weight from 1 to 10 to each option below]

	1	2	3	4	5	6	7	8	9	10
Infrastructure planning (e.g. electricity grids, hydrogen, CO2 pipelines), including cross-border aspects	○	○	○	○	○	○	○	○	○	◉

	1	2	3	4	5	6	7	8	9	10
Production and deployment of renewables and other clean energy sources.	○	○	○	●	○	○	○	○	○	○
Security of supply and resilience (e.g. energy diversification, protection against hybrid threats)	○	○	○	○	○	○	●	○	○	○
Sectoral decarbonisation pathways /roadmaps	○	●	○	○	○	○	○	○	○	○
Climate resilience and adaptation	○	○	●	○	○	○	○	○	○	○
Monitoring and reporting to increase consistency of data (such as improved land monitoring using satellite data or regional emissions coefficients)	○	○	○	○	○	●	○	○	○	○
Research & innovation to enhance EU and Member States competitiveness and greater market uptake of technologies/ solutions.	○	○	○	○	○	○	○	○	○	●
Clean tech manufacturing	○	○	○	○	○	○	○	○	●	○
Creation of lead markets for decarbonised industrial products and clean technologies.	○	○	○	○	○	○	○	●	○	○
Cross-border electricity trading.	○	○	○	○	○	○	○	○	○	●
Permitting of cross border projects.	○	○	○	○	○	○	○	○	○	●
Land management and nature-based solutions	○	●	○	○	○	○	○	○	○	○
Space observation data	○	○	○	○	●	○	○	○	○	○

What other areas, if any, should be considered?

500 character(s) maximum

Q9: How can the Governance Regulation facilitate more effective cooperation between Member States in these areas?

[rank from Very important – to don't know]

	Very Important	Important	Moderately important	Slightly important	Not important	Don't know
By expanding the scope of existing High-Level Groups (for example, the North Seas Energy Cooperation, Interconnection for South-East Europe, BEMIP, CESEC) to more areas of the NECPs.						
By setting up new fora or mechanisms tailored to cross-border energy and climate planning.						
By complementing or replacing national energy and climate						

plans with plans that cover larger geographical areas, rather than individual Member States.					
By introducing a process for Member States to peer-review or comment on each other's NECPs.					
At sectoral level, by facilitating exchanges between Member States particularly regarding specific industries/value chains w i t h interdependencies.					
Additional cooperation between Member States should be covered elsewhere,					

and not under the Governance Regulation.						

What other approaches, if any, should be considered?

500 character(s) maximum

Q10: How can the governance process between the European Commission and Member States ensure timely and high quality NECPs and reporting?

[Rank Very Important – do not know]

	Very Important	Important	Moderately important	Slightly important	Not important	Don't know
Simplify the current two-step cycle in which Member States submit a draft plan, receive Commission recommendations, and then submit a final plan, by moving to a lighter process with fewer steps, clearer timelines while ensuring the Commission continues to work closely with Member States so that the content of the plans adequately contributes to EU-wide						

energy and climate objectives.					
Limit the content of draft plans to key information: targets, projections, trajectories, overview of the most important Policies and Measures (PaMs), investment needs, leaving additional elaboration to final plans.					
Step up policy dialogue and technical guidance in preparation of the plans.					
Link access to sources of EU public funding to					

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the timely delivery and quality of NECPs and NECP reporting.					
Provide more flexible deadlines for NECPs and NECP Progress Reporting, for instance allowing for partial updates where relevant.					
Streamlining the quantitative information in NECPs to make it more precise and consistent (currently in Annex 1 part 2).					

What other approaches, if any, should be considered?

500 character(s) maximum

7. Improving public consultation and multilevel governance

The Governance Regulation requires Member States to ensure reasonable timeframes for the public to be informed, to participate, and to express their views in the preparation of NECPs and Long-Term Strategies. It also requires Member States to establish a multilevel climate and energy dialogue bringing together local authorities, civil society organisations, the business community, investors and other relevant stakeholders to discuss energy and climate policies. NECPs may be discussed in these dialogues.

However, the evaluation found that implementation of these provisions has been uneven across Member States. Many did not establish adequate or timely public consultations or stakeholder dialogues. While part of the problem stems from national factors (limited experience or administrative issues), the Regulation itself may also lack sufficient precision and prescriptiveness to guarantee effective consultations.

Q11: In your view, should the Governance Regulation public consultation process and provision be revised?

[Please select the option that best reflects your view]

- ◉ Yes, significant improvements are needed.
- ○ Yes, minor improvements are needed.
- ○ No, the public consultation process outlined in the Governance Regulation is adequate as it stands.
- ○ No, the public consultation process is included adequately in the Governance Regulation but implementation needs to be improved.
- ○ The provisions on public consultation do not have much added value because it is Member States competence to conduct it (subsidiarity principle) and could be removed.
- ○ No opinion/not sure
- ○ Ohter

Please explain why you selected a specific option and, if relevant, what other options should be considered.

2500 character(s) maximum

The public consultation feedback should also be summarised to the commission. Any consultation should be representative enough.

Q12: In your view, is there a need to revise the regulation's Multilevel Climate and Energy Dialogue provision?

○ No, the provision on multilevel dialogue is adequate as it stands.

○ No, the multilevel dialogue provision is included adequately in the Governance Regulation but implementation needs to be improved.

○ Multilevel dialogue provision in the NECP should only apply where lower- level authorities have legal competence to directly impact the achievements and implementation of the NECP.

◉ No opinion / Not sure.

○ Other (please specify below).

Please explain why you selected a specific option and, if relevant, what other options should be considered.

2500 character(s) maximum

Final questions

Would you have any additional comments on points not addressed in the previous questions?

1000 character(s) maximum

Alternatively, you may submit evidence or position papers on topics falling under the scope of this review

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

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