

CONSULTATION ON STREAMLINING OF PLANNING AND REPORTING OBLIGATIONS AS PART OF THE ENERGY UNION GOVERNANCE

Fields marked with * are mandatory.

What this consultation is about

The Commission's State of the Energy Union presented on 18 November 2015 states that "[t]he Energy Union needs a reliable and transparent governance process, anchored in legislation, to make sure that energy-related actions at European, regional, national and local level all contribute to the Energy Union's objectives." This corresponds to similar calls from the European Council and the European Parliament[*].

The State of the Energy Union also underlines that "[i]ntegrated national energy and climate plans, addressing all five dimensions of the Energy Union, are necessary tools to have more strategic planning", and that "[i]n order to track progress, a transparent monitoring system needs to be put in place based on key indicators as well as on Member States' biannual reports concerning progress made on their national plans". This builds further on the Commission's Communication on the Energy Union from February 2015, which explained that a purpose of the governance process for the Energy Union is to "streamline current planning and reporting requirements, avoiding unnecessary administrative burden".

In this context, the present consultation seeks stakeholders' views on current planning and reporting arrangements in the energy field, and on how these could be improved to better serve the objectives of the Energy Union and to reduce administrative burden. An overview of existing planning and reporting obligations in the energy sector concerning the Member States as well as the Commission is available here: [COM planning and reporting obligations \(energy field\)](#); [MS planning and reporting obligations \(energy field\)](#); [COM planning and reporting obligations \(climate field\)](#); [MS planning and reporting obligations \(climate field\)](#).

The responses to the public consultation will feed into the Commission's evaluation and fitness check of existing planning and reporting obligations (a REFIT initiative in the Commission's 2015 Work Programme) as well as into the Impact Assessment for the Commission's proposal(s) for streamlining of planning and reporting in the energy field foreseen for late 2016, as announced by the State of the Energy Union.

The consultation as well as the initiatives it will contribute to should be understood in the broader context of the Energy Union strategy; the Commission's guidance to Member States on national plans from 18 November 2015, and the Council's Conclusions on Energy Union governance from 26 November 2015 – which underscore the need for holistic national plans that address all five dimensions of the Energy Union in an integrated way.

This public consultation also relates to the preparation of other initiatives to implement the Energy Union foreseen for 2016 (notably initiatives on energy efficiency, renewable energy and electricity market design). For other completed and ongoing public consultation processes and their outcomes, see: <http://ec.europa.eu/energy/en/consultations>.

[*] REF to EUCO October 2014 and March 2015; EP 15 Dec 2015.

The questionnaire is structured as follows:

- A. Respondent's profile
- B. Evaluation of existing planning obligations
- C. Evaluation of existing reporting obligations
- D. Options for streamlining planning and reporting obligations
- E. Options for the governance of the Energy Union

Questions marked with an asterisk (*) are mandatory.

*

A. Respondent's profile

Please provide information to help us build your profile as a respondent. In accordance with Regulation 45/2001[*], all personal data collected through this survey will be kept securely and will ultimately be destroyed.

[*] Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, OJ L 008, 12.1.2001, p.1.

A.1 Are you answering as an individual or on behalf of an organisation/institution?

- ☐ I am answering as an individual.
- ☒ I am answering on behalf of an organisation.

A.2 Please specify your main field of activity.

Please tick the appropriate field. Only one choice is possible:

- ☐ Individual citizen
- ☐ National public authority (central or local government)
- ☒ Private company/ Industry association
- ☐ International organisation
- ☐ Workers' organisation/trade union
- ☐ Research organisation/university
- ☐ NGO
- ☐ Other interest group organisation/association

Other - please specify:

non profit consumer cooperative

*

A.3. Please indicate your country of residence/establishment:

If answering as an individual, please provide your country of residence.

If answering on behalf of an organisation/institution, please provide the country of establishment of the organisation/institution.

Please tick the appropriate field, only one choice is possible.

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Iceland
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Liechtenstein
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Norway
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovenia
- ☒ Spain
- ☐ Sweden
- ☐ Slovakia
- ☐ Switzerland
- ☐ United Kingdom

Other/international - please specify:

*

A.4 Name and contact details

- ☐ I prefer to provide a general comment only. Please provide your general comment in the box below. (up to 2000 characters)
- ☒ I will provide my name and contact details in the boxes below.

[Questionnaire ends here]

Name:

Organisation (*where applicable*):

Address:

ID from the Interest Representative Register[*] (*where applicable*):

Telephone:

Email:

[*] In the interest of transparency, organisations (including, for example, NGOs, trade associations and commercial enterprises) are invited to provide the public with relevant information about themselves by registering in the Interest Representative Register and subscribing to its Code of Conduct. If you are a registered organisation, please indicate the name and address of your organisation and your Register ID number on the first page of your contribution. Your contribution will then be considered as representing the views of your organisation.

*

A.5 Received contributions may be published on the Commission's website, with the identity of the contributor. Which publication arrangement would you agree upon?

- ☒ My contribution may be published under the name indicated.
- ☐ My contribution may be published but shall be kept anonymous.
- ☐ I do not agree that my contribution will be published.

B. Evaluation of planning obligations

Existing obligations

The EU energy and climate legislation includes a number of different planning obligations for the Member States. Planning obligations play a crucial role for EU energy policies in e.g. the fields of renewable energy, energy efficiency, security of gas supply, energy performance of buildings, waste management and decarbonisation. The main features of existing planning obligations can be summarised as follows:

- Current planning obligations usually include indicators and projections as an analytical basis as well as policies and measures needed to achieve the plan's objectives;
- Current plans usually cover a specific area of the energy or climate field, but do not necessarily refer to possible overlaps and interactions with other plans in these fields; in some cases templates are provided, which can be either voluntary or compulsory;
- Plans often have to be submitted once, but in many cases a periodical revision or the submission of new plans is required. The process for the adoption of the plans is often left to the discretion of the Member States;
- The role of the Commission varies. In some cases, it monitors plans, in other cases, it analyses plans and is requested to report to the European Parliament and the Council. In some instances the Commission could ask for modifications. Furthermore, it can use its enforcement powers, if the planning obligations are not fulfilled or not all the necessary details/content were provided.

1) How would you rate the following aspects of such planning obligations at EU level?

	Very important	Important	Less important	Not important	No opinion
Coherence of national plans among all EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission is better enabled to provide substantial and useful advice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please explain: (up to 1000 characters)

Consolidating the current patchwork of planning requirements presents an opportunity to strengthen the effectiveness and transparency of the EU's climate and energy (C&E) governance regime, and will be a key means by which Member States (MS) can be held accountable.

But while there are potential opportunities in streamlining, if excessive or poorly designed, a streamlined planning process could compromise the EU's ability to ensure delivery its objectives. Thus far, the Commission is proposing a process of developing National Energy Climate Plans (NECPs) outside of a binding legal framework. This may severely compromise the ability to collect data to verify MS' contributions, and thus to achieve (C&E) targets.

To ensure comparability, transparency for investors, and the achievement of common objectives, the planning process must conform to principles of good governance, and in particular be rooted in a legislative and binding framework - including a mandatory and detailed template.

2) Are you aware of overlaps or inconsistencies among the existing planning obligations in the same or different areas of the energy and climate acquis? Please provide examples. (up to 1000 characters)

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The current P&R regime imposes overlapping and unaligned timetables, thus creating unnecessary burden. Additionally, there is a discrepancy between weak and strong planning elements, which has implications on the Commission's ability to ensure and enforce a credible planning process:

- o While planning is robust under the Renewable Energy Directive (RED) owing to a binding template, the NREAPs are only done once and become obsolete, reducing their long-term value

- o Planning under the Energy Efficiency Directive (EED) is useful in being required every three years but lacks a binding template to ensure consistency and has resulted in inconsistent and weak NEEAPs

- o Planning under the Effort Sharing Decision (ESD) is weak as it does not contain a strong planning focus and is more about reporting on policies, measures, and projections

Furthermore, the current P&R contains a number of gaps (eg P&R to support consumer participation and to enhance flexibility in the power system).

3) a) Which of the current planning obligations could in your opinion be streamlined[*] into one integrated plan and why? (up to 1500 characters)

There are several risks related to the streamlining agenda. On one hand, a single oversimplified NECP may imply a significant loss of detail and reduce transparency and investor confidence. On the other hand, if a single plan were to include all the information that is currently provided through different documents, it is likely to be overloaded and risks becoming impractical for MS and non-transparent for stakeholders.

To ensure planning is fit for purpose, a modular approach should be used. Instead of having one streamlined plan replacing all existing provisions, this approach would differentiate between:

1) High level plans outlining MS vision for achieving the 2030 and other Energy Union objectives, serving communication and transparency purposes, including pledges towards EU targets and key performance indicators (KPIs). KPIs should comport to the principles of accountability and transparency, be rooted in law, and be quantifiable to avoid subjective narratives on performance. The need to prioritize low-carbon solutions (eg by activating the Efficiency First (EE1st) concept), should be reflected in the choice of all KPIs.

2) Detailed P&R in separate documents. Building on high level existing P&R requirements, certain P&R relating to key elements of sectoral legislation should remain distinct from the streamlined NECP and subject to more detailed rules in order to provide useful and comparable information for their respective audiences (eg Commission and investors).

b) Are there any planning obligations that should be kept separate from the integrated plan? (up to 1500 characters)

Integrating high level P&R obligations into one streamlined document will not replace the need for separate P&R instruments. Certain aspects of the current planning regime that will be vital for different sectors must be maintained in separate EU Directives.

For example, increased renewables and energy efficiency levels will require more dedicated P&R to describe how measures will be implemented as the penetration of both increases in the energy system. Likewise, some obligations (eg relating to security of supply and infrastructure planning) can hardly be streamlined into an integrated plan, if at all.

Similarly, where all targets are to be planned for together, this could potentially reduce the focus on achieving the binding targets and the effectiveness of the Energy Union governance could be reduced and planning provisions diminished to the lowest common denominator.

Moreover, maintaining distinct and robust planning obligations sends a strong signal to investors and wider stakeholders and provides a basis for ensuring transparency, proper monitoring and accountability.

Clarity and coherence between sectoral and integrated P&R must be ensured (eg through cross-reference to the NECPs). Bearing in mind that a number of EU Directives will be revised in 2016, it will be crucial to have the entire post-2020 regime decided simultaneously in order to ensure consistency between all P&R elements (ad-hoc sectoral and high level P&R).

c) Are there any planning obligations that could be repealed? (up to 1500 characters)

Streamlining should not be used as an excuse to weaken MS oversight. An excessive emphasis on streamlining and flexible P&R could indeed weaken monitoring and accountability, compromising the EU's ability to ensure delivery of the 2030 targets and Energy Union objectives.

In essence, a single, excessively streamlined report would lack detail and comprehensiveness, diminishing the level of clarity and detail, and hence the usefulness of P&R in providing transparency and investor confidence.

This risk must be balanced by ensuring that vital P&R for different sectors are maintained in binding legislation to ensure essential content is captured. Therefore, rather than being repealed, planning lines that relate to the implementation of provisions anchored in sector-specific legislation should stay in relevant Directives. This will enable the Commission to properly exercise its monitoring and enforcement duties.

[*] By streamlining we understand the possibility to integrate planning and reporting obligations resulting from (different) sectorial legislation by reducing possible duplications or gaps in the reporting and planning obligations, thereby ensuring transparency, coherence, relevance, efficiency and effectiveness of the reporting and planning. Furthermore planning and reporting cycles should be harmonised to the extent possible.

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4) Which elements/articles of the current planning obligations in the field of renewable energy do you consider indispensable and why? If relevant please, refer to specific [Articles of the Renewable Energy Directive](#). (up to 1000 characters)

A number of planning provisions should be kept in a revised RED as they are solely dedicated to the promotion of renewable energy, this includes planning obligations:

- for particular actors such as network operators
- on the removal of administrative barriers for renewables

Furthermore, maintaining specified trajectories for MS will be necessary in helping system operators plan for necessary infrastructure investments.

There is also a need for new and technical planning obligations (e.g. obligation placed on NRAs, TSOs, and DSOs to plan how they intend to better integrate and enhance flexibility into their systems). In their NECPs, MS also need to transparently elaborate how they will promote participation of prosumers in the achievement of renewable energy objectives (eg individual household consumers, community projects, multi-dwelling buildings, etc).

5) Which elements/articles of the current planning obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific Articles of the [Energy Efficiency Directive](#) and [Energy Performance of Buildings Directive](#). (up to 1000 characters)

All planning obligations currently included in the EED and the EPBD should be maintained. Certain obligations (eg national EE targets contributing to the overall EU target) may be streamlined but should remain within the EU legislative framework. No detail should be lost.

The EU must be able to monitor national trajectories towards the EU target. Otherwise, in the absence of national targets, it would not be possible for the EU to know how MS are performing towards common EU goals.

Planning of measures is also very important as the current EU energy efficiency policy is based on binding measures and non-binding targets. However, certain EED and EPBD measures give MS lots of flexibility on their implementation (eg Art 6 EED provides a number of additional conditions and refers to administration levels other than central government without imposing obligations; Art 4 EED is all based on national planning, and Art 7 EED gives flexibility on how to achieve its goals).

6) Which elements/articles of the current planning in the field of low-carbon development strategies do you consider indispensable and why? (up to 1000 characters)

MS must produce 'low-carbon development strategies' under the MMR. This obligation began only in 2015 and the first strategies are not available yet, thus it is impossible to assess the effects of this requirement.

However, it can be said that the MMR establishes very weak requirements for the MS to develop these strategies and that it seems that these plans are more akin to 'reports' rather than a 'plan' (ie it is unlikely they will push MS to develop a convincing narrative on how they will meet their GHG targets).

7) Which elements/articles of the current planning obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (up to 1000 characters)

Long-term infrastructure planning at national, regional and EU level must be maintained and reinforced to ensure that the power grid is prepared for challenges associated with the energy transition. Specifically, TSOs need to take energy efficiency, demand response and interconnection fully into account in their resource adequacy assessments and ten year network development plans (TYNDPs).

Rules and methodologies for adequacy outlooks and cost-benefit analysis for investment plans in infrastructure must be maintained and enhanced to provide coherence and comparability across the EU. Furthermore, these methodologies must provide for adequate consideration of flexible renewables and demand side response in the development of scenarios for future infrastructure needs.

At EU level, the Commission, ACER and ENTSO-E must ensure alignment between their own planning (eg Community-wide TYNDP, the European generation adequacy outlook) and the 2030 renewable and energy efficiency targets.

8) Which elements/articles of other existing planning obligations in the field of energy, including on security of supply, infrastructure and market integration do you consider indispensable and why? (up to 1000 characters)

Long-term infrastructure planning should remain distinct technical exercise from development of NECPs. To support infrastructure planning by TSOs, however, MS must provide sufficient national level projections for renewables, and specific information on how they intend to increase system flexibility and integration of renewables:

- removing excess and inflexible capacity
- optimising grid use and implementation of the efficiency first principle in grid investments
- improving locational price signals
- use of smart meters
- interconnections
- reforms to peak pricing rules
- demand side management by electric vehicles
- the role of demand side participation and storage in price formation

Furthermore, MS need to plan for how they intend to support prosumers (participating in both demand side response and production of renewable energy) and how they will reduce associated barriers to market entry for new actors (eg aggregators, community energy initiatives).

9) Can you provide qualitative or quantitative evidence on the administrative burden on Member States and other stakeholders resulting from planning obligations at EU level? (up to 1000 characters; a possibility to upload further evidence is provided at the end of the questionnaire)

As an archetypal example, the preliminary findings of the REFIT evaluation of the RED have demonstrated that the binding requirements of the Directive have had a “limited impact on the overall burden” and concluded that; although administrative burdens and costs arising from planning obligation might be relatively high during the implementation stage of a Directive, these significantly reduce over time while their benefits increase.

More importantly, the REFIT evaluation established that P&R requirements, and notably the use of templates, have actually contributed to reducing – and not increasing – the administrative burden on MS.

Furthermore, when evaluating the effectiveness of the Directive, the REFIT evaluation has shown that binding governance was particularly effective to ensure target achievement. In particular, the evaluation has outlined that both the national plans and the biennial monitoring have provided transparency and investor certainty, as well as MS accountability.

Future obligations

10) What level of importance do you attach to future planning obligations for Member States in the following key elements of the Energy Union Strategy?

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

C. Evaluation of reporting obligations


























Existing obligations

In the energy and climate field there are a number reporting obligations for the Member States and for the Commission. These have been developed to cover specific elements of the Energy Union, with less focus on integrated planning and reporting. Both the Member States and the Commission have to abide to reporting obligations. Usually, the information collected through Member States' reports is used by the Commission to assess trends in the climate and energy sectors, assess progress towards certain policy objectives, to monitor implementation and to propose policy and legislative reforms. Importantly, there are several different types of reporting obligations. The following distinctions are useful for the purpose of evaluating them:

- Reporting obligations can be regular or irregular. The former are fulfilled periodically; the latter usually once or after a specific request.
- The content of the reporting obligations may be specified in EU legislation, but the level of detail varies from one sector to another.
- Templates used to respond to reporting obligations are sometimes compulsory. In other cases, they have a voluntary nature.
- Reporting obligations are set up according to the information needs of each area of the energy field linked to the specific requirement of the objective of the initiative. Only in some cases they are coordinated with reporting obligations in other areas.

11) How would you rate the following aspects of reporting obligations in EU legislation?

	Very important	Important	Less important	Not important	No opinion
Coherence of reporting formats among all EU Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Effective and efficient implementation of EU legislation in the energy and climate field					
Assess progress to targets at Member State level and enable aggregation of data at EU level					
Better comparability of data from different Member States enabling an informed evaluation					
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU					
EU as a whole and Member States themselves are better informed on the actual performance and it provides ground for further action					

If other, please explain: (up to 1000 characters)

P&R must be rooted in legally binding legislation and must not weaken accountability or prevent the Commission from monitoring MS progress. The alternative, a soft non-binding approach (eg an Open Method of Coordination, or OMC) will be incapable of providing credibility or transparency.

Streamlining needs to ensure the existence of powerful accountability tools which make the attainment of the EU objectives credible, including through:

- binding templates to allow for effective, monitoring, and progress comparison (eg EU level aggregation)
- a legal mechanism to ensure the sum of MS effort is sufficient to enable the EU to meet its 2030 targets
- a legal mechanism to ensure MS accountability
- transparent access to relevant documentation
- regular status updates on MS and Commission actions
- regular updates of NECPs
- meaningful participation of stakeholders in the plan-making processes
- binding provisions to include a 2050 perspective
- a binding framework for the use of KPIs

12) Are you aware of overlaps or inconsistencies among the existing reporting obligations in the same or different areas of the energy acquis? Please provide examples. (up to 1000 characters)

The current landscape exhibits inconsistencies between weak/strong reporting elements:

- while a MS can be asked to update its NREAP if it is not on track to meet its indicative target under the RED, there is no such accountability link between plans and target under the EED
- Reporting under the ESD/MMR is extremely narrow as they are only intended to implement international commitments

Additionally, the Commission's reporting exercise is more retrospective than forward looking and generally fails to provide robust policy signposts and to probe the impact of free riders.

Furthermore, there is a lack of transparency around compliance and enforcement of reporting obligations as not all MS reports are available on the Commission website and no information is provided on whether the Commission is pursuing MS non-compliance with reporting obligations.

13) a) Which of the current reporting obligations could in your opinion be streamlined[*] into one integrated report and why? (up to 1500 characters)

The focus on streamlining should not be used to weaken EU monitoring and accountability controls. Rather, a modular structure should be used and reporting obligations could be integrated by creating different reporting levels, including:

1) Annual reporting to ensure that MS free riding can be seen as soon as possible (eg by tracking progress against KPIs). KPIs are indeed useful tools to indicate whether progress is being made, to proactively identify deviations from agreed objectives, and possibly trigger course correction. Annual reporting against KPIs (eg via the State of the Energy Union report) could be useful to monitor progress and agree specific actions to take with recommendations to MS.

2) Substantive and detailed integrated biennial reporting regulated by law, outlining MS efforts in achieving Energy Union objectives (reporting on pathways, targets and implementation of measures). To ensure that the Commission can properly monitor implementation of and enforce key aspects of sectoral EU legislation specific reporting requirements could be maintained in separate pieces of legislation. Cross references between a governance instrument and the respective Directives would be necessary to increase legal clarity and certainty.

Additional accountability tools are needed to make the streamlining process truly credible (eg binding annual and biennial reporting and binding use of templates and the implementation of a Transparency Platform to increase transparency).

b) Are there reporting obligations that should be kept separate from the integrated report? (up to 1500 characters)

A single high level report replacing all existing reporting requirements would place vital parts of the governance system at risk and would deprive the Commission of a crucial means to monitor how MS implement mandatory measures contained in sectoral Directives. In contrast, retaining essential sector-specific reporting provisions would ensure transparency and visibility for investors, and proper monitoring and oversight by the Commission. Under the post-2020 reporting architecture, legal requirements are needed to ensure continuing progress, not just on targets, but also on implementation of other obligations under the relevant directives. These more detailed reporting obligations are vital parts of the governance processes and facilitate evaluation, comparability, and enforcement of EU sectoral legislation.

Therefore, the Commission must be able to effectively assess following MS actions:

- 1) MS endeavours to ensure that 2030 targets and other Union level objectives are being delivered (incl. annual reporting on KPIs, and biennial reporting in one more detailed, but high-level document);
- 2) MS implementation of revised secondary climate and energy legislation, via sector-specific provisions with potentially different timelines (eg by reporting on regional cooperation or informing the Commission about alternative policy measures to achieve required energy savings).

c) Are there reporting obligations that could be repealed? (up to 1500 characters)

See answer to question 3) c).

[*] By streamlining we understand the possibility to integrate planning and reporting obligations resulting from different sectorial legislation by reducing possible duplication or gaps in the reporting and planning obligations, thereby ensuring transparency, coherence, relevance, efficiency and effectiveness of the reporting and planning. Furthermore planning and reporting cycles should be harmonised to the extent possible.

14) Which elements/articles of the current reporting obligations in the field of renewable energy do you consider indispensable and why? Please, if relevant, refer to specific articles of the Renewable Energy Directive. (up to 1000 characters)

MS reports on specific measures undertaken to implement Articles 13, 14 and 15, in particular reduction of administrative barriers for operators, and provision of information for local stakeholders has helped to shed light on the progress of MS – or the lack thereof – in these areas, as well as the need for further improvements in legislation.

15) Which elements/articles of the current reporting obligations in the field of energy efficiency do you consider indispensable and why? Please, if relevant, refer to specific articles of the Energy Efficiency Directive, the Energy Performance of Buildings Directive and the legislation on products. (up to 1000 characters)

As in the case of planning, all reporting obligations currently included in the EED and the EPBD should be maintained. No detail should be lost.

The arguments provided under question 5 are also relevant for reporting. In addition, it must be underlined that EU energy efficiency policy is essential for the achievement of the EU GHG targets. This is another reason for ensuring a proper reporting by MS of their energy efficiency targets and measures and a proper monitoring of these reports by the EU executive body.

There is also a number of EED reporting obligations that are strictly related to the EED obligations (Annex XIV, part 2.3). Without proper reporting, these provisions would not provide expected result. The reporting in these cases should be rather reinforced than weakened.

Future reporting (and planning) should also include the efficiency first principle.

16) Which elements/articles of the current reporting in the field of low-carbon development strategies do you consider indispensable and why? (up to 1000 characters)

See answer to question 6.

17) Which elements/articles of the current reporting obligations in the field of infrastructure development (like for example TEN-E) do you consider indispensable and why? (up to 1000 characters)

There is a need to ensure sufficient oversight of system operators' (eg TSOs) long-term planning obligations. In particular NRAs must continue to exercise appropriate oversight at national level over the development of adequacy assessments, and the development and implementation of investment plans. Moreover, oversight must be strengthened at regional level regarding cooperation between TSOs, particularly to ensure that long-term network planning is consistent with C&E objectives, including integration of renewable consistent with the 2030 EU objective and enhanced system flexibility.

18) Which other reporting obligations in the field of energy, including on security of supply infrastructure and market integration, do you consider indispensable and why? (up to 1000 characters)

Market monitoring obligations and duties on NRAs need to be maintained and strengthened. Thus far, the legal framework does not sufficiently address the need to report on market integration of new non-traditional market players in general (eg storage and demand side response providers) and prosumers in particular (eg individual households and non-household customers, and community energy initiatives). In particular, there is a need for NRAs to strengthen existing monitoring and reporting of grid access, including instances of discrimination and challenges faced by new market actors.

Member States and NRAs need to report on specific information on enhancing system flexibility in order to provide certainty to investors and network planners.

19) Which elements of the current reporting obligations in the field of energy research and innovation do you consider indispensable (investments in R&I, R&I funding programmes and projects and direct funding to institutions) and which information is publicly available or reported to other organisations? How can this reporting be made more consistent between Member States and more updated so that it can support more transnational cooperation in this field? (up to 1000 characters)

No answer.

20) Can you provide qualitative or quantitative evidence on the administrative burden imposed by existing reporting obligations on both Member States and other stakeholders? (up to 1000 characters, a possibility to upload further evidence is provided at the end of the questionnaire)

The experience of the RED has shown that although reporting provisions result in initial high costs, these are outweighed by benefits over time.

The REFIT evaluation of the RED has made clear that the use of mandatory and well defined provisions, such as the NREAPs, are more effective than voluntary provisions, and that rules set from the beginning are more efficient at ensuring transparency, stability, and credibility than provisions at a later stage.

This resonates with the need to use binding templates for the P&R exercise to avoid un-assessable planning and subjective reporting.

The binding nature of P&R has indeed ensured a high degree of compliance by MS and good quality information, the latter of which cannot necessarily be said for the experience under the EED which provided more flexibility for MS.

Binding P&R has also provided investors with necessary information to determine key investment decisions, and has helped ensure public participation in the planning process.

Future obligations

21) Do you consider future reporting obligations for Member States in the following key elements of the Energy Union Strategy to be?

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

D. Options for streamlining planning and reporting obligations

This part of the consultation seeks stakeholders' views on the options for the design of the planning and reporting obligations in the new governance system.













22) Do you agree that a comprehensive new legislative act covering both planning and reporting obligations of policy areas related to the Energy Union including the 2030 Energy and Climate framework would ensure consistency and reduce unnecessary administrative burden?

- ☒ YES
- ☐ NO
- ☐ No Opinion

23) Do you think that non-legislative approaches (e.g. guidance to Member States) can assure effective and efficient streamlining of planning and reporting obligations and would provide the necessary certainty for investors?

- ☐ YES
- ☒ NO
- ☐ No Opinion

24) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions" influence the following categories?

	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States						
Effective and efficient implementation of EU legislation in the energy and climate field						

Achievement of the EU energy and climate objectives						
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						

<p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p>						
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>						

25) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Regulating planning and reporting obligations in sectorial legislation as currently the case" influence the following categories?



















	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achievement of the EU energy and climate objectives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						

<p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p>						
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>						

26) Concerning options to streamline planning and reporting obligations in the framework of the governance of the Energy Union, how would "Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimensions" influence the following categories?

	Considerable Improvement	Improvement	No Change	Deterioration	Significant deterioration	No Opinion
Coherence of national plans and reporting formats among all EU Member States						
Effective and efficient implementation of EU legislation in the energy and climate field						

Achievement of the EU energy and climate objectives						
Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)						
Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU						

<p>Better implementation of international commitments by the EU as a whole and by Member States (e.g. concerning the reduction of greenhouse gas emissions)</p>						
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>						

27) In your view, what should be the nature of the initiative to best streamline the planning and reporting obligations in the framework of the governance of the Energy Union?

- ☐ Non-binding guidance for both planning and reporting obligations covering all Energy Union dimensions
- ☐ Regulating planning and reporting obligations in sectorial legislation as currently the case
- ☐ Regulating both planning and reporting obligations by a new comprehensive legislative act covering all Energy Union dimensions

If other, please elaborate: (up to 1000 characters)

P&R must be legally binding to be credible and should build on a modular approach, which responds to concerns for streamlining while also ensuring integration and conformity with good governance principles. Such an approach would allow for:

1. High level strategies to elicit MS buy-in, including pledges and mandatory tracking of KPIs. These strategies need to be rooted in law, although with differentiated requirements depending on the legal nature of the targets or objectives.

2. More detailed transparency and information sharing anchored in law to ensure its enforceability (incl mandatory P&R templates), which builds on existing P&R requirements, and that can be centralised in one instrument. Because relying on a single streamlined instrument would risk losing detailed information necessary for certain audiences, some sector-specific P&R need to be maintained in other revised directives.

3. The creation of links between national P&R and long-term decarbonisation objectives for 2050.

28) Please elaborate on the reasons justifying your choice in the previous question: (up to 1000 characters)

Soft or voluntary governance approaches have shown to be incapable of delivering agreed objectives because of the lack of legal framework ensuring accountability, transparency and stakeholder engagement. Thus, option 1 would reduce the potential for achieving Energy Union objectives.

Option 2 may respond to the need to maintain certain sectoral P&R in their respective Directives, but may not be sufficient in terms of addressing redundancies and gaps of the current regime.

Option 3 by itself would satisfy streamlining requirements but bears the risks of producing either overburdened or oversimplified documents. Moreover, this option does not take account of the different policy objectives of the NECPs. A strong legal framework incorporating hard and soft P&R measures is needed. A modular approach can serve these different functions by including different forms of bindingness in a process akin to the European Semester and drawing on a streamlined instrument complementing sectoral P&R.

E. Options for the governance system of the Energy Union and its process

E.1 Scope and nature of the integrated national climate and energy plans

National plans should take a holistic approach and address the five dimensions of the Energy Union in an integrated way recognising the interactions between different dimensions. The national plans should cover the period from 2021 to 2030 and build upon what each Member State should deliver in relation to their policies for 2020 and also include a perspective until 2050. These national plans should provide long term predictability and certainty for investment and ensure greater cooperation and coherence among Member States' approaches on climate and energy policies.

29) Notwithstanding the fact that all five dimensions will be part of the National Energy and Climate plans, which elements of the Energy Union Strategy should be given prominence?

	Very important	Important	Less important	Not important	No opinion
Security of supply	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internal Energy Market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy infrastructure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy efficiency	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable energy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
GHG emissions reduction (decarbonisation)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research, Innovation and competitiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

30) a) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current planning obligations should be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)

Legal options for streamlining P&R into NECPs needs to be assessed with respect to their respective risks and opportunities. The MMR already provides a framework for streamlining climate P&R (under the ESD, ETS reporting, and international obligations). As such, the MMR could be used as a model for streamlining, including by:

- Streamlining P&R into the MMR, using cross-referencing from P&R in sectoral directives to coordinate the Energy Union governance (incl KPIs, preventive and corrective actions).
- Placing high level P&R into a new MMR-type governance instrument acting as a chapeau to the sectoral P&R, which would allow for additional institutional innovation and provide for more transparency, and preventive and corrective measures. Nevertheless, there is a risk MS oppose new measures and block necessary EU governance innovation.

It is crucial that legal options for streamlined NECPs do not replace dedicated sectoral legislation and stronger rules where necessary, which is needed for specific dedicated P&R. There are significant risks of over-streamlining into an MMR-type instrument, as a simple 'policies and measures' approach to all P&R would jeopardise transparency, comparability, legal certainty, and accountability. In particular, where information serves specific strategic purposes or objectives which would be compromised by streamlining, they should be kept separate.

b) Building further on your replies to the sections devoted to the existing planning and reporting obligations (questions 1-21), which of the areas/articles subject to current reporting obligations should also be included in the integrated National Energy and Climate Plans? Please explain. (up to 1500 characters)

A Semester-type framework for oversight could be helpful to embed P&R in an overall legislative architecture so that process is respected and the system sufficiently transparent.

Within a semester-type process, annual reporting on KPIs by MS can be used as an early warning process. On the basis of this reporting, the Commission could identify countries requiring an in-depth study into the risks of underperformance and provide robust policy signposts to MS (eg non-binding country recommendations). A formalised State of the Energy Union would represent an obvious platform for issuing these annual reports and should be translated into legally binding reporting obligations for both MS and the Commission.

This is in contrast to the detailed biennial reporting, which complements the more dedicated reporting on particular P&R contained in sectoral legislation. For these reporting instances, legally binding provisions for corrective measures and non-compliance are stronger, although with differentiated requirements depending on legal nature of targets and objectives, and can result in updating plans and a review of target progress.

This process should be rooted law (incl the mandatory tracking of KPIs) and should resort to preventive and corrective/sanctioning measures – not all of which have a punitive nature. In order to take full advantage of this process it is crucial that the Commission utilises its enforcement jurisdiction against MS failing to comply with reporting requirements

c) Are there current planning obligations that should continue to be treated separately? (up to 1500 characters)

Attempts to streamline P&R must not be at the detriment of losing key information. As already emphasised, integrating all P&R lines into one document bears the risk of losing information on more detailed planning obligations on sub-topics of the Energy Union.

Planning could be done in more than one document distinguishing between the need for sectoral legislation and one streamlined instrument (eg the NECP). Thus, sector-specific planning requirements should be maintained in their respective legal instruments, including the production of separate and individual plans that are essential so actors have certainty (eg long-term infrastructure development, planning in the field of security of supply).

Where appropriate, sector-specific planning requirements should be cross-referenced in the NECPs. This is because the centralised instrument should indicate the way in which sectoral legislation will be monitored or where to find information on its monitoring. Another reason for this is a need for legal clarity so that all information related to a piece of legislation can be easily found

31) What political process would be necessary to ensure the stability of the National Energy and Climate Plans (e.g. approval by national governments, cross-party approval, approval by national parliaments, or national legislative acts)? (up to 1000 characters)

The development of NCEPs and KPIs must be rooted in legislation and be transparent and participatory. A soft OMC process, a weak form of governance, would be incapable of providing a credible framework for ensuring target delivery.

Rooting P&R in a legally binding regime would ensure the Commission has the data to verify MS contributions towards meeting Energy Union objectives, particularly the 2030 targets, and send a clear signal to investors concerning the seriousness of MS and EU commitments.

It would also allow the European Parliament to have a say in the legislative process and citizen to use their right under the Aarhus Convention to participate in the development of national plans.

Lastly, NCEPs and KPIs must be underpinned by a useful high level political process between MS and EU which not only increases MS ownership of the system, but also enables the Commission to ensure that EU and MS targets are reached (eg use of its enforcement authority).

32) What, in your opinion, would be the main factors that could justify an update of the National Energy and Climate Plans in the period from 2021 to 2030 (e.g. energy market developments, economic changes, evolving EU legislation, or collective progress made towards the Energy Union objectives)? (up to 1000 characters)

At a minimum, the update of the NECPs should align with the review process under the Paris Agreement. However, further monitoring and course correction actions should also have a prominent space within a semester-type process rooted in law.

Firstly, the Commission should be required to regularly assess whether collective action is sufficient to meet the 2030 targets and to propose additional EU measures to fill the gap if the targets are not likely to be met. There is precedent for such measures in Art 4 ESD, which triggered the adoption of the EED.

Secondly, the Commission's authority to require corrective action should be enhanced. Annual reporting could aid this process by providing non-binding country recommendations on the basis of KPIs tracking. Additionally, the Commission could provide guidance as part of the biennial reporting and request MS to update their NECPs where they are not meeting agreed objectives and, when legally feasible, to implement binding recommendations.

E.2 Role of different institutions in the governance process

33) How relevant would you rate the role of different institutions in the development of integrated National Energy and Climate Plans?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

34) How relevant would you rate the role of different institutions in the monitoring of the implementation of integrated National Energy and Climate Plans

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Parliament	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National stakeholders	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neighbouring or other group of Member States	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

35) With respect to the National Energy and Climate Plans, what should be the role of the European Commission in order to ensure the achievement of the Energy Union's objectives?

	Very relevant	Relevant	Less relevant	Not relevant	No opinion
Support to Member States in developing national plans, notably by providing templates and technical support and disseminating best practice	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Review national plans and analyse Member States' contributions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Issue policy recommendations, notably in its annual State of the Energy Union	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Approve national plans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Propose measures on EU level in view of delivering on the objectives of the Energy Union	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

E.3 Regional cooperation to establish, and peer review before finalisation of, integrated climate and energy plans

36) In accordance with the conclusions of October 2014 and March 2015 European Councils, the new governance system should facilitate the coordination of national energy policies and foster regional cooperation. How important would you rate regional cooperation in the course of integrated climate and energy plans?

	Very important	Important	Less important	Not important	No opinion
As part of their national integrated plans Member States should jointly develop regional objectives, standards and common coherent strategies on the relevant dimensions of the Energy Union.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The national plans should describe how they reflect regional integration and cooperation on the Energy Union domains.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should consult relevant other Member States on national plans before their submission.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The plans should provide clear account of these consultations and how they are incorporated in the plans.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Commission should guide the process, and develop appropriate fora for consultations of draft plans and regional cooperation where required.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

37) Concerning consultations and mutual reviews of the integrated National Energy and Climate Plans (meaning that plans or progress reports of one Member State being reviewed by other Member States), how important would you rate the following options?

	Very important	Important	Less important	Not important	No opinion
Only consultations should take place in the preparation of the plans leading to the draft plans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be done on draft plans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be also used for progress reports assessing the implementation of plans	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be of voluntary nature for Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Mutual reviews should be mandatory for Member States	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
A dedicated system of mutual reviews should be established including the creation of adequate fora	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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