

# 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:

Industry Association

\*

**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)**

**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)**

For energy efficiency policies planning and reporting are not always distinctly separate. In particular for buildings policies, reporting requirements are spread across, inter alia, EPBD, EED, NEEAPs, RED, MMR and ESD.

Planning and reporting requirements should integrate the principle of 'energy efficiency first' (EEF) and encourage Member States (MS) to develop national plans which are based on robust energy efficiency scenarios and policies in line with national and EU ambition and which ensure that building policy/infrastructure decisions are aligned accordingly.

Inconsistencies in EU planning and reporting should be addressed or we risk duplication at national level. A first example of inconsistencies/confusion is the EED definition of 'energy renovation'/major renovation/deep renovation which has a different appreciation in the EED and EPBD. The second example is the European Commission's (EC) sustainable energy security package from 16 February 2016 is the most recent example of misaligned demand projections and difficulties in delivering energy efficiency first. It used the lowest energy efficiency scenario for 2030 to assess Europe's gas import dependency, while using higher scenarios for the heating and cooling (H&C) strategy.

While certain overlaps may be useful to ensure effective achievement of multiple objectives and challenges in climate and energy policy area - ensuring consistency, coherency and comparability of provided information is essential. This includes ensuring regular EC monitoring, evaluation and enforcement of the energy union governance plans and reporting.

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

We consider that streamlining into one integrated plan for the energy union governance (with a binding template) would be useful if it is set out in EU legislation. A mere voluntary 'integrated plan' risks diluting some of the current and important reporting, monitoring and evaluation requirements and sets the path for 'cherry picking' reporting. This in turn makes it harder to compare, evaluate, improve and enforce policies.

A more integrated planning and reporting should serve as a better integration of costs and benefits of energy efficiency policies, especially when it has become easier to quantify multiple benefits, e.g. for health, productivity, pollution, or growth and jobs. Ultimately, better planning and reporting should support better progress in using the huge savings and GHG cut potentials, e.g. in the building sector.

Following the COP21 agreement and the wide acknowledgement that energy efficiency, in particular in buildings, plays a key role in our pathway towards a 2DS - the provisions related to energy savings (reported annually under EED Articles 3, 24.1 and Annex XIV part 1 of Art 4 and 7) should be incorporated into overarching plan as part of the energy efficiency dimension.

In order to properly embed the principle of EEF, planning and reporting of all relevant policy areas, a consistent and transparent baseline should be used for the energy transition. This means focusing on the trajectory of primary energy, final energy and an absolute energy savings.

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

All EED, EPBD and ESD planning and reporting must be maintained. A large part of this planning and reporting could be kept separate from the overall target reporting mentioned above, e.g. (Article 7.9 (planning and reporting requirement for measures to fulfil article 7, Art 4 Reporting on implementation of the Long term Renovation Strategies, or NZEB progress reports and Cost-optimality reporting every 5 years in the EPBD).

These reporting requirements are worth keeping separate and not merged in one overall plan on energy and climate, because the details they provide are instrumental to making concrete progress on the ground. Consistency should be ensured with the overall plan on energy & climate. For example, the outcomes of scenarios for reducing energy demand in the building sectors, which are part of Art. 4 EED should be captured in the overall plan.

Given that the planning and reporting for the EED/EPBD are linked - it is difficult to refer to one without the other. Since many of the deadlines for key EED planning provisions such as developing the plans for the implementation of Articles 5 and 7 have already passed and from now on, Member States have to report mainly on the progress of the implementation of the energy efficiency measures planned under the EED/EPBD - all the EED/EPBD reporting requirements addressed through the NEEAPs should be maintained.

While certain elements of the NEEAPs (i.e. Article 24.2 and Annex XIV part 2 - reporting requirements for several EED articles) could be streamlined. The basis for the NEEAPs should be maintained in the EED, no feature of the current NEEAPs should be lost and the binding character of NEEAPs should be preserved and even reinforced, where appropriate.

The planning and reporting for an integrated plan should be based on the outcomes of the reviews and/or revisions of the Energy Union initiatives.

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

When it comes to energy efficiency in buildings, the current reporting requirements set out in the EED and EPBD are very helpful to understand the national situations, divergences, typologies and specificities.

Regular reporting both from the MS and evaluation by the Commission, e.g. EPBD Art 10 of the EPBD (financial measures), or Art 9 (5) (NZEB progress report etc.) are crucial to track progress and provide further needed EU wide guidance.

There is room for providing more solid guidance for reporting on strategic articles, such as Art 4 on long term renovation strategies, which should be viewed in coordination with the public buildings renovation requirements established in Article 5 EED. In particular, given the challenge and opportunity linked, to renovating the building stock by 2050, this article should include a specific timeline, scenarios and targets and an obligation to implement the long-term renovation strategy (recital 17). MS should also report on new measures, relevant forward looking strategies for investment, and staged deep renovation. Not least consistency should be improved between EED and EPBD in many respects, notably nZEB and cost-effectiveness/cost-optimality. The EED for example mentions cost-effective approaches but does not refer to cost optimality (as set out in the EPBD). It would be good to provide coherency in this respect.

As a result, the existing EED/EPBD planning and reporting obligations are pivotal for ensuring progress. In this respect, intentions to repeal any of those must carefully considered and/or rather avoided (unless the EED/EPBD are strengthened in relation to all the above mentioned aspects).

[\*] 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.

**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)**

**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 EED and EPBD planning and reporting should continue.

In particular here is room for providing more solid guidance for reporting on strategic articles, such as Art 4 on long term renovation strategies, which should be viewed in coordination with the public buildings renovation requirements established in Article 5 EED. In particular, given the challenge and opportunity linked, to renovating the building stock by 2050, this article should include a specific timeline, scenarios and targets and an obligation to implement the long-term renovation strategy (recital 17). MS should also report on new measures, relevant forward looking strategies for investment, and staged deep renovation. Not least consistency should be improved between EED and EPBD in many respects, notably nZEB and cost-effectiveness/cost-optimality.

**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)**

In the ESD Art 4 concerning energy efficiency and the progress of the Community and its Member States towards the objective to reduce energy consumption are a key part of keeping on track, assessing progress, redirecting policy and/or introducing the right follow-on measures.

Considering that the ESD provides a legal framework to reduce emissions in the non-ETS sectors, it would be helpful to have included in the revision of the ESD a progress report on action/measures taken in the area of energy efficiency/savings in buildings/or how their renovation of their buildings stock has helped reduce CO2 emissions.

Also here it is worth noting that, all the planning and reporting for an integrated plan should be based on the outcomes of the reviews and/or revisions of the respective pieces of Energy Union legislation.

**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)**

**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)**

**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)**

The lack of standardised reports and mandatory templates means that the planning and reporting is often time consuming and incomparable.

The Buildings Performance Institute Europe (BPIE) has in several reports outlined a lack of comprehensive data on buildings at European level, including building characteristics, building codes and other regulatory measures. Standardised data through harmonized templates allows us to determine the energy and CO2 saving potential of Europe's buildings and to model a variety of scenarios for the systematic renovation of the European building stock to nZEB level till 2050.

Long term planning is pivotal for buildings, to ensure consistent packages articulating short and medium term policy measures consistently with a long term goal, and thus avoiding the lock-in effect.

The value of harmonised templates is undeniable, is also underlined in the Commission's 'Renewable energy progress report' (Brussels, 15.6.2015, COM(2015) 293 final): 'Certain provisions of the Directive were found to have contributed to reducing the administrative burden on Member States, such as the use of templates for planning and reporting requirements provided by the Directive.'

***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 type="radio"/>	<input checked="" 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"/>

### 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Assess progress to targets at Member State level and enable aggregation of data at EU level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better comparability of data from different Member States enabling an informed evaluation	<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"/>
EU as a whole and Member States themselves are better informed on the actual performance and it provides ground for further action	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

**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)**

See response to Q2.

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

See response Q3a.

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

See response Q3b.

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

See response Q3c.

[\*] 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)**

**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)**

See response Q5.

**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 response Q6.

**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)**

**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)**

**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)**

**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)**

See response Q9.

***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 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 type="radio"/>	<input checked="" 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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"/>

<p>Possibility to monitor the performance and trends (and put in place corrective measures if the results are lagging behind)</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>Increased certainty for investors across all EU Member States stimulating economic growth as well as research, innovation and competitiveness of the EU</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<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>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>The Commission is better enabled to provide substantial and useful advice and ensure uniform application of EU legislation</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Effective and efficient implementation of EU legislation in the energy and climate field	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

<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)

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

It is a combination, each with a slightly different purpose.

An overarching regulated planning and reporting obligations by means of a new legislative act addressing the 5 energy union dimensions with binding reporting templates would make planning and reporting easier, more transparent and comparable - thereby creating a as a 'one stop shop' (provided this does not repeal or dilute existing obligations in current legislation).

In actuality, the current system of sectoral legislation for energy efficiency is functioning (better compliance, implementation and enforcement is always needed) but binding and comparable templates would make reporting even more effective.

Non-binding guidance is simply not enough tackle our energy trilemma, especially in the energy efficiency area, where complexity is the biggest challenge There must be legal mechanisms to ensure national accountability for progress. This will also enable the Commission to ensure that the sum of national efforts is sufficient to meet our long term energy and climate goals and to stay in line with the EU's global commitment of a 2DS.

**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 nation 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 type="radio"/>	<input checked="" 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)**

See response to Q3a.

**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)**

See response to Q3b.

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

See response to Q3c.

**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 (monitoring, evaluation and enforcement) of national plans should be carefully followed by the EC. The European Parliament should be informed and consulted. The main exchange should be handled at Council and national level, where and exchanges/round table should be had with each MS and a group of national stakeholders (government, industry, civil society, experts etc.). This in turn would increase the quality, endorsement and contribution.

The national plans should build on solid sectoral processes, for example in the building sector it is essential that MS facilitate structured dialogue in the construction sector to overcome the lack of coordination currently preventing progress on the ground.

There must be legal mechanisms to ensure national accountability for progress enable to the Commission to ensure the sum of national efforts is sufficient to meet 2030 targets and beyond.

**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)**

The first is security of supply. As long as Europe remains heavily dependent on unstable regions for energy (oil and gas), there are ongoing geopolitical tensions between Russia and Ukraine - Europe will continue to face increasing energy security threats. Security of supply is therefore more than diversification of routes and supplies; it begins energy savings.

The second is Energy efficiency for CO2 reductions. As regards our CO2 emissions goals, it is clear that today majority of the reductions are coming (and will need to come) through measures from Energy Efficiency and RES. The improved knowledge and data regarding the multiple benefits of energy efficiency also means that we should include this in the scenario and reporting on energy efficiency policies. An update of the national plans needs to take account of this new reality.

The third is COP 21. Europe has been at the forefront of climate leadership, the Paris Agreement and the ambition to stay within the 2DS goal is not sufficiently acknowledged in energy union legislation.

The fourth is corrective action. Although some sectoral pieces of legislation have corrective measures - this should be included in the overarching framework.

***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 type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
European Council	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National administration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National parliaments	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Council	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment Council	<input type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional fora	<input type="radio"/>	<input checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mutual reviews should be done on draft plans	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input checked="" type="radio"/>
Mutual reviews should be mandatory for Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
A dedicated system of mutual reviews should be established including the creation of adequate fora	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**Please upload your files here:**

**be400125-1a3b-494c-896a-5c25931f7064/Eurima\_response\_to\_EC\_Streamlining\_and\_Reporting\_Public**

**Thank you for your participation!**

## **Contact**

**ENER-ENERGY-UNION-GOVERNANCE@ec.europa.eu**

---