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# Progress Check: Spain's updated energy and climate plan under review

# LIFE PlanUp

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The information and views set out in this report are those of the author(s) and do not necessarily reflect the official opinion of the European Commission.

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# Executive summary

As part of the European Union's 2030 climate and energy package, EU Member States (MS) are required to develop National Energy and Climate Plans (NECPs) to define and to report on their 2030 climate and energy objectives.

After the publication of the European Commission's (EC) recommendations on the draft NECPs, by the end of 2019 Member States were supposed to submit the final plans.

The Spanish government submitted its integrated National Energy and Climate Plan in April 2020. However, Spain's NECP is expected to undergo modifications once the feedback from the second public consultation will be resumed after its interruption due to the COVID-19 pandemic.

Divided into two main sections, this briefing first provides an overview of the Spanish updated plan and then assesses whether it is generally more ambitious than currently implemented legislation, especially in the transport, buildings and agriculture sectors.

The updated version of the NECP addresses most of the EC recommendations and maintains the commitment to climate-neutrality by 2050, showing progress from the draft.

The plan includes both new and already implemented policies. Their ambition varies depending on the sector: Agriculture remains the most problematic sector because it is linked to the finalisation of CAP (Common Agricultural Policy) whereby negotiations are still ongoing. While the final plan does better in terms of defining measures for the building and transport sectors, there are still some outstanding gaps.

As the government continues to work on the plan and its implementation, it will be crucial to first of all maintain the plan's ambition level and ensure that this plays a key role in the country's COVID-19 recovery efforts. Furthermore, there remains a clear need to define investment and financing plans for the listed measures and ensure policy coherence between different sectors and measures. Finally, in order to ensure public ownership and support for the climate plan, the results of the public consultation process that was recently resumed after the pandemic should be included in the final plan.



# Overview of the plan

The Spanish government submitted its integrated National Energy and Climate Plan (NECP) to the European Commission (EC) at the beginning of April 2020, three months after the deadline due at the end of 2019.

The first draft was already considered particularly comprehensive on targets and contributions as well as policies and measures on decarbonisation (including renewable energy) and the energy efficiency dimensions.

This second version addresses most of the EC recommendations and maintains the commitment to climate-neutrality by 2050.

However, despite the EC recommendations requiring more details on measures to achieve the energy efficiency (EE) and renewable energy sources (RES) targets, the second draft remains vague on this matter.

The first draft foresaw a reduction of 20%-21% in greenhouse gas (GHG) emissions by 2030 compared to 1990 levels. The updated version expects a reduction of 23% through the implementation of the measures included in the NECP (equivalent to a reduction of 38% GHG compared to 2010) which is consistent with the recommendations of the UN climate science body the Intergovernmental Panel on Climate Change (IPCC).

In the first draft, Spain endorsed the EU energy efficiency goal of 32.5% and expected to reach a 39.6% reduction in primary energy consumption with planned policies and measures. However, this target is foreseen to be reached mainly through measures linked to technology efficiency over energy efficiency measures.

The weight of RES on final use increases from around 20% by 2020 to 42% by 2030 (same target as in the first draft). However, this objective should be linked to an increase of renewable energy sources to avoid using unsustainable biofuels to reach the target.

	2030
<b>Reduction in greenhouse gas (GHG) emissions compared to 1990</b>	23%
<b>Share of renewables in energy end-use</b>	42%
<b>Improvement in energy efficiency</b>	39.5%
<b>Share of renewable energy in electricity generation</b>	74%

Source : Own elaboration based on ES NECP, 2020

In terms of investments, the amount increased from 236 billion euros to 241.4 billion euros. However, these investments have decreased slightly when it comes to energy efficiency, renewables and savings (-13 billion euros), which previously reached 80% and now stand at 73%.

<b>Estimated investments from the NECP, 2021-2030</b>	
Savings and efficiency	35% (€83.540 bn)
Renewable energy	38% (€91.765 bn)
Networks and electrification	24% (€58.579 bn)
Other measures	3% (€7.528 bn)

Source: Spanish Ministry of Ecological Transition, 2020

According to the plan, a very substantial part of the total investment would be made by the private sector (80% of the total), mainly linked to the deployment of renewables, distribution and transmission networks, and a large part of the saving and efficiency measures. The rest would be made by the public sector (20% of the total), in energy saving and energy efficiency measures, and in actions associated with promoting sustainable mobility and

modal shift. In the case of public sector investments, a portion is expected to come from European funds.

Spain expects to earn a potential flexibility of 29.1 MtCO<sub>2</sub> from the LULUCF (Land Use, Land-Use Change and Forestry) sector during 2021-2030 to achieve its GHG reductions annual targets. However, the Spanish government is not expected to use these flexibilities to achieve the country's 2030 commitments.

Spain plans to phase out coal-fired power plants by 2030. However, a fossil fuels phase-out plan is still missing.

Following the EC recommendations, the second draft of the Spanish NECP includes indicators and references to the Energy Poverty National Strategy, including a timeline for the strategy. The Institute for Energy Diversification and Savings (IDAE) will monitor and modify if required the proposed indicators on a yearly basis.

With regard to energy dependence, the document shows a significant reduction in the use of fossil fuels, from 74% to 59% by 2030.

In the new draft, the government also commits to reducing other primary pollutants associated with air quality: PM<sub>2.5</sub> particles will be reduced by 33%, sulphur dioxide by 38% and nitrous oxides by 35%.

The plan foresees job creation through the increased use of renewable energy, the promotion of energy efficiency in existing buildings with a focus on retrofiting.

## Overview of the sectors

### Transport

The Spanish draft NECP already recognised the importance of tackling transport emissions and set an implicit target for the transport sector of 43.5% GHG emission reduction (compared to 2005) by 2030. The decarbonisation of the transport sector mostly relies on the modal shift, the

deployment of electric mobility and the boost to the manufacturing and use of advanced biofuels.

Although the plan includes some improvements - for example, the promotion of low-emission zones for cities with more than 50,000 inhabitants (starting from 2023) and e-mobility - it still does not include measures to boost the electrification of heavy road transport.

GHG emission reductions from the shipping and aviation sectors are still barely covered in the plan.

## Buildings

The Spanish energy and climate plan sets the goal to achieve a highly energy-efficient and decarbonised building stock by 2050. Further details on milestones, indicators and intermediate targets for 2030 and 2040 are provided in a long-term strategy for energy upgrading in the building sector in Spain (ERESEE) presented in March 2020. However, the number of buildings planned to be renovated by 2030 is clearly insufficient to achieve the proposed objectives. There are two main measures related to the energy upgrading of buildings, targeting the residential sector and the services sector and public infrastructure (Measure 2.6. Energy efficiency in existing buildings in the residential sector and Measure 2.8. Energy efficiency in services sector buildings).

## Agriculture

According to the figures presented in the first and second version of the energy and climate plan, the Spanish government expects the GHG emissions from agriculture to reduce by 13% (1990 baseline) by 2030. However, such a reduction would not be sufficient as the sector's contribution to decarbonising the economy by 2050. The EC analysis did not provide any specific recommendation to increase climate ambition in this sector and no major improvements have been made in the second version of the plan. The three main measures described (reduction of greenhouse gas emissions in the agricultural and livestock sectors; agricultural sinks; energy efficiency in farms, irrigation communities and agricultural machinery) are supposed to be financed via the EU's common agricultural policy (CAP) with negotiations still

ongoing and a major vote on its reform taking place later this year at the European Parliament.

## Transparency and public participation

A public consultation was opened on the draft plan only after the submission to the European Commission (22nd of February 2019) and lasted until March 22nd 2019. The draft plan stated that a multilevel dialogue, involving citizens, local and regional authorities and all sectoral stakeholders, would be established for the implementation of the NECP measures. However, in the end only a 45-day public consultation was opened in the framework of a strategic environmental assessment procedure (SEA) in early 2020. Due to the COVID19 crisis the process was interrupted and was re-opened in June 2020. Despite complying with the national law, the public participation processes undertaken to develop the draft and the final plan have been insufficient as there has been no multilevel dialogue established.

## Implementation of policy measures in the transport, buildings and agricultural sectors

This section examines both selected existing measures in the target sectors and measures foreseen in the national energy and climate plan.

### Transport

The Low Emissions Zone in Madrid and the nation-wide MOVES Plan I and II aim to reduce air pollution and encourage the purchase of alternative vehicles. Despite having been introduced quite recently, they have both already yielded good results. They are both included in the first and second draft of the Spanish NECP.



### ***Madrid Central and Madrid 360 - Low Emissions Zone (LEZ)***

‘Madrid Central’ is a Low Emissions Zone implemented in certain parts of the metropolitan area of Madrid. The measure is part of the PLAN A of Air Quality and Climate Change. The initiative was introduced in November 2018 to meet EU rules on clean air. However, Madrid Central (now called Madrid 360) was weakened by the new mayor of the city, elected in 2019. Plan A underwent a public consultation, and a working group involving administrations and citizens’ associations was created. The Madrid 360 plan, on the other hand, only held a series of non-binding meetings without carrying out neither technical studies nor modelling exercises to justify the proposed changes.

The Madrid Central proved to be an effective measure. A report published in March 2019 by Madrid’s Universidad Politécnica found that Madrid Central reduced pollution from transport by 38% (NOx) and 14.2% (CO2). According to the report published by [Transport and Environment in September 2019](#) where different LEZs were compared around Europe, Madrid Central shows a 17% NO2 reduction in relation to preceding nine years.

The effectiveness of Madrid Central has led to LEZ becoming the basis for national policy on transport decarbonisation in Spain. The updated NECP includes a measure to establish LEZ and Zero Emissions Zones (ZEE) in cities with more than 50,000 inhabitants. The current draft of the Climate Change and Energy Law, once approved in Congress, should make the implementation of the measure mandatory.

Spain will not be able to meet the requirements set out in the [Directive 2015/1480/EC](#) on collection, sampling and analyses of air pollution data without a wider implementation of LEZ and ZEE. Although presented in the plan as one of the most important measures, it is still unclear how the LEZ and ZEE will be promoted or implemented and how the central government will support local authorities.

The NECP also mentions a Sustainable Mobility and Public Transport Funding Law. The law is supposed to generate economic resources through public and private funding to promote the transport measures included in the plan. A detailed strategy on its implementation should be included in the final plan.

## Recommendations to improve the measure (Madrid 360)

- Include an investment plan on renovation and urban adaptation of LEZ to enhance sustainable mobility
- Include a strategy to engage local authorities and citizens on the LEZ design and implementation
- Include a plan on how to promote public transport, cycling and other sustainable modes of transport in parallel to the implementation of LEZ
- Include rules for LEZ design to guarantee efficiency

### ***MOVES Plan I and II: Incentives for efficient and sustainable mobility 2019 - 2020***

The Efficient and Sustainable Mobility Incentives Program (MOVES) was approved in early 2019 with the aim of encouraging (through financial support) the purchase of alternative vehicles, installing infrastructures for charging electric vehicles and creating incentives to implement electric bicycle loan systems. The measure is in line with the EU car CO<sub>2</sub> standards and Alternative Fuels Directive (AFID). The Moves programme falls also within the scope of the Directive 2014/94/EU which establishes the deployment of alternative fuels infrastructure.

Despite being coordinated by the IDAE<sup>1</sup>, this programme is directly managed by the regional governments.

There is no post implementation review or official document on the results from the implementation of this measure (e.g GHG reductions, EV purchase, number of charging points). Despite being close to its first term, the funds made available by the programme have not been used up, and 50% of the

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<sup>1</sup> Institute for Energy Diversification and Savings

total budget is still available. According to the Ministry of Ecological Transition and the [Spanish Association of Automobile and Truck Manufacturers \(ANFAC\)](#), the reasons behind the low uptake of the programme are the obligation upon EV buyers to return their vehicle if it is more than 10 years old (a condition to access the EV purchase scheme)<sup>2</sup> and the fact that the budget is not controlled at the state level. The latter has led to an uneven implementation of the programme among the regions. The MOVES plan is mentioned in both versions of the NECP in measure 2.4 which promotes the uptake of electrification in the transport sector.

The MOVES Plan contributes also to achieving other objectives included in the NECP such as

- Measure 2.2. More efficient use of the means of transport
- Measure 2.3. Renewal of the vehicle fleet

A revised version of the Plan MOVES was recently approved by the Council of Ministers (PLAN MOVES II) with a budget of 100 million euros as part of the plan to boost sustainable mobility. The MOVES II Plan includes a sound and robust investment plan and is expected to be included in the General State Budget for 2021.

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<sup>2</sup> Companies and public authorities are the biggest purchasers of the electric vehicles via a renting scheme, which prevents them from being able to return a used vehicle

## Recommendations to improve the measure

The MOVES II plan already addresses some of the gaps of the MOVES I such as the non-compulsory scrapping of the replaced vehicle, the increase to 70% of incentives for light electric vehicles, the inclusion of incentives for the purchase of electric vehicles by rental car companies (renting, leasing, etc.) and the increase in the maximum allowed purchase price, which will allow the purchase of electric vehicles with greater flexibility. It will have a budget of 100 million euros, 50% more than the MOVES I plan.

However, the plan should be flanked by additional measures promoting the electrification of road and railway infrastructure, in particular, the freight transport sector. Investments in rail freight transport should also be enhanced as in recent years, investments in railways have been mainly dedicated to high speed trains.

## Buildings

This section looks at three main policies presented in the NECPs to tackle pollution from buildings and promote the energy upgrade of buildings: the National Housing Plan 2018-2021, the PAREER-CRECE Programme and the CTE DB-HE 2019.

### **National Housing Plan 2018-2021**

The National Housing Plan is a governmental funding mechanism that aims to support rental housing, urban rehabilitation and renovation. It seeks to facilitate access to housing for the most vulnerable groups, and to boost employment in the construction sector. The plan is implemented across Spain, except for the regions of Navarre and the Basque Country, which have their own regional housing plans. Economic resources are mobilised from both the public sector (as the funds are provided in cooperation with the regional administrations) and owners.

The plan sets requirements for reducing energy demand for heating and cooling as a condition for accessing funding. However, it does not provide a monitoring mechanism to check if the target objectives have been met.

The current plan was launched in 2018, following a previous initiative that started in 2013. The plan addresses energy efficiency performance as well as the improvement of accessibility or consolidation of building structures.

The measure has been well received by the regional governments. However, the refurbishment rate in Spain is still very low and barriers to accessing subsidies include:

- Delays in the approval of new financing periods and in signing agreements with the regional administrations
- Lengthy process to apply for subsidies
- De-centralised regional management. Some regions did not participate in the scheme
- Current setting of the horizontal property law which makes it difficult to reach agreements among neighbours.

Included in the new version of the Spanish climate and energy plan under the measure 2.6 related to "energy efficiency in existing buildings in the residential sector", the plan has been kept as currently implemented.

The housing plan will be financed through the general state budget. Thus, its financing will depend on budgetary availability and the government's priorities. The plan foresees the cooperation of financing between State and Regions. Consequently, Regions with greater funds will benefit more from the plan.



## Recommendations to improve the measure

According to the Group of Experts for Rehabilitation (GTR), a working group of 12 experts working on the energy transition of Spanish's buildings, this plan would achieved better results if the following recommendations were taken into account:

- Greater transparency, as currently the Ministry does not provide any information on the implementation of and results achieved by the measure
- Inclusion of indicators and data to measure the impact of the measure
- Increased financial aid levels
- Greater coordination between the state and the regions
- Cooperation of different public funds and resources with private financing
- Greater role played by the municipalities to ensure engagement with citizens.

### **PAREER-CRECE Program (Institute for Energy Diversification and Saving - IDAE)**

Promoted by the IDAE (Institute for energy diversification and saving), the PAREER programme aims to help finance retrofitting (through subsidies and loans) to reduce both the demand (actions on the thermal envelope) and energy consumption (on the installations) of buildings. The programme was introduced in 2013 and has been implemented through three successive calls: Pareer I (2013), Pareer + Crece (2015) and Pareer II (2017).

Over the years, 42,358 dwellings have been built. However, the geographical distribution of the actions supported is uneven, with 80% of the total actions concentrated in just four regions.

Continuing the IDAE's line of work, the Spanish Ministry of Ecological Transition has announced new funding for the retrofitting of buildings.

The PAREER programme is included in the new NECP under measures 2.6 "energy efficiency in existing buildings in the residential sector" and 2.8 "energy efficiency in the construction of the tertiary sector".

The measure is consistent with EU legislation as it contributes to achieving the objectives set out in Directive 2018/844 / EU amending Directive 2010/31/EU on the energy performance of buildings and Directive 2012/27/EU on energy efficiency.

### Recommendations to improve the measure

According to the Group of Experts for Rehabilitation (GTR), this programme would yield better results, if the following recommendations were taken into account:

- Ensuring greater accessibility to data and information on the results achieved
- Coordinating better between the state and the regions as well as between the IDAE, the Ministry of Transport and the Ministry for Ecological Transition.
- Reviewing the criteria to promote a more even distribution of aid throughout the Spanish territory.
- Improving access to financing through alternative public financing tools (not only direct subsidies), such as combined access to grants and public credits; creation of a new line of public guarantees to obtain credits with longer terms and fixed interest.

### **CTE DB-HE 2019 (Building technical regulations / Energy savings)**

The CTE-DB HE regulates the energy use and demand of buildings, both for new construction and retrofitting. Recent updates to the DB-HE have introduced the requirement of building (or retrofitting) near-zero-energy buildings. All building projects approved after 28 June 2020 must follow the new regulations (official periods may vary depending on the COVID crisis). The NECP highlights the importance of this measure as a key piece of legislation

setting the basis for additional policies such as the long-term strategy for the energy rehabilitation of the building sector in Spain (ERESEE).

In line with the EC regulations, the new Technical Building Code (CTE, Código Técnico de la Edificación) introduces modifications reviewing the minimum energy efficiency standard and updating the definition of buildings with almost zero energy consumption. The regulation implements the Directive 2010/31 / EU on the energy performance of buildings and the Directive 2012/27 / EU on energy efficiency, both amended by Directive 2018/844 / EU.

### Recommendations to improve the measure

The update and adaptation of the CTE is specifically targeting the construction of new buildings. It does not address the rehabilitation of existing buildings. Thus, the cases for rehabilitation should be clarified and related actions made more flexible.

## Agriculture

The Spanish NECP does not properly cover the agricultural sector and the measures outlined in the document ignore several sources of greenhouse gas emissions, such as pesticide production, consumption choices or farming intensity. However, the following selected three existing measures (not included in the NECP) could achieve good results if implemented on a larger scale.

### **Agricultural Contract for the Biosphere Reserve (CARB) in Menorca**

The Agricultural Contract for the Biosphere Reserve (CARB) aims to ensure the sustainability and viability of the agricultural sector in Menorca by generating positive impacts such as the reduction of GHG and CO<sub>2</sub> emissions.

In practice the measure works as follows: farms commit to a series of tasks and objectives and their fulfilment is rewarded according to their expenditure. An initial verification of the farm is carried out jointly by the local

administration and the farmer who together define both short and medium-term goals.

There is no data projected/achieved on energy consumption and/or GHG emission reductions as a result of this programme. However, more than 70% of the farms in Menorca use the CARB every year. CARB covers 25,000 hectares of agricultural area in Menorca<sup>3</sup> and its share continues to grow. Thanks to CARB there are currently 4,200ha of organic production<sup>4</sup>. In 2018, four solar pumps were installed and one farm installed solar panels. 202ha of forest were cleared to prevent fires and 281ha of legumes were planted. These crops fix atmospheric carbon and nitrogen in the soil, improving soil fertility.

Launched in 2005, the measure has gained high interest among beneficiaries, managers and Menorcan society in general.

The second draft of the NECP does not specifically address territorial contracts<sup>5</sup> and therefore does not include the specific case of the CARB. However, it does include aspects covered by this measure, such as forest management, GHG fixation in soils, reduction of livestock.

Territorial contracts are consistent with European policies and legislation such as the CAP, the LULUCF (Land Use, Land-Use Change and Forestry) Regulation and the From Farm to Fork Strategy, among others.

Initially financed by the budget of Menorca Council, CARB has been financed through funds from the Government of the Balearic Islands since 2016, as well as state aid. The funds allocated in this last period have been €750,000 per year.

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<sup>3</sup> The island of Menorca has 48,000 ha of useful agricultural area.

<sup>4</sup> The organic production increased in 2019 by 10.4%. It has grown from 5,449ha to 6,082ha

<sup>5</sup> The territorial contract establishes a set of commitments agreed between the Public Administration and the owner of a farm to incentivize sustainable development in rural areas.

## Recommendations to improve the measure

The implementation of territorial contracts should be extended to the whole country. Territorial contracts would increase their impact if they were linked to the CAP funding and included as measures in the National Energy and Climate Plan and the Climate Change Adaptation Plan.

### **Support for organic farming. The case of Castile and Leon.**

Aid for the conversion or maintenance of farm management to organic production is granted to farms based on the EU Regulations 834/2007 and 889/2008 on organic production. The beneficiary has to comply with the regulation and the specifications of the measure for a minimum period of five years. The premiums per unit of area vary according to each autonomous community.

Exact data in terms of reduction of GHG emissions and/or energy consumption are not provided. However, it is widely recognised that organic agricultural production is much more energy efficient than industrial agriculture, fixes greater amounts of GHG by improving soil fertility and its higher organic soil matter content, and produces far lower emissions per hectare from livestock than intensive conventional farming.

The interest of the agricultural sector in this aid has been growing steadily since it was first implemented in 1995 as part of the Rural Development Programme (Second Pillar of the Common Agricultural Policy). In 2017, the organic agricultural area in Castile-Leon reached 47,659ha and in 2019, it was already 50,500ha.

Despite its long history, the measure does not include a clear long-term vision, as it depends on the regional politicians who decide how the funds from the Common Agricultural Policy are distributed.

This support measure for organic production is not included in the latest NECP.



## Recommendations to improve the measure

The measure could be strengthened by increasing its budget allocation.

### **The Ecological School Lunches of the Canarias Programme (Forms part of the Action Plan for the Development of Organic Production in the Canary Islands)**

This programme is part of the Action Plan to develop organic production in the Canary Islands. Its objectives include creating both the conditions for the local organic production and achieving a more healthy diet for its inhabitants. The programme attempts to reconcile agriculture, livestock, education, environmental protection, rural development and food sovereignty and fair prices for farmers in their own territory. The Ecological School Lunches of the Canarias Programme started in 2013. It aims to dismantle the idea that fresh organic products are scarce and therefore expensive by enhancing the coordination among the different parties involved such as producers, consumers, logistics, cooks, educators and families.

The number of schools that joined the programme increased from 7 in 2013 to 51 today (7% of the total public and private schools).

This program has been kept at a very low cost. Its budget has progressively increased from 20,000 euros in the pilot plan in the first year to 116,000 euros in the fifth year. Now it will develop a three-year budget for 2020-2023 of 711,000€.

## Recommendations to improve the measure

There should be a greater uptake of similar measures at national level.

# Conclusions and next steps

The updated version of the Spanish NECP addresses most of the EC recommendations and maintains the commitment to climate-neutrality by 2050, showing progress from the draft. Combining new and current legislation, the plan can be considered quite ambitious. However, some gaps in the analysed sectors still exist which need to be addressed.

The COVID-19 pandemic interrupted Spain's second public consultation process on the NECP. It was resumed in June 2020. In the meantime, the Spanish government submitted an updated version of the NECP without including feedback from the second public consultation.

Spain's ambitious Law on Climate Change and Transition is expected to be approved before the end of 2020. It aims to reinforce the green transition commitment and determination to have climate conscious growth at the heart of the country's COVID-19 economic recovery.

The Spanish NECP is expected to be modified once the feedback from the second public consultation and the second round of recommendations by the European Commission are incorporated. Four elements will be crucial in this context:

- **Political commitment** - Maintaining the NECP's ambition and ensuring that it plays a key role in the country's post-COVID recovery.
- **Outline investment plans** - Detailing investments and financing plans for each policy and measure.
- **Policy coherence** - Systematically considering the inter-linkages between the different sectors and addressing existing gaps, especially in the agricultural sector. Ensuring consistency between policy objectives and proposed measures and sectoral strategic plans and legislation.
- **Stakeholder involvement** - Including the results of the recently resumed public consultation process in the final plan.

The Spanish government should make the final national energy and climate plan stronger and properly involve all relevant stakeholders in these final steps. Well planned climate action can also help pave the way out of the COVID-19 pandemic and into a more resilient and more sustainable society.



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