

Annex

Detailed analysis of the draft NECP updates from an energy efficiency perspective

This annex provides a detailed analysis of the integration of the 2023 EED requirements in the draft NECP updates.

The draft NECP updates of Denmark, the Netherlands, Finland and Sweden were not assessed as those plans do not take into account the 2023 Energy Efficiency Directive at all. At the time of writing this briefing, Austria had not submitted yet its draft NECP update.

In each table, a grading is given for each requirement, “not updated”, “insufficient” or “compliant”. For more information about the methodology and the scoring system, please refer to page 6 of the report.

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Draft NECP updates submitted between 30 September 2023 and 31 March 2024

1. Belgium (Link to plan [here](#))

Belgium is a federal state and the submitted draft NECP update reflects the division of competencies and responsibilities between the Federal State, the Flemish Region, the Walloon Region and the Brussels-Capital Region. As only the introductory parts of the draft NECP update are common parts that were validated by the four entities, the analysis and grading of the Belgian plan is limited to those sections.

Article	Description	Assessment	Grading	
Energy efficiency target	Energy efficiency contribution	Belgium indicates that its “With Additional Measures” (WAM) scenario would lead to a final energy consumption of 29.93 Mtoe and a primary energy consumption of 36.52 Mtoe in 2030. These levels of consumption are calculated using the sum of contributions from the different Belgian entities (Flemish Region, Walloon Region and Brussels Capital Region).	Belgium’s energy efficiency contributions for final energy and primary energy are above the results of the EED formula, even when using the 2.5% deviation flexibility (the contributions should be set at a maximum of 29.5 Mtoe and 34.6 Mtoe respectively when using the possibility to deviate).	Insufficient
	Trajectory	Belgium indicates a detailed trajectory for the evolution of its	The Belgian trajectories for primary and final energy is following a decreasing trend, that is	Compliant

		<p>final energy consumption until 2030, with yearly values.</p> <p>For primary energy, only a value between 2021 and 2030 (in 2025) is provided.</p>	<p>accelerating towards the end of the period (for final energy).</p>	
	Share of energy consumption per sector	<p>Belgium indicates the share of energy consumption in final energy per sector in 2030 according to its WAM scenario (See Page 146 in EN version).</p>	<p>Belgium does not provide a projection for primary energy consumption in its end-use sectors.</p>	Insufficient
	Policies and measures	<p>Missing.</p>	<p>A list of energy efficiency measures in addition to those under the scope of the ESO to achieve higher national energy efficiency contributions is only indicated for the Walloon region. These policies are quite well described, but an estimation of the expected energy savings is missing.</p>	Not updated
Energy Efficiency First principle	Use as an overarching principle in the NECP	<p>Belgium states that its commitment to reducing energy intensity and dependence on foreign supply is in line with the EE1st.</p>	<p>Belgium does not identify EE1st as a guiding principle for its draft NECP update or explain how the EE1st principle was integrated throughout the drafting of the plan.</p>	Insufficient

	Concrete measures to systemize the EE1st principle	Missing.	Belgium does not specify any concrete policies or measures to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Missing.	Belgium as a whole does not acknowledge the new public sector obligation. However, the Walloon region recognises the objective, and provides an estimation of the total consumption of its public bodies (5 TWh) and the energy savings to be achieved to reach the new public sector obligation (85 GWh per year).	Not updated
	Policies and measures	Missing.	A few measures are planned by the different Belgian regions in the public sector, but no clear link is made between these measures and the new public sector obligation.	Not updated
Renovation of public buildings	Objective	Missing.	Belgium does not acknowledge the strengthened requirement for the renovation of public bodies' buildings.	Not updated

			<p>The Wallon region recognises the increased scope in Art.6 of the 2023 EED and indicates the expected impacts in terms of energy savings (1,190 GWh between 2019 and 2030).</p> <p>The Flemish region and Brussels Capital Region still refer to the previous Art.5 EED requirement.</p>	
	Policies and measures	Missing.	A few measures are planned, namely in the Walloon Region, for the renovation of public buildings, but no clear link is made between these measures and the extended renovation requirement for public buildings.	Not updated
Energy Savings Obligation	Objective	Belgium acknowledges the increase of the ESO cumulative objective, indicating that its new objective is of 267.65 TWh (22.96 Mtoe) over the 2021-2030 period. However, Belgium recognizes that the measures planned in its draft NECP update (based on the contribution of each Belgian entity) would only amount to 156.76 TWh (13.41 Mtoe) of savings. Belgium therefore	<p>Belgium correctly estimates its increased ESO objective. However, Belgium does not provide information on the calculation of its ESO baseline and the annual rate of end-use energy savings in absolute value.</p> <p>As recognised in the plan, the planned policies and measures at this stage would not achieve Belgium's increased ESO objective.</p>	Compliant

		indicates that it will take the necessary additional measures to achieve the increased ESO objective.		
	Policies and measures	Each Belgian region indicates a list of policies and measures planned for the ESO, which covers a wide range of sectors such as buildings, industry and transport.	<p>The measures are described with a diverse level of detail depending on the region (very detailed for the Walloon Region and with a low level of detail for the Federal State, Flemish and Brussels Capital Regions).</p> <p>An estimation of the expected energy savings is provided for the measures of the Flemish and Walloon Regions, but not for Brussels Capital and the Federal State.</p>	Insufficient
	Energy poverty sub-target	<p>Missing.</p> <p>The Energy Poverty Platform monitors energy poverty in Belgium using three indicators. The draft plan states that, according to their Energy Poverty Barometer, about 21.5 % of Belgian households faced some form of energy poverty in 2022.</p>	<p>Belgium does not acknowledge the energy poverty sub-target within the ESO.</p> <p>It does not provide the share of its ESO dedicated to energy poverty, nor the measures that will deliver this obligation.</p>	Not updated

2. Bulgaria (Link to plan [here](#))

Article	Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Bulgaria indicates that its 2030 final energy efficiency contribution is 8.4 Mtoe and 12.4 Mtoe for primary energy.	Compliant
	Trajectory	Missing.	Bulgaria does not set a trajectory for the evolution of its final and primary energy consumption for the 2021-2030 period.
	Share of energy consumption per sector	Bulgaria indicates the share of energy consumption in final energy per sector in 2030 and 2040 in absolute values and in percentage.	<p>The total final energy projection of Bulgaria (<i>i.e.</i> the sum of final energy consumption by sector) expected for 2030 is higher than the indicated 2030 energy efficiency contribution (8.4 Mtoe compared to slightly below 10 Mtoe in the projection).</p> <p>Bulgaria does not indicate the expected share of primary energy consumption in its end-use sectors.</p>

	Policies and measures	Bulgaria provides a list of measures to promote energy efficiency, including in the public transport and industrial sector in addition to those planned under the ESO.	The measures are described but details related to the quantification of the energy savings, their clear implementation process or how these measures contribute to Bulgaria's 2030 energy efficiency contribution are missing.	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Bulgaria states that <i>"energy efficiency is the first priority in energy policy and central to meeting the 2030-2020 targets"</i> and that its priority is to <i>"bring the energy efficiency first principle, which means implementing the most energy efficient solution in all economic sectors."</i>	Apart from this reference, Bulgaria does not explain how EE1st was used as a guiding framework for the drafting of its plan.	Insufficient
	Concrete measures to systemize the EE1st principle	Missing.	Bulgaria does not specify any concrete policies or measures to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Missing.	Bulgaria does not acknowledge the new public sector obligation.	Not updated

	Policies and measures	Missing.	The draft NECP does not contain information regarding the measures planned specifically to meet the new public sector obligation. Bulgaria lists some measures to improve the energy efficiency of public buildings, as well as to prioritize energy efficient solutions in public procurement, but does not link either of these to the new public sector obligation.	Not updated
Renovation of public buildings	Objective	Missing.	Bulgaria still refers to the old obligation to renovate central government buildings set in the 2012 EED mentioning that it has set an objective to renovate 5% of State-owned buildings used by the public administration, already present in its 2019 NECP.	Not updated
	Policies and measures	Missing.	Bulgaria does not indicate specific measures to fulfil the new Art.6 obligation but lists several measures to meet the previous Art.5 EED obligation. These measures are not detailed, and their impact is unclear.	Not updated
Energy Savings Obligation	Objective	Bulgaria indicates that its cumulative ESO objective is	Bulgaria correctly calculates its increased ESO objective.	Compliant

		<p>6,227.39 ktoe for the period 2021-2030.</p>	<p>Bulgaria provides accurate and precise information on the calculation of its ESO baseline and its annual rate of end-use energy savings.</p> <p>Estimations of the expected cumulative savings of the measures are sometimes missing, or not covering the whole period as for the EEOS, making it difficult to assess whether the planned measures are sufficient to achieve Bulgaria's ESO objective. However, the estimated savings provided would deliver the majority of the obligation (about 4,000 ktoe).</p>	
	<p>Policies and measures</p>	<p>Bulgaria indicates that it will fulfil its ESO with both Energy Savings Obligation Scheme and alternative policy measures.</p> <p>Bulgaria indicates which energy entities will be covered by the scheme and the expected energy savings. Bulgaria also provides a list of alternative measures for the purpose of the ESO. Alternative measures cover a variety of sectors, notably buildings, including the setup of a National</p>	<p>Bulgaria provides a detailed explanation of its EEOS and alternative measures, including in most cases a quantification of the expected cumulative savings, a description of the implementation process, of the responsible authority, and the supportive financing streams.</p>	<p>Compliant</p>

		Decarbonisation Fund to support renovations that will deliver a large part of the savings (Alternative measure 2).		
	Energy poverty sub-target	Bulgaria acknowledges the new energy poverty sub-target of the ESO. Bulgaria indicates it has adopted a new act that introduces a definition of “households in energy poverty” and requires to assess their number. An Observatory for energy poverty is also being set up.	Bulgaria does not provide a quantification of the proportion of households in energy poverty or the share of its cumulative ESO that must be delivered among this group (nor the specific measures).	Not updated

3. Czech Republic (Link to plan [here](#))

Article	Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	<p>Czechia indicates that its 2030 final energy efficiency contribution is 846 PJ (20.2 Mtoe) and 1,206 PJ (28.8 Mtoe) for primary energy according to the result of the EED formula.</p> <p>Czechia's contributions for both final and primary energy are in line with the results of the EED formula, without using the 2.5% deviation flexibility.</p> <p>However, Czechia acknowledges that <i>"the modelled scenario shows the problem of achieving it"</i>. According to the scenarios modelled, even with ambitious policies and measures, final energy consumption in 2030 would be higher than their contribution (945 PJ or 22.6 Mtoe).</p>	Compliant
	Trajectory	Missing.	Czechia does not set a trajectory for the evolution of its final and primary energy consumption for the 2021-2030 period.
	Share of energy consumption per sector	Missing.	Czechia does not indicate the share of energy consumption per sector in 2030 for final or primary energy.

	Policies and measures	Czechia provides a comprehensive list of the instruments and measures to promote energy efficiency, in addition to those planned under the ESO (see Page 115 in EN version).	<p>The measures are briefly described without clear quantification of the estimated savings, the financial needs or the implementation process.</p> <p>As stated above, the planned measures for Czechia do not reach its 2030 energy efficiency contribution.</p>	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Czechia states, in footnotes, that policies and measures under the dimensions " <i>energy security</i> " and " <i>internal market</i> " shall reflect the EE1st principle. Czechia adds that the transformation of the heating sector must also be based on the EE1st principle.	References to the EE1st principle are isolated rather than integrated throughout the plan. Czechia does not explain how EE1st was used as a guiding framework in the drafting of the plan.	Insufficient
	Concrete measures to systemize the EE1st principle	Missing.	Czechia does not specify any concrete policies or measures to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Missing.	Czechia does not acknowledge the new public sector obligation.	Not updated

	Policies and measures	Missing.	The draft NECP does not contain information regarding the measures planned to meet the new public sector obligation.	Not updated
Renovation of public buildings	Objective	Missing.	Czechia indicates that the section on the renovation of public buildings has not been updated in the draft plan due to the need to prepare a database to implement the new EED. The draft plan only refers to the old obligation to renovate central government buildings set in the 2012 EED.	Not updated
	Policies and measures	Missing.	Czechia does not indicate specific measures to improve the energy performance of its public buildings; it mainly lists different funding sources (mostly Cohesion, Modernisation, Innovation funds) that will be devoted to this purpose (See Pages 350 to 355 in EN Version). The impact that the different funds will have in the renovation of public buildings is not described, nor quantified.	Not updated
Energy Savings Obligation	Objective	Czechia indicates that its cumulative ESO objective is of 669 PJ (15.98 Mtoe) for the period 2021- 2030.	Czechia correctly calculates its increased ESO objective.	Compliant

			<p>Czechia provides accurate and precise information on the calculation of its ESO baseline and its annual rate of end-use energy savings.</p> <p>The estimated savings resulting from the measures achieve Czechia's cumulative end-use savings objective.</p>	
	<p>Policies and measures</p>	<p>Czechia indicates a comprehensive list of alternative policy measures to deliver its increased ESO objective (financial mechanisms, regulatory measures, voluntary agreement). The measures cover multiple sectors such as industry, buildings, and transport (see the overview on Page 106 in EN version).</p> <p>Czechia also indicates that other policy measures are envisaged (as minimum energy standards for buildings) for which the potential in energy savings will need to be further analysed.</p>	<p>Czechia provides detailed explanation for each alternative measure adopted under Art.7 in Annex I of its plan. A large range of information is provided, including estimated savings, implementing authorities, planned budget and methods for measuring savings and additionality.</p> <p>A few measures presented are from the previous period (2014-2020), but Czechia indicates that these will continue delivering savings in the new period.</p>	<p>Compliant</p>

	<p>Energy poverty sub-target</p>	<p>While listing and reporting on some indicators, Czechia states that the <i>“definition of energy poverty has not yet been legislated in the Czech legal order”</i> and that it <i>“currently does not have policies or measures specifically aimed at reducing energy poverty”</i>.</p> <p>Czechia acknowledges the new energy poverty sub-target in the ESO and indicates that it will set up instrument to deliver energy efficiency improvements also for low-income groups.</p>	<p>Czechia does not provide the specific quantification of the energy savings required for energy poverty under the ESO or how this objective will be delivered.</p>	<p>Not updated</p>
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4. France ([Link to plan here](#))

Article	Description	Assessment	Grading	
Energy efficiency target	Energy efficiency contribution	France sets a 2030 national energy efficiency contribution for final energy of 1,209 TWh (104 Mtoe) and a primary energy contribution of 1,829 TWh (157.3 Mtoe).	The contributions for both final and primary energy are aligned with the result of the EED formula, without using the 2.5% deviation flexibility.	Compliant
	Trajectory	France mentions that it has modelled trajectories that lead to a final energy consumption of 1,371 TWh (or 117.88 Mtoe) in 2030. As these trajectories would leave a gap to the energy efficiency contribution, the plan states that new levers to reduce energy consumption will be identified in the final NECP update (naming energy sobriety and energy efficiency).	France does not set a clear trajectory to achieve its national energy efficiency contribution with underlying data. The gap between the current modelling scenario and France's final energy efficiency contribution is substantial (a gap of about 14 Mtoe), requiring the introduction of additional measures.	Insufficient
	Share of energy consumption per sector	Missing.	France does not provide the share of final energy and primary energy consumption in	Not updated

			each sector in 2030. It only provides the share of final energy consumption by sector in 2022.	
	Policies and measures	France provides a list of envisaged energy efficiency measures in addition to those planned under the ESO. France also highlights its energy sobriety plan adopted in October 2022 and revised in June 2023 which is an <i>"operational roadmap for energy saving measures to be implemented by the State, public administrations, local and regional authorities and businesses."</i>	The measures listed are only briefly presented, without a detailed explanation of their functioning or the expected energy savings.	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Missing.	France does not provide any explanation of the use of the EE1st principle when drafting its NECP.	Not updated
	Concrete measures to systemize the EE1st principle	France indicates that the <i>"modalities for the implementation of the EE1st principle for plans, projects and policy decisions"</i> , as mandated by the 2023 EED, are under development.	France does not list any specific policy or measure to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated

Public sector obligation	Public sector objective	France acknowledges the new public sector obligation. France indicates that work is ongoing to design trajectories for 2030, 2040 and 2050 to achieve the new public sector obligation.	France does not quantify the required reduction of energy consumption nor provide a list of the public bodies covered.	Not updated
	Policies and measures	Missing.	France does not indicate measures that could help fulfil the public sector obligation.	Not updated
Renovation of public buildings	Objective	France acknowledges the new renovation requirement for buildings owned by public bodies. It, however, states that it will develop renovation strategies to fulfil the public bodies buildings' renovation objective in its final plan. The plan states that a decision on whether to use the new alternative approach will be made by the end of 2023.	France does not provide details on the new renovation objective, the floor area covered by the obligation or the renovation depth.	Not updated
	Policies and measures	France indicates a measure, already in place since 2019, that requires Land-based buildings	The measure is not explained in detail. A quantification of the expected energy savings, and how these would contribute to the new Art.6, is not provided.	Not updated

		over 1,000 m2 owned by public bodies to reach either a maximum value of energy consumption or to reduce their consumption by 40 % in 2030.		
Energy Savings Obligation	Objective	France acknowledges the increased ESO annual rate and indicates that its cumulative objective amounts to 1,046 TWh (89.94 Mtoe) over the period 2021-2030.	France does not correctly calculate its cumulative objective, because France uses a baseline which is not aligned with Art.8 rules. France provides the level of its ESO baseline (1,649.35 TWh), but without indicating its calculation methodology. France also correctly indicates its yearly energy savings objective (see Page 65 in EN version). No quantification of the Energy Efficiency Certificate (EEC) scheme (France's EEOS) for the period 2026-2030 is made, but France indicates that the total energy savings required by the scheme should be at least equal to the ESO cumulative objective under the 2023 EED.	Insufficient
	Policies and measures	France indicates that it will fulfil its increased ESO with the EEC scheme, already in place since 2005. The scheme will be divided into two periods from 2022-2025 and from 2026-2030.	France provides a detailed explanation of the functioning of the EEC scheme including the implementation steps, the method to calculate the expected savings, the responsible authority and the way to ensure actions taken are additional to existing policies.	Compliant

	<p>Energy poverty sub-target</p>	<p>France provides a definition of energy poverty and uses two indicators to quantify the energy poverty share, the “<i>energy effort rate</i>” and the “<i>feeling of cold</i>”. In 2021, according to those metrics, 11.7% of the French population was considered to be in energy poverty (see Pages 75-76 in EN version).</p> <p>In that context, France indicates that, within its EEC scheme, a portion of the energy-saving must be achieved in households in energy poverty. For the period from 2022 to 2025, this represents 36% of the total scheme, or about 1,130 TWhcumac (Twh cumulated and actualised).</p>	<p>France does not precisely quantify an energy poverty sub-target under the ESO according to the 2023 EED rules, even if its EEC scheme will finance a certain amount of energy renovation works in French energy poor households.</p> <p>For the period 2022-2025, the 36% share is substantially above the rate of energy poverty according to the “<i>energy effort rate</i>” indicator of 11.7%, but data for the new period 2026-2030 are currently missing.</p>	<p>Insufficient</p>
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5. Germany (Link to plan [here](#))

Germany adopted its [Energy Efficiency Act](#) in April 2023; it sets new obligations and measures on energy efficiency that in many cases aim at integrating into national law the objectives and requirements of the 2023 EED. However, the German draft NECP update does not always reflect the changes introduced by the new Energy Efficiency Act, including those to align with the new EED. The below analysis only assesses the content of the German draft plan, but it is to be noted that the German final NECP update will likely reflect the content of the Energy Efficiency Act.

Article	Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	<p>Germany sets a 2030 national energy efficiency contribution for final energy of 1,867 TWh (160.5 Mtoe) and a primary energy contribution of 2,252 TWh (193.6 Mtoe).</p> <p>The contribution for final energy is not in line with the EED formula, even using the 2.5% deviation flexibility (the contribution should be set at a maximum of 159.8 Mtoe when using the possibility to deviate). For primary energy, the German contribution is more ambitious than the formula's result (194.2 Mtoe)</p> <p>According to our information, the divergence between Germany's indicated contributions and the result of the EED formula is due to a difference in how primary and final energy are defined and accounted for in the plan compared to the EED definitions, not necessarily a lack of ambition.</p>	Insufficient
	Trajectory	<p>Germany does not provide a trajectory to achieve its national energy efficiency contribution. It however indicates the evolution of</p> <p>The projections are not explicitly noted as Germany's trajectory mandated under Art.4 EED. In addition, the projection of final energy and primary energy consumption does not</p>	Insufficient

		its final and primary energy consumption according to its reference scenario of 2023 projection report (See Page 182 in EN version).	match Germany's declared energy efficiency contributions (for final energy 2,168 TWh vs. 1,867 TWh and for primary energy 2,797 vs 2,252 TWh). This is also acknowledged in the draft plan, which states that <i>"There is still a gap to the achievement of the target in 2030 based on the reference scenario of Germany's 2023 projection report. Significant additional efficiency measures are therefore needed, some of which still need to be developed and implemented"</i> .	
	Share of energy consumption per sector	Germany provides the projected share of final energy consumption in each sector in 2030 and beyond according to its reference scenario of 2023 projection report (See Page 182 in EN version).	Germany does not provide the projected share of primary energy consumption in each sector by 2030.	Insufficient
	Policies and measures	Germany provides a list of energy efficiency measures in addition to those under the scope of the ESO to support the achievement of its energy efficiency contribution, such as carbon pricing, the new Ecodesign rules, energy efficiency public procurement or energy audits (see Page 110 and beyond in EN version).	The measures listed are only briefly described, without a detailed explanation of their implementation steps or the expected energy savings.	Insufficient

Energy Efficiency First principle	Use as an overarching principle in the NECP	Missing.	Germany does not provide any explanation of the use of the EE1st principle when drafting its NECP. The principle is mentioned only when acknowledging the new obligation under the 2023 EED (see below).	Not updated
	Concrete measures to systemize the EE1st principle	Germany indicates that the modalities for the implementation of the EE1st principle are under analysis, notably linked to the new obligations of Art.3.	Germany does not specify any concrete policies or measures to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Missing.	Germany does not acknowledge the new public sector obligation in its draft NECP update. In its newly adopted Energy Efficiency Act, Germany plans an objective and a measure to reduce its public sector energy consumption which, however, is not integrated in its draft NECP update.	Not updated
	Policies and measures	Missing.	Germany does not indicate measures that could help fulfil the public sector obligation.	Not updated
Renovation of public buildings	Objective	Germany acknowledges the new renovation requirement for buildings owned by public bodies. It	Germany does not provide yet a quantification of the floor area to be renovated or the equivalent energy savings to be delivered.	Not updated

		states that it is in the process of developing a public buildings inventory and is assessing ways to fulfil this objective with alternative measures.		
	Policies and measures	Germany indicates three measures <i>"Federal funding for efficient buildings"</i> , <i>"Building Energy Act"</i> and <i>"Federal-Länder dialogue contracting"</i> that aim, among others, at promoting efficiency in non-residential buildings.	The measures are not explained in detail, they do not provide a quantification of the expected energy savings or how much of these savings would contribute to Germany's Art.6 objective.	Not updated
Energy Savings Obligation	Objective	Germany acknowledges the increased ESO annual rate and indicates that its cumulative objective amounts to 137.51 Mtoe over the period 2021-2030.	Germany correctly calculates its cumulative objective, despite the quantification of yearly savings appearing inaccurate (see Page 217 in EN version). Germany provides an accurate calculation of its ESO baseline (216.89 Mtoe). In addition, as there is no quantification of the measures' expected energy savings, it is not possible to calculate whether the measures notified would deliver the cumulative energy savings objective. It is, however, likely that the indicated measures would not deliver the full extent of the ESO, as Germany notes that <i>"further measures are needed to achieve the</i>	Compliant

			<i>presumably missing end-use energy savings" and that it "reserves the right to notify the Commission of any further measures to achieve the objectives referred to in Article 8 as soon as they are adopted".</i>	
	Policies and measures	Germany indicates a list of existing and planned alternative measures to fulfil its ESO increased objective (see Page 219 in EN version). Germany clarifies that it does not plan to adopt an Energy Efficiency Obligation Scheme.	<p>The measures provided are only briefly explained, without details on the implementation process, the expected energy savings or the responsible authority.</p> <p>In addition, there is no clarity on which measures are existing and which are planned. Germany explains how the materiality and additionality of the measures are estimated, and potential overlap, but the explanation is similar to the 2019 NECP. A detailed explanation of these elements is not provided for the measures specific to the draft NECP update.</p>	Insufficient
	Energy poverty sub-target	Germany acknowledges the new energy poverty sub-target and indicates that the share of end-use energy savings to be achieved in households in energy poverty is still being calculated. It highlights two measures to address energy poverty (Energy Savings Check and	Germany does not indicate the share of people in energy poverty in its population, or the share of the ESO that must be delivered among energy-poor households according to the 2023 EED rules.	Not updated

		Energy advisory services), already present in their 2019 NECPs.	The expected energy savings from the two measures to address energy poverty are not quantified.	
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6. Greece (Link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Greece indicates that its 2030 energy efficiency contribution for final energy is of 15.4 Mtoe and 18.2 Mtoe for primary energy.	Greece's contributions for both final and primary energy are above the results of the EED formula, even if using the 2.5% deviation flexibility (the contributions should be set at a maximum of 15 and 17.6 Mtoe respectively when using the possibility to deviate). Furthermore, Greece's 2030 expected final energy contribution (15.4 Mtoe) is above its 2021 final energy consumption (15.2 Mtoe).	Insufficient
	Trajectory	Greece sets a trajectory for the evolution of its final energy and primary energy consumption until 2050; the underlying data are based on 5-year intervals with an entry only for 2025 before the 2030 objective.	Greece's trajectories achieve its declared national energy efficiency contributions for both final and primary energy. The 2030 trajectories forecast an increase of final energy between 2021 and 2025 and almost a stabilization of primary energy for the same period, at odds with the need to accelerate cut in energy use to achieve the 2030 national energy efficiency contribution (which is too high compared to the EED's formula results).	Compliant

	Share of energy consumption per sector	Greece indicates the share of energy consumption in final energy for 2030, including a detailed breakdown for buildings' typologies and industrial sectors. (See Page 295 in EN version).	Greece does not indicate the expected share of primary energy consumption in its end-use sectors.	Insufficient
	Policies and measures	Greece lists 30 energy efficiency policy measures in different sectors, but mainly on buildings and industry (see Page 227 in EN version) that will contribute to Greece's 10 policy priorities to promote energy efficiency (see Page 219 in EN version).	The measures listed are not detailed, with no estimation of the expected energy savings or explanation of the timeline and implementation process. A few measures were already presented in Greece's integrated NECP .	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Greece states that the achievement of its NECP objectives is ensured by <i>"implementing the Energy Efficiency First principle, prioritising the choice of the most efficient policy measures while leading to multiple benefits in all final consumption sectors"</i> .	Greece does not provide a clear explanation for how EE1st was used in the drafting of the plan, and only mentions it in the sections relating specifically to energy efficiency.	Insufficient

	Concrete measures to systemize the EE1st principle	Missing.	Greece does not specify any concrete policies or measures to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Missing.	Greece does not acknowledge the new public sector obligation. Greece indicates that local authorities are required to reduce their net greenhouse-gas emissions by 30% in 2030 compared to 2019, but without providing additional information if this objective will positively impact energy consumption.	Not updated
	Policies and measures	Greece indicates several policy measures to improve the energy consumption of its public bodies (M1, M2, M3, M4, M5, M23, M24, M25).	Measures that address the energy consumption of public bodies are only briefly described without a quantification of the expected savings, and no link is made with the new public sector obligation under Art.5 EED.	Not updated
Renovation of public buildings	Objective	Greece acknowledges the new renovation requirement for public buildings, stating that it sets an	Greece does not provide additional information on the setting of this objective. No explanation is provided on the floor area to be renovated every year, the renovation depth, or whether	Not updated

		annual energy upgrading target of 3% of its public buildings.	the objective covers all buildings owned by public bodies.	
	Policies and measures	Greece indicates several policy measures to improve the renovation of its public buildings (M1, M2, M3) and highlights a programme “ <i>Ilektra</i> ” for the energy upgrading of public buildings.	The measures are only briefly explained without a quantification of the expected savings, and no link is made with the new renovation requirement under Art.6 EED.	Not updated
Energy Savings Obligation	Objective	Greece indicates that its new ESO objective is 30% higher than the ESO objective in its 2019 integrated NECP . According to own calculation, this would amount to a new cumulative ESO objective of 9.5 Mtoe for the 2021-2030 period.	Greece’s declared ESO objective would be lower than the EED requirement (10.38 Mtoe). Greece does not provide any information on the calculation of its ESO baseline or its annual rate of end-use energy savings. The measures put forward by Greece are not estimated in energy savings, making it impossible to assess whether the planned measures will ensure the achievement of the ESO target.	Insufficient
	Policies and measures	Greece lists 30 energy efficiency policy measures to improve energy efficiency. Greece also indicates that its EEOS and alternative measures will remain key to achieve its ESO	The measures listed are only briefly described and not quantified in terms of energy savings. In addition, Greece does not specify which measures will deliver Greece’s cumulative ESO objective.	Insufficient

		target.		
	Energy poverty sub-target	<p>Greece acknowledges the new energy poverty sub-target in the ESO indicating that <i>“part of the cumulative energy savings target will be achieved in households affected by energy poverty in accordance with the provisions of the revised Energy Efficiency Directive.”</i></p> <p>Greece underlines that in 2021, 12.4% of its population was in energy poverty, according to the indicator measuring the annual cost of a household’s energy consumption. Greece intends to reduce energy poverty by 50% in 2025 and 75% in 2030 compared to 2016.</p> <p>Greece indicates 9 policy measures (M1 to M9) to address energy poverty with 4 measures specifically on energy efficiency actions (M4 to M7, see Page 224 in EN version).</p>	Greece does not provide the quantification of the energy savings to be achieved among people in energy poverty under the ESO or how this objective will be delivered.	Not updated

7. Ireland (Link to plan [here](#))

Article	Description	Assessment	Grading	
<p>Energy efficiency target</p>	<p>Energy efficiency contribution</p>	<p>Ireland provides the evolution of its final energy and primary energy consumption according to the With Existing Measures (WEM) scenario. The scenario forecasts a final energy consumption of 12.91 Mtoe and a primary energy consumption of 15.23 Mtoe for 2030.</p> <p>Ireland indicates that the WEM scenario is the basis for its draft updated NECP, but that Ireland is aware of the new objectives under the Art.4 EED. In that context, Ireland underlines that it <i>“will provide an updated indicative national energy efficiency contribution to the Commission early in 2024 following receipt of this updated scenario”</i>. Ireland will include the updated contribution in its final NECP.</p>	<p>Ireland’s contributions for both final and primary energy are significantly above the results of the EED formula, even if using the 2.5% deviation flexibility (the contribution should be set at a maximum of 10.1 and 11.5 Mtoe respectively when using the possibility to deviate).</p> <p>In addition, Ireland’s projections for final energy and primary energy under the With Additional Measures (WAM) scenario of its 2019 integrated NECP forecasted lower energy consumption than in the WEM scenario in its draft NECP update.</p>	<p>Insufficient</p>

	Trajectory	Ireland sets a trajectory for its final energy and primary energy consumption under the WEM scenario with yearly values.	Ireland's trajectories achieve its declared national energy efficiency contributions for both final (from 11.4 Mtoe in 2021 to 12.91 Mtoe in 2030) and primary energy (from 13.8 Mtoe in 2021 to 15.23 Mtoe in 2030). However, as stated above, the declared contributions are significantly higher than the EED formula's results.	Compliant
	Share of energy consumption per sector	Ireland indicates the share of energy consumption in final energy per sector in 2030 and 2040 according to its WEM scenario (See Page 237).	Ireland does not indicate a projection for primary energy consumption in its end-use sectors.	Insufficient
	Policies and measures	Ireland provides a list of existing and planned measures that will contribute to the achievement of its energy efficiency contribution.	The measures listed are only briefly detailed, with no estimation of the expected energy savings or explanation of the implementation process. Several measures were already listed in Ireland's 2019 integrated NECP.	Insufficient
Energy Efficiency	Use as an overarching principle in the NECP	Ireland states that it is " <i>committed to applying the energy efficiency first principle to all proposals, decisions</i>	References to EE1st are isolated rather than integrated throughout the plan. Ireland does not explain how EE1st was used as a guiding	Insufficient

First principle		<i>and investments"</i> coming from its NECP. EE1st is also referenced in encouraging better planning of public transport and modal shift.	framework in the drafting of the plan as a whole.	
	Concrete measures to systemize the EE1st principle	Missing.	Ireland does not specify any concrete policies or measures to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	<p>Ireland acknowledges the public sector's obligation to achieve an annual energy consumption reduction of 1.9% under the EED recast.</p> <p>Ireland indicates that it has set a 50% energy efficiency target for the Public Sector by 2030.</p>	<p>Ireland does not provide any specific information on the 50% energy efficiency target for the public sector that it has set. No explanation is provided on the baseline for this objective, the public bodies covered, the current energy consumption of its public authorities, or the amount of energy savings that must be achieved.</p> <p>This objective was already present in Ireland's integrated NECP, suggesting that Ireland did not adapt it to the new Art.5 EED.</p>	Not updated
	Policies and measures	Ireland, among others, refers to a Public Sector Energy Efficiency Strategy to help public authorities increase energy efficiency in transport and buildings. Ireland	The strategy was already present in Ireland's integrated NECP without estimated savings, and no link is made with the new public sector obligation.	Not updated

		also mentions the role of energy performance contracting in helping public authorities to be more efficient.	Ireland does not indicate specific measures that could help fulfil the public sector obligation.	
Renovation of public buildings	Objective	<p>Ireland acknowledges the new renovation requirement for buildings owned by public bodies.</p> <p>Ireland indicates that it aims for its public sector buildings to have a B energy rating by 2030.</p>	<p>Ireland does not provide additional information on the setting of this objective. No explanation is provided on the floor area yearly renovated, or whether the objective covers the entirety of buildings owned by public bodies.</p> <p>In addition, the achievement of a B energy rating is not in line with the new requirements of Art.6 EED. This objective was already present in Ireland’s integrated NECP, suggesting that Ireland did not adapt it to the new Art.6 EED.</p>	Not updated
	Policies and measures	Missing.	Ireland does not indicate specific measures to fulfil the revised renovation obligation for public buildings.	Not updated
Energy Savings Obligation	Objective	Ireland indicates that Art.8 EED has significantly increased its cumulative energy savings target and that discussions are ongoing to define how it <i>“can be achieved</i>	<p>Ireland does not provide any information on the calculation of its ESO baseline, the annual rate of end-use energy savings or its increased cumulative ESO objective.</p> <p>The measures put forward by Ireland are not estimated in energy savings, making it</p>	Not updated

		<p><i>between EEOS and alternative measures."</i></p> <p>Ireland indicates that its Energy Efficiency Obligation Scheme (EEOS) will deliver 36,424 GWh (3.095 Mtoe) of cumulative end-use energy savings by 2030.</p>	impossible to assess whether the planned measures will ensure the achievement of the ESO target.	
	Policies and measures	Ireland provides a list of existing and planned measures, namely in the building sector (residential, commercial, public) that will deliver energy savings.	The measures listed are only briefly described, not quantified in terms of energy savings and no direct link is made with the achievement of Ireland's cumulative ESO.	Insufficient
	Energy poverty sub-target	<p>Ireland indicates that its energy poverty share has been measured based on households that spend more than 10% of their income on energy. Based on this metric, Ireland indicates that 29% of its households are in energy poverty.</p> <p>Ireland indicates that its EEOS holds a 5% sub-target for energy poverty and a few additional measures to tackle energy poverty (see Page 207).</p>	<p>Ireland does not acknowledge the new energy poverty sub-target in the ESO but already includes provisions that ensure that obligated parties deliver a 5% savings in energy poor households.</p> <p>This is however significantly below the share of people living in energy poverty (29%). The draft plan does not provide the specific quantification of the energy savings required.</p>	Not updated

8. Latvia (Link to plan [here](#))

Article	Description	Assessment	Grading	
Energy efficiency target	Energy efficiency contribution	Latvia reports a 2030 national energy efficiency contribution for final energy of 39,775 GWh (equivalent to 3.42 Mtoe). Latvia also indicates an objective for its "total energy consumption" (here interpreted as its primary energy consumption) of 45,470 GWh (3.91 Mtoe).	Latvia's contributions for final and primary energy are not in line with the results of the EED formula, even using the 2.5% deviation flexibility (the contributions should be set at a maximum of 3.36 and 3.82 Mtoe respectively when using the possibility to deviate).	Insufficient
	Trajectory	Missing.	Latvia does not set a trajectory to achieve its energy efficiency contribution.	Not updated
	Share of energy consumption per sector	Missing.	Latvia does not provide the evolution of the annual share of primary and final energy consumption per sector in 2030.	Not updated
	Policies and measures	Missing.	Latvia indicates that the chapter on policies and measures to implement the energy efficiency objectives is under development.	Not updated

Energy Efficiency First principle	Use as an overarching principle in the NECP	Missing.	Latvia does not mention the EE1st principle at all in its draft updated plan.	Not updated
	Concrete measures to systemize the EE1st principle	Missing.	Latvia does not list any specific policy or measure to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Latvia acknowledges the new public sector obligation indicating that its new objective is a 1.9% annual reduction of the energy consumption of public authorities.	Latvia does not provide any information on the public bodies covered, the current energy consumption of its public authorities, nor the amount of energy savings that must be achieved.	Not updated
	Policies and measures	Missing.	Latvia indicates that the chapter on policies and measures to implement the energy efficiency objectives is under development.	Not updated
Renovation of public buildings	Objective	Latvia indicates that it will renovate 500,000 m2 of public buildings' floor area in or by 2030.	Latvia does not provide any detail on how the renovation objective was calculated, whether the increased scope of Art.6 EED is taken into account, or the depth of the renovations that will be carried out. In addition, the total floor area to be renovated does not appear to have been increased compared to the 2019 integrated NECP , which	Not updated

			likely means that the objective is not in line with the 2023 EED.	
	Policies and measures	Missing.	Latvia indicates that the chapter on policies and measures to implement the energy efficiency objectives is under development.	Not updated
Energy Savings Obligation	Objective	Latvia notifies a cumulative ESO objective of 29,522 GWh (2.54 Mtoe) over the 2021-2030 period.	Latvia correctly calculates its increased ESO objective. However, Latvia does not provide any information on the calculation of its ESO baseline, or the annual rate of end-use energy savings. Latvia does not indicate the measures planned to fulfill its ESO. Therefore, it is not possible to calculate whether the indicated ESO cumulative objective will be met in the Latvian plan.	Compliant
	Policies and measures	Missing.	Latvia indicates that the chapter on policies and measures to implement the energy efficiency objectives is under development.	Not updated
	Energy poverty sub-target	Missing.	Latvia indicates that the chapter on energy poverty is under development.	Not updated

9. Malta (Link to plan [here](#)):

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Malta indicates that its 2030 national energy efficiency contribution for final energy is 687 ktoe and for primary energy contribution is 835 ktoe.	Malta's contributions for both final and primary energy are in line with the results of the EED formula, without using the 2.5% deviation flexibility. Malta indicates that it will update its national energy efficiency contributions in its final NECP update following the update of the PRIMES 2020 scenario.	Compliant
	Trajectory	Missing.	Malta does not set a trajectory to achieve its energy efficiency contribution.	Not updated
	Share of energy consumption per sector	Malta provides the annual share of primary and final energy consumption per sector from 2013 to 2021. Malta indicates that projections for final and primary energy consumption for each sector at least until 2040 will be shared in their final NECP update.	Malta does not provide the evolution of the annual share of final and primary energy consumption per sector in 2030.	Not updated

	Policies and measures	Malta provides a list of energy efficiency measures to achieve its increased national energy efficiency contributions in addition to the measures planned under the ESO (see Page 105 in EN version). Malta also indicates that further measures will be provided in its final NECP update.	The measures listed are only briefly detailed, with no estimation of the expected energy savings or explanation of the implementation process.	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Malta indicates that the EE1st principle has been considered in Malta's energy planning, policy and investment decisions and that energy efficiency was treated as a priority element in Malta's recent infrastructure decisions.	Malta does not provide a clear explanation of how the EE1st principle was used in the drafting of its NECP and indicates that other factors also need to be taken into account, namely related to the security of supply or cost-efficiency.	Insufficient
	Concrete measures to systemize the EE 1st principle	Missing.	Malta does not list any specific policy or measure to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
	Public sector objective	Missing.	Malta does not acknowledge the new public sector obligation.	Not updated

Public sector obligation	Policies and measures	Malta indicates a few measures that will support the reduction of its public sector's energy consumption (such as for public transport, public lighting, public buildings and water management).	The measures are only partially described and do not always estimate the expected energy savings. In addition, no clear link is made between the measures and the new public sector obligation.	Not updated
Renovation of public buildings	Objective	Malta indicates that it will renovate and improve the efficiency of 9,232 m ² of public buildings (with each renovation achieving a reduction of primary energy demand by 30%).	Malta does not clearly acknowledge the new renovation requirement for buildings owned by public bodies or the equivalent floor area to be renovated. Malta does not indicate how the floor area it intends to renovate (9,232 m ²), nor the renovation depth, relates to the objective in Art.6 EED.	Not updated
	Policies and measures	Malta indicates that it is making efforts to renovate buildings owned by the central government and a few municipal buildings (including two schools and one hospital).	Malta rather details the past improvements of public buildings than outlining measures for upcoming public building renovations. In addition, no precise energy savings estimation is indicated or linked to the new renovation requirement in Art.6 EED.	Not updated
Energy Savings Obligation	Objective	Malta notifies a cumulative ESO objective of 118.7 ktoe over the period 2021-2030.	Malta correctly calculates its increased ESO based on the 2023 EED (which allows a derogation for Cyprus and Malta to achieve a 0.45% annual rate from 2024 to 2030).	Compliant

			<p>Malta also provides accurate information on the calculation of its ESO baseline and the annual rate of end-use energy savings.</p> <p>However, the measures put forward by Malta to fulfil its ESO are not estimated in energy savings, making it impossible to assess whether the measures will ensure the achievement of the ESO target.</p>	
	Policies and measures	Malta indicates several measures to fulfil its ESO, namely with specific measures in the transport sector (shifting to EVs and more public transport) as well as measures in industries and for private households.	Malta provides some explanations on the implementation process of the measures and the responsible authorities. However, no estimation of the expected energy savings is provided or how double counting between measures has been avoided.	Insufficient
	Energy poverty sub-target	Malta acknowledges that the new EED sets an energy poverty sub-target within the ESO. However, the draft plan does not indicate the share of the population in energy poverty and outlines that the process to define energy poverty indicators is ongoing and will be included in the final NECP update.	Malta does not quantify the new energy poverty sub-target in the ESO.	Not updated

		However, Malta indicates a few measures to tackle energy poverty (see Page 137 in EN version).		
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10. Poland (Link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Poland indicates that its 2030 final energy efficiency contribution is 58.5 Mtoe and 79.9 Mtoe for primary energy.	Poland's contributions for both final and primary energy are in line with the results of the EED formula, using the updated PRIMES 2020 reference scenario's results (Poland is the only country that explicitly uses the updated scenario in their draft NECP).	Compliant
	Trajectory	Poland provides a clear trajectory for the evolution of its final and primary energy consumption, with yearly values. The trajectory is also compared with the evolution of energy consumption under the "With Existing Measures" scenario.	Poland's indicated trajectories for both final and primary energy foresee first a stabilisation of energy consumption until 2025 and then a rapid decrease to 2030. The trajectory expects a stabilisation of final energy consumption until 2025 that is at a higher level than what is foreseen in the WEM scenario for the same period.	Compliant

	Share of energy consumption per sector	Missing.	Poland does not indicate the share of energy consumption per sector in 2030 for final or primary energy.	Not updated
	Policies and measures	Poland indicates that the reduction of energy consumption <i>“will be the result of a number of projects implemented as well as ambitious measures to promote energy efficiency resulting from the implementation of the EED”</i> and provides a list of 13 actions to do so (Actions 86 to 98, see page 105 EN version).	The measures are only briefly described without clear quantification of the estimated savings, the financial needs or the implementation process. For some of them, no information is provided at this stage.	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Poland states that applying the energy efficiency first principle means treating energy efficiency as an energy source; it also indicates that applying the principle should be done by taking into account a system efficiency approach, social and health perspective, security of supply, energy system integration and the pursuit of climate neutrality.	Aside from a few references to EE1st, Poland does not explain how the principle was applied or used as the guiding framework of its plan.	Insufficient
	Concrete measures to systemize	Missing.	Poland does not specify any specific policies or measures to improve the application of the	Not updated

	the EE1st principle		EE1st principle or to comply with the new obligations under Art.3.	
Public sector obligation	Public sector objective	Missing.	Poland acknowledges the exemplary role of the public sector in improving energy efficiency but does not acknowledge the new public sector obligation under Art.5 EED.	Not updated
	Policies and measures	Missing.	Poland does not indicate measures to achieve the new public sector objective. The plan envisages one planned action (Action 94 on Page 106 in EN version) for an <i>"Energy efficient public sector"</i> that is <i>"to be completed at a later stage."</i>	Not updated
Renovation of public buildings	Objective	Missing.	Poland does not acknowledge the renovation requirement of public buildings under Art.6 EED.	Not updated
	Policies and measures	Missing.	Poland does not indicate specific measures to improve the energy performance of its public buildings. A single measure for the public sector efficiency is envisaged (Action 94) but no details are provided at this stage.	Not updated

Energy Savings Obligation	Objective	Poland indicates that its cumulative ESO objective is of 44.87 Mtoe for the period 2021- 2030.	<p>Poland correctly calculates its increased ESO objective.</p> <p>Poland provides accurate and precise information on the calculation of its ESO baseline and its annual rate of end-use energy savings.</p> <p>Poland is using the possibility provided by the EED to distribute the end-use savings during the period, as long as the total achieved cumulative savings remain the same.</p> <p>As no quantification of the expected energy savings of the policy measures is provided, it is not possible to calculate whether Poland is likely to achieve its ESO objective.</p>	Compliant
	Policies and measures	<p>Poland indicates that its ESO objective will be achieved, also for this period, by EEOS and alternative policy measures. The increase of the ESO objective will be covered by additional alternative measures, while the savings delivered by the EEOS will remain similar.</p> <p>Poland provides a list of measures to fulfil its ESO objective (Actions 29,</p>	The measures are only briefly described with no detail on the implementation process, the responsible authority, the funding resources or the expected energy savings.	Insufficient

		<p>31, 89, 90, 91, 92 and 93), detailed in Annex III of its plan, which consists of financial instruments, energy audits, improving the efficiency of residential buildings and measures related to the increase of electric vehicles.</p>		
	<p>Energy poverty sub-target</p>	<p>Poland does not include a share of its population in energy poverty. It therefore uses the average of the four indicators in the EED to calculate its energy poverty sub-target. It finds that 9.05% of its ESO must be delivered among people in energy poverty.</p> <p>The draft update NECP indicates that 2.68 Mtoe of the ESO savings will have to be provided among energy poor households.</p> <p>Poland sets out a list of measures intended to support the alleviation of energy poverty (see Page 87 EN version), without specifically linking them to the sub-target.</p>	<p>Poland's indicated energy poverty sub-target seems lower than the required 9.05% which should be 3.78 Mtoe (own calculation when using the cumulative savings in the period 2024-2030 as a basis).</p> <p>Similarly to the other measures indicated, very few details are provided. The estimation of energy savings expected with the measures are also missing so it is impossible to calculate whether the indicated measures will allow Poland to meet its energy poverty-sub target.</p>	<p>Insufficient</p>

11. Romania (Link to plan [here](#)):

Article	Description	Assessment	Grading	
Energy efficiency target	Energy efficiency contribution	<p>Romania sets a 2030 national energy efficiency contribution for final energy of 23.1 Mtoe and a primary energy contribution of 31.4 Mtoe.</p>	<p>Romania’s contribution for final energy is above the result of the EED formula, but within the 2.5% deviation flexibility margin (23.3 Mtoe). Romania’s contribution for primary energy is slightly above the EED formula’s result when using the 2.5% flexibility (31 Mtoe).</p> <p>However, Romania indicates that according to its With Additional Measures (WAM) scenario, its primary energy would be 30.4 Mtoe in 2030, lower than the indicated contribution and within the 2.5% margin of the formula’s result.</p>	Insufficient
	Trajectory	<p>Romania provides a trajectory of the evolution of its final and primary energy consumption until 2050; the underlying data are based on 5-years intervals, with only an entry for 2025 before the 2030 objective.</p>	<p>The trajectories reach the declared national energy efficiency contributions for final and primary energy consumption. However, the trajectories do not follow a linear decrease in energy consumption (see Page 45 in EN version).</p>	Compliant

	Share of energy consumption per sector	Romania provides its share of energy consumption per sector in 2030 in final energy (see Page 46 in EN version).	The share of energy consumption per sector in primary energy is not indicated.	Insufficient
	Policies and measures	Romania provides a list of energy efficiency measures in addition to those under the scope of the ESO to achieve its higher national energy efficiency contributions.	The measures listed are detailed, but no estimation of energy savings is provided nor funding estimations.	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Romania underlines that its energy consumption projections for 2050 are based on the guiding principle of prioritizing energy efficiency.	Except for this general statement, Romania does not provide a clear explanation of how the EE1st principle was used in the drafting of its NECP.	Insufficient
	Concrete measures to systemize the EE1st principle	Missing.	Romania does not list any specific policy or measure to improve the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
	Public sector objective	Missing.	Romania does not acknowledge the new public sector obligation.	Not updated

Public sector obligation	Policies and measures	Under the planned buildings related measures, Romania indicates a few measures that will also support the reduction of its public sector's energy consumption (PAM 29, PAM 30, PAM 33, PAM 35, PAM 43, PAM 44).	The measures are well described but do not indicate an estimation of the expected energy savings or the budget needed to implement them. While those measures can contribute to the new public sector obligation, the draft NECP does not make this link.	Not updated
Renovation of public buildings	Objective	Missing.	Romania does not clearly acknowledge the new renovation requirement for buildings owned by public bodies or quantify the equivalent floor area to be renovated.	Not updated
	Policies and measures	Romania indicates two policy measures (PAM 29 and PAM 30) that will renovate at a rate of 3% per year the energy performance of central government buildings and local government buildings.	The measures are well described but do not include an estimation of the expected energy savings or the budget needed to implement them. The measures also are not fully aligned with the enlarged scope of the public buildings' renovation requirement in the 2023 EED, and the energy performance level that must be achieved after renovation is not specified.	Insufficient
Energy Savings Obligation	Objective	Romania notifies a cumulative ESO objective of 10.1 Mtoe over the period 2021-2030.	Romania does not modify its cumulative ESO objective according to the 2023 EED; its end-use energy savings target is similar to the one in its 2019 NECP . Romania also provides no information on the calculation of its ESO baseline or the annual rate of end-use energy savings.	Not updated

			Romania does not provide an estimation of the expected energy savings from its planned measures, making it impossible to calculate whether the measures will achieve the cumulative ESO objective.	
	Policies and measures	Romania indicates that it will fulfil its ESO with a range of alternative policy measures (see Page 92 in EN version).	Romania provides a relatively detailed explanation of the policy measures (including the methodology used and the status of implementation). However, Romania does not provide the expected savings, funding streams for the measures nor explain how double counting of impacts has been avoided.	Insufficient
	Energy poverty sub-target	Romania reports that 15.2% of its population was unable to keep its home adequately warm in 2022 (by directly referring to Eurostat indicators and data). Romania indicates that the implementation of energy efficiency measures is expected to reduce this energy poverty rate and it also lists several policies and laws aiming at reducing energy poverty (PAM 62 & 63).	Romania does not acknowledge the new energy poverty sub-target in the ESO and does not provide the specific quantification of the energy savings that must be achieved among the priority groups.	Not updated

Draft NECPs submitted between 30 June 2023 and 30 September 2023

1. Croatia (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Croatia notifies an energy efficiency contribution in 2030 of 6.55 Mtoe for final energy consumption and 8.14 Mtoe for primary energy consumption.	The objectives for final and primary energy are not in line with the EED formula (even taking into account the possibility to deviate from the formula's result by 2.5%). Final energy consumption should not be higher than 6.01 Mtoe (EED formula result for final energy with 2.5% deviation) and 6.83 Mtoe (EED formula result for primary energy without 2.5% deviation).	Insufficient
	Trajectory	Croatia provides a graph with a trajectory towards its 2030 energy efficiency contribution for primary energy and final energy.	Croatia does not indicate specific values for yearly energy consumption. The trajectory appears to be linear and achieves an energy consumption in 2030 (both for final and primary energy) in line with the Croatian energy efficiency contribution.	Compliant

	Share of energy consumption per sector	Missing.	Croatia does not report the expected share of primary and final energy consumption for each sector.	Not updated
	Policies and measures	The draft plan includes a list of measures, complementing those reported for the purpose of the Energy Savings Obligation (ESO), such as an energy renovation program for heritage buildings and the promotion of energy management systems in the service and production sectors.	<p>The measures are detailed, including information on the funding source, the responsible entities and the monitoring methods. However, for some measures, the expected energy savings are not quantified.</p> <p>In addition, Croatia presents a scenario with additional measures that provide energy savings close to the amount needed to reach its notified final energy contribution.</p>	Compliant
Energy Efficiency First principle	Use as an overarching principle in the NECP	Croatia mentions the Energy Efficiency First (EE1st) principle, namely in the context of the building sector (see policy measure ENU-2, <i>Promotion of</i>	The EE1st principle is only acknowledged but not used as an overarching principle in the drafting of the NECP.	Insufficient

		<i>decarbonisation and the application of the "energy efficiency first" principle in building).</i>		
	Concrete measures to systemize the EE1st principle	Missing.	Croatia does not specify any policies or measures to increase the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Missing.	Croatia does not acknowledge the new public sector obligation.	Not updated
	Policies and measures	Several measures (ENU-5, ENU-7, ENU-8, ENU-9) listed in the general policies and measures section will have a positive impact on the energy consumption of the public sector and are estimated to save at least 204.06 ktoe.	Croatia does not list measures aiming at specifically achieving the public sector objective. However, the Croatian NECP still plans measures addressing energy consumption in the public sector, which are generally well explained and quantified.	Not updated
Renovation of public buildings	Objective	The draft plan indicates that Croatia will use the alternative	Croatia does not align its objective with the revised Art.6 in the 2023 EED (no extension of	Not updated

		approach to the 3% central government buildings renovation requirement (old EED). It commits to achieve 0.116 ktoe annual energy savings.	the scope and no reference to renovations to Nearly-Zero Energy Buildings (NZEB) or Zero-Emission Building (ZEB) level).	
	Policies and measures	One measure (ENU-5, <i>Energy renovation programme for public sector buildings</i>) is provided to increase the renovation rate of public buildings but limited to central government buildings only.	Croatia does not provide specific measures for the purpose of complying with the new Art.6 requirements.	Not updated
Energy Savings Obligation	Objective	Croatia acknowledges the increase ESO annual rate and indicates that its updated cumulative target from 2021 to 2030 will be 4,313 ktoe.	Croatia takes into account the new EED requirements with regard to the updated ESO and correctly calculates its cumulative objective. Croatia provides a detailed explanation of the setting of the ESO baseline, the calculation of the yearly energy savings, and the cumulative objective. The energy savings resulting from the planned measures	Compliant

			are close to the overall cumulative objective (4,245 instead of 4,313 ktoe).	
	Policies and measures	Croatia provides a detailed list of measures for the purpose of the ESO. The most impactful measure is the Croatian Energy Efficiency Obligation Scheme (ENU-1), which is set to fulfil 70% of the ESO cumulative objective. Other alternative measures relate to energy renovation programmes, the increase of efficiency in manufacturing industries and the improvement of the public transport system.	Croatia indicates a series of measures that are for the majority already in the existing NECP, with a few additional newly planned measures. However, the Croatian Annex on the ESO underlines that the distribution of the goal between the EEOS and alternative measures is not yet determined. The measures are described in detail with the implementation process of the measure, the funding source, the responsible entities, and the monitoring methods. However, the eligibility of the measures according to the new accountability rules is not provided. On the positive side, the Croatian Annex specifies that double counting has been avoided with the use of the SMiV (System for Measuring and Verifying) system.	Compliant
	Energy poverty sub-target	Croatia does not mention the new energy poverty sub-target in the ESO, nor does it declare the share of energy poverty in the country necessary to calculate	No specific quantification of the energy savings, as required by the energy poverty sub-target in the ESO is provided. A few policy measures are however indicated that will have a positive	Not updated

		this new sub-target. It however notes that it will develop a program to define the energy poverty share in the Croatian population.	impact on energy poverty (ENU-1, ENU-2, ENU-3, ENU-4, UET-9 and potentially UET-8).	
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2. Cyprus (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Cyprus' national energy efficiency contribution is based on a scenario that projects a final energy consumption of 1.88 Mtoe and a primary energy consumption of 2.28 Mtoe for 2030.	Both the primary and final energy contributions are not in line with the EED formula's result (even taking into account the possibility to deviate from the formula's result by 2.5% for final energy). Cyprus's national energy efficiency contribution should amount to no more than 1.852 Mtoe for final energy and 2.038 Mtoe for primary energy.	Insufficient
	Trajectory	Cyprus provides a trajectory towards its 2030 energy efficiency objectives for primary and final energy, with yearly consumption values for primary energy.	The trajectory follows a progressive minimal downward trend for primary energy and stabilizes for final energy.	Compliant
	Share of energy	The draft plan indicates the projected evolution of the final energy consumption for each of its	Cyprus correctly provides the share of final energy consumption per end-use sector.	Insufficient

	consumption per sector	sectors in 2030 (see Page 51 in EN version).	The contribution of the different sectors adds up to 1.84 Mtoe, which is in line with the overall national energy efficiency contribution for final energy as per projection. However, Cyprus does not provide a projection per end-use sector for primary energy.	
	Policies and measures	Cyprus provides a list of measures that promote energy efficiency mostly in the framework of the ESO. A few other measures are provided for the overall energy efficiency objective. Cyprus acknowledges that the measures planned are not enough to reach the increased energy efficiency contribution and indicates that additional measures will be planned in the final NECP update (See Pages 94-95 in EN version).	The measures listed by Cyprus are not well detailed and not quantified in terms of energy savings per measure with the exception of the measures planned in the framework of the ESO.	Insufficient

Energy Efficiency First principle	Use as an overarching principle in the NECP	Cyprus declares that the EE1st principle has been addressed in the preparation of the revised NECP through the prioritization of energy efficiency policies and measures, and that other decarbonisation measures have only been taken into account when alternative efficiency actions are deemed <i>"impractical or very costly"</i> . It also states that all <i>"cost-effective measures"</i> have been included in the updated NECP.	Cyprus provides explanations of how the EE1st principle was considered across the dimensions of the plan. However, it is not fully integrated in the other dimensions of the plan beyond the energy efficiency dimension. Cyprus' reasoning is also still based on pure economic cost-effectiveness without taking into account the wider benefits of energy savings, making these measures appear too costly or described as <i>"unrealistic"</i> (Cyprus gives as an example the acceleration of buildings' renovation by 2030).	Compliant
	Concrete measures to systemize the EE1st principle	Missing.	Cyprus does not indicate how the principle was applied in the planning phase of the projects mentioned under the EE1st section. Cyprus indicates a list of projects that could increase energy consumption, without explaining how or whether the principle was applied. In addition, Cyprus does not specify any policies or measures to increase the application of the EE1st principle or to	Not updated

			comply with the new obligations under Art.3.	
Public sector obligation	Public sector objective	Cyprus states that at the time of the preparation of the draft update, the national plan for meeting the public sector objective had not been completed, the planning will be presented in the final NECP in 2024.	Cyprus acknowledges the new public sector obligation. However, Cyprus does not quantify the required reduction of energy consumption nor provides a list of the public bodies covered. The starting date of the obligation is also missing.	Not updated
	Policies and measures	The draft plan lists measures to provide energy upgrades in " <i>public state buildings</i> " and for the wider public sector in the framework of the ESO, indicating that those will impact the energy consumption of the public sector.	The draft plan does not include measures specifically for the purpose of the public sector obligation. The measure to provide energy upgrades in the public sector is not estimated in terms of the expected energy savings and stops in 2026.	Not updated
Renovation of public buildings	Objective	The draft plan acknowledges the new increased renovation obligation for all buildings owned by public bodies. Cyprus indicates that the public building renovation requirement for 2021-2030 amounts	Cyprus does not use the new increased renovation obligation for all buildings owned by public bodies to achieve either NZEB or ZEB standards. The draft plan does not indicate whether Cyprus will use the default or the alternative approach to comply with the new obligation.	Not updated

		to 0.11 ktoe, but this target is calculated on the basis of the old obligation (based on the alternative approach).		
	Policies and measures	Cyprus indicates measures to provide energy upgrades in “ <i>public state buildings</i> ” and for the wider public sector (including one measure specifically for hospitals) (See page 90 EN version) in the framework of the ESO.	The measures are only briefly described and no quantification of the floor area to be renovated or equivalent energy savings is provided.	Not updated
Energy Savings Obligation	Objective	Cyprus acknowledges the increased ESO annual rates under the revised EED Art.8, with the specific derogation to achieve an annual rate of energy savings of 0.45% from 2024 to 2030. Cyprus indicates that its objective amounts to 349,04 ktoe of cumulative savings over the period 2021-2030.	Cyprus correctly calculates its cumulative objective. However, the draft plan does not explain how the ESO baseline was set or the yearly energy savings were calculated (it is stated that more detailed information will be included in the final NECP update). As there is almost no quantification of the measures’ expected energy savings, it is not possible to calculate whether the	Compliant

			measures notified would deliver the cumulative energy savings objective.	
	Policies and measures	The draft plan provides a list of 17 measures to fulfil the ESO. It encompasses one Energy Efficiency Obligation Scheme and 16 alternative policy measures. Cyprus claims that these measures allow to <i>"marginally achieve"</i> the ESO cumulative objective. The measures relate to, among others, additional building renovations, more efficient road lighting, energy savings measures in the road transport and the water sector.	The measures detailed by Cyprus are only briefly described with no details on the implementation process, the funding streams, the entities responsible or the expected energy savings. It is therefore not possible to verify that the measures declared in the draft plan achieve the ESO objective. Only the expected cumulative savings of the EEOS are quantified (100 ktoe over the 2023-2030 period). There is no proof that double counting was avoided or any evidence that measures are eligible and appropriate.	Insufficient
	Energy poverty sub-target	The draft plan sets the new energy poverty sub-target for the ESO at 67.36 ktoe. This corresponds to 19.3% of its total objective, which is the share of people living in energy poverty, low-income and vulnerable consumers. The share was calculated by using the average of	Cyprus positively indicates an energy poverty sub-target in line with the revised EED. However, the measures to reach the sub-target are not yet provided.	Compliant

		<p>the four indicators provided in the 2023 EED. Cyprus indicates that the energy poverty sub-target will be reached by a combination of the EEOS and alternative measures. It also adds that more information on the data and methodology to calculate the sub-target will be included in the final NECP, following a study (which could modify the declared share).</p>		
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3. Estonia (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Estonia indicates a 2030 national energy efficiency contribution for final energy of 30.19 TWh (2.59 Mtoe) and a primary energy contribution of 45.72 TWh (3.93 Mtoe).	The contribution in final energy is aligned with the result of the formula using the 2.5% deviation flexibility (2.62 Mtoe). For primary energy, the contribution is close to the formula's result (3.927 Mtoe).	Compliant
	Trajectory	Estonia does not set a clear trajectory to achieve its national energy efficiency contribution. It however indicates a projection (which looks similar to a trajectory) for primary and final energy consumption up to 2030 with no precise yearly consumption values.	It is not clear whether the reported projections are the trajectories requested by the 2023 EED. The projection for primary energy does not meet Estonia's energy efficiency contribution; the projection for final energy comes close to the 2030 national energy efficiency contribution.	Insufficient
	Share of energy consumption per sector	Estonia reports the share of final energy consumption in end-use	Estonia does not provide exact values for final energy in end-use sectors in 2030, it	Insufficient

		<p>sectors in 2030 which is the same as in 2021 (see Page 149 in EN version).</p> <p>Estonia also provides a graph with the primary energy consumption per sector by 2030 and beyond (See Page 150 in EN version).</p>	<p>only refers to 2021 data which could signal a lack of updated analysis.</p> <p>In addition, the data indicated in the draft plan for the primary energy consumption per sector is not precisely quantified.</p>	
	Policies and measures	<p>Estonia provides a list of measures beyond the scope of the ESO to reach the overall energy efficiency target.</p>	<p>The measures listed are the same as those included in Estonia's 2019 integrated NECP, with only a brief description of the measure and no quantification of the energy savings expected.</p>	Not updated
Energy Efficiency First principle	Use as an overarching principle in the NECP	<p>Estonia only briefly mentions the EE1st principle in footnotes.</p>	<p>Estonia does not use the EE1st principle as an overarching principle. The application of the EE1st principle when drafting the NECP is not detailed or explained, including in relation to the associated benefits of the EE1st principle or the responsible authority.</p>	Insufficient

	Concrete measures to systemize the EE1st principle	Missing.	Estonia does not specify any policies or measures to increase the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	Missing.	Estonia does not acknowledge the new public sector obligation.	Not updated
	Policies and measures	Estonia indicates a measure " <i>HF4 Investments in street lighting renovation programme</i> " (already present in the 2019 NECP) which could have a positive impact on the public sector energy consumption.	The reported measure is not directly linked to the new public sector obligation and the expected energy savings are not quantified.	Not updated
Renovation of public buildings	Objective	Estonia's plan describes the baseline of the old renovation requirement for central government buildings, indicating that, in 2022, 835,310 m ² of floor area of central government buildings did not meet the minimum requirements (Art.5 of the 2012 EED).	Estonia does not acknowledge the new increased renovation obligation for all buildings owned by public bodies to achieve either NZEB standards or the ZEB standards.	Not updated

	Policies and measures	Estonia indicates two measures that could possibly serve the purpose of Art.6 (HF1: Renovation of public and commercial buildings and HF5b: Additional renovation of central government buildings).	The HF1 and HF5b measures were already present in the 2019 NECP (and therefore do not seem to be updated to fulfil the new public bodies' building renovation objective).	Not updated
Energy Savings Obligation	Objective	Estonia acknowledges the increased ESO annual rate and indicates that its cumulative objective amounts to 21 279 GWh or 76 604 TJ over the period 2021-2030 which is equivalent to 1.8 Mtoe.	Estonia correctly calculates its cumulative objective. It also provides a detailed explanation of the setting of the ESO baseline, the calculation of the yearly energy savings to be achieved and the cumulative objective (see Page 37 in EN version). As there is no quantification of the measures' expected energy savings, it is not possible to calculate whether the measures declared would deliver the cumulative energy savings objective.	Compliant
	Policies and measures	Estonia provides a list of measures to fulfil the ESO (see Page 99 EN version).	The measures provided have not been updated compared to the 2019 integrated	Not updated

			NECP and the details of the measures are lacking, e.g., there is no calculation of the expected energy savings. There is also no proof that there is no double counting or any evidence that measures are eligible and appropriate.	
	Energy poverty sub-target	<p>Missing.</p> <p>Estonia indicates that, according to data from the European Energy Poverty Observatory, in 2016 2.7% of the population was unable to keep their homes warm, and 7.9% of households faced energy bill arrears.</p>	Estonia does not declare the share of people living in energy poverty and also does not acknowledge the new energy poverty sub-target in the ESO. It however lists measures that will have a positive impact on energy poverty, such as support for the renovation of small and multi-dwelling buildings; those measures are however the same as the previous NECP (see Page 59 in EN version).	Not updated

4. Hungary (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Hungary indicates as its national energy efficiency contribution that its final energy consumption “ <i>does not exceed</i> ” 750 PJ (17.913 Mtoe) by 2030.	Hungary’s final energy efficiency contribution is not in line with the EED formula, even taking into account the possibility to deviate from the formula results by 2.5% (with which Hungary’s contribution should amount to no more than 16.596 Mtoe). In addition, Hungary fails to indicate a primary energy efficiency contribution.	Insufficient
	Trajectory	Missing.	Hungary does not set a trajectory to achieve its final energy objective.	Not updated
	Share of energy consumption per sector	Hungary provides an evolution of the energy consumption of its total primary energy, total final energy and final energy per sector according to two scenarios (with existing measures, WEM and with	Hungary does not indicate the share of primary energy consumption per end-use sector, only by energy carrier.	Insufficient

		additional measures, WAM). Hungary also indicates the evolution of the primary energy consumption mix by energy carrier under the WEM scenario for 2030.	In addition, interestingly, the industry sector energy consumption increases under the WAM scenario compared to the WEM scenario. Finally, both the projections of the WEM and the WAM scenarios overachieve Hungary's declared final energy objective (to 742 PJ and 739 PJ respectively), which is positive.	
	Policies and measures	Hungary provides a list of measures in the scope of the ESO, the Long-Term-Renovation Strategy and for the public sector to reach its overall energy efficiency target. No additional measure is indicated to deliver specifically the overall energy efficiency contribution.	The measures have a very short description with regards to the aim of the measure, investment needs and target group, but they lack details with regards to implementation, responsible entity, monitoring and are not quantified in energy savings terms.	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Hungary highlights as a footnote of the dimensions "internal energy market" and "energy	Beyond the footnotes, the application of the principle in the other dimensions of the NECP is not detailed. Consequently, the EE1st principle is not used as an overarching principle in the Hungarian NECP.	Insufficient

		security" that these are in line with the EE1st principle.		
	Concrete measures to systemize the EE1st principle	Missing.	Hungary does not specify any policies or measures to increase the application of the EE1st principle or to comply with the new obligations under Art.3. There is no responsible authority for its application identified and no consideration of the multiple benefits of energy efficiency.	Not updated
Public sector obligation	Public sector objective	Hungary mentions the new public sector obligation.	Even if the new obligation is acknowledged, Hungary does not provide the amount of the energy consumption reduction objective, a list of its public bodies, their energy consumption, or the exemptions that will be used.	Not updated
	Policies and measures	Hungary lists one policy measure with regards to the public sector " <i>The National Energy Network</i> ", established in 2017, that aims at promoting energy efficiency for public bodies.	The measure is not directly linked to the public sector obligation and is not precisely quantified in terms of expected energy savings. It is very briefly described with some details about the responsible entity but without more information on implementation and monitoring.	Not updated

Renovation of public buildings	Objective	<p>Hungary mentions the new renovation obligation for all buildings owned by public bodies. Hungary seems to indicate that the renovation within the cost-optimal range of the Hungarian public buildings stock would deliver 6.6 PJ of savings for the 10 years, while the extension under the 2023 EED to NZEB level for public buildings would deliver 14.615 PJ of savings per year under the next 10 years. According to the Hungarian draft, this would deliver cumulative savings of 80 PJ.</p>	<p>Hungary provides no detailed quantification of the floor area to be renovated or a full indication of the equivalent energy savings. It remains unclear whether Hungary will use the default approach, as it has done in the past, and whether it will use exemptions for the new extended renovation requirement to public bodies buildings. As a strategic goal, Hungary still quotes the renovation of the floor area of central government buildings (old EED requirement).</p>	Insufficient
	Policies and measures	<p>Hungary states that in order to achieve its renovation objective, it will use financing through Energy Services Companies, and the</p>	<p>It is not clear how the renovations will be performed and whether the funding streams will be enough to ensure that these renovations materialize. The description of the measures is not connected to the renovation</p>	Insufficient

		Energy Efficiency Obligation Scheme. Furthermore, Hungary mentions that energy efficiency measures are also supported by <i>"The National Energy Network"</i> (see above).	requirement and lacks detail, e.g. with regards to the energy savings to be achieved.	
Energy Savings Obligation	Objective	Hungary indicates a cumulative ESO of 336 PJ, which equals 8.025 Mtoe, by 2030.	Hungary's declared objective is insufficient to meet its increased ESO. Hungary seems to refer only to the past ESO annual rate of 0.8% from 2021 to 2030. Indeed, the 2019 Hungarian NECP indicated a cumulative ESO objective of 331.23 PJ, close to the level indicated in the draft NECP update. In addition, Hungary does not provide an explanation for the setting of the ESO baseline, the yearly energy savings or the cumulative energy savings objective. Finally, as there is no quantification of the measures' expected energy savings, it is not possible to calculate whether the measures declared would deliver the cumulative energy savings objective.	Insufficient
	Policies and measures	Hungary provides a list of policies and measures to fulfil the ESO. It		Insufficient

		<p>indicates that the EEOS will fulfil 26% of the ESO objective, while alternative policies will fulfil 74% of the target. A few new measures compared to the 2019 NECP are presented, namely the setting of an Energy Efficiency Obligation Scheme in 2021 or a renovation aid scheme. Older measures are also described, such as a tax advantage for businesses to perform energy efficiency-enhancing investment, or the National Energy Network, both established in 2017.</p>	<p>The measures provided by Hungary are not well detailed, there is no quantification of the expected energy savings (except for the EEOS, which is quantified in the framework of Art.6), the implementation steps of the measure, the entity responsible or how the expected savings comply with the new Art.8 accounting and eligibility rules. There is only a brief description of the measures and the funding available for the measures. Hungary also adds to its draft NECP update an Annex which provides a list of planned measures, but these do not seem to have been updated as some of the measures in the plan are not yet reflected in the Annex. There might be confusion with regard to the Long-Term Renovation Strategy, as these measures are detailed in the ESO, with only a reference under the appropriate section.</p>	
	<p>Energy poverty sub-target</p>	<p>Hungary only briefly tackles the issue of Energy Poverty in its plan by stating that it aims to <i>"reduce the number of vulnerable consumers through integrated support in the relevant programmes, for example in the</i></p>	<p>The draft plan does not acknowledge the energy poverty sub-target in the ESO nor provides a quantification of energy poverty in Hungary. Policy measures to reduce energy poverty are not listed.</p>	<p>Not updated</p>

		<p><i>area of energy efficiency". It furthermore states that "Vulnerable customers/households are those who have difficulties in securing the basic energy needs of their homes" and mentions definitions with indicators to determine vulnerable customers for each supporting policy measure.</i></p>		
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5. Italy (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Italy sets its energy efficiency contribution in 2030 at 94.4 Mtoe of final energy consumption and 115 Mtoe of primary energy consumption.	Italy sets a contribution that is in line with the EED formula, using the 2.5% deviation flexibility (both for final energy and primary energy).	Compliant
	Trajectory	Italy sets a trajectory from 2021 to 2030 for both final and primary energy which appears to follow a linear decrease of energy consumption.	The trajectory is provided in a graph with no underlying yearly consumption values, except for 2030. The 2030 energy consumption indicated in the trajectory (122 Mtoe for primary and 100 Mtoe for final energy) does not match the reported energy efficiency contribution.	Compliant
	Share of energy consumption per sector	Italy indicates the projections of energy consumption for primary and final energy and for each of its sectors by 2030 both in percentages and Mtoe (Pages 327 in EN version). The draft plan also provides numbers for the expected evolution of each sector's	The share per sector for both final and primary energy is indicated; however, the primary and final energy consumption for 2030 do not match the national energy efficiency contributions submitted by Italy. This shows that additional sectorial measures are needed, which Italy	Compliant

		energy consumption by 2025, 2030 and 2040 according to existing policies and measures.	indicates it will do in its final update of the NECP.	
	Policies and measures	The draft plan lists energy savings measures that will contribute to achieve the energy efficiency contribution (complementary to the measures declared under the ESO). These measures concern among others public procurement, a national portal on the energy performance of buildings, and energy audits (see from Page 249 EN version). Italy indicates that the measures planned in the draft update of its NECP do not reach the level of Italy's energy efficiency contributions (100 instead of 94.4 Mtoe for final energy). Italy indicates that more measures will be planned in its final NECP update to fill this gap.	The measures declared in the framework of Art.4 are not detailed and their expected savings are often not quantified (only for energy audits and for the measures declared specifically in the framework of the ESO). Additional measures will be needed to reach the level of the energy efficiency contribution for final energy consumption.	Compliant
Energy Efficiency First principle	Use as an overarching principle in the NECP	Italy mentions the EE1st principle in a footnote with regard to the internal	Italy does not underline in its draft update NECP the EE1st principle as a core element of its energy policy.	Insufficient

		market dimension and in the context of Cohesion Policies.		
	Concrete measures to systemize the EE1st principle	Missing.	Italy does not specify any policies or measures to increase the application of the EE1st principle or to comply with the new obligations under Art.3.	Not updated
Public sector obligation	Public sector objective	<p>Italy indicates that it is planning to achieve 86.7 ktoe of savings per year in the public sector. The draft plan references a study that estimates the energy consumption of all public authorities. The study currently excludes the energy use of public transport but includes armed forces. However, Italy notes that further studies are necessary to estimate the energy consumption of small municipalities to make use of the temporary exemptions.</p> <p>No clear starting date for the obligation is provided but the draft plan mentions its indicative nature for the first two years after the EED transposition deadline.</p>	When compared to the total energy consumption of the public sector (4.6 Mtoe), Italy's annual reduction objective of 86.7 ktoes is equivalent to a 1.88% reduction per year, which fulfils approximately the 1.9% requirement of the EED. The use of further exclusions could reduce the reported objective.	Compliant

	Policies and measures	Missing. Italy does not specify the measures envisaged to reach the public sector obligation.	Despite the obligation being quantified and counted, the Italian draft NECP does not list the measures to achieve it.	Not updated
Renovation of public buildings	Objective	Italy extends the 3% renovation objective to all buildings of the public administration. It sets two scenarios (maximal and minimal) of the square meters to be renovated by 2030, amounting to 63 million m2 and 42 million m2 of floor area respectively. However, it clarifies that further research is needed to identify the extent of the exemptions provided in EED Art.6 text. Italy does not clarify whether these renovations will reach NZEB level (or ZEB level).	Italy positively uses the default approach and provides detailed quantification of the floor area to be renovated. Further exemptions could impact the renovation of public buildings negatively and reduce the floor area to be renovated annually.	Compliant
	Policies and measures	Italy lays down a policy in the framework of Art.8 ("Energy upgrading programme for public administration") in order to upgrade the energy	The measure "Energy upgrading programme for public administration" is detailed both in terms of the practical steps of implementation and funding	Insufficient

		<p>efficiency of public buildings (See Page 236 EN version). This policy will also be used to fulfil its Art.6 objective.</p>	<p>streams for local authorities as well as the quantification of the energy savings expected (0.54 Mtoe) for the purpose of Art.6.</p> <p>However, there is little information on how the expected savings are calculated, and if they will be monitored or verified. In addition, estimated savings only refer to the new projects after 2025 and no details are provided regarding the depth of the renovations or the overall floor area that will be renovated (so it is not possible to assess whether it matches the declared objective of Art.6).</p>	
<p>Energy Savings Obligation</p>	<p>Objective</p>	<p>Italy indicates that its cumulative ESO by 2030 amounts to a minimum of 73.42 Mtoe of final energy savings.</p>	<p>The draft plan correctly calculates its ESO baseline, the yearly savings and the cumulative savings to be achieved. The total declared savings of the planned measures would amount to 74.2 Mtoe, slightly higher than the ESO cumulative objective.</p>	<p>Compliant</p>
	<p>Policies and measures</p>		<p>Italy provides a good description on the planned measures, both in terms of the</p>	<p>Compliant</p>

		<p>The draft plan lays down a detailed list of measures to fulfil its Art.8 objective such as (in order of energy savings magnitude), tax deductions for retrofitting buildings, the 'Certificati Bianchi' mechanism (the EEOS), the transition plan 4.0 and 5.0 and energy efficiency measures implemented through the Kyoto Fund. The tax deductions for retrofitting buildings provides almost half of Italy's ESO.</p>	<p>aim and content of the measure, expected outcomes, entities responsible and funding resources. However, no explanation regarding the eligibility of the measures, its consistency with the new accounting Art.8 rules or assessment of potential double counting is provided.</p>	
	<p>Energy poverty sub-target</p>	<p>Italy indicates that a share of cumulative energy savings will be achieved among households in energy poverty, vulnerable customers and, where applicable, people living in social housing. Italy states furthermore that a new project, entitled Energy Poverty Indicators Calculation (EPIC project), will be launched to design and implement analytical and statistical processes for energy poverty.</p>	<p>Italy does not provide the share of people in energy poverty, the quantification of the savings to be achieved among the targeted groups, or the measures foreseen.</p>	<p>Insufficient</p>

6. Lithuania (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Lithuania sets its national energy efficiency contribution in 2030 at 4.2 Mtoe for final energy consumption and 5.2 Mtoe for primary energy consumption.	Lithuania sets a contribution that is in line with the EED formula both for final energy (4.248 Mtoe) and primary energy (5.157 Mtoe), without using the 2.5% flexibility possibility.	Compliant
	Trajectory	Missing. Lithuania only indicates projections for 2025 and 2030 energy consumption.	Lithuania does not set a trajectory in its draft plan. 2025 projections are set on a downward trend compared to 2021 data and seem aligned with a linear rate of decrease.	Insufficient
	Share of energy consumption per sector	The draft plan provides projections of the final energy consumption of each of its sectors in 2030 with new policies (see Page 42 in EN version) and with existing policies (see Pages 218 & 255 in the EN version).	Lithuania provides projections for the share of energy consumption per sector in final energy, but not in primary energy. Even the projections with the new policies do not add up to Lithuania's reported energy	Insufficient

			efficiency contribution for final energy (4.4 Mtoe compared to 4.2 Mtoe).	
	Policies and measures	Lithuania indicates a list of energy savings measures, but only in the framework of Art.8. No additional measures are indicated to deliver on the overall energy efficiency contribution.	The policies and measures in the framework of Art.8 are described, but they lack detail (see below).	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	The draft plan clearly states the importance of the EE1st principle as one of the main principles of national energy efficiency policies.	The clear explanation of the importance of the EE1st principle and the general ambition of the Lithuanian NECP showcases that the EE1st is used as a principle in national policy. However, the EE1st principle does not seem to be enshrined in the other dimensions of the plan and it is not used as an overarching principle in Lithuania`s draft NECP.	Insufficient
	Concrete measures to systemize	Lithuania lists national laws that require to prioritise energy efficiency options when they are more cost-	Lithuania provides an explanation on how it intends to use the EE1st principle to frame its energy system, including its future gas	Insufficient

	the EE1st principle	effective than supply-side solutions, in decisions on the planning and financing of energy transmission or distribution networks or systems. Lithuania also indicates that it will amend its national “Energy Efficiency Improvement Act” to enshrine in law actions to monitor the principle and extend its application to non-energy sectors having an impact on energy consumption.	infrastructure. However, Lithuania declares no concrete regulatory measures to structurally increase the application of the EE1st principle. This is not fully in line with the new requirements in Art.3, also given that no responsible authority for its application is identified and the choice between demand and supply-side solutions is still based on pure economic considerations, without factoring in the multiple benefits of energy efficiency.	
Public sector obligation	Public sector objective	Lithuania recognizes the new obligation for public bodies to reduce their energy consumption by 1.9% per year but states that the list of public bodies needs to be updated before providing an estimation.	The draft plan does not provide a clear objective, information on the application of the exemptions, or the starting date of the public sector obligation.	Not updated
	Policies and measures	Missing.	No measure is specifically indicated to fulfil the objective of the public sector obligation.	Not updated
Renovation of public buildings	Objective	Lithuania extends the 3% renovation target to municipal buildings on top of the central government buildings.	With regards to the renovation obligation, Lithuania correctly extends the 3% target to	Compliant

		<p>This represents an annual renovation of 960,000 m² of public buildings' floor area. Lithuania indicates that 0.578 TWh, or 49.7 ktoe, of cumulative savings are expected from the two main renovation measures that would help fulfil this objective.</p>	<p>public bodies buildings but does not indicate whether these renovations must achieve NZEB or ZEB level. It positively chooses the default approach but does not clarify whether social housing will be included within the renovation requirement. Lithuania indicates the total floor area to be renovated and the equivalent of energy savings.</p>	
	<p>Policies and measures</p>	<p>Lithuania lays down two measures (EE3-E and EE3-P, both on "<i>Renovation of public buildings</i>") that can help fulfil the renovation objective under Art.6.</p>	<p>The measures are not described in detail. Only the aim of the policies (in floor area to be renovated), their timeline, and the depth level of the renovation required are provided (which is only to class C or B of the Energy Performance Certificate, not in line with the NZEB requirement per EED rules). There is no explanation about the source of the funding, the legal basis, or the entity responsible for the implementation and monitoring and verification of the measures.</p>	<p>Insufficient</p>

Energy Savings Obligation	Objective	Lithuania indicates that its cumulative ESO by 2030 amounts to 39.3 TWh or 3383,9 ktoe.	Lithuania correctly calculates its ESO baseline and the cumulative savings to be achieved. Lithuania however does not indicate the yearly energy savings rates and a precise explanation of how the cumulative objective was calculated. The cumulative savings projected by each individual measure listed under the plan match and even overachieve Lithuania's cumulative ESO target (total of 46.4 TWh).	Compliant
	Policies and measures	Lithuania lays down a detailed list of measures to fulfil its Art.8 objective, dividing between existing policy measures and planned policy measures. The planned policy measures are often a strengthening of pre-existing measures. The most impactful measures (in terms of energy savings) are higher excise duties and taxes on fuel consumption, the renovation and modernisation of multi-apartment buildings, and the transformation of boilers into more efficient	The draft plan positively describes most of its policies and measures in detail, including a quantification in terms of energy savings, except for transport and industry measures, which are not correctly evaluated. Lithuania however lacks proof of their eligibility according to the new more stringent Art.8 accounting rules (in particular related to the fossil-fuel exclusion). The direct evidence that there is no double counting is also missing.	Compliant

		technologies. A few measures regarding transport and industry are also listed, but their expected energy savings are not quantified. Lithuania provides also details on the description of most of its policies and measures (except for measure P16.1) including with information on how the measures will be implemented, monitored and verified.		
	Energy poverty sub-target	Lithuania notes that energy poverty is estimated at 28% of the population in 2018 based on specific indicators and sets specific targets to reduce it by 2025 and 2030.	Lithuania does not acknowledge the energy poverty sub-target in the ESO. It however indicates that some of the policy measures in the framework of Art.8 will have a positive impact on energy poverty, but does not provide any quantification of the energy savings that will be achieved among the priority groups.	Not updated

7. Luxembourg (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	<p>Luxembourg reports a national energy efficiency contribution in 2030 of 35,430 GWh (3.05 Mtoe) for final energy consumption. Luxembourg mentions that it will compare its national contribution with the update of the 2020 Reference Scenario, to be provided by the European Commission.</p>	<p>Luxembourg's final energy contribution is similar to the target set in its 2019 integrated NECP. Its objective for final energy is not in line with the EED formula (even taking into account the possibility to deviate from the formula's result by 2.5%), as the final energy objective of Luxembourg must be of no more than 2.78 Mtoe. Luxembourg does not provide an objective for primary energy consumption.</p>	Insufficient
	Trajectory	<p>Luxembourg indicates a projection of the evolution of its final energy consumption according to the scenario "With Existing Measures" and the scenario "With Additional Measures" (See Page 65 in EN version).</p>	<p>The projection "With Additional Measures" could be considered as a trajectory as it reaches in 2030 the level of Luxembourg's final energy objective. The projection follows a linear trend of decrease, increasing with time. No numbers year by year are provided.</p>	Insufficient

	Share of energy consumption per sector	Luxembourg indicates the projection for the final energy consumption target for each of its sectors in 2030 in GWh (amounting to 35,430 GWh for all sectors, see Page 58 in EN version).	Luxembourg does not provide a projection for primary energy consumption in its end-use sectors. The aggregated projection of final energy consumption in 2030 is in line with Luxembourg's reported national energy efficiency contribution by 2030.	Insufficient
	Policies and measures	Luxembourg indicates a list of energy savings measures in the framework of Art.8 and with regards to the Long-Term Renovation Strategy. No other measures are indicated to deliver the overall energy efficiency contribution.	The measures are well described, especially with regard to the state of progress, implementation and responsible entities. However, a quantification of energy savings to be projected per measure is often missing.	Insufficient
Energy Efficiency First principle	Use as an overarching principle in the NECP	Luxembourg mentions the EE1st principle as a way to reach energy and climate objectives.	The EE1st principle is acknowledged but not used as an overarching principle in the NECPs or across various dimensions of the plan.	Insufficient

	Concrete measures to systemize the EE1st principle	Missing	Luxembourg does not specify any policies or measures to increase the application of the EE1st principle or the new obligations under Art.3. There is no responsible authority for its application identified and no consideration of the multiple benefits of energy efficiency solutions.	Not updated
Public sector obligation	Public sector objective	Luxembourg mentions the new public sector obligation as per EED revision. It also indicates the level of energy consumption linked to buildings of " <i>State entities</i> " and " <i>municipal entities</i> " and calculates the combined reduction objective of the mandatory four years of the obligation (from 2027 to 2030), acknowledging that the definition of public sector buildings is under revision. Luxembourg indicates that the obligation starts in 2027.	Luxembourg seems to limit the calculation of the public sector objective to the consumption of public buildings only, which would be a fraction of the complete public sector obligation. This limited definition would amount to 58,840 MWh or about 5 toe of energy savings by 2030. Luxembourg seems also to indicate that the consumption of public transport and armed forces buildings will be included, but that the exact figures still need to be developed.	Insufficient

	Policies and measures	Luxembourg indicates a series of measures that could help to fulfil the public sector objective, mostly with regard to buildings and to the <i>"pioneer role of the public sector"</i> .	The measures declared are mostly limited to buildings and only one overall measure (<i>"The pioneer role of the public sector"</i>) is directly linked to the public sector obligation, but without explaining what actions will be put in place or the expected energy savings. The measures are noted as being either under analysis or planned.	Insufficient
Renovation of public buildings	Objective	Luxembourg provides an estimation of the floor area of buildings owned by the state (5,400,000 m ²) but indicates that it is not possible to calculate the total surface area of state buildings of the Art.6 baseline as there is no clarity on NZEB/ZEB levels as per EPBD and EED revisions yet (see main report). Luxembourg indicates that it will prepare a list of all public bodies' buildings covered by the obligation.	It is unclear yet whether Luxembourg will use the default or the alternative approach and which exemptions will be used (for instance regarding the inclusion of social housing). An indication of the total floor area to be renovated from 2021-2030 is missing.	Insufficient
	Policies and measures	Luxembourg indicates a series of measures that can help to fulfil the		Insufficient

		renovation objective under Art.6 (Measures number 303 - 319 - 320 - 321 in the plan).	The measures (in particular 303 and 319) are limited to the description of the new Art.6 obligation without explaining what actions will be put in place or the expected savings. The measures are described as " <i>being under analysis</i> ".	
Energy Savings Obligation	Objective	Luxembourg indicates that its cumulative ESO by 2030 amounts to 42,538 GWh of final energy savings, or 3,658 ktoe.	Luxembourg correctly calculates its ESO baseline (according to Eurostat data) and explains how the calculation baseline was established. However, Luxembourg does not accurately calculate its cumulative energy savings objective. Instead of using 0.8.% in the cumulation for the year 2021-2023, from 2024 onwards this rate is replaced with more ambitious percentages (see Page 59 EN version). In addition, when aggregating Luxembourg's planned measures for the ESO, it seems that it will overachieve its Art.8 objective.	Compliant
	Policies and measures	Luxembourg lays down a detailed list of measures to fulfil its Art.8 objective. Two measures make up the bulk of the energy savings:	In addition to the EEOS and the CO ₂ tax, Luxembourg indicates ten other measures, which are not quantified precisely in terms	Compliant

		<p>Luxembourg's Energy Efficiency Obligation Scheme (32% of the total) and a CO₂ tax on liquid fuels (66%). Luxembourg notes that it has avoided double counting with regard to the EEO scheme and alternative measures.</p>	<p>of savings (only in ranges). The measures are explained in detail notably on the description of the policy, its state of play of the legislative references or entity responsible, but no details about the verification and monitoring of the measures are provided. There is no description of the eligibility of the energy savings declared under the EED rules (as for the CO₂ tax with the Energy Taxation Directive or the upcoming extension of the ETS) and no real evidence detailing that there is no double counting between measures.</p>	
	Energy poverty sub-target	<p>Luxembourg indicates that the share of the population living in energy poverty is 3% in September 2022 according to national indicators.</p>	<p>Luxembourg does not acknowledge the new energy poverty sub-target in the ESO and does not quantify it with a precise number.</p>	Not updated

8. Portugal (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Portugal declares a national energy efficiency contribution in 2030 of a 35% reduction compared to the PRIMES 2007 scenario, only for primary energy consumption. This is equivalent to a target of about 20.7 Mtoe (own calculation).	Portugal fails to provide a national energy efficiency contribution in final energy. The contribution in primary energy is not in line with the EED formula's result (15.164 Mtoe) and is unchanged compared to the Portuguese 2019 integrated NECP.	Not updated
	Trajectory	Portugal provides " <i>an indicative pathway</i> " for primary energy that ends in 2021 and only indicates the declared energy efficiency objective for 2030, without precising yearly energy consumption values (see Page 46 EN version). A projection is also indicated for primary energy consumption according to the "With Existing Measure" scenario (see Page 169 EN version).	Portugal does not set a trajectory for final energy consumption by 2030. It only provides a pathway that stops in 2021 and projections for primary energy only.	Not updated

	Share of energy consumption per sector	<p>Missing.</p> <p>Portugal indicates a projection for the evolution of its energy consumption for primary energy consumption by source (see Page 170 in EN version).</p>	The share of final energy consumption per sector is however not displayed.	Insufficient
	Policies and measures	<p>The draft plan lists energy savings measures in the framework of Art.8, with regards to the Long-Term Renovation Strategy, the public sector and other policies and measures to achieve the national energy efficiency contribution. Portugal clearly indicates whether each measure was already included in the 2019 Portuguese NECP or whether it is a new measure.</p>	The measures provided lack details in their description, the funding source and entity responsible are not indicated, energy savings are not quantified, and the implementation and monitoring is not specified.	Insufficient

Energy Efficiency First principle	Use as an overarching principle in the NECP	Portugal underlines its commitment to the EE1st principle when deciding on investment projects in the energy sector, with a view of sustainability and cost-effectiveness.	The principle is not translated into concrete actions in the draft NECP and it is not used as an overarching principle to draft the plan across dimensions.	Insufficient
	Concrete measures to systemize the EE1st principle	Missing	Portugal does not specify any policies or measures to increase the application of the EE1st principle or to comply with the new obligations under Art.3. There is no responsible authority for its application identified and no consideration of the multiple benefits of energy efficiency.	Not updated
Public sector obligation	Public sector objective	Missing.	Portugal does not acknowledge the new public sector obligation.	Not updated
	Policies and measures	Portugal indicates a series of measures in the public sector, such as on public street lighting or the decarbonisation of public administration buildings.	Portugal does not connect the measures indicated to the new public sector obligation.	Not updated

Renovation of public buildings	Objective	Portugal mentions the new extended renovation obligation for public buildings. The draft plan reports the equivalent annual energy savings for the public sector buildings (page 50 EN version).	Portugal does not provide any estimation of the floor area to be renovated, but only generally refers to the amount of total primary energy savings to be achieved in 2050 with the renovation of the building stock (0.11 Mtoe). Also, Portugal does not specify whether it will use the alternative or the default approach (in the past, Portugal used the default approach).	Not updated
	Policies and measure	Portugal indicates that the Energy Efficiency Programme in Public Administration will be reviewed and extended to include local and regional public administration (measure 1.5.1).	The measure is only an indication of the upcoming review of the program, which does not provide any information on the practical steps of implementation.	Not updated
Energy Savings Obligation	Objective	Portugal mentions the increased ESO annual rates under Art.8. Furthermore, it indicates that its cumulative energy savings over the 2021-2030 period will amount to around 6,739,682 toe.	Portugal still uses the old ESO annual rate to calculate its annual end-use objective and does not adapt its previous calculations to reflect the increased objective. As there is no quantification of the measures' expected energy savings, it	Not updated

			is not possible to calculate whether the measures declared would deliver the cumulative energy savings objective.	
	Policies and measures	Portugal adds a few new measures compared to its 2019 NECP and extends some existing measures, particularly to push towards more energy-efficient buildings (including through financial and technical assistance and promoting prosumer actions).	The measures provided in the draft plan (whether new or existing) are not detailed. For most measures, Portugal only indicates the funding source and the entity responsible. There is no information on how the measures will be implemented, their impact in terms of energy savings, the legal act to establish them, or on how double counting will be avoided.	Insufficient
	Energy poverty sub-target	The draft plan refers to two indicators related to energy poverty: "beneficiaries of the Social Energy Tariff" and "inability to keep dwelling warm during winter". Portugal indicates that measures are envisaged to reduce energy poverty, in particular the "Valle Efficiency" program.	The Portuguese NECP does not acknowledge the new energy poverty sub-target in the ESO. The "Valle Efficiency" program is outdated, as it has been discontinued.	Not updated

9. Slovakia (link to plan [here](#))

Article	Description	Assessment	Grading	
Energy efficiency target	Energy efficiency contribution	The draft plan states that to comply with the 2023 EED the national energy efficiency contribution in final energy in 2030 should be set at 8.463 Mtoe (a 12% reduction compared to the PRIMES 2020 scenario). It also indicates that with the 2.5% deviation, the contribution would be in the range between 8.252 Mtoe and 8.675 Mtoe for final energy.	The draft plan mentions different possible final energy consumption levels that could be selected as the Slovakian energy efficiency contribution, without committing to one. The 8.463 Mtoe is approximately compliant with the result of the EED formula for final energy (8.461 Mtoe), without using the 2.5% flexibility. Slovakia does not provide a contribution for primary energy consumption.	Insufficient
	Trajectory	Missing.	Slovakia does not set a trajectory to achieve its energy efficiency contribution.	Not updated
	Share of energy consumption per sector	Slovakia indicates a projection for final energy consumption for each of its sectors in 2030 (expressed in percentage) with existing measures	Slovakia provides the share of final energy consumption per end-use sector, however, the data indicated is not precisely quantified.	Insufficient

		<p>compared to their energy consumption in 2020 (see Page 286 in EN version).</p>	<p>The shares provided fail to reach the range indicated by Slovakia for its final energy contribution (increasing by 5% in 2030 compared to 2020 consumption, which is already above Slovakia's range of final energy contribution, see page 286).</p> <p>Slovakia fails to provide a projection for primary energy consumption in its end-use sectors.</p>	
	Policies and measures	<p>The draft plan lists energy savings measures in the framework of Art.8 and, in another section, measures tapping into the energy efficiency potentials of gas and electricity infrastructure in order to achieve the national energy efficiency contribution. No additional measures are indicated to specifically deliver the overall energy efficiency contribution.</p>	<p>Measures generally lack details, the entity responsible for implementing them is mostly not indicated, energy savings are not precisely quantified per measure, only as a share per sector, and the implementation and monitoring are not specified.</p>	Insufficient
Energy Efficiency	Use as an overarching	<p>The draft plan refers several times to the EE1st principle, including as part</p>	<p>Slovakia does not seem to translate the principle into concrete actions in its draft NECP, it does not adequately reflect it in all</p>	Insufficient

First principle	principle in the NECP	of the strategy of the five dimensions of the Energy Union. It is also mentioned in footnotes regarding the internal market and energy security dimension.	the dimensions of the plan and it does not use it as an overarching principle.	
	Concrete measures to systemize the EE1st principle	Missing.	Slovakia does not specify any policies or measures to increase the application of the EE1st principle or to comply with the new obligations under Art.3. The authority responsible for its application is not identified and there is no consideration of the multiple benefits of energy efficiency.	Not updated
Public sector obligation	Public sector objective	Missing.	Slovakia does not acknowledge the new public sector obligation.	Not updated
	Policies and measures	Slovakia indicates a series of measures in the public sector, such as renovation of public buildings, public lighting and green procurement.	Slovakia does not directly connect these measures to the new obligation. The measures are embedded in a general description of the context of the measures, but lack a more detailed explanation, including of the expected energy savings per measure.	Not updated

Renovation of public buildings	Objective	The draft plan mentions that Slovakia will use the alternative approach to the renovation requirement. It sets an objective of 52.1 GWh/year as the equivalent annual energy savings to fulfil the 3% renovation rate of central government buildings (page 64 EN version). Furthermore, the plan indicates a “medium deep” renovation of at least 117 000m ² of the total floor area of historical and detached public buildings.	Slovakia does not acknowledge the new extended renovation obligation for public buildings. However, in line with the Governance Regulation, it indicates the equivalent annual energy savings as per alternative approach between 2021 – 2030, which was missing in Slovakia’s 2019 integrated NECP.	Not updated
	Policies and measures	Slovakia indicates a number of measures with regards to the renovation of public buildings in the framework of Art.8 in Annex II, however Annex II is not attached to the plan. Measures connected to public buildings renovation under Art.8 include e.g. investment in “medium deep” renovation, the “Quick	The measures are not connected to the extended renovation obligation for public buildings and are not described in detail (see Art.8). There is often no explanation about the implementation of the measure, the legal basis, or the entity responsible for the implementation and monitoring and verification.	Not updated

		<p><i>Fixes</i>” support program and data collection on public buildings. Furthermore, a financial measure regarding the improvement of the energy efficiency of buildings is listed.</p>		
<p>Energy Savings Obligation</p>	<p>Objective</p>	<p>Slovakia indicates different projections for the ESO annual rate according to different methodologies (depending on how it calculates its final energy consumption). For the 2023 EED, Slovakia indicates two cumulative targets of 6.137 Mtoe or 6.899 Mtoe for the period 2021-2030.</p>	<p>Slovakia provides the different requirements for the ESO according to two methodologies. It provides calculations of two ESO baselines and two cumulative objectives. The objectives indicated are in the range of the cumulative objective required by the 2023 EED. However, the yearly annual savings provided seem inconsistent with the ESO methodology. Moreover, Slovakia does not clearly commit to achieving one of the two cumulative objectives.</p> <p>In addition, as there is no direct quantification of the measures’ expected energy savings, it is not possible to calculate whether the measures would deliver the cumulative energy savings objective.</p>	<p>Insufficient</p>

	Policies and measures	Slovakia lays down a list of measures to fulfil its Art.8 objective, this includes a short general description of the context of the measures divided into different sectors and the share of energy savings per measure per sector. Measures include multi-apartment buildings/renewal, energy savings agreements, and e-mobility in road passenger transport.	The measures provided by Slovakia are not detailed. There is no explanation of how the measure will be implemented, of the outcome in terms of cumulative energy savings (and the supporting rationale), the legal act for the policy or how they comply with the EED rules with regards to double counting and eligibility. Many measures already exist in Slovakia's 2019 integrated NECP (with a different name).	Insufficient
	Energy poverty sub-target	Slovakia states that a definition of energy poverty and some specific measures are being prepared in the framework of the 2023 EED. Slovakia indicates measures to alleviate energy poverty, such as the " <i>Home Light Recover</i> " program to allow 100% funding for the renovation of single-family houses.	Slovakia does not acknowledge the new energy poverty sub-target in the ESO and therefore does not provide the quantification of the energy savings required or the target groups.	Not updated

10. Slovenia (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Slovenia reports a national energy efficiency contribution in 2030 of 4.426 Mtoe for final energy consumption and 6.026 Mtoe for primary energy consumption.	Slovenia's objective for final energy is not in line with the EED formula or with the 2.5% deviation flexibility (but it is relatively close, as the final energy objective of Slovenia must be no more than 4.394 Mtoe to comply with the deviation). Similarly, Slovenia is not in line with the result of the EED formula for primary energy consumption (5.787 Mtoe).	Insufficient
	Trajectory	Slovenia provides a detailed trajectory towards its 2030 energy efficiency objective expressed in final and primary energy, with precise yearly consumption data.	Slovenia's declared trajectory is following a decreasing trend which is progressively tightening (it is not linear, the largest drop in energy consumption is expected at the end of the period).	Compliant
	Share of energy consumption per sector	Slovenia indicates projections for the evolution of each sector's final energy consumption for 2025, 2030 and 2040 according to two different	Slovenia's projections for the residential and services sectors are not singled out but are included in a "Wide Use" sector. Slovenia also	Insufficient

		scenarios (with existing measures and with additional measures) (see Page 128 in EN version).	<p>does not provide a projection for primary energy consumption in its end-use sectors.</p> <p>In addition, Slovenia's final energy projection in 2030 according to the NECP scenario (with additional measures) does not match Slovenia's reported final energy objective in 2030 (4.555 against 4.426 Mtoe).</p>	
	Policies and measures	Missing. Slovenia mentions that it has not yet updated the Chapter III of its NECP dedicated to policies and measures.	No measure is indicated to fulfil the higher energy efficiency objective.	Not updated
Energy Efficiency First principle	Use as an overarching principle in the NECP	Slovenia mentioned as its key objective to accelerate the energy and material efficiency improvements in all sectors <i>"according to the energy efficiency first principle"</i> .	The EE1st principle is only briefly referred to, with no indication on whether it is used as an overarching principle across the draft plan.	Insufficient
	Concrete measures to	Missing.		Not updated

	systemize the EE1st principle	Slovenia mentions that it has not updated the Chapter III dedicated to policies and measures.	Slovenia does not specify any policies or measures to increase the application of the EE1st principle or to comply with the new obligations under Art.3.	
Public sector obligation	Public sector objective	Missing.	Slovenia does not acknowledge the new public sector obligation.	Not updated
	Policies and measures	Missing. Slovenia mentions that it has not yet updated the Chapter III of its NECP dedicated to policies and measures.	Slovenia does not indicate measures in the public sector that could help fulfil the public sector obligation.	Not updated
Renovation of public buildings	Objective	Missing. The renovation requirement for public buildings is not mentioned.	Slovenia does not acknowledge the new renovation obligation for public buildings or recall its previous obligation.	Not updated
	Policies and measures	Missing. Slovenia mentions that it has not yet updated the Chapter III of its NECP dedicated to policies and measures.	Slovenia does not indicate measures to fulfil the revised renovation obligation for public buildings.	Not updated
Energy Savings Obligation	Objective	Slovenia mentions the increased ESO annual rates to comply with the	The cumulative annual energy savings rate for the ESO is missing. Slovenia does not	Insufficient

		2023 EED. However, Slovenia only indicates its yearly energy savings (with a mistake for the starting date of the increased ESO rate to 1.3% which is set at 2023 and not 2024 and a mistake to increase the rate to 1.5% already in 2025 not 2026).	provide details on how the ESO baseline is set, nor the cumulative energy savings it has to achieve. As there is no description of the measures with quantified energy savings, it is not possible to calculate how much energy savings the ESO is projected to achieve.	
	Policies and measures	Slovenia mentions that it did not update its Chapter III on the envisaged policies and measures to achieve the higher energy and climate objective.	Slovenia does not indicate measures to fulfil a higher annual energy savings rate in line with the revised EED.	Not updated
	Energy poverty sub-target	The draft plan quantifies the share of households in energy poverty in a range between 4.9% to 7.2% of the population in 2022 (according to figures of its Statistical Office). Slovenia declares its intention to reduce the share of households in energy poverty in a range between 4.6 % and 3.8 % by 2030.	Slovenia does not acknowledge the new energy poverty sub-target in the ESO and therefore not the specific quantification of the energy savings required.	Not updated

11. Spain (link to plan [here](#))

Article		Description	Assessment	Grading
Energy efficiency target	Energy efficiency contribution	Spain declares a national energy efficiency contribution in 2030 of 70.2 Mtoe for final energy consumption and 96.7 Mtoe for primary energy.	Spain's contribution for final energy is not in line with the EED formula even with the 2.5% deviation flexibility (maximum of 67.02 Mtoe). Similarly, Spain is not in line with the result of the EED formula for primary energy consumption without deviation (81.782 Mtoe).	Insufficient
	Trajectory	Spain provides the planned level of final energy only through one milestone in 2025. However, it also indicates that the proposed yearly reduction of energy consumption is equivalent, from 2019 to 2030, to 1.6% for final energy and 1.9% for primary energy.	Spain provides a yearly estimate of the reduction of primary and final energy consumption in percentage, even if no precise yearly consumption information is indicated.	Compliant

	Share of energy consumption per sector	Spain indicates the evolution by 2030 of its energy consumption for its total primary energy consumption, disaggregated for all sectors and for the total final energy consumption and final energy share of the industry, residential, services and transport (see from page 409 in EN version).	<p>Spain does not provide a projection for primary energy consumption in its end-use sectors.</p> <p>In its projection for final energy, Spain omits the consumption of the agriculture sector, and the service sector is bundled with other sectors.</p> <p>In addition, the projections for Spain's total primary energy by 2030 fall short of Spain's contribution (102.178 against 96.7 Mtoe). The aggregation of the final energy consumption of all sectors falls short by 3 Mtoe to Spain's declared final energy contribution.</p>	Insufficient
	Policies and measures	Spain provides 23 measures (15 " <i>sectoral measures</i> " and 8 " <i>horizontal measures</i> " under the ESO that will have an impact on the energy efficiency objectives for the sectors of transport, industry, residential, tertiary and agriculture and fishery	The measures declared are detailed, albeit the " <i>sectoral measures</i> " are more detailed than the " <i>horizontal measures</i> " (for instance, no quantification of the expected energy savings is provided for the majority of the horizontal measures). No specific funding seems to be allocated to most of the	Compliant

		(for instance the Energy Savings Certificate Scheme, the promotion of energy performance contracting or the promotion of energy audits).	measures, making their success more difficult.	
Energy Efficiency First principle	Use as an overarching principle in the NECP	The draft plan underlines that priority must be given to energy efficiency, in line with the EE1st principle, to achieve the overall objectives of the NECP.	EE1st is not used as an overarching principle. It is only briefly referred to, with no indication of its systematic inclusion and consideration in the drafting of the updated NECP.	Insufficient
	Concrete measures to systemize the EE1st principle	Missing.	Spain does not specify any policies or measures to improve the application of the EE1st principle or to comply with the new obligations under Art.3. The authority responsible for its application is not identified and there is no consideration of the multiple benefits of energy efficiency.	Not updated
Public sector obligation	Public sector objective	Missing. Spain only acknowledges the new public sector obligation.	Spain does not provide a quantification of the baseline or the required energy consumption reduction. It remains unclear	Not updated

			whether exemptions are used and when the public sector obligation will start.	
	Policies and measures	Spain indicates a measure (2.17) under the public sector obligation which envisages the <i>"introduction in public administration of the purchase of goods, works and services with the highest energy efficiency possible"</i> (both for construction and purchase/lease of public buildings).	The measure is well explained and can have a positive impact on the reduction of consumption in the public sector. However no exact quantification of the expected amount of energy savings is provided, nor a quantified impact on the public sector obligation. It is stated that the measure has no financial needs, which might hamper its success.	Insufficient
Renovation of public buildings	Objective	Spain mentions the new increased renovation obligation for all buildings owned by public bodies. However, it provides a quantification of the floor area to be renovated for central government buildings only (300.000 m2 per year), not for the rest of the <i>"territorial administrations"</i> .	Spain does not provide a complete indication of the total floor area to be renovated under the new Art.6 objective. Furthermore, even if Spain increases the scope of the renovation objective to state, autonomous communities and local authorities, it does not refer to the required level of renovation to NZEB or ZEB level required under the new Art.6. Spain seems to be using the default approach, as for the last obligation period.	Insufficient

	Policies and measures	Spain indicates two measures (2.17 and 2.11) which envisage “ <i>the introduction in public administration of the purchase of goods, works and services with the highest energy efficiency possible</i> ” (both for construction and purchase/lease of public buildings) and energy efficiency in buildings in the tertiary sector (which also encompass public buildings). The latter foresees the extension of the renovation obligation from the central state to all public buildings and is projected to achieve 3,361 ktoe over the period 2021-2030.	The measures are well explained and can have a positive impact on the consumption of public buildings. For the first measure, no quantification of the expected savings is provided and it is not certain whether the indicated actions can be counted under the 2023 EED Art.6 rules. However, the second measure indicates a quantified impact on the renovation requirements of buildings owned by public bodies, as well as details on the implementation, bodies responsible, policy mechanisms, legislative measures and financial needs.	Compliant
Energy Savings Obligation	Objective	Spain mentions the increase of the ESO annual rates under Art.8 and indicates that its updated cumulative target from 2021 to 2030 will be of 53,593 ktoe.	Spain acknowledges the increased ESO and correctly calculates its cumulative objective. Spain also provides a detailed explanation of the setting of the ESO baseline and of the calculation of the yearly energy savings and the cumulative objective (see Annex F). With the sum of alternative measures and the	Compliant

			EEO, it is likely that Spain will overachieve its Art.8 obligation.	
	Policies and measures	Spain provides a detailed list of 23 measures for the purpose of the ESO (15 sectoral measures and 8 horizontal measures). The measures projected to generate the most energy savings relate to the Energy Savings Certificate Scheme, mobility, non-energy intensive and energy intensive industries and buildings in the residential sector. The draft plan explains that the energy savings have been calculated according to TIMES-Sinergia model and provides a detailed explanation of the model's methodology in Annex B of the plan.	The 15 sectoral measures indicated are well explained with a detailed description, an indication of the expected savings, the bodies responsible, the eligible actions, the funding instruments and the legislative measures envisaged, though it is unclear how the expected savings per measure were calculated. On the other hand, the majority of the 8 horizontal measures are not quantified in terms of energy savings, except for the Energy Savings Certificate Scheme. Most of the measures are already existing (see Page 527 in EN version). The eligibility of the policy measures is only provided for the EEOs but not for each alternative policy measure. The prohibition of double counting is underlined but no specific explanation of how the double counting of savings has been avoided is provided for each measure.	Compliant
	Energy poverty sub-target	Spain provides several indicators to identify energy poverty but without	Spain does not acknowledge the new energy poverty sub-target in the ESO and does not	Not updated

		<p>singling out a specific number (see Page 87 in EN version). Spain indicates its aim to reduce each of the four indicators identified in its 'National Strategy against Energy Poverty' by at least 25% in 2025. In addition, several measures are described as having a positive impact on energy poverty, in particular measure 4.2 ("Fight against energy poverty").</p>	<p>provide the specific quantification of the energy savings required.</p>	
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