



IMPLEMENTATION OF THE EU NDC AND NECPs

Tracing Climate Justice Action in Germany and France

The Paris Climate Agreement aims to limit global warming to below 2°C. Meeting these goals demand an urgent and ambitious transition to socially just renewable energy systems. This study focuses on evaluating the implementation of EU NDCs and NECPs in France and Germany as case studies.

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Background and objectives of the study

On December 12, 2015, 197 countries made a joint commitment to combat climate change and signed the Paris Climate Agreement. The main goal of the agreement is to limit global warming to below 2°C by the end of the century. To achieve these climate targets, the signatories to the Paris Agreement agreed to submit Nationally Determined Contributions (NDCs) to the UNFCCC, setting out national emission reduction targets, policies and measures. These have to be updated every five years, starting in 2020, with the aim of achieving more ambitious NDCs. The national targets in the NDCs must then be supported by national laws and policies.

The study was conducted as part of CIDSE's NDC Transparency Initiative. The NDC Transparency Initiative aims to compare case studies on transparency in the monitoring and evaluation of countries' NDCs and assess how they are linked to national policies and local climate action. Special attention is given to the analysis of NDCs for the expansion and diffusion of renewable energy and for supporting energy access. The previous meta-analysis by Castro & Chaianong (2023) forms the basis of the study and focuses on transparency and local climate action. The analysis covers three dimensions: transparency in the objectives of NDCs and NECPs, monitoring and evaluation of climate action, and analysis of local climate action in support of international climate targets.

EU NDC and emission levels in France and Germany

The goal of the EU NDC is to reduce greenhouse gas emissions by 55% by 2030 compared to the baseline level of CO₂ emissions in 1990. The updated EU NDC refers to existing legislation and includes clear sector targets, including measures to reduce emissions from passenger cars and to increase energy efficiency and the development of renewable energies. There is also an economy-wide target. Implementation takes place via national reports and EU legislation such as the Green Deal and Fit-for-55. The expansion of renewable energies and energy efficiency are key targets. The EU must submit a biennial report to the UNFCCC on the achievement of the NDC targets.

France recorded a 25% reduction in CO₂-equivalent emissions in 2022 compared to 1990, while Germany has reduced its emissions by 40.4% since 1990, with the energy sector accounting for the largest share, mainly through coal-fired power generation. Both countries have ratified the Paris Agreement and will update their NECPs, with Germany publishing its NECPs in November 2023 after a delay of over four months.

Implementation of the NECPs in France

The French draft of the updated NECP contains preliminary guidelines of the new SNBC 3 and PPE 3, which are in line with the European emission reduction targets (55%

reduction by 2030). However, these must be transposed into national law, whereby the binding targets of the Code de l'énergie are not in line with the European targets. The NECP provides a largely transparent overview of existing and planned strategies, targets and measures, but lacks transparent targets for the share of renewable energies and sufficient measures for energy efficiency.

The new objectives and main policies are set out in the energy and climate strategy, including the Loi de Programmation sur l'Énergie et le Climat (LPEC). Further measures are set out in the Loi climat et résilience, which is based on the recommendations of a citizens' convention.

France's fifth biennial report to the UNFCCC on monitoring the implementation of the NDC is analyzed to assess the transparency of the monitoring and assessment of the NDC. Two emission scenarios are described: AME ("with existing measures") and AMS ("with additional measures"). Emission pathways are projected, but it is pointed out that even with additional measures, the Green Deal targets may not be achieved. Information on climate policies and measures is presented in the National Communication, which describes actions in different sectors, as well as information on implementation status and estimated impacts on greenhouse gas emissions. More specific information on local projects is missing.

France monitors the implementation of its climate strategy (SNBC) using 162 indicators such as greenhouse gas emissions and context indicators. More comprehensive assessments of these strategies will be published in the fourth year of the five-year implementation period.

The Climate Transparency Report assesses France's performance in terms of emissions and climate policy. The energy sector has a low emission intensity due to nuclear energy, but the share of renewable energies in electricity generation is average. The expansion of renewable energies has been slow. France exceeded its energy efficiency targets and saved a considerable amount of energy between 2014 and 2020. Energy supply has decreased, which is a positive result. Despite these positive aspects, the report indicates that the current rate of emission reduction in France is less than what had been aimed for the targets of its NECP and the stricter targets of the European Green Deal.

In the area of local climate protection measures, two projects were described as examples: DAISEE and Gecler. The assessment was based on the analysis of these two project examples and is purely descriptive in nature. In principle, there is the possibility of state support for local projects, even if only one of the project examples is financed by state. However, both projects do not report on any implementation effects. Synergy effects are not reported, but the Gecler project emphasizes regional participation.

Implementation of the NECPs in Germany

The German draft of the updated NECPs largely refers to existing laws, strategies and targets. There is a lack of adequate strategies for meeting the energy efficiency targets. There was also a lack of early opportunities for the participation of civil society and stakeholder groups.

The most important national climate law is the Federal Climate Protection Act, which sets national targets for reducing CO₂ emissions in line with international commitments. Germany is aiming for climate neutrality by 2045 and a 65 % reduction in emissions by 2030. The climate protection program is the long-term climate strategy. It comprises sector-related measures and targets and refers to the EU NDC. The Climate Action Program 2023 is a current update that aims to reduce the projected ambition gap between the 2030 target and the projected emissions trajectory. The Renewable Energy Sources Act is highlighted as the fundamental law regulating the expansion of renewable energies in Germany. It mentions the goal of increasing the share of renewable energies to 80 % by 2030. The Energy Efficiency Act is discussed as a means of reducing final energy consumption in the EU in line with EU targets.

Germany's fifth biennial report to the UNFCCC on monitoring the implementation of the NDC contains detailed information on the greenhouse gas inventory, which follows the IPCC guidelines, as well as assessments of individual measures.

In order to monitor compliance with the Federal Climate Protection Act, the German government publishes two reports: on the monitoring of emissions data and forecast reports for future-oriented assessment. In addition, the implementation of the climate protection programs is evaluated. The reports are generally standardized. The German Advisory Council on the Environment evaluates the government's climate policy. The independent advisory board monitors compliance with the Federal Climate Protection Act and the effectiveness of climate protection programs.

In the area of local climate protection measures, two projects are cited as examples: Energy Caravan and Citizen Energy. The evaluation is based on an analysis of these two project examples and is purely descriptive in nature. Governmental support is available, but is not claimed by either project. In contrast, both initiatives set targets for reducing greenhouse gas emissions. However, there is a lack of detailed information on actual reductions. Participation in the projects is voluntary. Information on the continuity of the advisory process is incomplete.

Conclusions

The study examines the transparency, implementation and relevance of NDCs in the EU with a focus on the NECPs in France and Germany. The EU NDC targets are partially transparent, but sectoral targets are missing. It is

questionable whether the limit below 2°C (1.5°C) can be achieved with implementation via the European Green Deal and the Fit-for-55 package. France and Germany have established energy and climate policies, but are working on adjustments to new European targets.

Monitoring reports from France and Germany are comprehensive. Local climate protection measures show low relevance for NECPs. Germany is improving energy efficiency, but there is still a need for ambition. France is also aiming for international climate targets, but there are concerns about sufficient measures to reduce emissions and the transition to renewable energies.

Recommendations and conclusions:

- Strengthen the ambition to expand renewable energies and supplement the NECPs with additional energy efficiency measures in order to achieve the European and national climate targets.
- The comprehensive monitoring reports are rated positively as they are comprehensive and are evaluated by

expert committees. However, the impact of climate protection projects should be presented in future monitoring reports.

- The NECPs are not very relevant for the implementation of local projects. Although there is governmental support, this is not linked to the NECPs.
- The NECP draft does not contain any ambitious measures for Germany, only existing measures are presented. Furthermore, the prescribed public consultation process is missing, which represents a major lack of transparency and urgently needs to be rectified in the upcoming consultation processes.
- France has a comprehensive monitoring report with information on the implementation of the SNBC in terms of emissions reduction. However, there are concerns about the accessibility of measures to achieve these emission reduction targets and the transition to renewable energies.

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CIDSE is an international family of Catholic social justice organisations from Europe and North America working together for global justice.

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