

Ditte Juul-Jørgensen  
Director General for Energy  
European Commission DG ENER

Kurt Vandenberghe  
Director General for Climate  
European Commission DG CLIMA

Brussels, 12 June 2024

**Subject: updating long-term strategies and issuing guidance for Member States**

Dear Ms Juul-Jørgensen and Mr Vandenberghe,

We as signatory organisations to this letter ask you to invite and encourage Member States to update their national long-term strategies, and to provide guidance to them on how best to do so. We also ask you to prepare an update to the EU's own Long Term Strategy, for submission to the UNFCCC.

**1. Updating long-term strategies is necessary for the EU to be consistent with its long-term objectives**

National Long Term Strategies (nLTSs) have in many cases been overlooked or not prioritised. They are mostly also lacking key information and were prepared with inadequate public engagement<sup>1</sup>. This is deeply concerning, as they are critical to enabling countries, regions, economic sectors and businesses to plan ahead, improve competitiveness, avoid wasting money on stranded assets, and ensure a just transition for all citizens in the EU.

According to Article 15 of the Regulation on the Governance of the Energy Union and Climate Action, "*Member States should, where necessary, update [their national long-term strategies] every five years*". As signatories to this letter, we believe there are compelling reasons for Member States and the EU as whole to update such strategies, namely:

- The world has changed dramatically since the Governance Regulation entered into force and the first long-term strategies were submitted - both in terms of the external context and in term of EU climate and energy targets: ongoing fossil-fueled energy crisis, COVID-19 crisis, cost of living crisis, accumulation of scientific evidence on the need to act swiftly to prevent dangerous climate change...
- In parallel, the EU climate and energy regulatory framework has thoroughly changed as well, as a consequence of the adoption of the EU Climate Law, its introduction of a binding long-term climate-neutrality objective for the EU, as well as the Fit for 55 and REPowerEU packages. The current group of submitted long-term strategies is therefore

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<sup>1</sup> See Charting a Path to Net Zero: an assessment of national long-term strategies in the EU ([Ecologic, 2022](#))

outdated, not least because nLTSs are required to be consistent with the EU's climate-neutrality objective set out in the Climate Law, according to Article 15.1 of the Governance Regulation;

- Waiting until 2029 for Member States to update their nLTSs is high risk, and the exhortation in the Governance Regulation that Member States update those strategies every five years “where necessary” is now clearly applicable;
- National Energy and Climate Plans (NECPs) are legally required to be consistent with nLTSs, which given the major recent updates to NECPs is unlikely now to be the case, making one or both potentially vulnerable to challenge;
- The EU and its Member States need to continue to demonstrate leadership at international level, including by responding to the invitation to UNFCCC parties at COP28 to update their long-term low greenhouse gas development strategies (something Member States themselves called for<sup>2</sup>).

Therefore, we as signatory organisations to this letter ask you **to invite and encourage Member States to update their national long-term strategies in 2025**, as set out in the Governance Regulation, **while respecting the principle of non-regression**. We also ask you to **prepare an update to the EU's own LTS**, for submission to the UNFCCC. Besides making good on the commitments given at the COP, this would also provide invaluable support to Member States in updating their own long term strategies and to industry sectors planning pathways to a competitive and low carbon future.

## **2. Issuing guidance for Member States to support them in preparing robust nLTSs**

EU Member States are currently in the process of updating their NECPs, based on the constructive guidance and recommendations provided by your services. On 15th December 2022, the European Commission's Directorate General for Energy published a Commission Notice on the Guidance to Member States for the update of the 2021-2030 national energy and climate plans (NECPs). This document, published ahead of the submission of the draft updated NECPs, laid down principles and good practices for updating NECPs, and highlighted the new political context and higher ambition of the EU that needed to be taken into account when updating those plans. **This provision of guidance for the update of NECPs is a good practice *per se* and it would be relevant to issue guidance for the update of national long-term strategies as well.**

Therefore, we as signatory organisations to this letter ask you **to provide Member States with guidance on how best to update their national LTS**. This guidance should be comprehensive enough to ensure that national long-term strategies are updated and fit for purpose, and can effectively guide the implementation of the EU Green Deal and the achievement of the EU-wide climate-neutrality objective, as well as the updated 2030 climate target and the upcoming 2040

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<sup>2</sup> See Council conclusions on Climate and Energy Diplomacy: <https://www.consilium.europa.eu/media/62942/st07248-en23.pdf>

climate target.<sup>3</sup> We attach in annex some suggestions on what we believe it would be useful for you to include in such guidance, and what other steps would be helpful, based on our experience of seeing how the existing rules have been implemented by Member States to date.

We would be very happy to discuss the above suggestions with you and your services, and to provide any further information that you might find helpful in this regard,

Yours sincerely,

Ester Asin, Director, WWF European Policy Office

Akos Eger, Executive President, National Society of Conservationists - Friends of the Earth Hungary / MTVSZ

Aleksander Śniegocki, CEO, Reform Institute, Poland

András Lukács, President, Clean Air Action Group

Ariel Brunner, Regional Director, Birdlife Europe and Central Asia

Aurélie Beauvais, Managing Director, Euroheat & Power

Chiara Martinelli, Director, Climate Action Network (CAN) Europe

Ciara Brennan, Director, Environmental Justice Network Ireland

Dörte Fouquet, Director, European Renewable Energies Federation (EREF)

Francisco Ferreira, President, ZERO - Associação Sistema Terrestre Sustentável (Portugal)

Greg Arrowsmith, Secretary General of EUREC, The Association of European Renewable Energy Research Centres

Jürgen Resch, CEO, Deutsche Umwelthilfe

Koulla Michael, Executive Director, Terra Cypria - The Cyprus Conservation Foundation

Markus Raschke, CEO, Protect the Planet Germany

Miljenka Kuhar, Executive Director, Society for sustainable development design / Društvo za oblikovanje održivog razvoja DOOR

Patrick Ten Brink, Secretary General, European Environmental Bureau

Peter Sweatman, CEO, Climate Strategy & Partners

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Valérie Séjourné, Managing Director, Solar Heat Europe

Wojciech Szymalski, CEO, Institute for Sustainable Development Foundation, Poland

Živa Kavka Gobbo, Chair, Focus Association for Sustainable Development / Focus, društvo za sonaraven razvoj

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<sup>3</sup> The position of WWF, CAN Europe and many other NGOs is that the EU should aim to reach net zero emissions by 2040, and increase the 2030 target to a cut of 65% gross emissions.

## Annex

In any Commission guidance document for the update of national long-term strategies, we suggest that particular attention needs to be applied to the following requirements:

1. **A national greenhouse gas emission reduction target for 2030 and beyond**, with indicative milestones for 2040 and 2050 and, separately, a target for the enhancement of net removals in the LULUCF sector, which together are consistent with the EU-wide climate-neutrality objective and the 1.5°C temperature objective of the Paris Agreement;
2. **A breakdown by sector** of greenhouse gas emissions reductions and removals;
3. **An increase of the estimated likely share of renewable energy in final energy consumption by 2040 and 2050**, and the associated infrastructure required, consistent with RED III and the REPowerEU plan;
4. **An update of the estimated likely energy consumption by 2040 and 2050**, consistent with the updated Energy Efficiency Directive;
5. **All updated planned policies and measures** for these increased targets described above, as well as updated adaptation policies and measures taking into account the best available science;
6. **Updated estimates of all investment needed** for achievement of the targets and the planned policies and measures described above<sup>4</sup>; including
7. **An updated impact assessment of the socio-economic aspects of the increased targets and updated planned policies and measures to address these impacts.** This means a meaningful and comprehensive impact assessment, covering employment, skills and social protection aspects and addressing fair transition<sup>5</sup>, with corresponding strategies and investments (including identification of resources).

Other steps that it would be helpful for the Commission to take could include organising a discussion of LTSs with Member States, creating a forum or process for Member States to share experiences, and providing support, for example in the form of common data sources.

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<sup>4</sup> This includes assessments for strategic clean technologies. To facilitate these estimates and address the current public funding gap for R&D in cleantech, an improved governance framework should ensure that the Strategic Energy Technology (SET) Plan can issue recommendations to EU Member States on how to structure non-price criteria in their renewable energy auctions in line with Article 26 of the Net Zero Industry Act. For reference, see EUREC's work on Research, Innovation & Competitiveness in NECPs: [Critique of Draft NECPs 2023 coverage of Research, Innovation & Competitiveness for ten Member States - EUREC](#).

<sup>5</sup> [Council Recommendations of 16 June 2022](#) on ensuring a fair transition towards climate neutrality