

Strengthen what works: renewable energy, investment certainty and delivery in the post-2030 governance framework

EREF input to the public consultation on the Governance Regulation revision

Brussels, 18 March 2026

EREF welcomes the opportunity to provide input on the revision of the Governance Regulation. The revision is the crucial foundation for the 2040 EU energy and climate architecture. While framed as a governance and simplification exercise, it will in practice determine whether the EU's 2040 climate objective translates into a credible delivery framework and stable, predictable investment signals.

The Commission's own assessment reinforces this urgency. Even assuming full implementation of current plans, a 1.5 percentage point gap remains towards the binding 42.5% renewable energy target for 2030 (with a further 2.5 percentage points needed to reach the 45% indicative aspiration) – and only if existing plans are actually delivered in full. Annual investments of around €695 billion will be required between 2031 and 2040 to stay on track.¹

Any simplification should strengthen implementation, transparency and enforceability. It must not dilute accountability or weaken the investment certainty required to deploy very high renewable energy shares and achieve Europe's energy transition.

This is particularly important in a context where pressure is growing to reframe the post-2030 architecture under broad "clean" or "low-carbon" banners. Where renewables are no longer clearly distinguished as the primary delivery option, the credibility of fossil phase-out, system integration and timely delivery is undermined. This would also delay the necessary strengthening of supply security, slowing Europe's efforts to reduce import dependence and improve competitiveness.

A credible post-2030 architecture needs a clear renewable energy anchor

The climate target alone does not provide investment certainty or system guidance. It must be operationalised through renewable energy targets and governance that are clear, measurable and enforceable.

To reach Europe's 2040 climate goal of 90% GHG reduction, EREF underlines that a dedicated renewable energy target remains indispensable as the central energy anchor. The governance framework should preserve a binding renewables target expressed as a share of gross final energy consumption – the only metric providing cross-sector clarity across electricity, heating and cooling, transport and industry alike.

¹ European Commission, State of the Energy Union Report 2025, COM(2025) 667 final.

This ensures coverage of the full range of renewable technologies – including wind, solar, hydropower, bioenergy, geothermal and ocean energy – each contributing to delivering high renewable shares across all sectors and end-uses.

Energy efficiency must remain a core pillar of this architecture. It reduces overall system pressure, limits grid reinforcement needs and supports lower energy bills. The Governance Regulation should therefore reinforce efficiency in planning and delivery, alongside the renewables anchor.

Electrification is an important enabler but cannot replace a renewables target. Electrification on its own does not guarantee GHG reduction or defossilisation, since it can be achieved with fossil-based or nuclear electricity. It should be embedded under a renewables-based trajectory and complemented by energy efficiency, grid investment, storage and non-fossil flexibility.

Governance as delivery, not deregulation

Implementation gaps under the existing 2030 framework remain significant. Almost all Member States have been subject to infringement procedures related to incomplete or delayed transposition of the Renewable Energy Directive.² Europe's competitiveness challenge lies in weak implementation, slow roll-out of enabling infrastructure and insufficient accountability; not in excessive EU-level ambition.

Given the lack of binding national targets, NECPs are currently the Commission's most effective coordination and enforcement tool. The revised Regulation should strengthen NECPs as delivery and investment instruments, including by requiring Member States to:

- prioritise the timely delivery of renewable energy projects and enabling infrastructure, including grids, storage, flexibility solutions and heat networks;
- identify implementation bottlenecks and set out concrete measures, responsible authorities and timelines to address them;
- provide more credible investment planning, including clearer identification of investment needs and pathways to mobilise private capital;
- ensure coherence between NECPs and core planning and implementation frameworks, notably TYNDPs, EU infrastructure planning, the European Semester and relevant EU funding instruments, to reduce fragmentation and increase deliverability.

² European Commission, "Commission takes action to ensure complete and timely transposition of EU directives – key decisions in the energy sector", Press Release, 24 July 2025.

Where longer time horizons up to 2050 are considered, they should improve long-term investor visibility whilst preserving interim accountability, interim targets and the established NECP rhythm.

It is equally important that the internal energy market functions in a way that ensures fair market access and cost-reflective pricing for all stakeholders. An increasing range of policy-related charges is being added to electricity prices that would historically have been financed through general budgets. This disproportionate loading of costs onto energy bills distorts price signals, undermines consumer acceptance of the transition and weakens incentives for electrification and demand-side participation. A credible governance framework should therefore safeguard fair cost allocation, transparent pricing and non-discriminatory access across the Union.

Accountability and enforcement must close the delivery gap

To ensure collective achievement of EU objectives, the revised Governance Regulation should strengthen compliance through clearer obligations, improved monitoring and a stronger Commission toolbox. Simplification should focus on practical measures such as clearer templates, digitised reporting and data reuse, whilst preserving strong oversight and enforcement. Simplification must not become reduced scrutiny.

EREF particularly underlines the need for:

- stronger reporting obligations and improved data quality, precision and comparability across Member States;
- earlier and more effective Commission review of both ambition and implementation, enabling intervention where progress is insufficient;
- a reinforced corrective-action framework building on existing gap-filling mechanisms, with faster follow-up and clearer consequences;
- credible enforcement pathways, including infringement and penalty mechanisms where necessary, to ensure compliance and provide investment certainty;
- stronger transparency and tracking of the phase-out of fossil fuels and fossil fuel subsidies, as a core condition for a level playing field and a credible transition.

Investment certainty depends on credible national planning

A stable and predictable investment environment after 2030 depends primarily on the clarity, credibility and enforceability of national planning. The scale of capital mobilisation required – around €695 billion annually between 2031 and 2040 – cannot

be achieved without governance frameworks that provide genuine long-term bankability for renewable energy investments.

The Governance Regulation should therefore strengthen NECPs as investment-enabling roadmaps through more granular and comparable information on investment needs, infrastructure requirements and financing pathways; concrete measures to engage investors and financial institutions; clearer and digitised templates enabling comparability across Member States; and stronger coherence between NECPs and EU-level planning and funding instruments, including TYNDPs, the European Semester and the next MFF.

KPIs can effectively support delivery monitoring where they are clearly linked to implementation bottlenecks and system enablers. However, they must remain complementary and must not replace binding targets and enforceable obligations.

Avoiding dilution through “clean energy” or “low-carbon” reframing

EREF cautions strongly against approaches that replace renewables-specific targets with vague “clean energy” or “low-carbon” framing. Such an architecture would dilute renewables-specific investment signals and increase uncertainty for renewable project developers, including independent producers, SMEs and energy communities.

A “clean energy” framing also risks channelling political and financial focus towards slower-to-deliver, capital-intensive options, weakening delivery discipline for 2040. Renewables must be clearly distinguished from broader categories. Complementary metrics can be useful only where they reinforce – and do not blur – a renewables-based trajectory and credible fossil phase-out.

System enablers: grids, storage and non-fossil flexibility

Planning and reporting should more explicitly integrate grid readiness, storage and demand-side flexibility into national delivery pathways, so that renewable deployment is feasible in practice and not delayed by avoidable system bottlenecks. Strengthening the link to internal market rules and non-fossil flexibility resources supports security of supply and resilience, and makes a high-renewables system deliverable at scale.

The full range of renewable technologies – wind, solar, hydropower, bioenergy, geothermal and ocean energy – must be recognised as integral to this system. Their complementarity and, in the case of hydropower and bioenergy, dispatchability, create synergies essential to system flexibility and security of supply

Conclusion

The revision of the Governance Regulation should translate the EU's post-2030 objectives into a clear and enforceable delivery framework, with renewable energy at its core. This requires maintaining a binding renewable energy share target, keeping energy efficiency as a core pillar, and treating electrification and other indicators as supporting enablers within a renewables-based trajectory.

A stronger focus on implementation, accountability and enforcement is the most cost-effective way to deliver Europe's energy transition, strengthen competitiveness and ensure energy security. A governance framework that is stable, transparent and enforceable reduces investment risk, crowds in private capital and accelerates delivery – making Europe's 2040 ambition both credible and bankable.

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Update of the Governance of the Energy Union and Climate Action

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Introduction

As announced in the Action plan for affordable energy, the European Commission plans to present a proposal to simplify, strengthen and modernise the **Regulation on the Governance of the Energy Union and Climate Action** (Governance Regulation) adopted in December 2018. This proposal aims to help the EU prepare an enabling energy and climate policy framework for the decade ahead and to support its efforts to achieve the long-term objectives of the Paris Agreement. The revision will support reaching the target to reduce net greenhouse gas emission by 90% in 2040 compared to 1990 proposed by the Commission in the European Climate Law amendment[1]. In November 2025, the Council and the European Parliament agreed their negotiating positions on the proposed amendment. Both co-legislators support a legally binding 2040 target of net 90% emission reductions with up to 5% of international credits. Ongoing initiatives, such as the review of the EU Emissions Trading System (EU ETS1) and the Market Stability Reserve (MSR), the revision of national targets and flexibilities in the EU climate policy framework, the development of the European integrated framework for climate resilience, and specific energy policy initiatives and other enabling instruments, are also part of this process.

The Governance Regulation sets out the rules for **planning, reporting and monitoring** on the Energy Union and Climate Action. It supports strategic medium- and long-term energy and climate planning through integrated national energy and climate plans (NECPs) and long-term strategies (LTSs). It provides a framework for Member States to report on their progress towards meeting the 2030 and long-term energy and climate objectives and targets to the Commission and the United Nations Framework Convention on Climate Change (UNFCCC). It also enables the Commission to assess and monitor the progress made by the EU and by Member States, and to take measures in cases where the level of ambition or progress is insufficient.

In September 2024, the Commission published the report on the review of the Governance Regulation (https://energy.ec.europa.eu/publications/report-functioning-governance-regulation_en). The report evaluated how the Regulation has functioned since its entry into force in 2018. The report finds that the Regulation has made energy and climate planning and reporting more coherent, integrated, and simpler. It also highlighted that the Regulation added value in a quickly evolving context, including increasingly ambitious and cross-cutting energy and climate policies and legislation, the COVID-19 pandemic and the energy crisis triggered by Russia's war of aggression against Ukraine. The Regulation played an important role in the EU more efficiently closing in on its energy and climate objectives and targets for 2030 and beyond. At the same time, the review highlighted areas for further improvement[2].

Building on the review, and political priorities for 2024-2029, the Commission will assess several options to revise the Governance Regulation with a view to developing the framework needed for a true Energy Union and to deliver on the EU's climate and energy objectives in a simple and flexible manner.

In this context, the Commission is launching a public consultation to gather views from all interested parties. This is done based on a questionnaire consisting of two parts:

Part 1 collects some information about you.

Part 2 focuses on several possible policy options to revise the Governance Regulation, notably:

1. Reviewing the scope of the Governance Regulation
2. Addressing the evolution of the post-2030 policy framework
3. Making energy and climate investments happen
4. Contributing to a more resilient energy system
5. Streamlining the Governance framework
6. Strengthening cooperation between and within Member States
7. Improving public consultation and multilevel governance

You can save your replies as a draft and finish them later. Apart from some mandatory questions, you can answer questions on the sections which are relevant to you. When answering questions with a free text box for additional comments please be concise. At the end of the questionnaire, you can also upload a document with further comments and views, as appropriate.

[1] See Commission proposal of July 2nd, 2025, to amend the European Climate Law.

[2] The main conclusions of the review can be accessed here: [Governance of the Energy Union and Climate Action - European Commission](#)

About you

*Language of my contribution

English

*I am giving my contribution as

Business association

*First name

Robert Max

*Surname

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DO you represent an organisation?

- Yes
 No

*Organisation name

255 character(s) maximum

European Renewable Energies Federation (EREF)

Is the organisation's main headquarter within the EU?

- Yes
 No

*Organisation size

Micro (1 to 9 employees)

In which sector do you / your members operate?

Please select all that apply and describe in a few words the nature of your activities.

- Public sector/government – National level
 Public sector/government – Regional level
 Public sector/government – sub-regional level
 Financial and insurance sector
 Research and education
 Social economy
 Construction/Buildings

Energy Sector

- Producer of energy
 Transmission system operator or distribution system operator (TSO/DSO)
 Power Exchange/Market Operator
 Energy trader
 Retailer
 Regulator
 Energy Service Company
 Data centre or Information and Communication Technology processing company
 Manufacturer of clean technologies

Energy Intensive Industry

- Steel
 Non-ferrous metals
 Cement
 Chemicals and chemical-based fertilizers
 Glass and ceramics
 Paper
 Production of hydrogen, production of gasses including low carbon, biomethane, biogases
 Other

Transport

- Aviation
 Maritime
 Road transport
 Rail

Waste management, including incineration:

- Technology provider or manufacturer for waste management
- Company of mission of public service

Land use/bioeconomy

- Agriculture value-chain
- Forestry value-chain

If other, please specify.

500 character(s) maximum

Please provide a short description of your activities in the above-mentioned sectors:

500 character(s) maximum

EREF is the federation of national renewable energy associations, representing all renewable energy technologies. Ever since its foundation over twenty-five years ago, EREF acts as information hub on renewable energy policies and developments between EU and national levels informing about the feasibility and advantages of a European energy system based only on renewable energy.

If you are a civil society organisation or a public administration, please indicate your main area of focus or your area of competence.

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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*Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

Belgium

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions (<https://ec.europa.eu/info/law/better-regulation/specific-privacy-statement>)

How many years of experience do you have dealing with the Governance Regulation?

- Less than 1 year
- 1-5 years
- More than 5 years

How familiar are you with the overall objectives and mechanisms of the Governance Regulation?

- To a very large extent
- To a large extent
- To some extent
- To a small extent
- Not at all
- Do not know

Part 2: Options to revise the Regulation

1. Reviewing the scope of the Governance Regulation

The Commission's review found that the Regulation, in addition to aiming to achieve the EU's 2030 energy and climate targets and setting the adequate framework to achieve the objectives of the next decade, could potentially do more to help pursue a set of broader objectives. This includes accelerating the transition to climate neutrality, factoring in competitiveness, energy security and energy resilience, the need for strategic independence and tackling challenges across the supply chains for clean and net zero technologies and the infrastructure needed to deploy them. Also, it shed light on the potential for incentivising the phase-out of fossil fuels and fossil fuel subsidies, tackling energy poverty and just transition concerns, factoring in skills and jobs aspects, and putting more emphasis on climate resilience and adaptation considerations. The review concluded that there is also scope to enhance coherence and synergies with other policy areas, including on environment, agriculture, transport, industry, circular economy and macro-economic policy.

Q1: Which of the following areas should the Governance Regulation focus on more to best support a secure, independent, competitive and decarbonised energy system as well as a climate neutral and resilient EU by 2050?

	Very Important	Important	Moderately Important	Slightly Important	Not important	Don't know
Sectoral transition pathways (energy supply, industry, transport, buildings, agriculture, land/bioeconomy, waste)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coherence and synergies with other policy areas	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competitiveness, investment, innovation and clean tech supply chains and dependencies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Just transition, social impacts, affordability, skills and jobs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy security, including supply diversification away from fossil fuels, energy system flexibility and resilience	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Phasing out fossil fuels and fossil fuel subsidies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Climate resilience, including water resilience	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Circular economy and material footprint	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Early and effective engagement of all administrative levels (local, regional) in the design, adoption and implementation of energy and climate policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No change - The current Regulation focuses on the most relevant areas	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Application of the energy efficiency first principle.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

How concretely should the policy aspects listed above be better reflected in the Governance Regulation?
2,000 character(s) maximum

The revised Governance Regulation should translate the EU energy and climate objectives into a clear and implementable delivery framework, with renewable energy at its core. This requires maintaining a strong and explicit focus on renewable energy deployment across all sectors, supported by a coherent framework for phasing out fossil fuels and fossil fuel subsidies. Given the slow progress towards the 2030 renewable energy target, the emphasis should shift decisively towards implementation and ensuring accountability.

Concretely, the Regulation should require Member States to prioritise the timely delivery of renewable energy projects and enabling infrastructure, including storage, flexibility solutions and grids. NECPs should clearly identify implementation bottlenecks and set out concrete measures and timelines to address them. Investment planning should be closely linked to these measures to ensure that renewable deployment is deliverable in practice.

To ensure credibility and accountability, the Governance Regulation should strengthen reporting obligations and improve the quality, precision and comparability of data submitted by Member States. This should be accompanied by a more robust review framework, enabling the Commission to assess both ambition and implementation, to intervene earlier where progress is insufficient, and to require corrective action. Effective enforcement and, where necessary, infringement and penalty mechanisms are essential to ensure compliance and to provide investment certainty.

Any simplification effort should therefore focus on streamlining procedures and improving clarity and transparency, while preserving strong oversight and enforcement, rather than reducing the scope or ambition of the governance framework.

Are there additional or existing aspects/areas, besides those listed above, that should be better reflected in or excluded from the Governance Regulation and how?

500 character(s) maximum

The revision should explicitly avoid vague "clean energy" or "low-carbon" reframing that dilutes renewables-specific investment signals. The Regulation should better reflect non-fossil flexibility (demand response, storage, flexible renewable energy sources) and grid readiness as system enablers, and strengthen provisions on fossil fuel subsidy transparency and phase-out tracking.

No key accountability elements should be removed under "simplification".

2. Evolution of the post-2030 energy and climate policy framework

The 2024 review highlights that the Governance Regulation should continue to support the EU in meeting its energy and climate policy objectives beyond 2030. The Regulation should serve as a foundation for shaping and implementing energy and climate policies consistent with the Union's 2040 ambition and its commitments under the Paris Agreement. Its governance mechanisms should support Member States in ensuring the 2040 ambition is achieved in a simple and cost-effective manner and should drive and accelerate the transition to climate neutrality by 2050.

To fulfil this role, the Regulation, while maintaining the framework for 2030, could evolve along three key

areas for the post-2030 framework: (1) the overall governance architecture, to reflect the transformation of Europe's energy system, capturing dimensions such as competitiveness, resilience, just transition, affordability and security of supply; (2) the structure of post-2030 energy targets striking the right balance between continuity and adaptation, while providing investment certainty and predictability taking into account Member States specificities, as well as offering flexibility in how they contribute to the collective ambition; (3) delivery and compliance mechanisms that secure collective achievement of post-2030 objectives while driving sufficient progress toward climate neutrality by 2050.

Member States post-2030 targets and efforts should reflect cost-efficiency and solidarity, taking into account different national circumstances and specificities, including those of islands and outermost region

Q2: As the EU's energy system continues its transformation, becoming more integrated, resilient and decarbonised, how should the overall energy and climate policy framework guide this change and track progress, while reflecting aspects such as flexibility, affordability, competitiveness, innovation, interconnectivity and security of supply?

Overall Governance Architecture

- Option 1:** Continue with the current architecture, aligned with objectives across the five Energy Union dimensions (Energy union - European Commission ([https://ec.europa.eu/eusurvey/Energy union - European Commission](https://ec.europa.eu/eusurvey/Energy%20union%20-%20European%20Commission))).
- Option 2:** Shift the architecture's focus from Energy Union-dimensions to economic sectors (e.g. buildings; transport; industry; agriculture, land/bioeconomy, waste, and power generation, etc..).
- Option 3:** Maintain the current architecture based on the five Energy Union dimensions (Option 1) and complement it with a set of quantitative and/or qualitative key performance indicators (KPIs) monitoring performance, such as: Competitiveness (e.g. economic value added of energy consumption); Affordability and security of supply (e.g. electrification, energy system flexibility, robust infrastructure and climate resilience, domestic manufacturing capacity of clean energy technologies, interconnectivity); Decarbonisation (e.g. fossil fuel phase out).
- Option 4:** Adopt a sector-based architecture (Option 2) and complement it with the same type of quantitative and/or qualitative KPIs as described under Option 3.

What other option, or combination of options, if any, should be considered?

2,000 character(s) maximum

The current governance architecture based on the five Energy Union dimensions should be maintained as the primary framework (Option 1). It provides continuity, legal certainty and a stable reference for national planning and investment decisions with a strong European perspective, which is particularly important in the transition to the post-2030 period.

Where useful, this architecture could be complemented by a targeted set of key performance indicators, as foreseen under Option 3, provided that these indicators clearly support implementation and do not create parallel structures. Such indicators should focus on system-relevant aspects that are not fully captured by existing targets, for example, grid readiness, non-fossil flexibility, affordability and security of supply, and should remain closely linked to existing obligations under EU energy and climate law.

Any use of indicators should be strictly supplementary. They must not replace, dilute or blur binding targets, nor introduce counterproductive burdens. The priority should remain on clarity, comparability and enforceability.

From an EREF perspective, a key feature of a credible post-2030 framework is the implementation and enforcement of the Governance Regulation. Strengthening delivery mechanisms, improving the quality and credibility of NECPs, and enhancing the Commission's ability to assess progress and require corrective action are more urgent than structural redesign. The focus should therefore remain on making the existing framework work effectively, rather than reopening its foundations.

Overall post-2030 energy targets structure

[Please rank the options from 1 to 5, where 1 is the most important and 5 the least important]

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ **Option 1:** Continue with the current structure of binding EU targets for renewables and energy efficiency, supported by national contributions guided by formulas (Based on the formulas for Member States contributions on renewable energy and energy efficiency under the current governance framework).

⋮ **Option 2:** Keep a similar structure with binding EU targets as in option 1 while allowing for flexibilities that reflect Member's states' specificities.

⋮ **Option 5:** Option 1, 2, 3 or 4 complemented/combined with monitoring KPIs for key energy system components (e.g. electrification, waste heat reduction or re-use), while ensuring transparency and comparability.

⋮ **Option 4:** Define a single, overarching electrification target for the EU, with embedded minimum thresholds for key parameters (e.g. renewable energy, energy efficiency)

⋮ **Option 3:** Define a single, overarching clean energy target for the EU, with embedded minimum thresholds for key energy parameters (e.g. renewable energy, energy efficiency).

What other option, or combination of options, if any, should be considered?

500 character(s) maximum

Option 1 is clearly preferable, as a binding EU renewable energy target (expressed as a share of gross final energy consumption) is the only structure providing cross-sector investment certainty.

Single electrification or “clean energy” targets are clearly rejected as unreliable basis for bankable renewable deployment.

Limited flexibilities (Option 2) may be considered only if preserving comparability and enforceability.

Monitoring KPIs (Option 5) may be useful as a supplement.

Q3: In your view, how can the Governance Regulation most effectively ensure compliance with post-2030 energy and climate objectives and drive sufficient progress toward climate neutrality by 2050 and the goals of the Paris agreement?

[Please rank the options from 1 to 7, where 1 is the most important and 7 the least important]

Use drag&drop or the up/down buttons to change the order or accept the initial order.

⋮ **Legally binding national objectives:** Legally binding energy sector targets at Member State level to reach the energy and climate Union objectives.

⋮ **Accountability mechanisms and enforcement:** Enhance accountability mechanisms to address any gaps in delivery by strengthening the connection between i) progress on the objectives and KPIs in the Regulation and ii) access to EU-level support tools.

⋮ **Improve the monitoring, reporting and verification system, in particular on projections:** better assess the effectiveness of climate and energy policies and maintain accountability and transparency.

⋮ **Proactive toolbox:** Create a toolbox of delivery measures, including the allocation of EU funding, the European Semester and technical assistance, which can be activated at EU or Member State level if progress is insufficient.

⋮ **Capacity building:** Promote knowledge-sharing, expertise, and good practices to foster the development and implementation of climate and energy policies and projects, foster access to independent technical and financial advice.

⋮ **Cooperation between Member States and the private sector:** Enhance cooperation between national administrations, economic sectors, and relevant financial institutions in the formulation of national policies and energy and climate investment planning.

⋮ **Investment plans:** Strengthen the role of NECPs to include robust and up-to-date investment roadmaps. These roadmaps should clearly define investment needs and corresponding funding sources, linking key Policies and Measures (PaMs)/ reforms to financing instruments and plan in a coherent manner the related infrastructure needs.

What other option, or combination of options, if any, should be considered? In particular, what kind of enforcement tools can be deployed to ensure Member States accountability?

2,500 character(s) maximum

Ensuring compliance with post-2030 energy and climate objectives requires a significantly stronger focus on accountability and enforcement. The absence of binding national energy targets has proven to be a key weakness of the current framework and should be addressed. Binding national targets, or clearly enforceable national contributions, are essential to ensure collective delivery of EU-level targets.

This must be complemented by a reinforced system for monitoring, reporting and verification, including more robust and transparent projections, to allow early identification of delivery gaps. Reporting should focus on implementation and effectiveness of policies and measures, not only on formal compliance.

The Governance Regulation should also strengthen the Commission's enforcement toolbox. This includes clearer powers to require corrective action where progress is insufficient, building on the existing gap-filling mechanisms, and the ability to link delivery under NECPs to access to EU-level support tools, including funding, technical assistance and other enabling instruments.

Supportive measures such as capacity building and cooperation should complement enforcement, but cannot replace binding obligations.

Any simplification should therefore be conditional on credible delivery and compliance, not a form of weakening the system.

Q4: In the context of the discussions to amend the European Climate Law for the 2040 climate target, the need for flexibility across sectors to help achieve targets in a cost-effective and socially fair way has been raised. In your views, how can the Governance Regulation introduce more flexibility in achieving targets compared to the current approach?

Please select one of the following answers:

- By simplifying the structure for national climate and energy sub-targets while still providing investment certainty and predictability.
- By designing a mechanism that takes into account progress on enabling measures when assessing progress towards targets.
- By defining flexibility among the sectors, allowing for overachievement in one sector to compensate shortfalls in other sectors. Please specify.
- The current architecture (binding EU targets for renewables and energy efficiency, supported by national contributions and binding national climate targets) offers sufficient flexibility and is important for providing investment certainty and predictability.

Other (please specify)

3. Making energy and climate investments happen

One of the objectives of the Governance Regulation is to enhance regulatory certainty to foster investment predictability, consumer confidence, innovation, and market growth for clean technologies and decarbonisation investments. The review of the Governance Regulation indicated that NECPs should evolve into robust investment plans that efficiently direct public and private funding and outline impactful national reforms for the transition of each sector. This is also reflected in the Commission's MFF proposal, which explicitly lists NECPs among the plans guiding funding under the next MFF.

Q5: In your view, to what extent would the following options strengthen the Governance Regulation’s contribution to a stable and predictable investment environment for private investors in the transition?

[Please assign a numerical weight from 1 to 5 to each option below]

Investment needs and sources of funding

	1	2	3	4	5
Require more granular information on medium-to-long-term investment needs and underlying assumptions (by sector and decarbonisation lever, e.g. through indications for the national sectoral decarbonisation pathways), as well as related infrastructure requirements and envisaged sources of finance, both private and public.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Ensure that NECPs include concrete measures to mobilise private investment and involve financial institutions and investors in preparing NECPs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Set clearer, simpler and digitised templates to harmonise NECPs and provide methodologies to calculate investment needs, increasing comparability of data across Member States.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ensure that NECPs place more emphasis on investments with clear EU-added value, such as cross-border energy and CO2 transport infrastructure projects.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Ten-Year Network Development Plans (TYNDPs) must inform NECPs on infrastructure investment needs to ensure delivery and consistency. At the same time, TYNDPs need to be consistent with the objectives and policies identified in the NECPs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other relevant planning frameworks such as the planning of CCS investment under the Net Zero Industry Act must be consistent with and inform the NECPs.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen the coherence between the NECPs and the Medium-Term Fiscal and Structural Plans under the economic governance framework.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Strengthen the link between NECPs and Country Specific Recommendations under the framework of European Semester.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Strengthen the link between NECPs and relevant EU funding under the next MFF.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Timeline and frequency of updates

	1	2	3	4	5
Extend the time horizon of NECPs to 2050 by integrating Long-Term Strategies into NECPs, ensuring stable, long-term climate and energy policy frameworks.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Incorporate greater flexibility into NECPs' adoption and preparation to allow adaptation to uncertainties and significant policy changes, as well as better alignment with national and other EU planning cycles.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen and further develop the system for consultation, exchanges and support between the Commission and Member State authorities to facilitate high-quality NECPs and timely submissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Key Performance Indicators

	1	2	3	4	5
Enhance investor certainty by establishing binding energy and climate objectives and targets beyond 2030.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Use Key Performance Indicators relevant to energy and climate investments (e.g. permitting or grid connection times or sectoral pathways) to make NECP objectives and delivery monitoring more relevant to investors and stakeholders.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhance the role and functioning of the Union renewable energy financing mechanism by simplifying the procedure for organising tenders and facilitating the contribution of the mechanism to the enabling framework set out by Article 3(5) of the Renewable Energy Directive, including for increasing the flexibility of the energy system.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please substantiate your ranking choices, providing explanations and any supporting evidence and, if relevant, indicate what other options could be considered?

2,000 character(s) maximum

A stable and predictable investment environment after 2030 depends primarily on the credibility and enforceability of national planning. The highest-ranked options are those that strengthen NECPs as clear delivery and investment instruments.

This includes more granular and comparable information on investment needs and infrastructure requirements, concrete measures to mobilise private investment, and clearer, simpler and digitised templates. Strong coherence between NECPs and other core planning and implementation frameworks, notably TYNDPs, economic governance instruments, the European Semester and EU funding under the next MFF, is essential to ensure that investment pathways are financed and implemented.

Extending the time horizon of NECPs to 2050 can improve long-term visibility for investors, provided this does not weaken accountability or incentivise moving implementation further into the future, or disrupt the established NECP rhythm and review cycles. Structured exchanges and support between the Commission and Member States can further improve plan quality and timely delivery.

Binding energy and climate objectives beyond 2030 remain the central anchor for investment certainty. Key Performance Indicators can support implementation monitoring, but only in a complementary role and not as a substitute for binding targets.

Options that risk weakening delivery discipline were ranked low. Increased flexibility in NECP adoption, more flexibility in tender design, or elevating CCS planning to a central organising role do not address the core implementation gap and may dilute accountability. Where relevant, CCS planning must remain consistent with NECPs and clearly differentiated in favour of renewable-based solutions.

4. Contributing to a more resilient energy system

Resilience of the energy system refers to the ability of the European energy system to anticipate, withstand, adapt to, and recover quickly from disruptions or challenges—such as natural disasters, climate impacts (heat, fires, floods), geopolitical tensions, cyberattacks, equipment failures, or sudden changes in energy demand and supply—while maintaining a reliable, secure, independent and sustainable energy supply. The review of the Governance Regulation stressed that mainstreaming climate resilience and adaptation considerations in climate mitigation and energy policy has become a prominent area of action for the Regulation.

Q6: In which areas can the Governance Regulation strengthen the resilience of the energy system, complementing existing rules?

[Please rank the potential areas from 1 to 6, where 1 is the most important and 6 the least important]

Use drag&drop or the up/down buttons to change the order or accept the initial order.



Security and resilience of energy supplies, including diversification of supply and strategic planning of energy and critical materials' imports.



Stronger links to the internal energy market rules, particularly on non-fossil flexibility resources such as demand response and energy storage, and non-fossil capacity mechanisms.

⋮ Building up resilience of the energy system to climate change impacts (resilience by design) through strategic planning and monitoring.

⋮ Securing critical energy infrastructures against cyber and other physical attacks.

⋮ Economic resilience / EU's strategic autonomy / vulnerabilities in supply chains.

⋮ Adapting energy infrastructure to better integrate renewable energy sources and address the decline in domestic fossil fuel demand, facilitating the shift to lower-carbon alternatives while ensuring long-term security of supply.

What other areas, if any, should be considered?

500 character(s) maximum

All listed areas are relevant. Priority should be given to accelerating renewable energy build-out and its integration into the energy system, as this is the most effective way to strengthen security of supply, resilience and strategic autonomy.

Non-fossil flexibility, grids and storage are key enablers.

Approaches based on generic "low-carbon" framing must be avoided, as resilience and fossil fuel phase-out are only credible if renewables remain clearly distinguished and central.

4. Contributing to a more resilient energy system

Resilience of the energy system refers to the ability of the European energy system to anticipate, withstand, adapt to, and recover quickly from disruptions or challenges—such as natural disasters, climate impacts (heat, fires, floods), geopolitical tensions, cyberattacks, equipment failures, or sudden changes in energy demand and supply—while maintaining a reliable, secure, independent and sustainable energy supply. The review of the Governance Regulation stressed that mainstreaming climate resilience and adaptation considerations in climate mitigation and energy policy has become a prominent area of action for the Regulation.

5. Streamlining the Governance framework

The evaluation of the Governance Regulation concluded that the regulation has reduced the administrative burden associated with energy and climate policy obligations by merging and streamlining previously scattered and partly overlapping monitoring obligations. However, the evaluation also showed that more can still be done, including to support the Commission's commitment to reduce the administrative burden from reporting obligations by 25%. In this vein, the evaluation points to barriers in areas where internal consistency can be improved.

Q7: Please rate the simplification potential of the following options.

	1	2	3	4	5
Integrating the Long-Term Strategies (LTSs) into the NECPs.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Introduce a stricter split where the plans mainly set national energy and climate objectives and key policies and measures (PaMs), while progress reporting covers more detailed information on the implementation of policies & measures as well as tracking progress towards achieving the targets.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce the frequency of NECP updates (currently every five years, with both a draft and a final plan).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce the frequency of progress reporting (NECP progress reporting is biannually. In case of any substantial changes GHG reporting is annually).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Streamline the different reporting cycles and timelines (e.g. long-term strategies, NECPs, NECPR, GHG Projections and inventories, PaM Reports), taking into account international obligations.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduce the information reported by the Member States in the progress reporting by simplifying tables and limiting optional elements.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further streamline digital reporting (platforms) under the Governance Regulation.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Increase the reuse of data (e.g. from Eurostat, EEA, ACER, ENTSOE) for progress reporting.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Introduce fully digitalised templates for NECPs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Integrate other planning or reporting obligations in EU legislation so that they are covered in either the NECPs or progress reporting (please specify below).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Use Artificial Intelligence to streamline elements of monitoring and reporting processes to reduce administrative burdens.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

What other simplification options, if any, should be considered?

500 character(s) maximum

Any kind of simplification should primarily focus on improving implementation and enforcement, not on reducing accountability. Streamlining reporting, digitalisation and data reuse can reduce administrative burden, but must not weaken monitoring, transparency or the Commission's ability to assess progress and require corrective action. Effective enforcement remains more important than further procedural simplification.

6. Strengthening cooperation between and within Member States

One of the objectives of the Governance Regulation is to stimulate cooperation between Member States, including regional cooperation, to achieve Energy Union and climate action objectives and targets. The review has signalled opportunities to enhance engagement and cooperation among Member States, sub-state actors and stakeholders.

NECPs are currently developed every 10 years, with an update after 5 years. For both the original plan and the update, the Governance Regulation takes an iterative approach: Member States first submit a draft plan, to which the Commission issues recommendations. Member States must then take these recommendations into account in developing their final NECPs. The Commission monitors the implementation of the NECPs through NECP Progress Reporting (NECPR) generally every two years or annually for GHG emissions.

Q8: In your view, what are the main strategic areas where stronger cooperation between Member States is needed - including those outside of the scope of current cooperation mechanisms?

[Please assign a numerical weight from 1 to 10 to each option below]

	1	2	3	4	5	6	7	8	9	10
Infrastructure planning (e.g. electricity grids, hydrogen, CO2 pipelines), including cross-border aspects	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Production and deployment of renewables and other clean energy sources.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Security of supply and resilience (e.g. energy diversification, protection against hybrid threats)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Sectoral decarbonisation pathways/roadmaps	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>						
Climate resilience and adaptation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Monitoring and reporting to increase consistency of data (such as improved land monitoring using satellite data or regional emissions coefficients)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>						
Research & innovation to enhance EU and Member States competitiveness and greater market uptake of technologies/ solutions.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Clean tech manufacturing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Creation of lead markets for decarbonised industrial products and clean technologies.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Cross-border electricity trading.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Permitting of cross border projects.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Land management and nature-based solutions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							
Space observation data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>							

What other areas, if any, should be considered?

500 character(s) maximum

All listed areas are relevant. Cooperation should prioritise the production, deployment and system integration of renewable energy, as this is central to security of supply, resilience and affordability.

Renewables should be clearly distinguished from generic “clean energy” categories. Treating all technologies on the same level risks diluting delivery, weakening fossil fuel phase-out and undermining credible sectoral decarbonisation pathways.

Q9: How can the Governance Regulation facilitate more effective cooperation between Member States in these areas?

[rank from Very important – to don't know]

	Very Important	Important	Moderately important	Slightly important	Not important	Don't know
By expanding the scope of existing High-Level Groups (for example, the North Seas Energy Cooperation, Interconnection for South-East Europe, BEMIP, CESEC) to more areas of the NECPs.		X				
By setting up new fora or mechanisms tailored to cross-border energy and climate planning.		X				
By complementing or replacing national energy and climate plans with plans that cover larger geographical areas, rather than individual Member States.				X		
By introducing a process for Member States to peer-review or comment on each other's NECPs.			X			
At sectoral level, by facilitating exchanges between Member States particularly regarding specific industries/value chains with interdependencies.		X				
Additional cooperation between Member States should be covered elsewhere, and not under the Governance Regulation.					X	

What other approaches, if any, should be considered?

500 character(s) maximum

Strengthening regional cooperation on interconnections, grids and system integration can significantly enhance affordability, security of supply and the cost-effective integration of renewable energy.

However, regional coordination must complement, not replace, clear national accountability and binding national planning obligations under the Governance Regulation.

Q10: How can the governance process between the European Commission and Member States ensure timely and high quality NECPs and reporting?

[Rank Very Important – do not know]

	Very important	Important	Moderately important	Slightly important	Not important	Do n't know
Simplify the current two-step cycle in which Member States submit a draft plan, receive Commission recommendations, and then submit a final plan, by moving to a lighter process with fewer steps, clearer timelines while ensuring the Commission continues to work closely with Member States so that the content of the plans adequately contributes to EU-wide energy and climate objectives.					X	
Limit the content of draft plans to key information: targets, projections, trajectories, overview of the most important Policies and Measures (PaMs), investment needs, leaving additional elaboration to final plans.					X	
Step up policy dialogue and technical guidance in preparation of the plans.		X				
Link access to sources of EU public funding to the timely delivery and quality of NECPs and NECP reporting.	X					
Provide more flexible deadlines for NECPs and NECP Progress Reporting, for instance allowing for partial updates where relevant.					X	
Streamlining the quantitative information in NECPs to make it more precise and consistent (currently in Annex 1 part 2).					X	

What other approaches, if any, should be considered?

500 character(s) maximum

Ensuring timely and high-quality NECPs requires stronger focus on implementation and accountability, not further streamlining that reduces scrutiny. Close policy dialogue, clear guidance and sufficient Commission oversight are essential.

Any simplification must not weaken the Commission's ability to assess plans, require improvements or ensure delivery of EU energy and climate objectives.

7. Improving public consultation and multilevel governance

The Governance Regulation requires Member States to ensure reasonable timeframes for the public to be informed, to participate, and to express their views in the preparation of NECPs and Long-Term Strategies. It also requires Member States to establish a multilevel climate and energy dialogue bringing together local authorities, civil society organisations, the business community, investors and other relevant stakeholders to discuss energy and climate policies. NECPs may be discussed in these dialogues.

However, the evaluation found that implementation of these provisions has been uneven across Member States. Many did not establish adequate or timely public consultations or stakeholder dialogues. While part of the problem stems from national factors (limited experience or administrative issues), the Regulation itself may also lack sufficient precision and prescriptiveness to guarantee effective consultations.

Q11: In your view, should the Governance Regulation public consultation process and provision be revised?

[Please select the option that best reflects your view]

- Yes, significant improvements are needed.
- Yes, minor improvements are needed.
- No, the public consultation process outlined in the Governance Regulation is adequate as it stands.
- No, the public consultation process is included adequately in the Governance Regulation but implementation needs to be improved.
- The provisions on public consultation do not have much added value because it is Member States competence to conduct it (subsidiarity principle) and could be removed.
- No opinion/not sure
- Ohter

Please explain why you selected a specific option and, if relevant, what other options should be considered.

2,500 character(s) maximum

The Governance Regulation already contains clear provisions on public participation and stakeholder engagement. However, implementation across Member States has been uneven in practice. In many cases, consultation processes were conducted late in the drafting cycle (if at all), lacked transparency, or did not provide sufficient space to integrate the views of key stakeholders, including renewable energy producers, SMEs and energy communities.

Effective public consultation is essential to improve the quality, credibility and investability of NECPs. The Regulation should therefore strengthen expectations regarding timing, transparency, minimum consultation standards and feedback mechanisms, while ensuring that stakeholder input meaningfully informs final national plans. Improved implementation and clearer procedural guidance would enhance ownership, legal certainty and delivery.

Q12: In your view, is there a need to revise the regulation's Multilevel Climate and Energy Dialogue provision?

- No, the provision on multilevel dialogue is adequate as it stands.
- No, the multilevel dialogue provision is included adequately in the Governance Regulation but implementation needs to be improved.
- Multilevel dialogue provision in the NECP should only apply where lower- level authorities have legal competence to directly impact the achievements and implementation of the NECP.
- No opinion / Not sure.
- Other (please specify below).

Please explain why you selected a specific option and, if relevant, what other options should be considered.

2,500 character(s) maximum

The provision on multilevel climate and energy dialogue is adequate as it stands, but its implementation needs to be significantly improved. Experience to date shows uneven application across Member States, with limited depth, late engagement and insufficient involvement of key stakeholders.

From an EREF perspective, effective implementation is essential to ensure credible delivery of the 2040 energy and climate objectives. In particular, dialogues should more consistently involve renewable energy stakeholders, including independent producers, energy communities and system actors, as part of the NECP preparation and review process. This would improve the quality, realism and acceptance of national plans without reopening or weakening the existing governance framework.

Final questions

Would you have any additional comments on points not addressed in the previous questions?

1,000 character(s) maximum

Alternatively, you may submit evidence or position papers on topics falling under the scope of this review

EREF_PC_GovReg_Consultation_03_2026.pdf

Contact

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