

Last chance: How to strengthen the final Italian energy and climate plan.

LIFE PlanUp

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Legal notice

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Executive summary

Building on the assessments of the draft National Energy and Climate Plans (NECPs) and the European Commission recommendations, this publication aims to support EU Member States in implementing the Commission recommendations for selected measures in the transport, buildings and agriculture sectors.

The last chance: how to strengthen the final Italian energy and climate plan briefing matches key measures in the Italian draft NECP with the relevant recommendations of the European Commission and suggests additional policies and solutions that will help strengthen the final NECP.

In the transport sector, the Italian government sets out three main objectives: promotion of biofuels, a more efficient organisation of the mobility system and the roll-out of six million electric cars by 2030. There are several policy options available that will help achieve these objectives and should be properly explored. An excise tax adjustment on fuels would help level the playing field between different types of fuels making biofuels more competitive compared to traditional and more polluting types of fuels. However, their sustainability has to be ensured. Remodelling urban spaces to facilitate and improve public transport and soft mobility is essential to achieve deep emissions reductions and improvements in energy efficiency. The roll-out of six million electric cars should be supported by the right incentives to make them financially attractive. These include tax incentives on purchase but also a reduction in grid charges for electricity used for public electric vehicles and electric shared mobility. Moreover, other complementary policies should be implemented such as the promotion of the use of public transport, rental cars, car-sharing and intermodality.

In the building sector, promoting energy refurbishment in multi-storey buildings and fixing the tax deduction on the costs of energy upgrades at 65% is paramount to achieve high energy efficiency improvements and help families afford their energy bills. Moreover, simplifying the different forms of tax deductions, and eliminating those without energy efficiency requirements will be crucial to facilitate the deep refurbishment of buildings. Self-consumption of renewable energy will be also vital to achieving climate and energy objectives. Therefore, measures to promote local energy communities, such as the simple transposition of the Renewable energy directive, should be swiftly implemented.

While agriculture is responsible for more than 9% of greenhouse gas (GHG) emissions in Italy, the draft NECP does not recognize the importance of the agricultural sector in reducing emissions. However, solutions such as changing the intensive agriculture practices, increasing the stock of organic matter in the soil, shifting from intensive to extensive livestock production are already available and can be easily implemented. Furthermore, increasing investments in Ecological Focus Areas (EFAs) will contribute to improving biodiversity on agricultural land and strengthening resilience against pests and weeds.

In order to further increase transparency and public participation, the Italian government should publish the relevant information on the thematic expert groups, as well as their scope and content. Civil society organisations should be better included in the process to ensure wider support and engagement in policy-making.

➤ Transport

Transport plays a significant role in the Italian draft energy and climate plan and is supposed to deliver a major part of the greenhouse gas (GHG) emission reductions to meet the mandatory target of 33%. However, the plan does not provide a specific decarbonisation target for the transport sector.

The Italian draft NECP gives priority to policies aimed at reducing demand for mobility and increasing collective mobility, especially rail transport. While

setting a clear goal for electromobility, the plan does not detail how it can be reached.

Some good policy measures highlighted in the plan represent a step in the right direction. However, how these will be financed and concretely implemented should be further elaborated.

Measure 1 - Increase renewables in transport

Two of the main measures identified in the plan related to the uptake of renewables in the transport sector are:

- the promotion of biofuels, in particular biomethane
- the introduction of a mandatory quota for the consumption of conventional and advanced biofuels by 2030

European Commission recommendation:

“In the transport sector, the share of renewable energy is projected to reach 21.6 % by 2030. The main measures are the promotion of biomethane, and the introduction of mandatory quota for the consumption of conventional and advanced biofuels by 2030. Other measures aim for increased energy efficiency and an increase of renewable electricity use in road and rail. Multipliers are included in the calculation of this trajectory as requested in Articles 25-27 of Directive 2018/2001. However, the draft plan lacks details when it comes to limitation of the contribution of conventional biofuels, in accordance with Article 27 of the Directive 2018/2001/EC12 on renewable energy and the related Delegated Regulation”.

How to implement the recommendation given the national context:

To achieve this goal it is necessary to create a level playing field between fuels, and reduce tax advantages for traditional cars to address the disproportion between pollution generated and tax advantages. This could be achieved for example by reducing the excise duty on petrol by seven cents per liter, and increasing by 3 cents that for diesel, liquid petroleum gas (LPG) and methane, which currently benefit from very low excise taxes. Additionally, the excise tax on sustainable biomethane which is the same as for fossil gas should be eliminated. The excise tax adjustments would generate extra revenue worth 300 million euros for the state to be used (at least in part) to support other forms of mobility. A zero excise policy for all "advanced" biofuels from real renewables, and the abolition of subsidies for palm oil, derivatives, and soybean oil, starting from January 1, 2021, should also be considered. All first-generation biofuels should progressively fall under this policy.

Furthermore, with regards to aviation, an airport tax for each landing and take-off in national airports should be established by 2020. The proceeds of the airport tax could support projects and proposals to develop zero-emission airports, also in relation to the Air Recovery Plans. Air travel taxation could be designed as dependent on consumption and pollution rather than being a passenger tax. A passenger tax penalizes travelling at full load, does not reward efficiency and would, therefore, be less popular.

Measure 2 - More efficient organisation of mobility

The plan mentions a program for promotion of alternative mobility which puts in place instruments for encouraging:

- development of mobility for cyclists through cycle paths;
- promotion of shared mobility (bike, car and motorbike sharing with low or zero emissions);

- integration between sustainable mobility services (for example, parking structures for bicycles or car and bike sharing services close to public transport stops) and interchange parking;
- promotion of smart working tools;
- promotion of carpooling;
- development of ITS (traffic management, infomobility, smart roads).

European Commission recommendation:

“The draft NECP also includes measures that contribute towards a more efficient organisation of the mobility system and thus towards improved energy efficiency and emissions reductions (e.g. reduce transport demand, incentivising modal shift and multimodality, digitalisation and automation). More details on how related policies would be further developed are welcome”.

How to implement the recommendation given the national context:

Achieving this goal is possible only by remodelling urban spaces. Public and shared mobility has to be increased through a widespread development of public transport, accompanied by soft mobility made up of micro-mobility, bicycles, e-scooters as well as electrically assisted sharing modes. Urban spaces, offering greater security to users of soft mobility, also need to be redesigned.

Measure 3 - Roll out six million electric cars by 2030

The Italian NECP indicates an expected gradual increase, from year to year, in new registrations of electric cars as well, in order to reach the cumulative target of 1.6 million electric cars or electric vehicles by 2030, which, if added to hybrid cars (4.4 million), would allow a total of 6 million electric cars 2030.

European Commission recommendation:

“The draft plan does not clearly indicate how this could be achieved. Extensive details about measures related to electro-mobility (both relating to vehicles and charging infrastructure) are included in the draft NECP, however, those relate mostly to existing measures.”

How to implement the recommendation given the national context:

The goal of having six million electric vehicles in circulation by 2030 can be only be achieved if the sale of combustion engine cars is phased out. This should be flanked by the expansion of charging networks to accommodate the expected increase in electric vehicles. In this respect, public support should be given for cabling all parking spots of buildings and reinforcing the grid in urban areas to enable connections for charging hubs. The grid connections and upgrades, the cabling of buildings and the supply of public electric vehicle charging stations needs to be completed by 2035 at the latest to be in line with the requirements of phasing out the internal combustion engine vehicles. Additionally, to incentivise the uptake of electric vehicles, it will be necessary to use taxation to promote the use of public transport, rental cars, car-sharing and intermodality.

Furthermore, it is necessary to include specific targets for zero-emission mobility targets through the expansion of pedestrian zones, bike lanes, as well as services of collective and shared mobility.

Additionally, other measures that should be considered are the following: setting specific CO₂ targets for the Urban Sustainable Mobility Plan (PUMS), taxing fuels on the basis of energy content and CO₂ pollution, as well as focusing on the electrification of ships, ferries, docks and loading/unloading systems.

If there were targeted policies in place, electric road mobility in Italy could grow more rapidly. For example, with the involvement of “Cassa Depositi e Prestiti” - Italian Development Finance Institution- the planned expenditure for the purchase of electric buses could be accelerated, thereby achieving an increase in the number of full-electric vehicles (BEV) over hybrids (PHEV).

The objective of six million electric cars is broken down into 1.6 million fully electric vehicles and 4.4 million hybrids. However, already in 2018, 70% of sales in Italy have been fully-electric (BEV), and there is no reason it should not keep increasing in the coming years. Therefore, the target should be set at five million electric vehicles (BEV) and one million hybrids. The efficiency of the majority of short journeys of people and goods is also increasing significantly with the expansion of the use of light electric vehicles, such as electric micro-mobility, e-bikes, electric mopeds, and tricycles (cargo bikes) with pedal assistance.

Furthermore, in order to promote public and private electric mobility, it would be advisable not to tax electricity, as it is done today. Grid charges for electricity used for public electric vehicles and electric shared mobility should be reduced. This can be implemented unilaterally by Italy as it sits within the jurisdiction of Member States. Moreover, the state should give an incentive, equal to at least 20% of the price and up to a maximum of 3000 euros, for the purchase of light electric and electro-muscular vehicles (from the e-bike to the quadricycle), non-contingent on the disposal of a combustion engine vehicle.

A bonus should also be handed out to those who get rid of old cars (or motorcycles) - even without the purchase of a new electric car - to purchase public transport passes, to use sharing mobility services, taxis and

micro-mobility electric vehicles. Access to the scrapping bonus should be granted to everyone and not only to those who can afford to buy electric cars.

➤ Buildings

Together with transport, buildings is one of the highest emitting sectors in Italy. Measures to tackle the decarbonisation of buildings and improve energy efficiency are supposed to deliver a third of the mandatory greenhouse gas reductions in the country by 2030.

The draft NECP identifies how the significant potential for efficiency in the buildings sector can be realized through measures directed at the energy renovation of buildings and neighbourhoods, their structural renovation, remodelling and refurbishment. This is in line with the strategy for energy renovation of the building stock by 2050. Furthermore, the plan recognises the importance and benefits that these measures will have on tackling energy poverty in the country.

However, the Italian draft NECP lacks a clear vision of how these measures can be implemented and financed. It should be hence further elaborated on such practical steps to ensure these measures are feasible and effective.

Measure 1 - Increase renewable energy in the heating and cooling sector

In order to achieve this target, the Italian NECP includes measures such as the continuation of tax credits for energy-efficient renovation of buildings (i.e. facilitating the fitting of renewable energy installations), white certificates and mandatory integration of energy from renewable sources in buildings.



European Commission recommendation:

“The NECP is missing a clear description of how Italy intends to increase renewable energy in heating and cooling and in district heating and cooling by an indicative 1.3 and 1 percentage points as an annual average calculated for the periods of 2021 to 2025 and 2026 to 2030, respectively. The role of waste heat and cold remains unclear.”

How to implement the recommendation given the national context:

It is imperative that precise objectives, including milestones, be defined for the building sector. In 2017, the share of renewables in the building sector reached 20.1% of final gross energy consumption, which represents a sharp increase compared to 18.9% in 2016. However, this should not be considered as a justification not to go further. According to the Simeri Observatory of the Energy Services Managers, from 2010 to date, the development of renewable sources in heating has seen an average yearly growth of 0.6%. However, this growth rate is too slow considering that this sector is highly emitting and costly, reaching an average yearly cost of €1000 per household.

The increased efficiency achieved between 2016 and 2017 not only shows that it is possible to do more in Italy, but that reaching the 33.1% energy efficiency target is also necessary to improve the conditions of both families and local administrations, who are struggling to pay the bills. Moreover, the business as usual (BAU) scenario would worsen the situation of over nine million people at risk of energy poverty, many of which are already forced to forego heating and/or cooling due to economic problems.

Addressing multi-storey buildings is also very relevant for reaching the target for energy efficiency in the building sector. According to the latest data, there are 1.2 million condominiums in Italy, hosting about 14 million families. At least 740.000 (16%) of these condominiums need extensive energy refurbishment since they were built in the post-war period with materials and techniques that paid very little attention to heating systems efficiency.

Overall, 82% of condominiums were built before the entry into force of the first national legislation introducing energy efficiency requirements in buildings.

While substantive progress has been made in the last few years, more can and should be done both on individual dwellings and condominiums, with the latter being an absolute priority.

Families living in apartments would greatly benefit from the stabilisation of 65% tax deduction on the costs of energy upgrades. This measure is currently confirmed on a yearly basis, which makes energy service companies and other businesses reluctant to make the necessary investments.

The 33.1% RES objective can only be achieved by doubling the efforts in the average yearly growth of condominiums' refurbishments, which should increase from the current 0.6% to at least 1.2%. Concretely, this would translate in the energy upgrade of at least 30.000 buildings a year until 2030. According to the report presented by Civico 5.0 (an awareness-raising campaign carried out by Legambiente), these upgrades would bring consistent benefits to families and they would deliver almost €400 millions/year of savings in household bills, while at the same time avoiding 840,000t of CO₂eq/year emissions. Consumption of gas would also be reduced by almost 420 million cubic meters a year as a result of this measure.

Another advantage of this measure is the increase in real estate values that would be in the range of 5% to 15% for homes renovated with energy and environmental standards such as those requested for the tax rebates.

By 2030 this operation would allow a total reduction of €9.7 billion on household bills and 20.7 million tons CO₂eq/year not emitted and 10.3 billion cubic meters of gas not consumed. According to a [report](#) by the 'Osservatorio innovazione e sostenibilità nel settore edilizio' (OISE), these figures would also bring along roughly one million jobs in the building sector.

Measure 2 - Increase energy savings

According to the Italian NECP, in order to reach the set energy savings target - estimated as 51.4 Mtoe by 2030 - Italy has various support instruments

already in place. These are set to be adapted and reinforced in order to meet the target. In particular, the instruments in place expressly dedicated to the promotion of energy efficiency for the purposes of achieving the savings target pursuant to Article 7 of the EED Directive are the following:

- the white certificates scheme;
- tax deductions for energy-efficient measures and restoration of existing buildings;
- the 'Conto Termico';
- The National Fund for Energy Efficiency.

All of the above measures, already operational or in the process of being launched at a national level.

European Commission recommendation:

“The largest impacts are attributed to the tax deduction mechanism for building renovation (18 Mtoe) and to the Energy Efficiency Obligation Scheme (15 Mtoe). In light of the key role of such instruments in delivering the necessary energy savings, close and timely monitoring of their implementation will be crucial. Given the significant contribution of a cost-effective transformation of existing buildings into nearly zero-energy buildings to the Union's energy efficiency target, realistic and ambitious measures and policies for the implementation of a coherent long-term renovation strategy remain to be developed”.

How to implement the recommendation given the national context:

To implement and further improve the tools identified in the draft NECP, it is necessary to start by carrying out a careful analysis of the effectiveness and feasibility of the proposed measures.

One of the most important measures in Italy to promote building renovations are tax deductions. In the current system, incentives are recovered in 10 years, a period which is too long to be attractive for both families and small and medium enterprises (SMEs).

Moreover, the tax deduction schemes, in particular those for energy upgrades, are very complex. Therefore, for reasons of convenience or simplicity, the costs for upgrading boilers, heat pumps or fixtures are often embedded in those for global renovations of buildings, thus disappearing from official accounts of emissions reductions. According to ENEA's Energy Efficiency Report¹, the number of installed heat pumps incentivized with tax deductions for energy upgrading in 2017 was around 17,000, which is way lower than the actual sales of heat pumps on the national market, which was estimated at about 173,000 units in the residential sector as a primary heating system. As for condensing boilers, units incentivized by tax deductions for energy refurbishment were just over 67,000, against the estimated 664,000 new units placed on the market in the same period.

An additional issue, which should be corrected, is the fact that among devices and renovations that are incentivised through tax deductions are also some powered by fossil fuels. This practice should be totally eliminated, and only devices that best meet efficiency and climate mitigation objectives should be rewarded.

Incentives to promote building renovations should be restructured. Firstly, the 50% tax deduction scheme, which applies to a variety of low-performing building upgrades and does not require energy audits and certifications, should be eliminated. Secondly, a reward mechanism should apply to incentives, with a bonus malus scheme based on energy efficiency achieved results.

In view of the increasing demand for simplified incentives to carry out building refurbishment and the decreasing demand for energy efficiency

¹ http://www.agenziaefficienzaenergetica.it/allegati/RAEE_2018_-_COMPLETO.pdf

refurbishments, it is necessary to strongly push for deep refurbishments of buildings by simplifying the different forms of tax deductions, eliminating those without energy efficiency requirements and establishing a rewarding system based on the achieved results.

Measure 3 - Promote repowering

As reported in the Italian plan, the extension of the scope and the conditions for creating renewable energy communities is still being assessed. Further instruments in support of self-consumption, both individual and collective, are mentioned:

- reinforcing minimum quota obligations for renewable energy sources in new buildings or buildings subject to major renovation, in line with the targets for near-zero emissions buildings.
- Progressive and gradual extension of the minimum quota obligation for renewable energy sources to existing buildings.

Complementary measures to support the development of self-consumption of renewable energy and streamline the related administrative procedures are also included in the plan.

European Commission recommendation:

“Self-consumption of renewable energy (up to 1 MW) is considered as a means to achieve the objectives and will be promoted through the exemption from network and system charges for self-consumed electricity, the revision of the existing net-metering scheme, minimum renewable energy quota for new and renovated buildings, simplified administrative procedures for small-scale energy plants, and through specific premium tariffs when needed. In line with this, measures to promote local energy communities, self-consumption and administrative simplification should be further described. Their compatibility with state aid rules should also be ensured.”

How to implement the recommendation given the national context:

Promotion, establishment and support for self-production and energy communities requires the full implementation of related European directives.

At the moment, in Italy, it is only possible to self-produce energy either by means of a grid through the *On-site Exchange and Dedicated Withdrawal* mechanisms - a procedure that makes the self-consumption burdensome and less convenient - or by selling production to the purchasing authority at a low price.

It is also impossible to exchange energy within Energy Communities. This presents a serious obstacle to the replication of the remarkable success that can be found in the tens of small Alpine municipalities, where cooperatives and real energy communities have been able to involve consumers in groups ranging from a few dozen citizens to several thousands. These cooperatives were established as a result of the legislative autonomy that applies only to the autonomous region of Trentino Alto Adige/South Tyrol (Südtirol).

Examples and models such as those of Toblach/Dobbiaco and Prad am Stilfserjoch/Prato allo Stelvio cooperatives in the province of Bolzano or, the Primiero Community in the Province of Trento, guarantee family savings on bills, ranging from 15 to 40% thanks to the production and local distribution of energy from renewable sources.

Moreover, important examples of self-production are also the thousands of farms that have in recent years decided to focus on renewable sources to reduce energy costs as well as to improve production processes through self-production.

One such example is the one of Azienda Agricola Val Paradiso in Naro (Agrigento province) that grows over 100 hectares of olive trees using organic farming and clean energy from renewable sources to supply the entire production process. The same happens in the Azienda Agricola Arte, located

between Manfredonia and Cerignola in the region of Puglia, which started a certified organic production four years ago and is now self-sufficient thanks to a biogas plant. Another good example of self-production in rural areas is the Azienda Agricola Isola Augusta located in the municipality of Palazzolo dello Stella in the Udine province, which over the years has built three photovoltaic plants, thereby reducing the costs of energy used. The company has also a charging station for electric vehicles as well as a geothermal water system that can satisfy up to 80% of the heating of the structures (accommodation, farm, cellar).

A rapid and full implementation of the Renewable Energy Directive is necessary to drive the development of renewable sources and self-consumption in rural areas.

➤ Agriculture

Agriculture is responsible for more than 9% of greenhouse gas (GHG) emissions in Italy, mainly attributable to the agro-livestock sector. Apart from naturally occurring emissions of methane and nitrous oxide from soils, intensive agriculture causes soil impoverishment, which results in emission of soil organic carbon and compromises its CO₂ absorption capacity. Nitrogen fertilisers cause further nitrous oxide emissions and also pollute waterways. Particularly, intensive animal production leads to increased GHG emissions in an attempt to meet the growing demand for meat and dairy products. According to Compassion in World Farming (CIWF), approximately 565 million of the 620 million animals bred in Italy each year, are bred in intensive systems. It is estimated that almost $\frac{3}{4}$ of arable land in Europe is used to produce animal feed.

The Italian draft NECP is vague on the agriculture sector and rarely provides specific measures on the GHG emissions reduction potential for the different agricultural sources of emissions. Furthermore, the European Commission's recommendations for the agriculture sector in the draft NECPs tend to be either absent or weak.

Solutions within our reach

1 Change of agricultural production mode

There is an urgent need to reform the way agricultural production is done in Italy for it to become more sustainable. One clear illustration of this is the intensive farming system in the Po Valley. In this area 2/3 of greenhouse gas emissions come from agriculture (19.55Gt of CO₂eq out of 29.95Gt). Moreover, this area is affected by multiple problems connected to farming such as air and water pollution (mainly caused by fertilisers and antibiotics). The current production mode also significantly threatens the biodiversity in the agro-ecosystem.

It should be evident that current practices cannot be sustainably maintained. National agriculture policy should aim at addressing the consequences of climate change and the many other environmental issues caused by agricultural activity, particularly in densely populated and intensively cultivated areas such as the Po Valley.

2 Soil conservation and restoration

Italy's contributions to the global '4p1000' initiative would increase the absorption of carbon by soil. The initiative was launched at the Paris summit and aims at increasing the stock of organic matter in soil, particularly those depleted as a result of decades of intensive agriculture. The goal of the project is an annual increase of 0.4% of carbon incorporated in the first 30cm of fertile soil on all the national utilised agricultural area (UAA). In Italy, this would correspond to a net absorption, at full capacity, of almost 5Mton CO₂/year. It would also improve the structure and fertility of agricultural soils, reducing erosion and irrigation requirements in crops.

Another important initiative is the shift from intensive to extensive livestock production, in particular in the cattle sector, with the conversion of arable land to permanent meadows and pastures. This conversion, with the complete suspension of soil working, also leads to significant increases in the soil organic matter content.

Additionally, other actions should be considered, such as the ban of deep plowing, promotion of minimum processing and no-tillage, mandatory cover crops, promotion of green manure and prohibition of stubble burning, optimal use of digestates from biogas plants, replacing chemical fertilisers with organic fertilisers (manure, compost, crop residues) and the prohibition of pesticides and herbicides.

Finally, to avoid nullifying the overall effects of these actions, it is imperative to protect existing permanent grassland and pasture. The transformation of permanent grassland causes rapid mineralization of its organic component, resulting in CO₂ emissions comparable to deforestation. Moreover, due to the collateral ecological effects, unwise policies can cause loss of plant and animal biodiversity and a greater propensity to soil erosion. Therefore, these areas must be subject to rigorous protection.

3 Further investment in Ecological Focus Areas

Investing at least 10% of the total arable area on the Ecological Focus Area (forest environments, hedges, buffer strips, permanent meadows and wooded pastures, etc.), could yield a considerable improvement in biodiversity on agricultural land, and bring advantages for the production systems' resilience against pests and weeds. Moreover, the implementation or maintenance of approximately 1.200,000 hectares of agricultural land as EFA could achieve an absorption of up to 2Mton CO₂eq a year between 2021 and 2030, calculating both the carbon stored in the vegetation and in the litter stabilized as organic substance in the soil.

► Transparency and public participation

The European Commission does not provide a specific recommendation to Italy on how to improve transparency and public participation in the preparation of its final NECP. It only notes that *“the public and other stakeholders are to be engaged in the preparation of the final integrated*

national energy and climate plan". Italy held an online public consultation after the submission of its draft NECP, which took place from the 21st of March until the 5th of May 2019.

One of the few EU Member States, Italy has created a [dedicated web portal](#) on its NECP, in which it outlines the context, scope, objectives and process followed for the plan. Furthermore, the plan's consultation process is described in a specific section on the web portal. In the finalization of its NECP, Italy indicates that it launched targeted consultations with the Parliament and local and regional authorities (LRAs). These consultations do not follow a predefined format, but rely on already existing dialogue platforms such as a State-Regions-Local autonomous territories conference. At the time of writing, Italy is conducting a strategic environmental assessment for its NECP.

Furthermore, Italy is also organizing thematic expert groups, which are aimed at collecting feedback and proposals on the most technical themes of the NECP such as safety, markets, research and competitiveness. Experts invited by the government in this format include Transmission System Operators, distributors, research institutes, universities, independent authorities and experts, workers' associations as well as *"representative sectoral associations"*.

In order to further increase transparency and public participation, the Italian government should provide a list of organizations and experts that are taking part in the thematic expert groups, inform about the scope and content of their gatherings, and provide civil society organizations (CSOs) with a seat at the table.

How to implement the recommendation /
improve practice given the national
context:

The relevant information on the organizations and experts invited to the thematic expert groups and the scope and content of its meetings should be

added to the existing NECP web portal. This information should also highlight whether or not CSOs were included in this critical consultation format.

Conclusions

The Italian draft NECP includes several objectives and measures that have major climate mitigation potential. However, in most cases, details on how the measures will be implemented or how the objectives will be achieved are missing. The final plan should be more detailed and include strengthened measures in all three sectors.

In the transport sector, remodelling urban spaces to facilitate and improve public transport and soft mobility will be crucial to achieve deep emission reductions as well as to reduce traffic and improve air quality in urban areas. The planned roll-out of six million electric vehicles is a step in the right direction but will need better incentives and less financial competition.

In the building sector, a coherent long-term renovation strategy should be developed alongside a consistent restructuring of tax incentives for energy refurbishments. Recognizing the importance that these measures have on tackling energy poverty is clearly a step in the right direction. However, barriers to the development of energy communities need to be properly and swiftly addressed to promote the uptake of renewable energy.

Agriculture should be given a more prominent role in the final NECP, as cutting emissions from the agriculture sector is key to ensuring that the overarching economy-wide emission reduction target is achieved. A plethora of solutions such as changing the agricultural production mode, conserving and restoring agricultural soils, and further investing in

Ecological Focus Areas (EFAs) are already available and could be easily implemented.

Equally important for the overall success and robustness of the plan is a more inclusive development process. To further strengthen transparency and public participation, the Italian government should provide a list of organizations and experts that take part in the thematic expert groups, provide information about the content of their gatherings and ensure that civil society organizations (CSOs) are given voice in the process.