

# Fit to succeed?

An assessment of the Hungarian

draft energy and climate plan

### **Table of contents**



### **Executive summary / 1**

### An assessment of the Hungarian draft national energy and climate plan / 3

Scope, ambition and credibility / 4

In-depth sectoral analysis / 6

Transport / 6

Buildings / 8

Agriculture / 9

Public participation and transparency / 10

Co-benefits / 12

### Overall score and conclusions / 13

### Annexes / 15

Assessment criteria / 16

LIFE PlanUp project description / 23

### **Executive summary**

As part of the European Union's 2030 climate and energy package, EU member states are required to develop energy and climate strategies to plan and to report on their 2030 climate and energy objectives.

The LIFE PlanUp project (for more information, see Annex II), analyses the draft national energy and climate plans (NECPs) from five countries - Romania, Poland, Hungary, Italy and Spain.

Divided into four sections, this briefing assesses the draft plan of Hungary. An overall score is provided at the end of the assessment (for more information, see Annex 1 on assessment criteria).

The first section covers the scope of the plan and the ambition and plausibility of its overall objectives.

Hungary published its draft national energy and climate plan (NECP) in February 2019, thus missing the legal deadline. The plan fails to address key issues such as phasing out fossil fuel subsidies and reducing energy poverty, and to put forward measures to ensure that the rights of prosumers and those of renewable energy communities are protected, in accordance with the Clean Energy Package.

Hungarian greenhouse gas (GHG) emissions are expected to decrease by at least 40% by 2030 compared to 1990. However, the country's emissions are already 35% lower than the 1990 level, meaning that the drop over the next decade is expected to be small. In terms of goals, the government plans to strictly adhere to the 7% target required by the Climate Action Regulation (also known as the Effort Sharing Regulation), although there would be a need and potential go way beyond that.

The draft plan foresees a 20% and 8-10% increase in the use of renewable energy sources and energy efficiency improvement, respectively, by 2030. These are the bare minimum decided on at the EU level, and will hardly contribute to the common climate targets of the EU.

The second chapter provides an in-depth analysis of the transport, buildings and agricultural sectors with regard to the proposed objectives and policy measures.

There is no specific decarbonisation target for transport in the Hungarian draft NECP. In the scenarios presented, the planned energy consumption of, and the GHG emissions from transport will be growing, neglecting the emission reduction potential of climate mitigation policies.

The draft NECP has very little information on reducing emissions from buildings. The long-term energy efficiency roadmap, expected to be developed in the course of 2019, will be crucial in order to enable energy modernisation of buildings.

Instead of proposing measures to rein in emissions from agriculture, the Hungarian government argues that the expected 18% increase in agricultural emissions is acceptable, considering the emission reductions by other sectors towards meeting the Climate Action regulation overall goal of reducing emissions by 30% by 2030.

The third chapter looks at how the Hungarian NECP was developed, and whether the process was transparent and inclusive. While more involvement of stakeholders is expected in the course of 2019, for the draft NECP, the government only asked for input from a selected group of stakeholders, giving them a very limited time frame to react.

Finally, an important part of an NECP is the impact assessment of planned policies with regard to co-benefits such as job creation, air quality improvement and reduction of energy poverty, but the Hungarian plan fails to address any of these issues.

Overall, the Hungarian draft NECP lacks key information and scores low in all criteria used in this assessment. It is of paramount importance that when developing the final plan, the Hungarian government strengthens its commitment to the 2030 climate objectives, and involves all stakeholders in a transparent process.

## An assessment of the Hungarian draft national energy and climate plan



### Scope, ambition and credibility

The Hungarian draft NECP, published in February 2019, fails to address key issues such as phasing out fossil fuel subsidies. It doesn't include measures to ensure that the rights of prosumers' and those of renewable energy communities are protected, in accordance with the Clean Energy Package.

At the time of writing, the Hungarian government is developing a new National Energy Strategy (NES), due to be published later in the year, which will address many items that are relevant to the NECP.

### Greenhouse gas emission target

According to the draft NECP, Hungarian greenhouse gas (GHG) emissions will decrease by at least 40% by 2030 compared to 1990. However, the country's emissions are already 35% lower than in 1990, mostly because of the collapse of the heavy industry at the beginning of the 1990s. 6,4 MtCO2 of the total 8,2 MtCO2 reduction is expected to come from closing down the lignite and biomass-fired Mátra power plant. Under the Climate Action Regulation, Hungary is expected to cut its emissions from the CAR (i.e. those not covered under the EU Emissions Trading System) sectors by 7% by 2030 compared to 2005. However, national emissions have been on the rise since 2015, partly due to increasing pollution from the industrial, agricultural, and first of all transport sectors.

### Renewable energy

In its draft plan, Hungary sticks to the minimum target of reaching a 20 % share of renewable energy sources in primary energy consumption by 2030, which is rather modest.

In particular, the plan expects Hungary to continue to rely heavily on solid biomass for residential heating.

The government plans to develop a system integration of renewable sources, as well as household and industrial-scale energy storage technologies, and to support the development of energy-efficient technologies, digitalisation and promotion of smart metering. However, a more detailed explanation on how this measure would be implemented and financed is missing.

### **Energy efficiency**

As for the renewable energy deployment, the Hungarian government plans to adhere to the minimum EU level target of improving energy efficiency by 8-10% by 2030, therefore hardly contributing to the common climate targets of the EU.

Despite deploying energy efficiency programs since 2014, Hungary will probably not meet its 2020 energy efficiency target. One of the reasons for this is probably the government's policy to keep utility costs artificially low in the residential sector. The low energy prices and lack of a stable investment environment do not encourage investments in energy efficiency.

Criterion	Indicator	Indicator description	Score
Scope	Consistency with En-	Does the plan follow the	2/4 = to some extent
	ergy Union governance	mandatory template as	
	regulation	outlined in the Governance	
		Regulation?¹	
	Sectors/policies cover-	Does the plan include pol-	2/4 = to a small extent
	age	icies covering all required	
		sectors?	
	Deadline	Has the plan been pub-	1/4 = considerable delay
		lished on time/respecting	
		deadline?	

Criterion	Indicator	Indicator description	Score
Ambition/	Greenhouse gas (GHG)	Does the plan include an	1/4 = to a small extent
plausibility	emissions	economy-wide GHG emis-	
		sions reduction target for	
		2030?	
	Consistency among	Does the plan utilise con-	3/4 = to a moderate extent
	targets	sistent and harmonised	
		GHG emission targets and	
		related baselines?	
	Renewable energy	Does the plan include a	1/4 = to a small extent
		national 2030 renewable	
		energy target?²	
	Energy efficiency	Does the plan include a	0/4 = not at all
		national 2030 energy effi-	
		ciency target?	
	Alignment with 2050	Is there a clear commit-	0/4 = not at all
	decarbonisation objec-	ment to the Paris Agree-	
	tive	ment's objectives?	

<sup>1</sup> http://data.consilium.europa.eu/doc/document/PE-55-2018-INIT/en/pdf

<sup>2</sup> https://www.ecofys.com/en/publications/national-benchmarks-for-a-more-ambitious-eu-2030-res-target/

Criterion	Indicator	Indicator description	Score
Consistency	Adaptation plan	Has an adaptation plan	1/4 = unclear adaptation
and credibility		been devised? Is it reflect-	strategy
		ed in the NECP?"	
	Use of loopholes	Does the plan include use	1/4 = yes, large use
		of loopholes in achieving	
		GHG emission targets?4	
	Policy projections	Does the plan use a strong	0/4 = not at all
	Impact assessment	and effective model used	
		for the impact assessment	
		of planned policies and	
		measures?	

### In-depth analysis of sectors

### **Transport**

The Hungarian NECP does not include any specific target for decarbonising the transport sector. It builds mainly on electric mobility, although no clear financial support for this is specified. The transport sector should contribute to climate change mitigation goals in accordance with the overall Hungarian target, i.e. at least 7% emission reduction compared to 2005. On the contrary, the plan foresees 15.66 million tCO2e emissions from transport by 2030 that means more than a 50% rise compared to 2005.

Furthermore, the Hungarian government plans to make infrastructure investments that will increase passenger and freight transport, leading to additional emissions and energy use.

The draft plan includes a target for the use of renewables in transport of 15% (the EU only mandates a binding 7% for advanced fuels) with a rough breakdown of the sources of energy, as seen in the table below.

Transport energy generated from renewable energy sources in the breakdown of fuels (Mtoe)

Mtoe	2015	2023	2025	2027
Traditional biofuel	0.188	0.426	0.439	0.57
Electricity - from renewable energy	0.025	0.125	0.75	0.215
Biogas	0	0.003	0.005	0.007
Hydrogen - from renewable energy	0	0	0.001	0.003

There is a slight increase in the use of traditional biofuels, which is not in line with the EU's Renewable Energy Directive (REDII) that requires that traditional biofuels be frozen at 2020 levels and

<sup>3</sup> Art. 19 Governance Regulation: http://data.consilium.europa.eu/doc/document/PE-55-2018-INIT/en/pdf

<sup>4</sup> https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0842&from=EN

should never be higher than 7%. At the same time, there is no mention of advanced biofuels, which according to the REDII, must make up for at least a 3.5% share of the mix for transport.

Furthermore, there is no clarity about the source of biomass, which should not be based on first-generation feedstocks. If 'traditional biofuels' also include advanced fuels, it should be clarified in the plan.

Criterion	Indicator	Indicator description	Score
Sectoral	Alignment/plausibility	Are transport policies in-	1/4 = to a small extent
policy:	with 2030 goals	cluded in the plan plausi-	
Transport		ble to reach 2030 national	
		climate goals? <sup>5</sup>	
	Inclusion of long-term	Do plans include transport	0/4= not at all
	strategy	policies beyond 2030?	
	Consistency with EU	Are transport policies con-	1/4 = to a small extent
	legislation	sistent and in line with EU	
		legislation? <sup>6789</sup>	
	Infrastructure	Are proposed infrastruc-	1/4 = to a small extent
		ture investments aligned	
		with the long-term climate	
		goals?	
	Daliaina hayand ar ad	Daga the plan include	0 /4 - to come extent
	Policies beyond or ad-	Does the plan include	2 /4 = to some extent
	ditional to EU require-	policies that are additional	
	ments	or go beyond EU require-	
		ments?	

### Recommendations

- Include a transport specific GHG emission reduction objective, to be able to track the emission reductions in such a polluting sector.
- Increase the share of electric vehicles to be in line with the EU target.
- Include measures and policies to address emissions from heavy-duty transport. At the bare minimum, the plan should include what is mandated by the EU in the CO2 standards for these vehicles, but other measures should be considered such as modal shift.
- Implement road charging schemes.
- Include provisions for big emitters in the transport sector such as aviation and shipping, which are largely ignored in the current NECP.

<sup>5 &</sup>lt;a href="https://ec.europa.eu/clima/policies/effort/proposal\_en">https://ec.europa.eu/clima/policies/effort/proposal\_en</a>

https://eur-lex.europa.eu/resource.html?uri=cellar:609fc0d1-04ee-11e8-b8f5-01aa/5ed/1a1.0001.02/DOC\_1&format=PDF

<sup>7</sup> https://eur-lex.europa.eu/resource.html?uri=cellar:3eb9ae57-faa6-11e6-8a35-01aa75ed71a1.0007.02/DOC\_1&format=PDF

https://ec.europa.eu/transport/themes/urban/vehicles/directive\_en

<sup>9 &</sup>lt;u>https://ec.europa.eu/transport/themes/urban/cpt\_en</u>

### **Buildings**

Hungary is currently developing a long-term energy efficiency roadmap relating to the country's building stock.

The draft NECP mentions ESCO (Energy Services Company)<sup>10</sup>, but it is doubtful whether the building sector can be attractive enough for this type of for-profit companies.

Although energy modernisation of buildings has the greatest emission reduction potential by volume, the payback time is long and the cost to be covered by residents is prohibitively high. Better regulation and targeted support would be necessary to harness this savings potential.

Criterion	Indicator	Indicator description	Score
Sectoral	Alignment/plausibility	Are buildings policies in-	0/4 = not at all
policy:	with 2030 goals	cluded in the plan plausi-	
Buildings		ble to reach 2030 national	
		climate goals?	
	Inclusion of long-term	Do plans include buildings	0/4 = not at all
	strategy	policies beyond 2030?	
	Consistency with EU	Are buildings policies con-	2/4 = to some extent
	legislation	sistent and in line with EU	
		legislation? <sup>11 12 13</sup>	
	Infrastructure	Are proposed infrastruc-	0/4 = not at all
		ture investments aligned	
		with the long-term climate	
		goals? <sup>14 15</sup>	
	Policies beyond or ad-	Does the plan include	0/4 = not at all
	ditional to EU require-	policies that are additional	
	ments	or go beyond EU require-	
		ments?	

### Recommendations

- Develop a long-term energy efficiency roadmap enabling energy modernisation of buildings.
- Implement tariff schemes that incentivise energy efficiency, and adopt specific measures for vulnerable consumers.

(https://e3p.jrc.ec.europa.eu/communities/energy-service-companies)

- https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L0844&from=EN
- 12 <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016PC0761&from=EN</u>
- 13 <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016PC0767R(01)&from=EN</u>
- 14 https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32012L0027&from=EN
- 15 <u>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L0844&from=EN</u>

An ESCO is a company that offers energy services which may include implementing energy-efficiency projects (and also renewable energy projects) and in many cases on a turn-key basis

### Agriculture

The draft NECP does not include any measures to address GHG emissions from agriculture.

The government's reasoning is that, given the reduction targets in other sectors, it is actually possible to allow the agricultural emissions to increase, while still reaching the 30% reduction target for the non-ETS sectors. Indeed, Hungary expects that its agricultural GHG emissions will increase by 18% by 2030.

Seeing that more than half of menthane and a large majority of NO2 emissions stem from agriculture, it is irresponsible to allow the sector's GHG emissions to keep growing unabated. Using other sectors' climate efforts as a pretext to allowing agricultural emissions to grow will only make the inevitable long-term adjustment of the sector more difficult.

Criterion	Indicator	Indicator description	Score
Sectoral	Alignment with 2030	Are agricultural poli-	0/4 = not at all
policy:	goals	cies included in the plan	
Agriculture		plausible to achieve 2030	
		climate goals?¹6	
	Inclusion of long-term	Do plans include agri-	0/4 = not at all
	strategy	cultural policies beyond	
		2030?	
	Consistency with EU	Are agricultural policies	0/4 = not at all
	legislation	consistent and in line with	
		EU legislation? <sup>17</sup>	
	Infrastructure	Are proposed infrastruc-	0/4 = not at all
		ture investments aligned	
		with the long-term climate	
		goals?	
	Policies beyond or ad-	Does the plan include	0/4 = not at all
	ditional to EU require-	policies that are additional	
	ments	or go beyond EU require-	
		ments?	

https://ec.europa.eu/clima/policies/effort/proposal\_en

<sup>16</sup> https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R0841&from=EN

### Recommendations

- Acknowledge the sector's significant potential to contribute towards reaching the CAR targets, and outline policies, measures and available funding sources in the energy and climate plan in order to reduce agricultural emissions.

### - Ensure that:

- agricultural mitigation measures cover all sources of emissions from the sector all measures are environmentally proofed (air - water - biodiversity)
- specific budget is allocated for each measure and the number of farmers expected to enroll is put forward.

### Transparency and public participation

Prior to the elaboration of the draft NECP, the Hungarian government sent out a questionnaire on the plan only to a selected group of stakeholders, including some NGOs, such as the Clean Air Action Group. Municipalities or associations of municipalities are not explicitly mentioned among the stakeholders contacted. The stakeholders contacted by the Ministry could send their reply to the questionnaire and their proposals in writing. The questionnaire included questions on the specific sectors and the general ambition of the plan, but not on the governance aspects of the NECP (e.g. multi-level dialogue). The process lasted one month according to the information provided in Hungary's draft NECP, and reached 134 stakeholders in total.

More involvement of stakeholders is expected in the course of 2019, when a more advanced version of the NECP is ready. The draft plan does not mention a specific public consultation open for all citizens, nor does it foresee elaborate plans for a multilevel dialogue.

Criterion	Indicator	Indicator description	Score
Transparency	Public participation	Does the plan include	2/4 = no, public consul-
		early and effective oppor-	tation but too short time
		tunities for public partici-	
		pation? <sup>16</sup>	
	Publication	Is the draft plan publicly	1/4 = yes, but for a limited
		available? <sup>17</sup>	period of time

Art. 10 Governance Regulation: http://data.consilium.europa.eu/doc/document/PE-55-2018-INIT/en/pdf

<sup>7</sup> Art. 3.4, 9.4 Governance Regulation: http://data.consilium.europa.eu/doc/document/PE-55-2018-INIT/en/pdf

Criterion	Indicator	Indicator description	Score
Transparency	Multilevel dialogue	Does the plan cater for a	0/4 = no provision for
		multilevel dialogue where	dialogue
		local authorities, NGOs,	
		business, investors and	
		the general public can ac-	
		tively engage and discuss	
		the climate and energy	
		policy scenarios, and re-	
		view progress? <sup>18</sup>	

### Recommendations

- Organise a public consultation to enable citizens and other stakeholders to contribute to the NECP, following the European Commission recommendations in June.
- Publish a summary of stakeholder contributions to the first and second questionnaire process, describing how they were included/not included in the NECP.
- Make the timeline for the remaining NECP process publicly available, so that citizens and stakeholders can receive early and effective information on how they can contribute to the NECP process.
- Organise regional gatherings to discuss the NECP with local and regional authorities (LRAs), civil society organisations (CSOs) and other stakeholders in the second half of 2019.
- Make use of existing local energy and climate initiatives, such as the Covenant of Mayors, to gather the potential contribution of LRAs to the NECP. National associations of LRAs, such as Klimabarat, the association of County Councils and others, as well as the Covenant of Mayors initiative, can be used to reach out to LRAs.
- Establish a multi-level energy and climate dialogue for the finalisation of the NECP, making use of existing formats like working groups, taskforce or other consultative bodies that involve all stakeholders; provide the dialogue with an administrative structure to ensure its duration and its involvement in regularly following up on the NECP implementation from 2020 onwards.

### **Co-benefits**

### Air quality, energy poverty and job creation

While phasing out lignite as a source of energy for residential heating would be absolutely necessary in order to improve air quality, the draft plan does not include a coal phase-out date. On the other hand, the government's goal to improve the technical condition of residential solid firing equipment is a step in the right direction.

The draft plan does not set any energy poverty objectives, as energy costs of Hungarian consumers are considered among the lowest in Europe.

As for jobs, there is no mention in the draft plan about job creation in low-carbon industries.

Criterion	Indicator	Indicator description	Score
Co-benefits	Air quality	Do proposed policies im-	3/4 = moderate improve-
		prove air quality?	ment
	Energy poverty	Do proposed policies re-	0/4 = no effect predicted
		duce energy poverty?	
	Job creation	Does the plan include in-	0/4 = no effect predicted
		vestments in low-carbon	
		industries, thus promot-	
		ing job creation in these	
		industries?	

### Recommendations

- Acknowledge the job-creating potential of a shift towards a low-carbon economy.
- Foresee energy poverty measures for low-income households

### Overall score and conclusions



Criteria	Weight	HU points
Scope	5	6/12
Ambition	20	5/20
Consistency and credibility	20	2/12
Transport policies	10	2/20
Buildings policies	10	2/20
Agriculture policies	10	0/20
Transparency	20	2/12
Co-benefits	5	3/12

Total score: 17%

The Hungarian draft NECP scores very low in all the most important criteria.

The ambition of its climate and energy objectives and the transparency of the NECP development require major improvement. Higher ambition in terms of targets would set Hungary on the right path to significantly reducing its emissions and contributing to the fulfilment of the Paris Agreement objectives.

A more transparent process where all relevant stakeholders and the general public are consulted on the country's climate objectives, together with well-planned policies would ensure greater support and commitment from all parties involved.

With regard to sectoral objectives and policy measures, the draft plan needs review and improvement, especially on the buildings and agricultural sectors.

Energy consumption and GHG emissions of transport in Hungary are growing, as the government neglects the emission reduction potential of climate mitigation policies, such as the shift of freight from trucks to (electric) trains and implementation of road charging.

The draft plan lacks a long-term energy efficiency roadmap for the buildings sector, which should be developed in the finalisation of the plan to enable the energy modernisation of buildings which will help unlock the sector's emission reduction potential.

The plan should also acknowledge the contribution of the agricultural sector to reaching the goals of the Climate Action Regulation by outlining policies, measures and available funding sources to reduce its emissions.

The Hungarian draft NECP should be completed and properly finalised. It is of paramount importance that, when developing the final plan, Hungary increases its commitment to the 2030 climate objectives, and involves all stakeholders in a more transparent process.

### Annexes



### Assessment criteria

### Methodology

To develop the used set of criteria, we conducted desk research and looked mainly at two examples: the criteria used in the LIFE Maximiser Project and the criteria developed by Climate Action Network (CAN) Europe.

The LIFE Maximiser project analysed EU Member States' 2050 low-carbon development strategies (LCDS). For this purpose, LIFE Maximiser developed a complex technical tool<sup>20</sup> to assess and score the quality (in terms of substance, credibility and process) and status of the EU Members' LCDS. The tool was broken down into 10 criteria, and based on these criteria, further into 48 indicators and sub-indicators. The overall approach used by LIFE Maximiser was normative, meaning that their tool was designed with the primary purpose to measure what elements should be included in the LCDS they analysed. Of the 10 criteria, the most relevant for our work were: ambition, scope, integration, public transparency and process transparency.

The guidelines developed by CAN Europe (part 1<sup>21</sup> and part 2<sup>22</sup>) are intended to serve as a tool to empower civil society organisations across Europe to engage actively and effectively in the process of the development of the NECPs; to demand ambitious targets and policies from their governments; to check on the accuracy and coherence of governmental proposals; and to hold them accountable for what they have committed to do. They are meant to provide an understanding of the plans and how they work. The guidelines are composed of five pillars, one per topic analysed. Each pillar is underpinned by a set of criteria and indicators. For our work, we looked at all the pillars and selected the relevant criteria and indicators.

Additionally, we developed sector-specific indicators to analyse sectoral policies that are the focus of our project. Each sector - agriculture, buildings and transport - was given a set of indicators that explore the ambition level of sectoral policies, their alignment with EU legislation and the level of their infrastructure investment.

### User manual

The result of this methodology was a set of eight criteria, underpinned by a total of 38 indicators. In addition, a scaling system was introduced to measure and evaluate the indicators.

The participatory assessments shall be conducted on the basis of the eight criteria listed below.

 $<sup>20 \</sup>qquad \\ \underline{\text{https://static1.squarespace.com/static/57050297356fb0e173a11732/t/5b3107a96d2a73fc7bbaaa28/1529939892483/final+tool+concept+Maximiser+formatted.pdf}$ 

<sup>21 &</sup>lt;a href="https://docs.google.com/document/d/1A4qGHLX2ThnlwlrukHjJHRZTdh0jghlV6PxUjqxDzI0/edit">https://docs.google.com/document/d/1A4qGHLX2ThnlwlrukHjJHRZTdh0jghlV6PxUjqxDzI0/edit</a>

<sup>22</sup> https://docs.google.com/document/d/1tl0HUF1T0gYWPMU7SeBpybw1AvPwH3L-TLGPmbozDnA/edit#heading=h.2nusc19

These criteria should be used to provide a general indication of the strengths and weaknesses of the specific NECP section on a scale from 0 to 4. The score should be properly justified in a dedicated paragraph.

These criteria, and related indicators, rely exclusively on existing data provided within the NECPs. Lack of data or sections in the NECPs should be highlighted but not compensated for. The lack of details and data shall instead be translated into concrete policy asks to be submitted to Member States in public consultations.

When impact assessment of policies and measures is missing in the NECP, the following national projections may be used to explain the point assigned to each indicator: Climate and Energy country profiles.

### Assessment criteria template

Criterion	Indicator	Indicator description	Score
Scope	Consistency with En-	Does the plan follow the	0 = not at all
	ergy Union governance	mandatory template as	1 = to a small extent
	regulation	outlined in the Gover-	2 = to some extent
		nance Regulation?	3 = to a moderate extent
			4 = to a great extent
	Sectors/policies cov-	Does the plan include	0 = not at all
	erage	policies covering all re-	1 = to a small extent
		quired sectors?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Deadline	Has the plan been pub-	0 = no publication
		lished on time/respecting	1 = considerable delay
		deadline?	2 = no, reasonable delay
			3 = yes, some delay
			4 = yes, no delay

Criterion	Indicator	Indicator description	Score
Ambition/	Greenhouse Gas (GHG)	Does the plan include an	0 = not at all
plausibility	emissions	economy-wide GHG emis-	1 = to a small extent
		sions reduction target for	2 = to some extent
		2030?	3 = to a moderate extent
			4 = to a great extent
	Consistency among	Does the plan utilise con-	0 = not at all
	targets	sistent and harmonised	1 = to a small extent
		GHG emission targets and	2 = to some extent
		related baselines?	3 = to a moderate extent
			4 = to a great extent

Criterion	Indicator	Indicator description	Score
Ambition/	Renewable energy	Does the plan include a	0 = not at all
plausibility		national 2030 renewable	1 = to a small extent
		energy target?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Energy efficiency	Does the plan include a	0 = not at all
		national 2030 energy effi-	1 = to a small extent
		ciency target?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Alignment with 2050	Is there a clear commit-	0 = not at all
	decarbonisation objec-	ment to the Paris Agree-	1 = to a small extent
	tive	ment's objectives?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent

Criterion	Indicator	Indicator description	Score
Sectoral	Alignment/plausibility	Are transport policies in-	0 = not at all
policy:	with 2030 goals	cluded in the plan plausi-	1 = to a small extent
Transport		ble to reach 2030 national	2 = to some extent
		climate goals?	3 = to a moderate extent
			4 = to a great extent
	Inclusion of long-term	Do plans include trans-	0 = not at all
	strategy	port policies beyond	1 = to a small extent
		2030?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Consistency with EU	Are transport policies	0 = not at all
	legislation	consistent and in line	1 = to a small extent
		with EU legislation?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Infrastructure	Are proposed infrastruc-	0 = not at all
		ture investments aligned	1 = to a small extent
		with the long-term cli-	2 = to some extent
		mate goals?	3 = to a moderate extent
			4 = to a great extent

Criterion	Indicator	Indicator description	Score
Sectoral	Policies beyond or ad-	Does the plan include	0 = not at all
policy:	ditional to EU require-	policies that are addition-	1 = to a small extent
Transport	ments	al or go beyond EU re-	2 = to some extent
		quirements?	3 = to a moderate extent
			4 = to a great extent

Criterion	Indicator	Indicator description	Score
Sectoral	Alignment/plausibility	Are buildings policies in-	0 = not at all
policy:	with 2030 goals	cluded in the plan plausi-	1 = to a small extent
Buildings		ble to reach 2030 national	2 = to some extent
		climate goals?	3 = to a moderate extent
			4 = to a great extent
	Inclusion of long-term	Do plans include buildings	0 = not at all
	strategy	policies beyond 2030?	1 = to a small extent
			2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Consistency with EU	Are buildings policies	0 = not at all
	legislation	consistent and in line	1 = to a small extent
		with EU legislation?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Infrastructure	Are proposed infrastruc-	0 = not at all
		ture investments aligned	1 = to a small extent
		with the long-term cli-	2 = to some extent
		mate goals?	3 = to a moderate extent
			4 = to a great extent
	Policies beyond or ad-	Does the plan include	0 = not at all
	ditional to EU require-	policies that are addition-	1 = to a small extent
	ments	al or go beyond EU re-	2 = to some extent
		quirements?	3 = to a moderate extent
			4 = to a great extent

Criterion	Indicator	Indicator description	Score
Sectoral	Alignment/plausibility	Are agricultural poli-	0 = not at all
policy:	with 2030 goals	cies included in the plan	1 = to a small extent
Agriculture		plausible to reach 2030	2 = to some extent
		national climate goals?	3 = to a moderate extent
			4 = to a great extent

Criterion	Indicator	Indicator description	Score
Sectoral	Inclusion of long-term	Do plans include agri-	0 = not at all
policy:	strategy	cultural policies beyond	1 = to a small extent
Agriculture		2030?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Consistency with EU	Are agricultural policies	0 = not at all
	legislation	consistent and in line	1 = to a small extent
		with EU legislation?	2 = to some extent
			3 = to a moderate extent
			4 = to a great extent
	Infrastructure	Are proposed infrastruc-	0 = not at all
		ture investments aligned	1 = to a small extent
		with the long-term cli-	2 = to some extent
		mate goals?	3 = to a moderate extent
			4 = to a great extent
	Policies beyond or ad-	Does the plan include	0 = not at all
	ditional to EU require-	policies that are addition-	1 = to a small extent
	ments	al or go beyond EU re-	2 = to some extent
		quirements?	3 = to a moderate extent
			4 = to a great extent

Criterion	Indicator	Indicator description	Score
Transparency	Public participation	Does the plan include	0 = no opportunities/form
		early and effective oppor-	of consultation
		tunities for public partic-	1 = no only limited and
		ipation?	not public
			2 = no, public consulta-
			tion but too short time
			3 = yes, several opportu-
			nities
			4 = yes, several opportu-
			nities and ample time to
			participate
	Publication	Is the draft plan publicly	0 = no
		available?	1 = yes, 6 or more months
			delay
			2 = yes, 2-3 months delay
			3 = yes
			4 = yes, plus
			summary in English

Criterion	Indicator	Indicator description	Score
Transparency	Multilevel dialogue	Does the plan cater for a	0 = no provision for dia-
		multilevel dialogue where	logue
		local authorities, NGOs,	1 = very limited effort
		business, investors and	2 = only limited to very
		the general public can ac-	few stakeholders
		tively engage and discuss	3 = yes, some effort in
		the climate and energy	including multiple stake-
		policy scenarios, and re-	holders and gather input
		view progress?	4 = yes, effective dialogue
			and high engagement

Criterion	Indicator	Indicator description	Score
Consistency	Adaptation plan	Has an adaptation plan	0 = no
and		been devised? Is it re-	1 = no, unclear adaptation
credibility		flected in the NECP?	strategy
			2 = yes, but not clearly
			reflected in the plan
			3 = yes, but limited
			4 = yes, fully developed
			and integrated
	Use of loopholes	Does the plan include use	0 = yes, full use/no alter-
		of loopholes in achieving	native sought
		GHG emission targets?	1 = yes, large use
			2 = yes, most opportuni-
			ties used
			3 = yes, but limited
			4 = no loopholes used
	Policy projections	Does the plan use a	0 = not at all
	Impact assessment	strong and effective mod-	1 = to a small extent
		el used for the impact	2 = to some extent
		assessment of planned	3 = to a moderate extent
		policies and measures?	4 = yes, very strong and
			detailed model used

Criterion	Indicator	Indicator description	Score
Co-benefits	Air quality	Do proposed policies im-	0 = no effect
		prove air quality?	1 = minimal effect
			2 = small improvement
			3 = moderate improve-
			ment
			4 = great improvement

Criterion	Indicator	Indicator description	Score
Co-benefits	Energy poverty	Do proposed policies re-	0 = no effect
		duce energy poverty?	1 = minimal effect
			2 = small improvement
			3 = moderate improve-
			ment
			4 = great improvement
	Job creation	Does the plan include in-	0 = no investment
		vestments in low-carbon	1 = almost insignificant
		industries, thus promot-	increase
		ing job creation in these	2 = small increase
		industries?	3 = moderate increase
			4 = great investment and
			substantial job growth

The table below summarises the weight that each criterion has on the overall score of the NECP.

Given the difference in importance of the criteria in our analysis, a weight system helps us quantify this difference and ensure that it is reflected in the overall score of the NECP. For example, while the consistency between the NECP document and template provided in the Governance regulation is important, the plausibility of the policies listed, the ambition level in targets set for each sector and the dialogue with multiple stakeholders in the development of the NECP are much more relevant and important to the objective of this exercise, and therefore should be given more prominence in the overall assessment.

Hence, a good performance in particular in these criteria should be graded higher in the overall assessment of climate and energy policies.

The final score of the assessment will be expressed as a percentage and will equal to the sum of the weighted points.

Criteria	Weight	Points
Scope	5	12
Ambition	20	20
Consistency and credibility	20	12
Transport policies	10	20
Buildings policies	10	20
Agriculture policies	10	20
Transparency	20	12
Co-benefits	5	12

A NECP should obtain at least 65% to be considered a good plan.

### LIFE PlanUp project description

LIFE PlanUp supports the shift to a low-carbon and resilient economy through the development and implementation of effective and ambitious national 2030 energy and climate plans (NECPs) in Hungary, Poland, Romania, Spain and Italy. A key objective of the PlanUp project is to strengthen the climate and energy governance processes in these countries by increasing the involvement of local and regional authorities (LRAs) and civil society organisations (CSOs) in the development and implementation of the NECPs.

Aiming to support the five target countries in strengthening their national NECPs and to engage in their development, a core action of the PlanUp project is the participatory assessment of draft and final NECPs. In order to conduct meaningful and consistent analyses for all five Member States, we developed a set of assessment criteria that will guide the assessments and ensure their comparability.

### **LIFE PlanUp**

Published: May 2019

Analysis by Clean Air Action Group and Carbon Market Watch, with input from Earth Hungary, WWF Hungary, Energiaklub, Greenpeace Hungary, Transport and Environment, Energy Cities and European Environmental Bureau.

Expert group: Agnese Ruggiero, Elisa Martellucci, Kaisa Amaral, András Lukács, Zoltán Lontay, Márton Vargha, Judit Szegő, Alexa Botár, Ádám Harnat, Orsolya Fülöp, András Perger, Cristina Mestre, Stephan Piskol, Roland Joebstl, Berenice Dupeux and David Donnerer.

To cite this study: LIFE PlanUp (2019) Fit to succeed? An assessment of the Hungarian draft energy and climate plan

### **Acknowledgement**

The Life PlanUp project has received funding from the LIFE programme of the European Union. The project acknowledges also the generous support of the European Climate Foundation.

### **Legal notice**

This publication, C4.1 Participatory assessment of draft NECPs, is financed by the European Commission through the LIFE+ programme, the European Climate Foundation and the European Climate Initiative (EUKI).

It is the overarching goal of the LIFE + programme to act as a catalyst for changes in policy development and implementation by providing and disseminating solutions and best practices to achieve environmental and climate goals, and by promoting innovative environmental and climate change technologies.

The information and views set out in this report are those of the author(s) and do not necessarily reflect the official opinion of the European Commission.

### **Further Information**

Agnese Ruggiero
Policy Officer
Carbon Market Watch
agnese.ruggiero@carbonmarketwatch.org
Rue d'Albanie 117, B-1060 Brussels, Belgium, Belgium | Tel: +32 2 335 36 66
www.carbonmarketwatch.org | @carbonmrktwatch | fb: Carbon Market Watch











Join the conversation > www.planup.eu