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Summary of the Commission assessment of the draft National Energy and Climate Plan 2021-2030

The EU has committed itself to a clean energy transition, which will contribute to fulfilling the goals of the Paris Agreement on climate change and provide clean energy to all. To deliver on this commitment, the EU has set binding climate and energy targets for 2030: reducing greenhouse gas emissions by at least 40%, increasing energy efficiency by at least 32.5%, increasing the share of renewable energy to at least 32% of EU energy use and guaranteeing at least 15% electricity inter-connection levels between neighbouring Member States. To ensure that the EU targets are met, EU legislation requires that each Member State drafts a 10-year National Energy and Climate Plan (NECP), setting out how to reach its national targets, including the binding national target for reducing greenhouse gas emissions that are not covered by the EU Emissions Trading System (ETS). The European Commission has analysed each draft NECP. The summary of this assessment for Belgium is outlined below. The final NECPs for the period 2021-2030 are due to be submitted by Member States by the end of 2019.

BELGIUM - National targets and contributions foreseen in the draft National Energy and Climate Plan
Belgium is a federal state, where the decision-making power is shared between a Federal government, three Regions (Wallonia, Flanders and the Brussels Capital Region) and three Communities (the Flemish, the French and the German-speaking Community). This division of competence is reflected in the Belgian draft integrated National Energy and Climate Plan (NECP), to which additional plans from the federated entities were annexed for further information. The draft NECP covers all five dimensions of the Energy Union, but the information provided for each dimension varies in length and in detail. Notably, Belgium has reported clear national contributions for 2030 for GHG emissions reduction, energy efficiency (final and primary energy consumption), and renewable energy.

Belgium’s 2030 target for greenhouse gas (GHG) emissions not covered by the EU Emissions Trading System (non-ETS), is -35% compared to 2005, as set in the Effort Sharing Regulation (ESR)\(^1\). Adopted policies would lead to 13% reductions and the draft NECP aims at achieving the -35% target domestically. The final plan would therefore benefit from additional information on the scope, timing and the expected impacts of policies and measures needed, notably in the building and transport sectors, as well as on the intended use of the flexibility with the ETS.

The draft NECP expects the Land Use, Land Use Change and Forestry (LULUCF) sector to remain a net sink over the period up to 2030. However, the plan would gain in clarity if it included estimates on how many net credits are expected to be generated, applying the accounting rules set out in Regulation (EU) 2018/841. The draft NECP also does not provide quantifiable information nor projections for specific policies and measures related to agriculture, and LULUCF.

Belgium proposes an 18.3% share of energy from renewable sources in gross final consumption of energy in 2030 as contribution to the EU renewable energy target for 2030. This level of ambition is significantly below the share of 25% by 2030 that results from the formula in Annex II of the Governance Regulation, a situation which would also require in the final plan an indicative trajectory that reaches all reference points\(^2\) in accordance with the national contribution in the final plan. The final plan would benefit from elaborating further on the policies and measures allowing the achievement of the contribution and on other relevant sectoral measures.

For energy efficiency, the 2030 national contribution is set on the basis of the projections of the scenario with additional measures at a level of 39 Mtoe in primary energy consumption and 33.1 Mtoe in final energy consumption in 2030. This can be seen as a low level of ambition.

Regarding energy security, due attention is given to the increasing dependence on gas, renewable energy and energy imports in light of the nuclear phase out. Further information is provided in relation to reinforcing diversification and system flexibility and reducing import dependency. This could be explained in more detail, along with setting clear and measureable objectives and accompanying measures.

In relation to the internal market, Belgium will have already surpassed the electricity interconnection level for 2030, with a level of electricity interconnectivity of 21% in 2020. Nonetheless, the plan would benefit from including a concrete aim for 2030. Further concrete and quantifiable objectives could be

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2 Pursuant to Article 4(a)(2) of Regulation 2018/1999.
identified to the other aspects of the dimension, providing detailed information on the strategy that will be taken towards 2030. The final plan should also provide additional details on existing and potential measures, the energy-poverty plans and their expected impact, while at the same time completing the analysis on energy poverty as required in the Governance Regulation.

- **On research, innovation and competitiveness**, the plan provides a clear overview of the extensive research and innovation architecture in Belgium, but more attention could be given to the desired outcome of all these efforts by setting clear and measurable objectives for 2030. The draft NECP would moreover benefit from presenting a comprehensive overview on competitiveness, in particular for the low-carbon technologies sector, including also for energy-intensive industries.

- The draft plan provides information on **investment needs**, which remains however mainly qualitative and focused on a particular sector or measure. The final NECP would benefit from a comprehensive assessment of overall investment needs to achieve the objectives, as well as information on the national, regional and Union financial sources to be mobilised. This would take full advantage of the role NECPs can play in providing clarity to investors and attracting additional investments in the clean energy transition. The draft NECP does not yet contain an impact assessment of planned policies and measures, which is needed in the final plan.

- The division of competence between the different federated entities in Belgium presents a challenge to arrive at an integrated NECP. When proceeding to the finalisation of the NECP, additional coordination efforts will be needed to present an integrated national vision on how to achieve the objectives of the Energy Union towards 2030, while ensuring overall consistency and coherence with the federal and regional plans. The Inter-federal Energy Pact represents a step in the right direction in presenting a common vision that should be more consistently reflected in the draft NECP. The final NECP will need to contain all elements required by the Governance Regulation, including all information to assess the proposed ambition levels and the adequacy of policies and measures in achieving them. A general reference to annexed plans is not sufficient in this regard.

- The draft NECP describes numerous **policies and measures** for each dimension of the Energy Union, notably on decarbonisation and energy efficiency. These often present interesting avenues to achieve the objectives and deserve to be explained in more detail, presenting the necessary information on their scope, timeframe and related budget, combined with an assessment of the foreseen impacts, which is currently not always the case. This lack of information renders difficult the assessment of whether the policies and measures will achieve the set ambitions.

- The draft plan mentions the interactions with **air quality and air emissions policy**, in particular as regards an integrated assessment of air and climate plans for one of the three regions. However, the analysis needs to cover the whole of Belgium, and would benefit from including a quantitative perspective.

- The issue of a socially **just transition** could be better integrated throughout by considering social and employment impacts, e.g. shifts in sectors/industries and skills impacts, distributional effects and revenue recycling. The plan mentions the need for education and training in general terms only, and foresees education or training for certain occupations and sectors, but would benefit from providing more details on these aspects.

- A list of all **energy subsidies** and actions undertaken and planned to phase them out, in particular for fossil fuels, needs to be included in the final plan.
An example of **good practice** is the approach followed to promote regional cooperation, where Belgium has spearheaded a reform of the Pentalateral Energy Forum to modify its scope and governance structure for cross-border cooperation in the frame of the NECPs. Another example is Belgium’s significant advancements in electricity interconnectivity, enabling it to reach the EU’s 2030 ambition already in 2020. The foreseen overarching emergency plan, mapping risk across energy vectors and ways to address them is another example of good practice. The use of voluntary templates for projections with existing measures and with additional measures is well appreciated. Furthermore, the draft regional plans contain several examples of good practice in involvement of local government, such as the system of 'local energy strategies', or the 'conventions for ecological transition'.

### Related links:
- [National Energy & Climate Plans](#) – for links to the Commission recommendations and Staff Working Document for Belgium and all other Member States, to the Commission Communication assessing all draft NECPs, and to the draft NECPs themselves.
- More information about the [Clean energy for all Europeans package](#)
- More information about the [2030 climate & energy framework](#)