



2024/1042

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COMMISSION RECOMMENDATION (EU) 2024/1042

of 23 February 2024

**on the draft updated integrated national energy and climate plan of Belgium covering the period
2021-2030**

(Only the French and Dutch texts are authentic)

THE EUROPEAN COMMISSION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 292 thereof,

Having regard to Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council ⁽¹⁾, and in particular Article 9(2), and Article 14(6) thereof,

Whereas:

- (1) Belgium submitted its draft updated integrated national energy and climate plan (NECP) on 30 November 2023. Due to the late submission of Belgium's draft updated national energy and climate plan, the European Commission was not in a position to adopt this recommendation six months before the final updated national energy and climate plans are due, as required by Article 9(2) of Regulation (EU) 2018/1999.
- (2) Article 3 and Annex I to Regulation (EU) 2018/1999 ('the Governance Regulation') lay down the elements that are to be included in the updated integrated national energy and climate plans. In December 2022, the Commission adopted guidance to Member States on the process and scope of preparing the draft and final updated national energy and climate plans ⁽²⁾. The guidance identified good practices and outlined the implications of recent policy, legal and geopolitical developments in energy and climate policies.
- (3) In connection with REPowerEU plan ⁽³⁾, and as part of the 2022 and 2023 European Semester cycles, the Commission has put a strong focus on Member States' energy and climate related reform and investment needs to strengthen energy security and affordability by accelerating the green and fair transition. This is reflected in the 2022 and 2023 Country Reports ⁽⁴⁾ for Belgium and the Council Recommendations ⁽⁵⁾ to Belgium. Member States should take into account the latest country-specific recommendations in their final updated integrated national energy and climate plans.
- (4) The Commission's recommendations with regard to the delivery of national targets under the Regulation (EU) 2018/842 of the European Parliament and of the Council ⁽⁶⁾ (Effort Sharing Regulation – ESR) are based on the likelihood that the Member States will respect the 2030 targets, taking into account the rules for the use of flexibilities under the ESR.

⁽¹⁾ OJ L 328, 21.12.2018, p. 1.

⁽²⁾ 2022/C 495/02

⁽³⁾ COM(2022) 230 final

⁽⁴⁾ SWD (2022) 602 final, SWD (2023) 601 final

⁽⁵⁾ COM (2022) 602 Recommendation for a Council Recommendation; COM (2023) 601 final, Recommendation for a Council Recommendation

⁽⁶⁾ Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 (OJ L 156, 19.6.2018, p. 26), as amended by Regulation (EU) 2023/857 of 19 April 2023 (OJ L 111, 26.4.2023, p. 1).

- (5) The Commission's recommendations regarding Carbon Capture, Utilisation and Storage (CCUS) aim at having an overview of the intended deployment of these technologies at national level, including information about annual volumes of CO₂ planned to be captured by 2030, split by source of CO₂ captured coming from installations covered by Directive 2003/87/EC of the European Parliament and of the Council ⁽⁷⁾ or from other sources, such as biogenic sources or direct air capture; about planned CO₂ transport infrastructure; and about potential domestic CO₂ storage capacity and injection volumes of CO₂ planned to be available in 2030.
- (6) The Commission's recommendations regarding the performance under the Regulation (EU) 2018/841 of the European Parliament and of the Council ⁽⁸⁾ (Land Use, Land Use Change and Forestry Regulation – 'LULUCF Regulation') address the delivery by the Member State on the 'no debit' rule for the period 2021-2025 (Period 1) and its national target for the period 2026-2030 (Period 2), taking into account the rules governing the use of flexibilities as set out in that Regulation. The Commission's recommendations also take into account that in Period 1 any excess in emissions under the LULUCF Regulation will automatically be transferred to the ESR.
- (7) For climate adaptation to properly support the achievement of energy and climate mitigation objectives, it is essential to identify the potential climate change hazards and analyse climate vulnerabilities and risks that may affect relevant areas, populations and sectors. The Commission's recommendations on adaptation consider the extent to which Belgium integrated in its updated NECP adaptation goals that account for climate risks, that could prevent Belgium from meeting the objectives and targets of the Energy Union. Without specific adaptation policies and measures, planned and implemented, the achievement of objectives in Energy Union dimensions is at risk. Water management in changing climatic conditions requires particular attention due to risks of electricity disruption as floods, heat and drought impact the energy production.
- (8) The Commission's recommendations regarding Belgium's renewable energy ambition are based on the formula set out in Annex II to Regulation (EU) 2018/1999, which is based on objective criteria, and on the main policies and measures missing in Belgium's draft updated plan to enable a timely and cost-effective achievement of Belgium's national contribution to the Union's binding renewable energy target of at least 42,5 % in 2030, with the collective endeavour to increase it to 45 % pursuant to Directive (EU) 2018/2001 of the European Parliament and of the Council ⁽⁹⁾ as regards the promotion of energy from renewable sources and as amended by Directive (EU) 2023/2413 of the European Parliament and of the Council ⁽¹⁰⁾. The Commission's recommendations are also based on Belgium's contribution to the specific targets of Articles 15a, 22a, 23, 24 and 25 of that Directive and the related policies and measures to rapidly transpose it and implement it. The recommendations reflect the importance of developing comprehensive long-term planning for the deployment of renewable energy, and in particular wind, to increase visibility for the European manufacturing industry and grid operators in line with the European Wind Power Package ⁽¹¹⁾.

⁽⁷⁾ Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC (OJ L 275, 25.10.2003, p. 32).

⁽⁸⁾ Regulation (EU) 2018/841 of the European Parliament and of the Council of 30 May 2018 on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry in the 2030 climate and energy framework- and amending Regulation (EU) No 525/2013 and Decision No 529/2013/EU (OJ L 156, 19.6.2018, p. 1), as amended by Regulation (EU) 2023/839 of the European Parliament and of the Council of 19 April 2023 (OJ L 107, 21.4.2023, p. 1).

⁽⁹⁾ Directive (EU) 2018/2001 of the European Parliament and of the Council of 11 December 2018 on the promotion of the use of energy from renewable sources (OJ L 328, 21.12.2018, p. 82).

⁽¹⁰⁾ Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001, Regulation (EU) 2018/1999 and Directive 98/70/EC as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652 (OJ L, 2023/2413, 31.10.2023, ELI: <http://data.europa.eu/eli/2023/2413/oj>).

⁽¹¹⁾ Communication on European Wind Power Action Plan COM (2023) 669 final, 24.10.2023 and Communication on delivering EU offshore renewable energy ambition, COM (2023) 668 final.

- (9) The Commission's recommendations regarding the national contribution to energy efficiency are based on Article 4 of the Directive (EU) 2023/1791 of the European Parliament and of the Council ⁽¹²⁾ on energy efficiency; and the formula in Annex I to that Directive, and the related policies and measures to implement it.
- (10) The Commission's recommendations pay particular attention to the targets, objectives and contributions and related policies and measures to deliver on the REPowerEU plan in order to rapidly phase out dependence from Russian fossil fuels. They take into account lessons learnt from the implementation of the Save gas for a Safe winter Package ⁽¹³⁾. The recommendations reflect the imperative to make the energy system more resilient in light of the obligations stemming from Regulation (EU) 2019/941 of the European Parliament and of the Council ⁽¹⁴⁾ on risk preparedness in the electricity sector and Regulation (EU) 2017/1938 of the European Parliament and of the Council ⁽¹⁵⁾ on the security of gas supply in line with the Commission Recommendation on energy storage ⁽¹⁶⁾.
- (11) The Commission's recommendations take into account the need to accelerate the integration of the internal energy market to strengthen the role of flexibility and empower and protect consumers. The Commission's recommendation also considers the importance of assessing the number of households in energy poverty in line with the requirements of Article 3 of Regulation (EU) 2018/1999, and the Commission Recommendation (EU) 2023/2407 ⁽¹⁷⁾.
- (12) The Commission's recommendations reflect the importance of ensuring sufficient investments in clean energy research and innovation to boost their development and manufacturing capacities, including appropriate policies and measures for energy intensive industries and other businesses; and the need to upskill workforce for a net-zero industry in order to consolidate a strong, competitive and clean economy within the Union.
- (13) The Commission's recommendations build on the commitments taken under the Paris Agreement to phase down the use of fossil fuels, as well as on the importance of phasing out fossil fuel subsidies.
- (14) The Commission's recommendation on investment needs follows its assessment of whether the draft updated plan provides a general overview of investment needs to achieve the objectives, targets and contributions for all dimensions of the Energy Union; indicates the sources of financing, distinguishing private and public sources; outlines investments consistent with Belgium's Recovery and Resilience Plan, Belgium's Territorial Just Transition Plans and the 2022-2023 country-specific recommendations issued under the European Semester; and includes a robust macroeconomic assessment of planned policies and measures. The NECP should ensure the transparency and predictability of national policies and measures, to support investment certainty.

⁽¹²⁾ Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast) (OJ L 231, 20.9.2023, p. 1).

⁽¹³⁾ Communication from the Commission to the European Parliament, the Council, the European economic and social committee, 'Save Gas for a Safe Winter', COM/2022/360 final.

⁽¹⁴⁾ Regulation (EU) 2019/941 of the European Parliament and of the Council of 5 June 2019 on risk preparedness in the electricity sector and repealing Directive 2005/89/EC (OJ L 158, 14.6.2019, p. 1).

⁽¹⁵⁾ Regulation (EU) 2017/1938 of the European Parliament and of the Council of 25 October 2017 concerning measures to safeguard the security of gas supply and repealing Regulation (EU) n°994/2010 (OJ L 280, 28.10.2017, p. 1).

⁽¹⁶⁾ Commission Recommendation of 14 March 2023 on Energy Storage – Underpinning a decarbonised and secure EU Energy system, C/2023/1729 (OJ C 103 20.3.2023 p. 1).

⁽¹⁷⁾ Commission Recommendation (EU) 2023/2407 of 20 October 2023 on energy poverty, C:2023/4080 (OJ L 2023/2407, 23.10.2023, ELI: <http://data.europa.eu/eli/2023/2407/oj>).

- (15) The Commission's recommendations reflect the crucial importance of a wide regional consultation and of ensuring early and inclusive consultation on the plan, including effective public participation with sufficient information and timeframe, in line with the Aarhus Convention ⁽¹⁸⁾.
- (16) The Commission's recommendations on just transition reflect the assessment of whether the Belgium's plan identifies in sufficient depth the relevant social, employment and skills impacts of the climate and energy transition and outlines adequate accompanying policies and measures to promote a just transition, while contributing to the promotion of both human rights and gender equality.
- (17) The Commission's recommendations to Belgium are underpinned by the assessment of its draft updated NECP ⁽¹⁹⁾, which is published alongside this Recommendation.
- (18) Belgium should take due account of the present recommendations when developing its final updated integrated NECP to be submitted by 30 June 2024.

HEREBY RECOMMENDS THAT BELGIUM TAKES ACTION TO:

1. Set out cost-efficient additional policies and measures, including in the transport and the building sectors, to bridge the projected gap of 4,4 percentage points to meet the national greenhouse gas target of -47 % in 2030 compared to 2005 levels under the ESR. Provide updated projections to show how the existing and planned policies will deliver on the target and, if necessary, specify how flexibilities available under the ESR will be used to ensure compliance. Complement the information on the policies and measures, clearly spelling out their scope, timeline and, where possible, expected greenhouse gas reduction impact, including measures in Union funding programmes, such as the common agricultural policy.
2. Identify the sources of CO₂ emissions that are planned to be captured.
3. Provide additional detail about the planned measures, quantifying their expected impacts in terms of removals or emissions from the LULUCF sector. Provide clear information on how public funds (both Union funds, including the common agricultural policy, and State aid) and private financing through carbon farming schemes are consistently and effectively used to achieve the net removal national target. Provide information on the status and progress to be made in ensuring the enhancements to higher tier levels/geographically explicit datasets for monitoring, reporting and verification in line with Part 3 of Annex V to Regulation (EU) 2018/1999.
4. Provide additional analysis on the relevant climate vulnerabilities and risks regarding the achievement of national objectives, targets, and contributions and the policies and measures in the different dimensions of the Energy Union. Better outline and quantify where possible the link to the specific Energy Union objectives and policies, that adaptation policies and measures should support. Set out additional adaptation policies and measures in sufficient detail to support the achievement of national objectives, targets and contributions under the Energy Union, including measures to safeguard electricity generation capacity and residential energy saving.
5. Significantly raise the ambition of a share of renewable energy sources to at least 33 % as a contribution to the Union's binding renewable energy target for 2030 laid down in Article 3(1) of Directive (EU) 2018/2001 as amended, in line with the formula in Annex II to Regulation (EU) 2018/1999. Include an indicative trajectory that reaches the reference points for 2025 and 2027 pursuant to Article 4 (a)(2) of Regulation (EU) 2018/1999.

⁽¹⁸⁾ Convention on access to information, Public Participation in Decision-making and Access to Justice in Environmental Matters of 25 June 1998 (the 'Aarhus convention')

⁽¹⁹⁾ SWD(2024) 44

6. Provide estimated trajectories and a long-term plan for the deployment of renewable energy technologies over the next 10 years, with an outlook to 2040. Include an indicative target for innovative renewable energy technologies by 2030 in line with Directive (EU) 2018/2001 as amended. Include specific targets to contribute to the indicative sub-target in buildings and industry for 2030, and the binding sub-target for renewable fuels of non-biological origin (RFNBOs) in industry for 2030 in line with Directive (EU) 2018/2001 as amended. Increase the binding targets for renewables in heating and cooling for both 2021-2025 and 2026-2030 and include an indicative target to achieve the top-ups of Annex IA to Directive (EU) 2018/2001 as amended and an indicative target in district heating and cooling for the 2021-2030 period. Include a sub-target for advanced biofuels and RFNBOs in the transport sector, making sure the minimum level of RFNBO in 2030 is observed.
7. Further develop detailed and quantified policies and measures, in a way that enables a timely and cost-effective achievement of Belgium's national contribution to the EU's binding renewable energy target of 42,5 % in 2030, with the collective endeavour to increase it to 45 %. Describe, in particular, for which renewable energy technologies other than wind power Belgium plans to accelerate permitting and to designate 'renewables acceleration areas' with faster and simpler procedures. Describe how Belgium aims to accelerate the deployment of renewables through the uptake of renewable power purchase agreements or measures using on guarantees of origin. Provide information on how Belgium aims to further accelerate the deployment of renewables and the phasing out of fossil fuels in the heating and cooling sector, and in district heating and cooling in line with the Directive (EU) 2018/2001 as amended. Include further detailed measures on an enabling framework for increasing integration between electricity and heating and cooling networks. Describe how the obligation on fuel suppliers in the transport sector will be covered and include comparable measures to promote hydrogen in industry and prepare the EU for renewable hydrogen trade.
8. Provide the estimated trajectories for biomass supply by feedstock and origin, differentiating between domestic production and imports. Include an assessment of the domestic supply of forest biomass for energy purposes in 2021-2030 in accordance with the strengthened sustainability criteria of Article 29 of Directive (EU) 2018/2001 as amended. Include an assessment of the compatibility of the projected use of forest biomass for energy production with Belgium's obligations under the revised LULUCF Regulation, particularly for 2026-2030, together with national measures and policies to ensure such compatibility. Include further information regarding the concrete targets to promote sustainable production of biomethane, given Belgium's sustainable biogas/biomethane potential and production and profile of natural gas consumption and existing infrastructure.
9. Provide to the extent possible an expected timeline of the steps leading to the adoption of legislative and non-legislative policies and measures aimed at transposing and implementing the provisions of Directive (EU) 2018/2001 as amended, in particular for the measures mentioned in the previous points.
10. Include a national energy efficiency contribution on final energy consumption to the Union's binding final energy consumption target for 2030 in line with Article 4 and Annex I of Directive (EU) 2023/1791, or equal to the corrected indicative national contribution that the Commission will submit to each Member State by 1 March 2024 under Article 4(5) of that Directive. Include a national energy efficiency contribution on primary energy consumption to the EU's indicative primary energy consumption target in line with Article 4 and Annex I of Directive (EU) 2023/1791. Specify the amount of energy consumption reduction to be achieved by all public bodies disaggregated by sector and the total floor area of heated and/or cooled buildings owned by public bodies to be renovated yearly or corresponding yearly energy savings to be achieved.
11. Set out complete policies and measures to achieve the national contributions on energy efficiency, and in particular how the Energy Efficiency First principle will be implemented. Further quantify the expected energy savings of the planned measures to achieve the 2030 energy efficiency goals. Specify robust financing energy efficiency programmes and financial support schemes able to mobilise private investments and additional co-financing.

12. Include updated ambition level to ensure a highly energy efficient and decarbonised national building stock and to transform existing buildings into zero-emission buildings by 2050, including intermediate milestones for 2030 and 2040 and a comparison with the most recent long-term renovation strategy. Support the targets for the decarbonisation of buildings by providing further information on policies and measures including their costs and expected impact in energy savings, for the implementation of a coherent long-term renovation strategy.
13. Further explain the envisaged measures to pursue the diversification of its gas supply and to continue encouraging gas demand reduction towards 2030, in particular given the foreseen increased share of natural gas in the national energy mix in the mid-term. Strengthen the resilience of the energy system in particular by clarifying the objective and the envisaged measures for electricity storage deployment. Assess the adequacy of the Belgian oil infrastructure (refinery, oil stocks, ports, pipelines) with the expected decline in oil demand and the move toward lower-carbon alternatives. Specify appropriate measures for the diversification and the long-term supply of nuclear materials, fuel, spare parts, and services and for the long-term management of nuclear waste. Provide more details on ongoing research activities related to Small Modular Reactors (SMRs).
14. Put forward clear objectives and targets for demand response to improve the flexibility of the energy system, in light of an assessment of the flexibility needs. Describe how Belgium intends to facilitate energy system integration in the context of Article 20a of Directive (EU) 2018/2001 as amended.
15. Further develop the approach to addressing energy poverty by indicating a specific measurable reduction target, as required by Regulation (EU) 2018/1999 and taking into account the Commission Recommendation (EU) 2023/2407. Provide additional detail on existing and potential measures to address energy poverty and on the dedicated financial resources from the perspective of both social policy (affordability) and structural energy measures.
16. Further clarify national objectives in research, innovation and competitiveness to deploy clean technologies, establishing a pathway for 2030 and 2050 with a view to support the decarbonisation of industry and promote the transition of businesses towards a net zero and circular economy. Put forward policies and measures to promote the development of net-zero projects including those relevant for the energy intensive industries. Describe a predictable and simplified regulatory framework for permitting procedures and how access to national funding will be simplified where needed. Provide detailed policies and measures for the digitalisation of the energy system, for the development of clean energy-related skills, and to facilitate open trade for resilient and sustainable supply chains of key net-zero components and equipment.
17. Specify the reforms and measures to mobilise the private investments needed to achieve the energy and climate targets. Improve and expand the analysis of investment needs to include a comprehensive and consistent overview of the public and private investment needs in aggregate and by sector. Complement a top-down economy-wide approach with a bottom-up project-specific assessment. Include a breakdown of total investment needs with additional information on the federal, regional and Union funding sources, as well as private financial sources, to be mobilised. Add a short description of the type of financial support schemes chosen to implement the policies and measures, which are financed through the public budget, and the use of blended financial instruments making use of grants, loans, technical assistance and public guarantees, including the role of national promotional banks in the respective schemes and/or how private financing is mobilised. Consider the cost-effective generation of transfers to other Member States under the ESR as a funding source. Provide a robust assessment of the macroeconomic impact of the planned policies and measures.
18. Outline how the policies and measures included in the draft updated NECP are consistent with Belgium's national recovery and resilience plan.
19. Explain in detail how and by when Belgium intends to phase out the remaining fossil fuel subsidies.

20. Further detail the analytical basis by providing projections under the planned policies and measures on how the energy system will develop with an outlook to 2040.
21. Provide more detailed information on the social, employment and skills consequences, or any other distributional impacts, of the climate and energy transition, and on the planned objectives, policies and measures to support a just transition. Specify the form of support, the impact of the initiatives, the target groups and the resources dedicated, taking into account the Council Recommendation on ensuring a fair transition towards climate neutrality ⁽²⁰⁾. Include to the extent possible more elements to provide an adequate analytical basis for the preparation of a future Social Climate Plan, in accordance with Regulation (EU) 2023/955 of the European Parliament and of the Council ⁽²¹⁾, including indications on how to assess the challenges and social impacts on the most vulnerable of the emissions trading system for fuel combustion in buildings, road transport and additional sectors, and to identify potential beneficiaries and a relevant policy framework. Explain how the policy framework identified in the NECP will contribute to the preparation of Belgium's Social Climate Plan and how the consistency between the two plans will be ensured.
22. Provide a clearer and more detailed overview on how the consultation process has enabled participation from all relevant authorities, citizens and stakeholders, including social partners and energy communities, in the preparation of both the draft and the final updated plan, including information on the timing and duration of the different consultations. Provide a detailed summary of the views expressed by different actors during the consultations and a summary of how they have been taken into account.
23. Expand the already good regional cooperation with neighbouring countries, in particular by describing how Belgium plans to establish a framework for cooperation with other Member States by 2025, in line with Article 9 of Directive (EU) 2023/2413. Pursue efforts to sign the five required solidarity agreements for the security of gas supply (with Ireland, France, Luxembourg, Germany, and the Netherlands).

Done at Brussels, 23 February 2024.

For the Commission
Kadri SIMSON
Member of the Commission

⁽²⁰⁾ Council Recommendation of 16 June 2022 on ensuring a fair transition towards climate neutrality (OJ C 243, 27.6.2022, p. 35).

⁽²¹⁾ Regulation (EU) 2023/955 of the European Parliament and of the Council of 10 May 2023 establishing a Social Climate Fund and amending Regulation (EU) 2021/1060 (OJ L 130, 16.5.2023, p. 1).