



COMMISSION RECOMMENDATION (EU) 2024/627

of 18 December 2023

on the draft updated integrated national energy and climate plan of Greece covering the period 2021-2030 and on the consistency of Greece's measures with the Union's climate-neutrality objective and with ensuring progress on adaptation

(Only the Greek text is 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,

Having regard to Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ⁽²⁾, and in particular Article 7(2) thereof,

Whereas:

Recommendation on Greece's draft updated integrated national energy and climate plan (NECP) of Greece covering the period 2021-2030

- (1) Greece submitted its draft updated integrated national energy and climate plan on 3 November 2023.
- (2) Due to the late submission of Greece's draft updated national energy and climate plan, the European Commission has had limited time to draft its assessment in order 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.
- (3) 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 the Guidance to Member States on the process and scope of preparing the draft and final updated national energy and climate plans ⁽³⁾. The Guidance identified good practices and outlined the implications of recent policy, legal and geopolitical developments in energy and climate policies.
- (4) In connection with the REPowerEU plan ⁽⁴⁾, 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 for Greece ⁽⁵⁾ and Council Recommendations to Greece ⁽⁶⁾. Member States should take into account the latest country-specific recommendations in their final updated integrated national energy and climate plans.

⁽¹⁾ OJ L 328, 21.12.2018, p. 1.

⁽²⁾ OJ L 243, 9.7.2021, p. 1.

⁽³⁾ Commission Notice on the Guidance to Member States for the update of the 2021-2030 national energy and climate plans (OJ C 495, 29.12.2022, p. 24).

⁽⁴⁾ COM(2022) 230 final.

⁽⁵⁾ SWD(2022) 609 final, SWD (2023) 608 final.

⁽⁶⁾ COM(2022) 609 Recommendation for a Council Recommendation; COM(2023) 608 final, Recommendation for a Council Recommendation.

- (5) The Commission's recommendations with regard to the delivery of national targets under the Effort Sharing Regulation ⁽⁷⁾ (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.
- (6) 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 ⁽⁸⁾ 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.
- (7) The Commission's recommendations regarding the performance under Regulation (EU) 2018/841 of the European Parliament and of the Council (Land Use, Land Use Change and Forestry Regulation – 'LULUCF Regulation') ⁽⁹⁾ 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.
- (8) 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 or sectors. The Commission's recommendations on adaptation consider the extent to which Greece integrated in its updated NECP adaptation goals that account for climate risks, that could prevent Greece from meeting the objectives and targets of the Energy Union. Water management in changing climatic conditions requires particular attention due to risks of electricity disruption as floods, heat and drought impact the energy production.
- (9) The Commission's recommendations regarding 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 Greece's draft updated NECP to enable a timely and cost-effective achievement of Greece'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 ⁽¹⁰⁾ as regards the promotion of energy from renewable sources. The Commission's recommendations are also based on Greece'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⁾ Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement and amending Regulation (EU) No 525/2013 (OJ L 156, 19.6.2018, p. 26), as amended by Regulation (EU) 2023/857 of the European Parliament and of the Council of 19 April 2023 amending Regulation (EU) 2018/842 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement, and Regulation (EU) 2018/1999 (OJ L 111, 26.4.2023, p. 1)

⁽⁸⁾ 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).

⁽⁹⁾ 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 amending Regulation (EU) 2018/841 as regards the scope, simplifying the reporting and compliance rules, and setting out the targets of the Member States for 2030, and Regulation (EU) 2018/1999 as regards improvement in monitoring, reporting, tracking of progress and review (OJ L 107, 21.4.2023, p. 1).

⁽¹⁰⁾ 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), as amended by 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/dir/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

- (10) The Commission's recommendations regarding the national contribution to energy efficiency are based on Article 4 of 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.
- (11) 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 on risk preparedness in the electricity sector ⁽¹⁴⁾ and Regulation (EU) 2017/1938 of the European Parliament and of the Council ⁽¹⁵⁾ on the security of gas supply, and in line with Commission Recommendation on energy storage ⁽¹⁶⁾.
- (12) 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 to 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⁾.
- (13) 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.
- (14) 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.
- (15) The Commission's recommendations on investment needs follow 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; and whether it outlines investments consistent with Greece's Recovery and Resilience Plan, Greece'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.
- (16) The Commission's recommendations reflect the crucial importance of a wide regional consultation and of ensuring an early and inclusive consultation on the plan, including effective public participation with sufficient information and timeframe, in line with the Aarhus Convention ⁽¹⁸⁾.

⁽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 (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) No 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 (OJ C 103, 20.3.2023, p. 1).

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

⁽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').

- (17) The Commission's recommendations on just transition reflect the assessment of whether Greece'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.
- (18) The Commission's recommendations to Greece are underpinned by the assessment of its draft updated NECP ⁽¹⁹⁾, which is published alongside this Recommendation.
- (19) Greece should take due account of the present recommendations when developing its final updated integrated NECP to be submitted by 30 June 2024.

Recommendations on the consistency with the Union's climate-neutrality objective and with ensuring progress on adaptation

- (20) Pursuant to Regulation (EU) 2021/1119 (the European Climate Law), the Commission is required to assess the consistency of national measures with the climate-neutrality objective and with ensuring progress on adaptation. The Commission assessed the consistency of Greece's measures with these objectives ⁽²⁰⁾. The below recommendations are based on that assessment. Greece should take due account of the present recommendations and follow up on them in accordance with the European Climate Law.
- (21) To ensure effectiveness of climate adaptation strategies and plans, it is essential to properly establish what potential climate change hazards may affect a certain area or sector. A solid risk assessment is a precondition of strategic and well-calibrated adaptation policy. It should build on the latest climate science and the results of stress testing, and be regularly updated to identify most vulnerable populations, infrastructures and sectors to climate change. Adaptation measures need to be implemented for improving preparedness and resilience. They may be prepared through adaptation pathways, setting out a sequence of measures towards an adaptation goal. Monitoring and evaluation of adaptation efforts is necessary for maintaining accountability and improving adaptation policy. Various EU funding instruments can be mobilised to fund adaptation. Climate resilience considerations should be put in the forefront when Member States design their national plans under the relevant EU funds. None of the spending should do harm to adaptation: that is, increase vulnerabilities either for the beneficiaries or for others.
- (22) The most vulnerable communities are those with elevated likelihood of being impacted by climate change. Unequal exposure and vulnerability to climate impacts of different regions and socioeconomic groups worsens pre-existing inequalities and vulnerabilities. Just resilience should reduce the unequal burden of climate risk and ensure equity in the distribution of the benefits of adaptation. The systemic ability to adjust to climate change is a key feature to avoid or moderate potential damage, to take advantage of opportunities, and to cope with the consequences. Physical impacts of climate change are evolving at a faster pace than expected. Progress in adaptive capacity is needed at all levels of the government, and in the public and private sectors, and requires increased awareness on vulnerabilities and risks. Private stakeholders are agents of change by providing information, resources, capacities, and funding.
- (23) Nature-based solutions offer efficient and cost-effective adaptation and mitigation options, if their deployment is incentivised through strategic frameworks, policies and funding. They can be implemented independently or integrated in other adaptation and mitigation measures, combined with more technological or infrastructure-based solutions. Implementation needs to consider the complexity of ecosystems and the projected effects of climate change, the local context, linked interests and values, and socioeconomic conditions,

⁽¹⁹⁾ SWD(2023) 929.

⁽²⁰⁾ EU Climate Action Progress Report 2023, COM(2023) 653 final, and Commission Staff Working Document – Assessment of progress on climate adaptation in the individual Member States according to the European Climate Law, SWD(2023) 932.

HEREBY RECOMMENDS THAT GREECE TAKES ACTION TO:

CONCERNING THE DRAFT UPDATED NATIONAL ENERGY AND CLIMATE PLAN UNDER REGULATION (EU) 2018/1999

1. Complement the information on the existing and planned policies and measures, including in agriculture, which are expected to contribute to meeting the national greenhouse gas target under the ESR. If necessary, specify additional policies and measures, clearly spelling out their scope, timeline and, where possible, expected greenhouse gas reduction impact, including for measures in Union funding programmes such as the common agricultural policy.
2. Identify the amount of CO₂ emissions that could be captured annually by 2030, including the source. Provide details on how the captured CO₂ will be transported.
3. Set out a concrete pathway towards reaching the national LULUCF target as defined in Regulation (EU) 2018/841. Provide additional detail about the planned and existing measures including quantifying their expected impacts to ensure that greenhouse gas removals in this sector are effectively aligned with the 2030 EU net removal target of – 310 MtCO₂eq and with the country-specific removal target of – ktCO₂eq defined in Regulation (EU) 2018/841. 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 the link to the specific Energy Union objectives and policies, that adaptation policies and measures should support. Pay particular attention to water management in changing climatic conditions due to risks of electricity disruption as floods, heat and drought impact the energy production.
5. Include an indicative trajectory with the reference points for 2025 and 2027 to reach Greece's national contribution of 44 % to the Union's binding renewable energy target for 2030, pursuant to Article 4(a)(2) of Regulation (EU) 2018/1999.
6. Provide a long-term deployment plan for 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. Include an indicative target for heating and cooling to achieve the top-ups of Annex 1A of Directive (EU) 2018/2001 as amended and the indicative target in district heating and cooling for 2021-2030. Specify which target Greece intends to achieve in the transport sector through the obligation on fuel suppliers, including by means of a sub-target for advanced biofuels and renewable fuels of non-biological origin (RFNBOs), making sure the minimum level of RFNBO in 2030 is observed.
7. Further develop policies and measures in a way that enables a timely and cost-effective achievement of Greece'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 %. Describe in particular how it plans to accelerate permitting in line with the provisions introduced by Directive (EU) 2018/2001 as amended. Describe how it aims to accelerate the deployment of renewables via the uptake of renewable power purchase agreements and guarantees of origin. Elaborate further on the measures for ensuring an enabling framework to promote self-consumption and energy communities, including on specific quantitative goals. Provide further information on how it aims to accelerate the deployment of renewables and the phasing out of fossil fuels in the heating and cooling sector, in line with Directive (EU) 2018/2001 as amended, including on establishing an enabling framework for increasing integration between electricity and heating and cooling networks. Include comparable measures for promoting hydrogen in industry and prepare the EU for renewable hydrogen trade.

8. 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 Greece's obligations under the revised LULUCF Regulation, particularly for 2026-2030, together with national measures and policies ensuring such compatibility. Elaborate on the measures to promote sustainable production of biomethane, given Greece's profile of natural gas consumption and existing infrastructure, digestate use and biogenic CO₂ applications.
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 to primary energy consumption in the Union'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. Include the amount of cumulative energy savings to be achieved over the period from 1 January 2021 to 31 December 2030 and an explanation on how the annual savings rate and the calculation baseline were established.
11. Set out complete policies and measures to achieve the national contributions on energy efficiency and in particular provide information of the energy savings measures to ensure the achievement of the required amount of cumulative end-use energy savings by 2030. Specify robust financing energy efficiency programmes and financial support schemes able to mobilise private investments and additional co-financing. Detail the role of the National Energy Efficiency Fund, as defined in Article 30 of Directive (EU) 2023/1791, in helping deliver the energy efficiency national contributions to the EU target, including the use of financial instruments within the Fund.
12. Include updated ambitions on ensuring a highly energy-efficient and decarbonised national building stock and transforming existing buildings into zero-emission buildings by 2050, including intermediate milestones for 2030 and 2040, and a comparison of these milestones with the most recent long-term renovation strategy. Include more information on related measures for buildings and provide their expected impact on energy savings.
13. Strengthen the resilience of its energy system by setting clear objectives and measures to address constrained or interrupted supply and putting forward policies and measures to integrate the imperative of climate adaptation in the energy system. Assess the adaptation of the oil infrastructure (refinery, oil stocks) with the expected decline in oil demand and the move toward lower-carbon alternatives.
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 and describe specific measures to facilitate energy system integration in the context of Article 20a of Directive (EU) 2018/2001 as amended. Elaborate on how the measures outlined in the draft updated NECP can contribute to the development of more competitive retail energy markets and strengthen consumer empowerment in the retail market.
15. Complete the approach on energy poverty by including 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, particularly as regards access to energy efficiency, building renovation and renewable energy, taking account of Recommendation (EU) 2023/2407 on energy poverty. Explain how the use of energy efficiency measures under the Energy Efficiency Obligations Scheme to alleviate energy poverty is foreseen to be deployed as required by Regulation (EU) 2018/1999.

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, 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. Provide 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 along the five dimensions of the Energy Union. Include a breakdown of total investment needs with additional information on the national, regional and Union funding sources as well as private financial sources, to be mobilised. Add a short description of the type of financial support scheme chosen to implement the policies and measures financed through the public budget, Union funding, 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. Explain in detail how and by when Greece intends to phase out fossil fuel subsidies. Explain in more detail how Greece plans to phase out solid fossil fuel power generation by clarifying related commitments and measures.
19. 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.
20. Provide 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, including on the islands. 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 ⁽²¹⁾. Ensure alignment between the timeline for the coal phase-out and the closure of individual lignite-powered plants outlined in the Territorial Just Transition Plans and the final updated NECP. 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 ⁽²²⁾, 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 Greece's Social Climate Plan and how the consistency between the two plans will be ensured.
21. Ensure inclusive public participation within a reasonable timeframe and broad participation of local authorities and civil society in the preparation of the plan. Provide a clear overview on how the consultation process will enable broad public participation from all relevant authorities, citizens, and stakeholders, including social partners, in the preparation of both the draft and final updated plan. Provide a summary of the views expressed by different actors, and a summary of how the plan integrates the views expressed during the consultations.
22. Intensify regional cooperation with neighbouring Member States as part of Central and South Eastern Europe Energy Connectivity (CESEC) High-Level Group to further integrate common challenges and shared objectives for interconnectivity, renewable energy and internal market. Describe how Greece plans to establish a framework for cooperation with other Member States by 2025, in line with Article 9 of the Directive (EU) 2023/2413. Pursue efforts to sign the two required bilateral solidarity arrangements for the security of gas supply with its neighbours (Bulgaria and Italy).

⁽²¹⁾ Council Recommendation of 16 June 2022 on ensuring a fair transition towards climate neutrality (OJ C 243, 27.6.2022, p. 35).

⁽²²⁾ 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).

CONCERNING THE CONSISTENCY OF NATIONAL MEASURES WITH THE CLIMATE-NEUTRALITY OBJECTIVE AND WITH ENSURING PROGRESS ON ADAPTATION UNDER REGULATION (EU) 2021/1119

1. Assess relevant vulnerabilities and risks related to heatwaves, floods, droughts. Prepare a comprehensive assessment of risks and vulnerabilities, with a particular focus on agriculture, water management, and forestry, among others. Ensure progress in the implementation of adaptation measures. Ensure that adaptation policies are monitored and evaluated systemically and regularly, and results reflected in the ensuing revised policy design and implementation. Put climate resilience considerations more to the forefront in the use of support from Union funding programmes, such as the common agricultural policy, cohesion policy funding and other relevant EU funds. Union funds should be spent in such a way that they increase climate resilience and do not increase vulnerabilities (i.e. do no significant harm to adaptation).
2. Engage stakeholder groups that are particularly vulnerable to the impacts of climate change in Greece's adaptation policy design and implementation. Improve coordination between different levels of governance (national/regional/local) to align planning tools and to help coordinated interventions aimed at 'systemic' transformation. Involve social partners and private sector stakeholders in policy design, implementation, and investments. Document the processes and outcomes of relevant consultations.
3. Promote nature-based solutions and ecosystem-based adaptation in national strategies, policies and plans and provide investments for their deployment.

Done at Brussels, 18 December 2023.

For the Commission
Kadri SIMSON
Member of the Commission