

Additional comments on Czech NECP

These are additional comments by Czech NGOs, which complement the “Briefing on Czech NECP”, sent to the European Commission earlier this year.

These additional comments were prepared by Frank Bold, in cooperation with Centre for Transport and Energy, Hnutí DUHA - Friends of the Earth Czech Republic and Greenpeace Czech Republic.

According to Art. 7 of Regulation 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action *„member States shall describe, in accordance with Annex I, in their integrated national energy and climate plan, the main **existing and planned policies and measures** to achieve in particular the objectives set out in the national plan.“*

After thorough inspection of the draft of Czech **NECP**, we found out that, **contrary to the Art. 7 of the abovementioned regulation, it does not include planned policies in many fields of required policies and measures** (as specified below), **nor does it include at least existing policies in some regards**. We therefore enclose the detailed description of particular chapters of NECP below:

3.1 Dimension decarbonisation

3.1.1 GHG emissions and removals

3.1.1.1 Transport sector (p. 59)

This chapter summarizes the goals of diverse transport policy plans such as Transport Policy of the Czech Republic 2014–2020, but it **doesn't describe concrete future measures**.

3.1.1.2 Agriculture and forestry sector (p. 61)

Describes actual policies, **doesn't include the future ones**.

3.1.1.5 Industry sector (p. 64)

“In order to reduce greenhouse-gas emissions in the industry sector, it is crucial to implement crosscutting measures based on EU legislation. In addition to the EU ETS, especially integrated pollution prevention and control, in accordance with Act No 76/2002, on integrated prevention, has a major contribution to reducing emissions. Emissions of fluorinated gases are regulated by Act No 73/2012, on ozone-depleting substances and on fluorinated greenhouse gases, and Implementing Decree No 257/2012, on the prevention of emissions of ozone-depleting substances and on fluorinated greenhouse gases, which transpose the relevant EU regulations.”

A chapter describing **only policies introduced by EU regulation (EU ETS etc.), yet ignoring the great share of emissions production by the industry. Nor the existing neither the future measures are included.**

3.1.1.6 Energy sector

“The contribution of the energy sector to greenhouse-gas emissions (or their reduction) is described in detail in other parts of this document.” Emphasizes the importance of nuclear power.

We suppose that **the plan is completely missing policies leading to reducing the sources with high emissions such as coal power plants** – no plan for phase-out of these sources of carbon emissions is presented. Increasing the number of renewable energy sources doesn't alone lead to carbon emission reduction, to do so it is necessary to reduce the number of high emission power plants. Specific measures can be implemented to ensure the transition: increasing the taxes on coal mining and burning, cancelling the exceptions of pollution limits by coal power plants etc.

3.2 Dimension energy efficiency (p. 87)

*“In view of the effective date of the revision of the Energy Efficiency Directive and the date of its transposition, the Czech Republic **does not submit a concrete proposal** of a scheme to meet the obligation in accordance with Article 1(3) of the revised Energy Efficiency Directive. However, the scheme setting options are discussed by politicians and professionals.”*

*“In the second step, the Energy Management Act requires the construction of buildings with ‘near-zero’ consumption (gradually for new buildings with application for building permit submitted after 1 January 2016 until 1 January 2020). **However, this standard is defined very softly** and inadequately in the Implementing Decree on the energy performance of buildings. For this reason, this definition is being revised and the second step of near-zero-energy buildings is being introduced; this obligation will take effect for example from 2022.”*

The chapter also leaves out the energy efficiency of industry, which consumes about one third of electricity.

3.4.4 Energy poverty (p. 117)

*“The Czech Republic **does not currently have policies or measures specifically aimed at reducing energy poverty.** This issue is primarily addressed by social policies or, where applicable, partially by consumer protection policies. However, the Czech Republic addresses this issue also with regard to the approved European legislation.”*

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