

Smarter, simpler, more effective: Options to improve EU clean transition policy

Enhancing climate policy management through simplification

Policy Paper

03 December 2025

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Key insights and recommendations

A competitive and clean EU economy depends on smarter governance. Existing frameworks are comprehensive but complex, risking slower delivery, lost investments, and policy fatigue. More streamlined management of the clean transition will not only help ensure the efficient delivery of EU objectives but also foster certainty for investors, companies, and citizens alike.

In the context of upcoming changes to the Governance Regulation and post-2030 climate policy architecture, this paper proposes **eight priority actions for simpler, leaner, and more performance-oriented transition governance**.

- 1 Integrate NECPs and their reports (NECPRs) iteratively to reduce duplication
- 2 Align monitoring of decarbonisation, competitiveness, and just transition aims
- 3 Common core set of indicators for transition-related planning and reporting
- 4 Merge LTSs, NECPs (and possibly more) for fewer submissions and more aligned long-term policy planning
- 5 Streamline by cutting low-value, purpose-unclear obligations
- 6 Enhanced digitisation and AI-supported tools for data flows
- 7 Merge Reportnet 3 and ReportENER
- 8 Build a single EU transition dashboard across domains

1. Context: Having to work for a strong EU economy

External and internal challenges to a competitive and clean EU

The EU's role as an economic powerhouse and innovator in clean technologies is being challenged. Recent geopolitical and economic developments have put European competitiveness in stark relief, which in turn has raised questions about the EU's ability to reap the benefits of modernisation and innovation along its journey towards a fair and climate neutral society by 2050.

The EU is losing investments and facing cleantech competition

First, external headwinds are mounting. Investments in clean energy and technologies are increasingly flowing outside of the EU, especially to China and the United States, where more aggressive industrial policies and financial incentives have created attractive business environments (Humphreys, 2024). China continues to flood global markets with inexpensive cleantech, most visibly in the electric vehicle (EV) sector, undercutting European manufacturers and raising concerns about strategic dependencies, supply chains, and the future fitness of the European automobile industry. This could accelerate due to the trade war between the United States and China, with surplus Chinese manufacturing increasingly rerouted into European markets. Indeed, the Trump Administration's on-again, off-again tariffs have all but severed transatlantic trade relations and spread uncertainty throughout the global cleantech value chain.

Fossil fuel import dependency makes the EU vulnerable in turbulent times

Compounding these challenges is Europe's enduring reliance on fossil fuel imports. Despite significant advances in domestic clean energy, as of 2024, the EU spent EUR 376 billion or **over 2% of its entire GDP on imported oil, gas, and other fuels** (Eurostat, 2025). Energy security remains a major vulnerability, as demonstrated by the economic fallout from the Russian invasion of Ukraine and the subsequent energy price shock. In parallel, the United States has shown, once again, that it is an unreliable ally when it comes to international climate diplomacy. President Trump's executive actions in the first 100 days, especially withdrawing the United States from the Paris Agreement (for a second time), are emblematic of his scepticism of multilateral relations as well as his disdain for clean technologies and decarbonisation efforts. Yet again, at least for the time being, the EU has lost an important partner at international level.

Far right gains despite public support for the transition reveal existing fears

At the same time, internal political upheavals have changed domestic priorities and discourse. Elections at EU and Member State level have shown increased support for far-right parties, many of which question the EU's role in climate action and advocate for a renationalisation of key policies. While **public support for EU climate action has remained stable** over the years (Eurobarometer, 2025), concerns over economic impacts have been used to fuel opposition in certain sectors. High-profile political conflicts in several Member States, e.g., over gas boilers in Germany, suggest that there is currently a tenuous foundation for additional, more ambitious measures in some national contexts. This is likely to continue in the future as transition measures increasingly affect households and citizens directly, especially through rising energy prices for the most vulnerable.

Decarbonisation and competitiveness are a joint project for the EU's future

Today, the EU finds itself more geopolitically isolated and under greater economic pressure than when it first set out on a path to climate neutrality. In response, a new competitiveness-oriented agenda has been put forward, informed by the 2024 **Draghi Report**. The Draghi Report proposed a joint roadmap for decarbonisation and competitiveness as the key 'transformational imperative' for the next five years (Draghi, 2024, pp. 63–65). This call for action was taken up by the European Commission with its **Competitiveness Compass** (EC, 2025c) for innovation-driven productivity and the **Clean Industrial Deal** (EC, 2025b), both published in the first 100 days of the 2024-2029 legislative period. The Compass states explicitly that *'Europe must be the place where tomorrow's technologies, services, and clean products are invented, manufactured and marketed, as we stay the course to climate neutrality'* (EC, 2025c, p. 2). The Clean Industrial Deal projects a way forward that lies in a proactive focus on the innovative cleantech technology markets of the future, the full-scale modernisation of EU industry, and **accelerating clean investments to realise resilience and energy independence** co-benefits sooner rather than later (EC, 2025b). In addition, the Commission's continued focus on delivering a just and fair transition, underscores the central role that clean jobs, training, and skills will play in future European prosperity.

This new agenda reinforces the vital importance of the EU's decarbonisation project as a driver for European economic fitness (not a barrier). It is based on the recognition that turning back the clock to older, dirtier (and more expensive) technologies is a losing strategy – an understanding shared also by business associations (see, e.g., BCG et al., 2024). The European People's Party (EPP) has also thrown its support behind the Clean Industrial Deal, acknowledging that policies that support European competitiveness should act as vehicles for modernisation and innovation in pursuit of the transition and urging for 'clarity on [...] climate targets', as otherwise 'industries cannot plan their transition investments' (EPP, 2025b, 2025a). The **importance of streamlined planning for long-term investor security** has been likewise emphasised by the Institutional Investors Group on Climate Change, who furthermore highlighted the particular importance of linking national and sectoral decarbonisation roadmaps to dedicated financing mechanisms (IIGCC, 2025).

Solution? Smarter, simpler, more effective policymaking

What can be done to enhance EU policymaking to support the twin strategies of increased competitiveness through clean industry? The Draghi Report had another clear message in this context. International challenges notwithstanding, the EU is at least in part itself to blame for its slipping competitive edge. The report singled out a lack of follow-up on common objectives, the dilution of common resources, and ineffective coordination and collaboration as the main challenges stifling growth and innovation and called for wide-ranging efforts to streamline EU policy and improve economic productivity (Draghi, 2024).

Doing better with less: The EU's simplification and implementation agenda

In response, Ursula von der Leyen appointed Valdis Dombrovskis as dedicated Commissioner for Implementation and Simplification to oversee and guide a simplification agenda – one of the key policy recommendations from the Draghi Report adopted directly. The European Commission has also promised a **'simpler and faster Europe'**, complete with a series of Omnibus policy packages and an annual implementation and simplification cycle for monitoring

improvements aimed at the far-reaching simplification of the EU regulatory and administrative apparatus (EC, 2025a).¹ Moving forward, new legislation will be under scrutiny to ensure proposals are coherent, transparent, and lean.

While the simplification element has received more immediate attention, **implementation is a critical second component** to ensure Union measures perform as intended, delivering EU policy objectives. The Commission plans targeted, sector-specific dialogues with stakeholders and national/local authorities to resolve inconsistencies and pre-empt gold-plating and fragmentation. It aims to work more closely with Member States, introducing ‘implementation strategies’ to guide national transposition. Investments will also support administrative capacity, especially through digital tools integrated into technical support from the European Commission – e.g., as has been done with the Technical Support Instrument and COMPAct (EC, 2025a, pp. 3–5). Going forward, key principles include ‘digital by default’ and ‘once only’ for data entry in national reporting (EC, 2025a, p. 10).

It is important to note that while much of the Commission’s simplification agenda targets private sector relief, the focus of this paper is on simplification in governance and reducing administrative burden for public officials.

Potential benefits: saving costs, facilitating investments, and better implementation

There are **multiple potential benefits of targeted simplification and streamlining** of EU policy, if implemented well.

First and foremost, greater confidence in the delivery of proclaimed EU objectives through a clearer regulatory framework focused on implementing targeted policies could further **enhance clarity and certainty for investors (companies and citizens alike)**. This would in turn unlock private investment in new innovations – ultimately allowing the change to happen and the objectives to be achieved.

Cost savings are another important driver for this agenda. Already in 2023, the EU set a goal of cutting reporting burdens on large companies by at least 25% (35% for small and medium-sized enterprises, SMEs). In addition, a competitiveness check using a ‘one-in, one-out’ approach to avoid unneeded additional burdens has been implemented since 2022 (EC, 2023b). Raising the ambition to include not only reporting but all administrative costs as a baseline, the Commission estimates the target could **save up to EUR 37.5 billion in annual costs** (EC, 2025a, p. 5).

Saving time on administrative efforts has the potential to **free up capacity to ensure better delivery** of existing important reporting requirements. Especially for smaller Member States, lowering the administrative burden could allow governments to focus on the quality of submissions as well as ensuring a robust evidence base and public consultations, which require time and effort to be meaningful. In short, authorities could spend less time on compliance box-ticking and more on reporting and planning quality.

At national level, a more streamlined regulatory ecosystem could **reduce fragmentation in national policy** and benefit policymakers in Member States, who pursue national economic

¹ These efforts have their footing in the Better Regulation Agenda, specifically the regulatory fitness and performance programme (REFIT) and subsequent Fit for Future Platform established in 2020. The Commission’s 2024 Work Programme already placed a strong focus on simplification, doubling down on the objective to reduce administrative and private sector reporting burden by 25%. It further listed 26 concrete proposals for ‘rationalising’ reporting requirements – compared to only 8 within the context of the EU’s regulatory fitness and performance programme (REFIT) the year before.

policy under the umbrella of EU rules. Better quality documents would also provide the EU level with more useful data, allowing cross-country comparisons, and ultimately better information for targeted follow-up and interventions. **In short, greater transparency generates higher accountability – and smarter policy.**

EU climate policy management has potential for improvements

Bolstering EU competitiveness and resilience by modernising the European economy is no small task and requires **policy management tools that guarantee impact** and a clear sense of where progress is lacking. The current state of information shows that additional action is required.

Transition is underway, but despite EU policy boost, speed of change is too slow

The comprehensive ‘Fit-For-55’ policy package established a robust policy framework for implementing the EU’s decarbonisation goals – especially in the short term. Many pieces are still in the early stages of implementation, and thus the package’s impact on GHG emissions as well as its provisions for a just and fair transition (e.g., Social Climate Fund) will only be felt in the coming years. While the **focus is rightly on implementing adopted policies**, it is important not to lose sight of designing a post-2030 framework that is fit to deliver on the EU’s 2040 vision and beyond.

Analysis by both the European Commission itself and independent tracking initiatives show that while the transition is underway, the **current speed of change is too slow**. The EU must pick up the pace of the transition in nearly all sectors of the economy (EC, 2024; ECNO, 2024b, ESABCC, 2024). To identify which enabling conditions for the transition are not being realised (fast enough), dedicated analyses have been carried out by the European Scientific Advisory Board on Climate Change and the European Climate Neutrality Observatory (ECNO). These supplement the Commission’s focus on headline targets. If the transition is facing bottlenecks, the path to a more competitive green economy could be blocked.

Implementation gap visible at Member State (and EU) level – a risk to the transition

Achieving climate neutrality at EU level depends on national actions, but Member States do not all have equally robust institutions and processes in place to ensure the effective implementation of climate and transition policies (Evans et al., 2024). The EU has established a series of procedures common to all countries (laid down mainly in the EU Climate Law and the Governance Regulation). While this provides a stable foundation, **the problem lies in the application of legal requirements and follow through**.

Progress monitoring and planning provisions help to ensure that the right decisions are being made now to enable future emission cuts and avoid lock-ins. These include the national energy and climate plans (NECP) and their progress reports (NECPR) as well as national long-term strategies (LTS) with a 30-year time horizon. Still, studies show that many of these instruments are underutilised, lack ambition, and are missing important detail on investment, jobs, affordability, and other aspects central to a just and fair transition (ECNO, 2024a, 2025a; Velten et al., 2022).

In addition, in the last planning and reporting cycle, many Member States were late submitting their progress reports as well as their draft updated NECPs (EC, 2023c). At the time of writing, Poland’s final updated NECP has still not yet been submitted (close to a year after the deadline).

Moreover, numerous studies and the EU's own reporting point to underwhelming national public and stakeholder participation practices on climate policy (EC, 2023a; EEB, 2023; ESABCC, 2024). These shortcomings suggest that the **NECPs have thus far failed to fulfil their potential** as 'essential tools to ensure EU target achievements and to support strategic investment' (EC, 2024b, p. 14, 2025b).

Implementation can also be improved on EU-level processes, especially with regards to the mandatory check of all new policies for consistency with climate neutrality. Reporting by the Regulatory Scrutiny Board in 2023 showed that the Commission failed to conduct an adequate evaluation for nearly 40% of relevant policies (RSB, 2023). The EU Climate Law also requires the Commission to monitor overall progress towards the 2050 climate neutrality target, but so far EU-wide progress tracking has been limited largely to headline targets, **missing key and actionable information on the underlying enablers for structural change** in the real economy that will unlock future emission cuts. Limited data availability in several areas, such as adaptation, international finance, and the buildout of key infrastructures, make effective progress tracking a challenge (ECNO, 2025b). The Commission has acknowledged the need for more detailed monitoring of these 'enabling conditions' (EC, 2023c), and introduced a small set of structural change indicators (i.e., 'levers') in the 2024 edition of its Climate Action Progress Report (EC, 2024a).

All in all, these **deficiencies in the EU's clean transition governance underline the need to look at improvements that can reduce effort, free up resources, generate better data, and enhance oversight.**

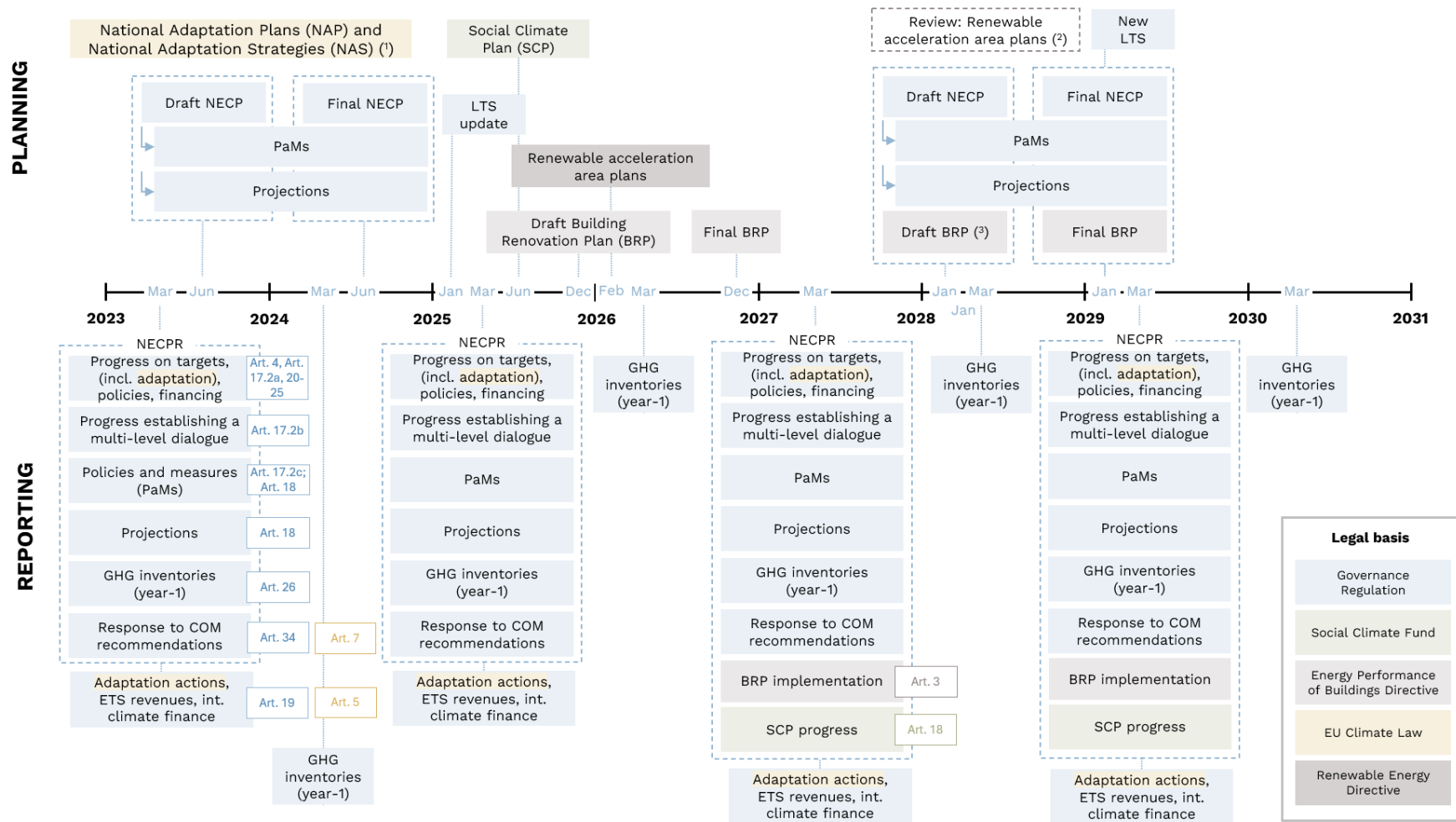
Current complexities reduce effectiveness, eat up capacity

Where can the current framework be improved to better oversee implementation and track progress toward EU targets? A closer look at the current landscape of national and EU governance requirements and follow-through reveals a range of problems that could be addressed to fill the implementation gap and improve delivery.

Parallel plans with low integration on content and timing are a burden for Member States

National authorities are subject to myriad climate-related planning and reporting obligations by EU regulation. See Figure 1 for a non-exhaustive overview of the main instruments for the years 2023-2030 and the interlinkages between these. In several cases, the timing, process, and format of submission leads to overlaps, inconsistencies, and unnecessary efforts, which can exhaust national capacities, especially in smaller Member States. This results in late and/or lower quality plans and reports. One illustrative example pertains to the LTSs and NECPs. The Governance Regulation requires consistency over the two planning horizons, but the templates are not aligned (and not mandatory for the LTS) and the voluntary five-year cycle for LTS updates means that these are often too outdated to serve as a basis for the NECPs.

Figure 1: Climate-related planning and reporting by EU Member States for the period 2023-2030



Source: own illustration. This figure represents a non-exhaustive overview of the key national climate-related planning/reporting obligations in the EU. Notes: (1) Art. 5 of the EU Climate Law requires Member States to adopt National Adaptation Plans (NAP) and long-term National Adaptation Strategies (NAS) but does not include a provision for updating these. (2) Renewable acceleration area plans under Directive (EU) 2023/2413 'shall' be reviewed 'periodically, as appropriate' in the context of NECP updates (Art. 15c). (3) The second round of BRPs is to be submitted with the NECPs. By 2029, progress on implementing the NECPs, BRPs, SCPs, and adaptation actions must be reported within the context of the Governance Regulation's biennial cycle (NECPs, BRPs, and SCPs as part of the integrated national energy and climate progress reports (NECPRs)).

Moreover, several new planning requirements were added recently under various EU laws – some sector-specific (e.g., Building Renovation Plans (BRPs), renewable acceleration area plans), others covering cross-cutting domains of the transition, such as the Waste Management Plans or Social Climate Plans (SCP). The EU Climate Law made National Adaptation Plans (NAP) and Strategies (NAS) legally required even though many Member States commenced adaptation planning as early as 2005.² This increasingly **complex planning landscape can lead to an incoherent policy approach**, especially if responsible governmental agencies and departments fail to coordinate and communicate on underlying methodologies and assumptions. For instance, a lack of consistent integration has been demonstrated regarding planning for the social and just transition aspects of climate policymaking, especially on SCPs, NECPs, and territorial Just Transition Plans (Kögel, 2024; REScoop, 2025).

Splitting climate policy planning over short- and long-term time horizons has led to a division of responsibility in many Member States, with the NECP usually in the hands of an economics or energy ministry and the LTS developed by a climate or environment ministry (Velten et al., 2022). This makes inter-ministerial coordination and communication more important to ensure consistency. Thus far, **issues with timing have caused capacity bottlenecks**, especially when **EU planning cycles do not align with national ones** (Evans et al., 2024). Misaligned sequencing and tardy submissions have made it difficult for LTSs and NECPRs to effectively inform the short-term actions under the NECPs (ICF, 2024). Finally, the NECPs themselves, on a five-year timeline, can become quickly outdated, rendering them less useful as guidance for other planning exercises, especially pertaining to the use of EU funding (e.g., Recovery and Resilience Plans, RRP). Consider, for instance, that the COVID-19 pandemic and Russian invasion of Ukraine both happened in the period 2020-2022 right *after* the submission of the first round of NECPs.

Misaligned templates and requirements for plans and reports undercut usefulness

There is a **mismatch between the information required in planning and respective progress reporting templates**. For one, Member States are required to include information across several topics and areas listed in the NECP template that do not align with the information required in the NECPRs (e.g., on interconnectivity, finance needs, and sectoral GHG trends). Although these data may be reported elsewhere, the apparent discrepancy shows that in their current design the NECPRs do not transparently track progress on all elements included in the plans and would benefit from greater coherence overall.

A similar **disconnect exists between the format of information that is required on national climate measures in the NECP template and the policies and measures (PaMs) and projections reporting** (part of the NECPRs) under Reportnet 3 as per Governance Regulation, Art. 18. This is less an issue of coherence and more of duplicated efforts and redundancies – national measures and projections must be elaborated and entered in multiple places. In addition, national practitioners have questioned the relevance of some reporting requirements for target achievement and the extent to which the reported information is useful or being used at all (see ICF, 2024).

A more overarching observation is that **the NECP template currently in use comes from a different time in EU climate and energy policy** and is due a revision to make it fit for the future. This may require exploring ways to amend or complement the current structure, which

² See <https://climate-adapt.eea.europa.eu/en/countries-regions/countries>, accessed 20 August 2025.

is built on the five dimensions of the Energy Union, to incorporate other pressing issues and challenges, such as a more substantive focus on, e.g., competitiveness, cost of living, and public and private investment.

Complexity and duplications in reporting increase effort, not necessarily the quality of information

Climate-related reporting is also highly complex, with obligations spread across several key EU policies.³ Despite an integrated approach on paper, depending on the information in question, **national authorities must make use of different platforms, each with its own system, terminology, and rules.** This reflects the fact that dataflows are managed separately by the EEA (delegated by DG CLIMA) and DG ENER, with data on, e.g., emissions, renewables, and energy efficiency flowing to Reportnet 3 and information on, e.g., energy poverty, just transition, subsidies, and the implementation of multi-level dialogues flowing to DG ENER via ReportENER (see Box 1).

Table 1: Overview of NECPR and other climate-related dataflows

Reported to Reportnet 3	Reported to ReportENER
Pursuant to Implementing Regulation 2022/2099 (NECPRs)	
- Decarbonisation: GHG emissions, removals, adaptation goals (Annex I, III) - Decarbonisation: Renewables (Annex II, XVI) - Energy efficiency (Annex IV, XI, XII, XVII) - Financing (Annex XIII) - Implementation of PaMs (incl. impact on air quality) (Annex IX, X, XIV)	- Energy security (Annex V) - Internal energy market (Annex VI) - Research, innovation, competitiveness (Annex VII) - Energy subsidies (Annex VIII) - Implementation of PaMs related to fossil fuel subsidies (Annex XV) - Energy poverty and just transition (Annex XVIII-XX) - Regional cooperation (Annex XXI) - Response to COM recommendations (Annex XXII) - Multi-level climate and energy dialogues (Annex XXIII)
Pursuant to Implementing Regulation 2020/1208 and other Governance Regulation reporting	
- Adaptation actions (Annex I) - ETS auctioning revenues (Annex II) - Support to developing countries (Annex III-V) - GHG inventories (Annex VI-XIV) - National PaMs (Annex XXIII, XXIV) - GHG projections (Annex XXV)	- Safety of offshore oil and gas (Art. 26, Governance Regulation) - Minimum stocks (Art. 26, Governance Regulation)

Note: Responses to Commission country-specific recommendations under EU Climate Law, Art. 7.3a are also reported to Reportnet 3 in a dedicated dataflow.

This fragmentation means that national officials must learn two systems for climate policy reporting and effectively spreads the information contained in the NECPRs across multiple repositories. An independent survey of the functioning of the Governance Regulation commissioned by the EU showed that ‘inadequate connections and differences in formats between the two platforms’ has limited potential time and resource savings from the fully online platforms (ICF, 2024, p. 188). Furthermore, because ReportENER is only available to Member

³ The bulk of obligations are covered in the Governance Regulation, including the biennial NECPRs (Art. 17), national policies and measures (PaMs) and emission projections (Art. 18), and annual emissions inventories (Art. 26). NECPRs should contain information across the Energy Union dimensions (spelled out in Art. 20-25). Progress reporting on the national Social Climate Plans will commence in 2027 and should come with the NECPRs. Guidance on reporting under the Governance Regulation is laid out in Implementing Regulations 2020/1208 and 2022/2299.

State officials the transparency of reporting is diminished, with information made publicly available only after a lengthy review process (Robert, 2023).

Moreover, there are several examples in which the **level of detail or the quality of the submitted information means that its use is limited**. For example, when it comes to PaMs reporting, Member States provide some limited qualitative information as context but often fail to offer quantitative data on ex post and ex ante impact and costs, which makes it challenging to aggregate or compare across countries (Le Den et al., forthcoming). In other cases, reporting detail is low and highly variable in quality, as was the case in 2023 for progress on the implementation of multi-level climate and energy dialogues (Faber et al., 2024). Particularly on the multi-level dialogues, this could stem from a lack of clarity in the legal obligation itself, which although binding, provides little guidance on formats and leaves much up to national authorities to decide themselves.

Parallel monitoring systems for decarbonisation, competitiveness, and fairness risk a siloed approach

The new competitiveness agenda brings with it new objectives and new policies, and thus also the need to keep track of progress towards delivery. The Clean Industrial Deal and the Competitiveness Compass both refer to using the Annual Single Market and Competitiveness Report for this purpose.⁴ This includes the mention of seven dedicated key performance indicators (KPIs), which cover a range of topics from circular material use rate to the annual installation of renewable electricity capacity (EC, 2025b). Further components of EU economic competitiveness monitoring include the European Monitor of Industrial Ecosystems (EMI) Data Dashboard⁵ and the Single Market and Competitiveness Scoreboard⁶, which together comprise over 100 indicators, many with direct relevance to climate policy. Both are updated at least annually. How specifically these work together, or **what, if any, connections there would be with the existing monitoring framework for energy and climate** targets has not been detailed by the Commission.

On top of this, reporting on the social aspects of the clean transition, including just transition concerns, is spread across several formats and platforms, including indicators under the Social Climate Fund, the European Pillar of Social Rights (ESPR), and the potential for new indicators under the Commission's Intergenerational Fairness Strategy. Moreover, the planned European Fair Transition Observatory (EFTO) is set to develop another set of indicators for monitoring progress on green jobs, skills, and other aspects related to regional competitiveness and just transition. While the linkages here are often clearer – e.g., monitoring of the SCPs is reported in the NECPRs – **integration could be improved to help streamline disparate dataflows**.

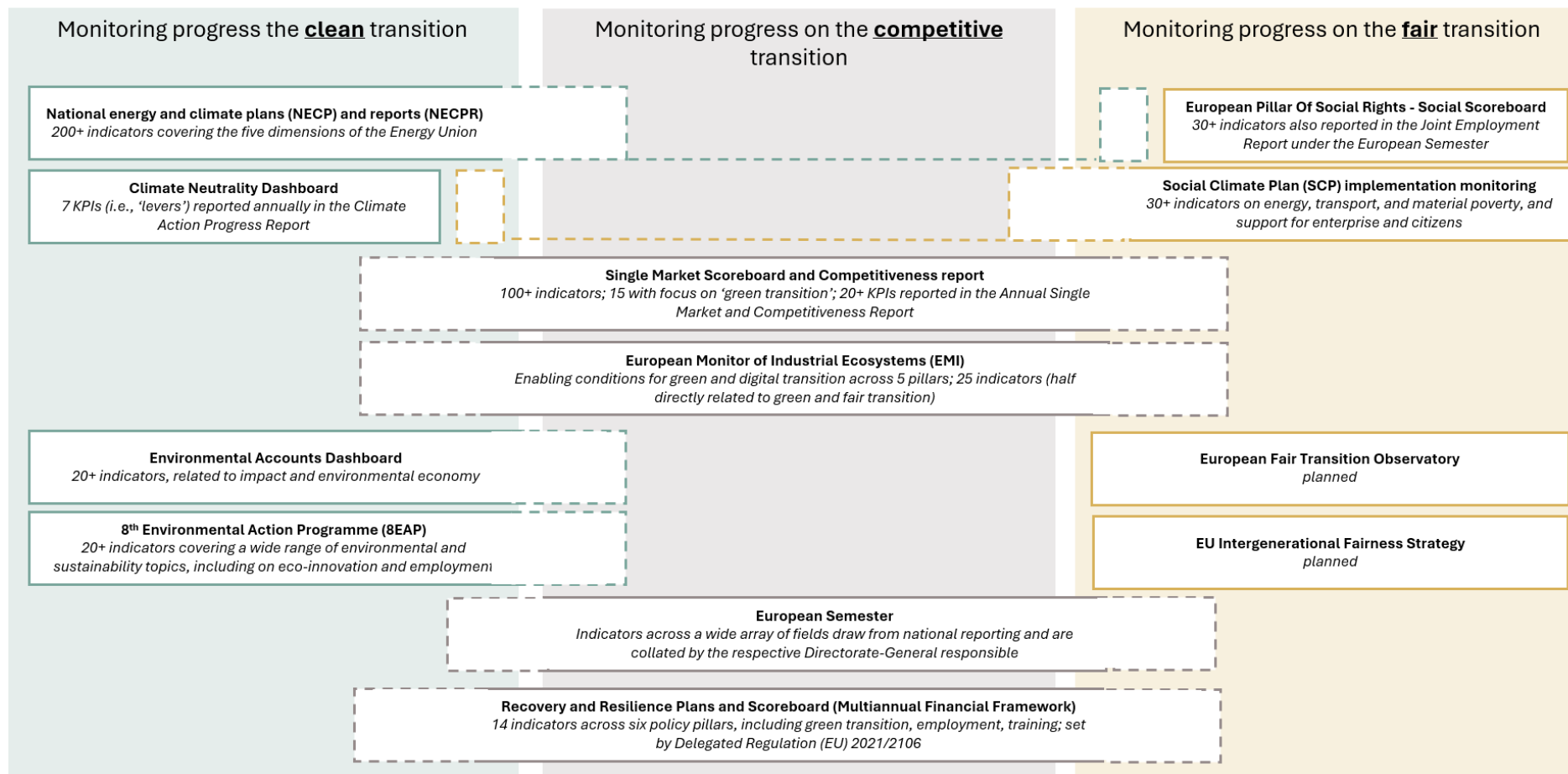
The absence of a clear and explicit plan to integrate existing systems (for an overview see Figure 2) raises concerns about **fragmentation and possible additional effort** that would be in contradiction to the simplification agenda. Such separation also risks undermining a coherent approach to pursuing the EU's *interdependent* objectives: enhancing competitiveness and achieving decarbonisation in a way that is fair and socially equitable.

⁴ The Single Annual Market and Competitiveness Scoreboard and associated annual reporting has been around since the early 1990s. This was expanded in 2024 with dedicated indicators on EU competitiveness, following an impulse by the European Council (EUCO, 2023) and the EU strategy on long-term competitiveness (EC, 2023b). See [Annual Single Market and Competitiveness Report](#), accessed 27 April 2025.

⁵ See [European Monitor of Industrial Ecosystems](#), accessed 27 April 2025.

⁶ See [Overview of Indicators | Single Market and Competitiveness Scoreboard](#), accessed 27 April 2025.

Figure 2: Fragmented landscape of progress monitoring for a clean, competitive, and fair transition



Source: authors' own illustration. Note: the figure represents the most relevant *official* scoreboards and indicator indexes at EU level still in operation. A notable omission is the range of data tools and visualisations offered by the EEA. We also did not include the proposed National Regional and Partnership Plans (NRPP) and associated reporting proposed by the European Commission in summer 2025 in the context of the 2028-2034 Multiannual Financial Framework (MFF). For a full list refer to the European Commission [Competence Centre on Composite Indicators and Scoreboards](#).

2. Better performance with less effort: Options for streamlining and simplification

The inefficiencies outlined above mean that EU and national governments waste precious resources and are still missing information that could lead to more effective policies. This means not necessarily *more* but primarily *better* information is needed, and the processes delivering it should be both efficient and effective. Reconfiguring and rationalising existing structures and processes to ensure that the most important information is captured in a timely manner to inform policy decisions may require the further advancing of digital solutions, a more agile approach to planning cycles, better integration between plans and their reports, and streamlining what goes into submissions.

In the following, we offer a **list of eight options to improve the existing framework** for achieving the EU's decarbonisation and competitiveness objectives.

Streamline like you mean it: Integrating processes and policy areas

1. **Better integration between the NECPs and their progress reports (NECPRs): A more streamlined and agile framework for climate transition-related planning and monitoring**

Avoiding duplicate efforts should be a standard principle for national planning and reporting. The Commission has signalled that it wants to make progress in this area, also avoiding double entries of the same information under different obligations (i.e., the 'once-only' principle) – which is facilitated by digital databases underpinning the information (EC, 2025a).

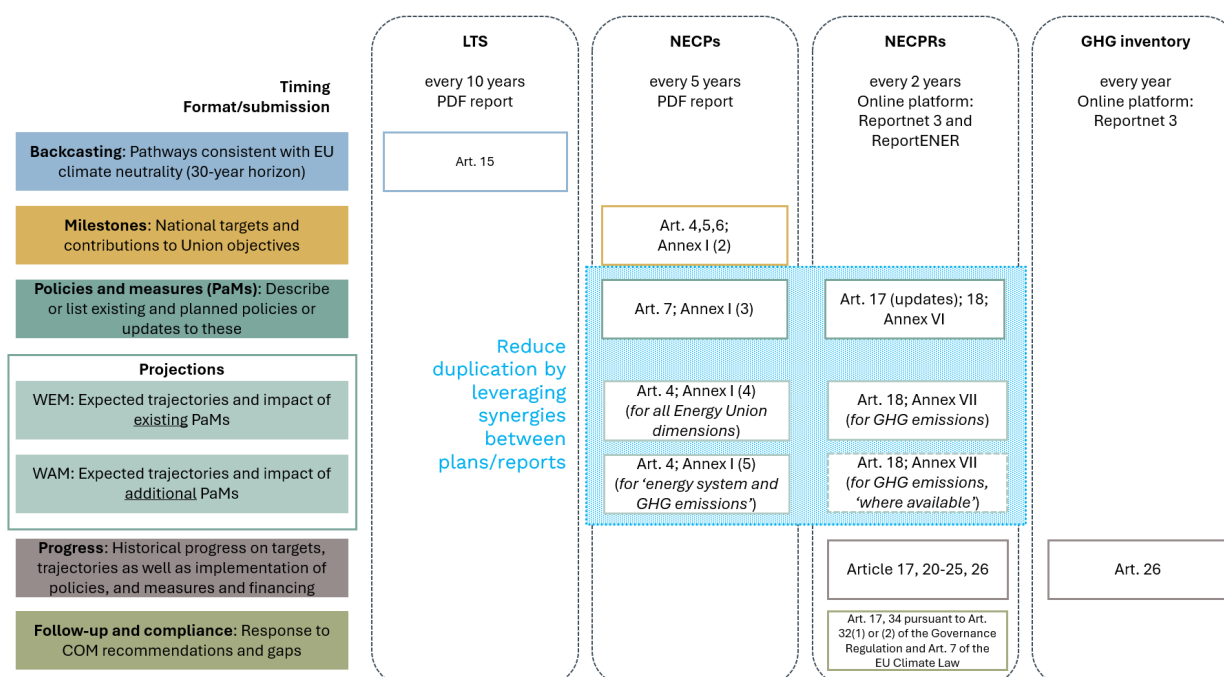
Still, this does not seem currently fully applied in the climate and energy framework, which asks for information on PaMs and projections in the NECPs themselves and separate submissions of lists of these PaMs as per Governance Regulation, Art. 18 – together with the projections for GHG emissions as part of the NECPRs every two years. See Figure 3 for an illustration of where main duplications exist. Most national authorities are already using the same methodologies on projections for NECPRs and NECPs.⁷ Given the overlap in required content, the two exercises could be conceived as iterative updates of the same information, with significant potential for savings.

All of this points to the need to reimagine the NECPs and their progress reporting as a more integrated and agile process, with the plans and reports informing one another, while not doing away with deadlines. Figure 4 illustrates what this could look like in practice, showing how linking the plans and reports more explicitly reduces reporting complexity and requirements. As demonstrated, across two NECP cycles, the **number of reporting instances for PaMs and projections could be cut in half without altering reporting frequency and thus the relevance of information**. Indeed, the integration of PaMs and scenario information from the NECPRs into the NECPs would even allow for interim updating of the plans. All of this would require a new schedule for NECPRs so that they fall *in between* years in which new or updated NECPs are submitted

⁷ Some countries, e.g., Netherlands, Ireland, and Germany, even do the projections on a yearly basis.

and not back-to-back in the same year, as is currently the case. This could also help to better align the EU planning and reporting cycle with international obligations, especially the Biennial Transparency Reports (BTRs) under the UNFCCC, which have been out of sync with the EU schedule since the Enhanced Transparency Framework under the Paris Agreement became operational in 2024. In the past, the PaMs reported in the NECPRs (i.e., integrated reporting under Articles 17 and 18 of the Governance Regulation) were not always explicitly referenced in the NECPs (see Dauwe et al., 2023, p. 22). Although this has improved over time, it suggests that a more integrated approach would also help with consistency.

Figure 3: Overlaps in the climate-related planning and reporting regime under the Governance Regulation

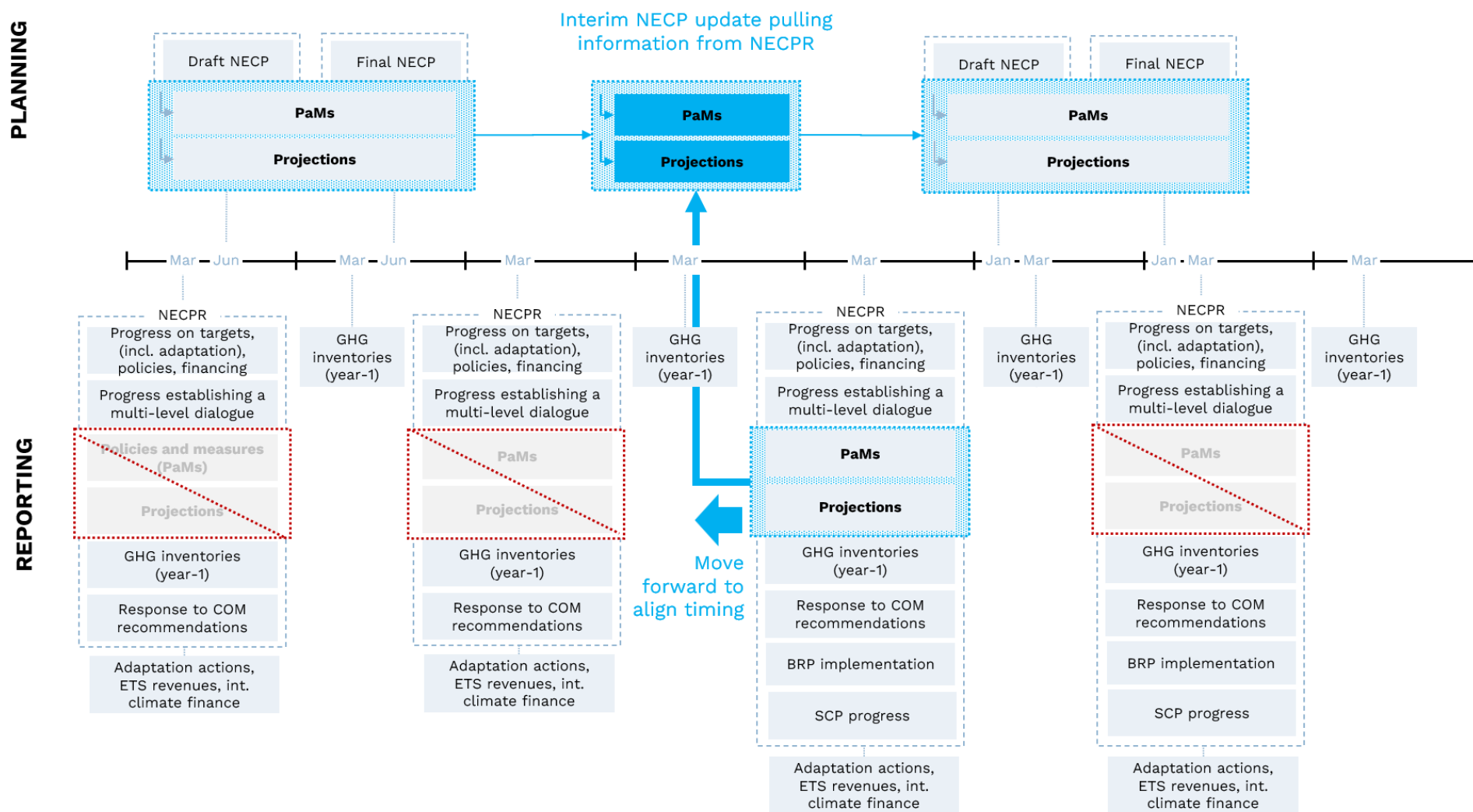


Source: authors' own illustration. Note: all legal references refer to the EU Governance Regulation unless stated otherwise.

Ultimately, the **NECPs should be considered** less as monoliths that remain unchanged for 4-5 years, but **more as dynamic documents**, with specific parts updated as new information is reported in the NECPRs and potentially other national submissions under the UNFCCC. This would not only (1) keep plans relevant and up to date but could also (2) save effort through avoiding interim steps and (3) help to align submissions better with (pre)existing national policymaking cycles – an issue that has in the past led to incomplete or late submissions. Interim updating opportunities would allow public servants to better account for changes in government, incorporating new priorities without starting from scratch.⁸

⁸ National electoral cycles are on their own schedule and can lead to significant delays in NECPs and need for revisions to account for new political priorities.

Figure 4: Better integration of NECPs and NECPRs into a more dynamic process reduces reporting duplication



Source: own illustration.

Dynamic updating could help strengthen the link between NECPs (as strategic planning tools) and national plans for accessing EU funding – such as RRP or SCPs or any new plans that arise, including sectoral transition planning in the private sector. For instance, RRP were meant to outline how Member States would use EU funding to support NECP objectives and measures, but the first round of NECPs were already largely too outdated to serve as a solid basis. There is a risk that this misalignment could recur with the proposed National Regional and Partnership Plans (NRPPs) under the next MFF, weakening the role of the next round NECPs as strategic investment plans by disconnecting them from EU funding. A more flexible system would keep the NECPs up-to-date as *the* keystone strategic documents, aligned with (and underwritten by) how Member States intend to use EU funding. It could also facilitate better integration with transition planning and investment in the private sector, ‘with every policy objective in NECPs accompanied by a private or public capital allocation’ (Cesaro et al., 2025, p. 8).

To ensure transparency and effectiveness the consistency between the NECP and NECPR templates and formats would need to be improved – both in what kinds of information are compiled (e.g., units, differentiation by sector or technology) as well as how this information is accessible. In current form, information is spread across multiple areas and exists either in static PDF form (as is the case for the NECPs) or as downloadable datafiles. These formats would need to be merged somehow into a single online interface for climate planning and reporting with both a backend (for data input) and outward facing side for presentation and viewing by other actors, such as NGOs and the public. In this context, it would be worth exploring a more modular approach to the NECP template with a section dedicated to strategic policy planning and more standardised components based on indicators and other information drawn from the NECPRs based on a common core set of indicators (see Option 3 below) with some room for national variation.

Better NECP/NECPR integration could also make the Commission’s assessments of progress and identification of gaps in national implementation easier, especially if the NECPRs can be reimagined to provide a clearer picture of progress towards objectives. Simplification would produce multiple benefits in one go: reduced effort, enhanced comparability, greater transparency – and ultimately more targeted actions to address implementation gaps.

2. Integrated monitoring of a clean, competitive, and fair transition

The introduction of the competitiveness agenda and the Clean Industrial Deal with its own coordination and accountability framework (i.e., KPIs under the Annual Single Market and Competitiveness Report) means that at first there is an increase in the overall complexity of EU governance, not a simplification. There are few direct linkages with the monitoring frameworks for the other two dimensions of the transition: decarbonisation and social policy – although the Commission has acknowledged the connections between decarbonisation and competitiveness in principle, with the Clean Industrial Deal meant to enable the transition to a competitive and climate-neutral industry while ensuring further advancement of the EU’s just transition aims.

The system for monitoring performance across the EU’s goals for competitiveness, decarbonisation, and a just and fair transition could be better integrated. **Rather than three separate systems**, looking at related, similar, or even the same information, a

more efficient system would be based on a common framework and draw on the same data – even if to different extents (refer back to Figure 2). Such a framework might also be further extended or made use of for related EU processes, such as under the European Semester, and could be linked with the proposed Competitiveness Coordination Tool to provide greater oversight over national level dynamics. A single system for tracking progress would avoid duplication and possible inconsistencies, creating also a political link in both directions. Furthermore, with monitoring of BRP and SCP implementation commencing in the context of the NECPRs in the coming years, there is already the need to consolidate and streamline information between the current NECPR requirements and these new monitoring activities. All these emerging and extant indicator frameworks should be linked using a consistent underlying data infrastructure based on a common core of indicators across topics (see Option 3).

Notably, the European Parliament has called for ‘annual monitoring and reporting on the competitiveness and resilience of [the EU’s] industrial ecosystems and on the progress made on the transition pathways, so that instruments can be adapted swiftly with tailor-made support when needed’ (EP, 2025). A framework for monitoring across decarbonisation, competitiveness, and social fairness aims would help provide the evidence base for more reflexive policymaking.

3. A common set of indicators for planning, reporting, and assessments

The current energy and climate progress monitoring system looks mainly at headline GHG targets and is blind to many of the crucial underlying real-world changes and whether and how fast these are occurring. Certainly, this includes monitoring delivery on the enabling conditions for the industrial transition – as demonstrated by the European Scientific Advisory Board on Climate Change and by the work of the European Climate Neutrality Observatory (ECNO, 2024b; ESABCC, 2024).

An integrated, more holistic approach would employ a common set of indicators for policy planning, reporting, and related assessments, incorporating these into the templates for both plans and reports (e.g., NECPs and NECPRs, see Option 1). These indicators should emphasise the enabling conditions for a clean, competitive, and fair transition (and their interdependencies), producing better evidence for smarter policy-making – and improving the chances of delivery.

Make it easy on Member States: Leaner planning and reporting

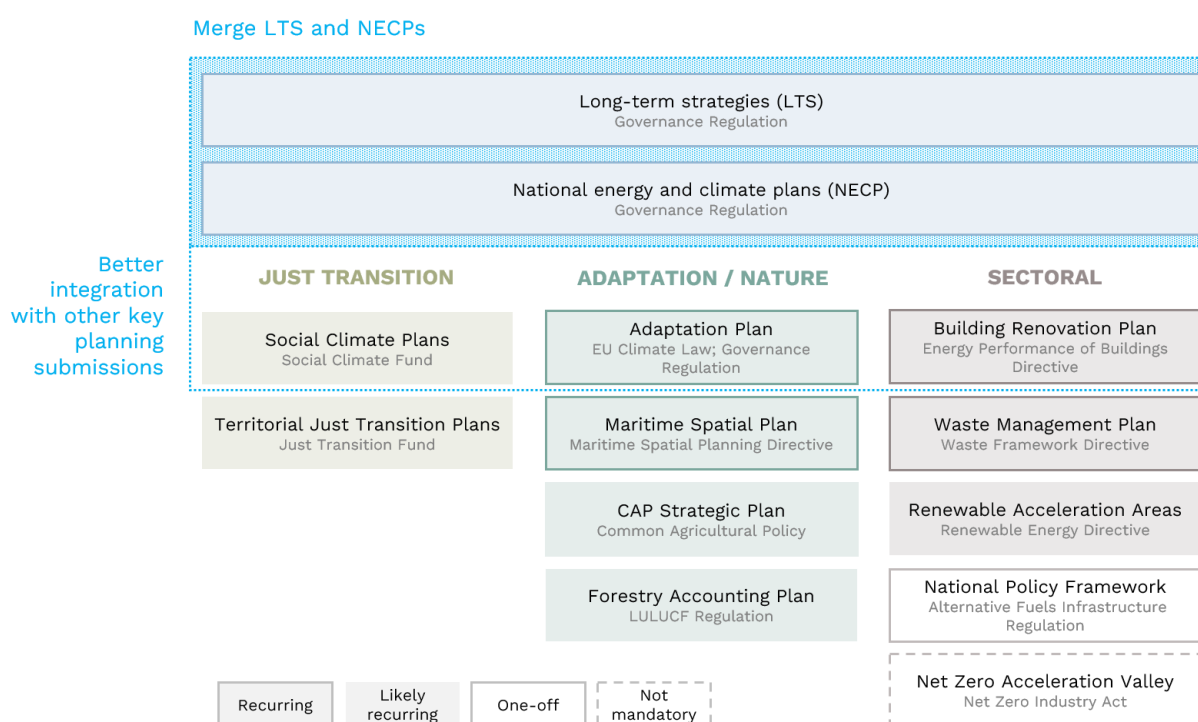
4. Merging LTSs and NECPs (and possibly more) for fewer submissions and more aligned long-term policy planning

The next round of NECPs (due in 2028) will be 2040 plans. Thus far, LTSs and NECPs are separate processes with their own timelines, content, format requirements, and responsibilities. As action progresses towards climate neutrality, the longer-term vision dimension that LTSs are meant to provide (by backcasting appropriate pathways to get there), could be integrated directly into the NECPs, reducing the effort to develop separate LTSs. This could also make NECPs more directly transformational in nature, gearing them not only to targets a few years into the future but more clearly aimed at the next 30 years, or at the least taking this longer-term perspective into account.

Where possible it would be worth exploring more concrete integration of additional national planning requirements in different sectors for a more holistic approach to transition planning. For instance, NAPs, SCPs, and BRPs are already integrated to varying extents, both in terms of submission timing within the NECP/NECPR cycle and through legal obligations to ensure consistency with the NECPs. In theory, some of these could be combined into a single ‘national climate and resilience plan’, cutting down on individual submissions and improving planning coherence (T&E, 2024) (see Figure 6). That said, adaptation planning comes with its own challenges and as mentioned above, is long-standing practice in many EU countries. Any approach combining planning across policy areas should be careful not to weaken individual sectors or become so large that it negates efficiency gains for national officials.

Nevertheless, better alignment of various planning processes is necessary for good policymaking and would require enhanced EU-level guidance and coordination, bringing together institutions and agencies working on the relevant policy areas (Cesaro et al. 2024). The Competitiveness Coordination Tool proposed in the Competitiveness Compass (EC, 2025c) within the context of the proposed European Competitiveness Fund offers a potential top-down solution for coordination on cleantech and innovation funding and measures, but a concerted effort must be made to link this to existing climate and energy planning processes while respecting national and local competencies (Forte, 2025). The same goes for the proposed National and Regional Partnership Plans (NRPP) under the next MFF (EC, 2025g). Notably, as proposed by the Commission, the next iteration of the SCPs will be integrated into the NRPPs as dedicated chapters, and the NRPP template (Annex V) includes a dedicated section on consistency with the NECPs (EC, 2025f, p. 114).

Figure 5: Streamlining and integrating climate-related plans to reduce individual submissions



Source: adapted from T&E (2024)

5. Added-value check of all existing national reporting obligations – which could be made more fit for purpose?

Member States have a long list of various reporting duties to ensure transparency and accountability. As part of a thorough assessment of whether there are options to reduce the effort involved, individual obligations should be assessed in terms of their necessity. A **guiding question could be what the information is used for** – is something being done with the data that is submitted, **does it serve a specific purpose?** The alignment of information provided in the NECPs and in the corresponding NECPRs would be a substantive improvement (see Option 1 above, the reporting would directly serve as a progress check and feed assessments), as would the integration of reporting on similar information in separate processes.

One longstanding reporting obligation worth checking for current added value is the detailed reporting of national PaMs as an entirely separate exercise. This takes up significant effort in its current form without a clear target process. The NECP template asks for information on PaMs in narrative form, while the biennial reporting on PaMs asks for these in list form with substantially more detail, including on impacts. Instead of providing quantitative information on impacts directing in the NECPRs, where they exist, countries could simply link to national evaluations for more detail. The information required by the PaM reporting could be streamlined, ensuring that this remains consistent (both in content and format) with what Member States must report to the UNFCCC in their BTRs. PaM reporting under the Governance Regulation is significantly more detailed than what is required at international level (there are several times the number of fields that must be filled in per measure). At the very least, this obligation could likely be slimmed down without undermining its usefulness to include only the information required for a specific purpose and necessary for EU-wide assessments.

Streamlining of these and other national reporting requirements should be pursued following the Better Regulation Agenda's principles of subsidiarity and proportionality, i.e., does the EU requirement add value over Member State actions and is it fit for purpose, respectively.

6. Reduce effort through enhanced digitalisation of internal architecture for data reporting as well as innovative AI-assisted tools

Advancing digital solutions to fully realise the 'once-only' and 'digital by default' principles in national reporting should be a priority. While the introduction of digital forms and interfaces has enhanced efficiency with the adoption of Reportnet 3, there is still room for improvement. To reduce duplication of efforts, the EEA supports 'pre-filling' and 'post-filling' of information in the NECPR templates. Pre-filling automatically loads data sourced from other national reporting obligations, such as the Eurostat energy balances, while post-filling does the same but for data that is reported after the NECPR deadline (e.g., Eurostat's biomass questionnaire).

Nonetheless, Member States still need to fill in information that could be easily provided (e.g., on PaMs and projections) or where info is the same for all Member States (e.g., all countries list the acquis of EU level policies in their PaMs). Even though some of this information can be automatically loaded from the previous reporting cycle, Member States often make substantive changes. Especially when it comes to EU policy, which is

common to all countries, it is unnecessary and redundant for national officials to enter this 27 times when it could be compiled and updated centrally. Additionally, as mentioned above, NECPs come in the form of PDFs, a digital format that limits comparability and the ability to extract data, making EU-wide assessments highly resource intensive. Exploring more adaptable and workable online formats (with the option to download as a standalone PDF) could increase accessibility.

Furthermore, the Commission should advance the use of artificial intelligence (AI) and AI-assisted tools to support the collection, synthesis, and/or presentation of nationally submitted data, ensuring the right safeguards are in place to avoid errors and hallucinations. Potential applications include the creation of summaries or readouts in PDF form on specific topics as well as standardisation across national submissions to enhance comparability, especially for qualitative information. The AI search assistant on the EEA's Climate-ADAPT platform as well as the AI-assisted machine translation of the entire platform serve as innovative examples here.⁹

7. Merging reporting platforms (Reportnet 3 and ReportENER)

Presently, Member States use two separate platforms for reporting progress on climate and energy policy. This may be owed to the split in responsibilities of policy portfolios between DG ENER and DG CLIMA, but it is an unnecessary and avoidable duplication for both anyone having to enter information and those seeking to use the information.

The reporting platforms should either be merged into a one-stop shop for relevant reporting or integrated such that the existing data infrastructures speak to one another and are accessible through a common platform. Ideally, this would be further expanded to other relevant policy areas, bringing in information gathered for the Annual Single Market and Competitiveness Scoreboard and any other future competitiveness monitoring mechanisms (even if this may not come from national authorities). Ultimately, the most efficient option might be a single system for national data submissions across policy areas, which could then be made accessible through various thematically specific website interfaces all drawing on the same database.

Show off what you got: Enhancing data infrastructure and accessibility for the public and policymakers alike

8. Single online data dashboard to collect and present reporting information on the transition to a clean, competitive, and fair EU economy

At present, information from climate and energy reporting by Member States is compiled and scattered across many places, including the Commission's annual Climate Action Progress Report (and Climate Neutrality Dashboard), the EEA's climate-related datahubs¹⁰, as well as in repositories on the Commission website and platforms like ReportENER and Reportnet 3, and the outward-facing Communication and Information Resource Centre for Administrations, Businesses and Citizens (CIRCABC) platform for third party observers, to name a few (refer to Figure 2). Reporting by the European

⁹ See [Ask Climate-ADAPT | Discover the key services, thematic features and tools of Climate-ADAPT](#), accessed 21 August 2025.

¹⁰ See [EEA, Climate and Energy in the EU](#), accessed 09 May 2025.

Commission on EU economic indicators and competitiveness is further spread across several formats, such as the European Monitor of Industrial Ecosystems (EMI) and the Single Market and Competitiveness Scoreboard with national data flowing from the European Semester and other sources.

While these may speak to one another or pull information from common sources (e.g., Eurostat), a single outward-facing dashboard that integrates all relevant dataflows for the transition would greatly increase transparency, accessibility, and use of the information by policymakers and stakeholders at all levels of government. Such an online platform could be used to synthesise information from a common core set of indicators (**Option 2**) by Member State in an interactive manner that allows the user to quickly navigate to a specific policy area. Moreover, more dynamic updating of such a dashboard could facilitate the type of modular, flexible submission of information by national governments to the Commission (as described above under **Option 1**), while pulling continuously from other sources, such as Eurostat. This could build on work by the Commission's Competence Centre on Composite Indicators and Scoreboards housed at the Joint-Research Centre (JRC), particularly the Explorer tool¹¹, but should be tailored to the transition specifically.

3. Outlook and policy windows

Effective and efficient delivery of the transition to climate neutrality is essential for a more competitive and stronger EU economy. Europe cannot afford to get this wrong. The EU needs to act with speed to invest in the transition of its industrial base or risk losing both old manufacturing and cleantech markets to its competitors, along with the value chains and jobs that go with them – and thus overall prosperity.

Investor certainty can be enhanced – and actual investments facilitated – **through leaner administrative processes** and **greater reliability of policy frameworks**. Businesses and citizens alike need to know that their governments will maintain the course and support them in the transition; otherwise, they will not spend their money. Furthermore, transparency on the state of progress in implementing agreed policies and objectives is key for this trust by private and corporate investors. The open drafting of relevant plans and reporting on developments regularly are thus important components in ensuring actual delivery.

The Commission can begin to realise these and more benefits by exploring and implementing the options outlined above for smarter decarbonisation and competitiveness transition policy. At the time of writing, there exist several windows to anchor improvements into the regulatory framework underpinning the EU's policy objectives for a clean, competitive, and fair transition. See Table 2 for an overview of all options and how these could be implemented.

Immediate actions through changes in current practice

Options 6, 7, and 8 on enhancing digitalisation, merging reporting platforms, and online presentation of reporting data could be pursued by the Commission already without substantive changes to underlying policies. These point more to internal processes and do not necessarily

¹¹ See [JRC, CC-COIN Explorer](#), accessed 08 July 2025

change or place any new requirements on national governments or other EU institutions. More technical changes might require amendments to implementing regulations, i.e., Regulation (EU) 2020/1208 and Regulation (EU) 2022/2299. Ideally, these changes should be made in a timely fashion for Member States to benefit from the potential reduced administrative burden in the next NECPR and NECP cycles, in 2027 and 2028/2029, respectively. Still, changes to Implementing Regulations (e.g., templates, processes, guidance) can be fast-tracked with qualified majority voting under the comitology procedure. Exploring better integration of progress monitoring for the clean and fair transition *and* competitiveness (**Option 2**) should also be pursued within the context of revisions to the EU's Single Market Strategy (EC, 2025e) and underlying Scoreboard as well as future editions of the Annual Single Market and Competitiveness report.

Table 2: Overview of eight options for simplification – and means to realise them

Main purpose	Eight options for targeted simplification	Change through
 Streamline like you mean it: Integrating processes and policy areas	1. Integrate NECPs and their reports (NECPRs) iteratively to reduce duplication	• Governance Regulation • Implementing regulations
	2. Align monitoring of decarbonisation, competitiveness, and just transition aims	• Commission practice • Governance Regulation • EU Climate Law • MFF
	3. Common core set of indicators for transition-related planning and reporting	• Governance Regulation • EU Climate Law • MFF • Commission practice
 Make it easy on Member States: Leaner planning and reporting	4. Merge LTSs, NECPs (and possibly more) for fewer submissions and more aligned long-term policy planning	• Governance Regulation
	5. Streamline by cutting low-value, purpose-unclear obligation	• Governance Regulation
	6. Enhanced digitisation and AI-supported tools for data flows	• Commission practice • Implementing regulations
 Show off what you got: Enhancing data infrastructure and accessibility for the public and policymakers alike	7. Merge Reportnet 3 and ReportENER	• Commission practice • Implementing regulations
	8. Build a single EU transition dashboard across domains	• Commission practice • Implementing regulations

Improvements through refinements in EU legislation

Aside from the more immediate paths outlined above, three key ongoing legislative processes could be used.

1. First among these is **the pending revision of the Governance Regulation**, expected in 2026 or 2027 within the context of the post-2030 package of policies – should the Commission's 2040 target proposal be adopted as is. Specifically, **Options 1, 3, 4, and 5** regarding better NECP/NECPR integration, use of common indicators, streamlining the existing planning landscape, and slimming reporting requirements would require changes to the Governance Regulation, and potentially also planning and reporting

obligations stemming from other relevant regulations, such as the Social Climate Fund Regulation. Moreover, there is scope here for the integration of different policy areas.

2. Second is the **revision of the European Climate Law**. The Commission published a proposal in early July 2025 (EC, 2025f), which focused narrowly on the 2040 target (Art. 4). This nonetheless serves as a potential opportunity to better integrate parallel monitoring of the decarbonisation and competitiveness agendas. In fact, at the time of writing, positions adopted by Council and the Parliament in November 2025 have added in more explicit fashion both competitiveness and social dimension aspects to future reviews of the legislation and its progress. A new review cycle has been added (Art. 4), and the existing one (Art. 11) expanded, both with a list of additional considerations. However, the existing progress assessments under Article 6 of the EU Climate Law have not been revised or replaced by the new ones – possibly adding complexity and process intensity. The final negotiations between the institutions may still be able to establish a connection to the monitoring of progress under the Clean Industrial Deal and the Competitiveness Compass to create synergies with the EU Climate Law requirements. This would at the very least reduce administrative burden on the Commission itself. If need be, the Commission, who will have to implement the new requirements, could create these connections in practice – possibly in sync with simplification of the framework under the Governance Regulation, e.g., with common indicators.
3. Finally, the European Commission's **proposal for the next multiannual financial framework (MFF)** offers another injection point for improvements and the exploitation of synergies between decarbonisation and economic policies (EC, 2025d). The Commission has suggested a 'cash for reforms' approach, i.e., moving from a programme-based to performance-based system. This has the potential to improve national policy by making access to EU funding contingent on adequate implementation of planning and reporting requirements. Shifting from programme-based to more flexible funding also opens room to identify and leverage synergies between the EU's clean transition and competitiveness agendas and could be complemented by a more concrete anchoring of decarbonisation in the European Semester. The enforceability of NECP commitments could be strengthened by incorporating these as explicit milestones under the proposed NRPPs under the MFF. In doing so, their implementation would also be subject to monitoring through the European Semester process (Forte, 2025). All in all, sequencing is key. NECPs must be prepared in a timely manner to serve as strategic investment plans with effective links to the NRPPs.

These and all reforms to the existing EU clean transition framework should be pursued in close cooperation and dialogue with national and regional partners as well as stakeholders and civil society organisations. Effective implementation of the **dedicated Implementation Dialogues** and annual reporting by Commissioners Hoekstra and Jörgensen will play a key role in ensuring that their efforts improve existing practices and national implementation.

The pursuit of a competitive, innovative, and modern European economy will inevitably require new policy tools and approaches. Linking the EU's twin priorities, decarbonisation and competitiveness, not only in principle, but in practice – with smarter, more agile policy planning, monitoring, and reporting systems – will provide a clear signal that the EU is not only open for business but means business when it comes to a clean economic future.

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Date: 03 DECEMBER 2025

Suggested citation

Evans, Nick; Matthias Duwe (2025):
Smarter, simpler, more effective:
Options to improve EU transition
policy. Ecologic Institute, Berlin.

Funding

This research received support from the European Climate Foundation. The final paper was developed under the Kopernikus project ARIADNE, which is funded by the German Federal Ministry of Research, Technology, and Space.

Acknowledgements

Thank you to Eike Karola Velten, Erica Hope, Zoltan Massay Kosubek, Romain Didi, Michael Forte, and Michael Sicaud-Clye for their close review and input on different drafts.

We are also indebted to experts from various governmental institutions who provided input to questions and ideas raised throughout the writing process.

We appreciate any feedback and are interested in engaging in follow-up conversations on the topic.