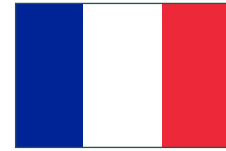


France



Input from: Réseau Action Climat France

STATE OF PLAY

France still needs to submit its draft NECP update. However, the main objectives and levers have been published in an [Action Plan](#), evaluated in this assessment. The plan will be incorporated into a bill or draft plans to be finalised in autumn, and then submitted to the Commission as a NECP update.

OVERVIEW

Many details still cannot be derived from the Action Plan. France does not move towards a 1.5°C trajectory. As it increased its 2030 economy-wide target, however, France should likely be in line with the EU target for non-ETS sectors. Conversely, the energy efficiency contribution is likely not ambitious enough to align with the EU 2030 energy efficiency target. There is not enough information available with regards to the renewable energy contribution. The draft NECP update needs to be the space to plan for policies and measures (PAMs) that are not laid out in the Action Plan.

RECOMMENDATIONS

Strengthen the 2030 gross emission reductions target, to avoid a risky over-reliance on carbon sinks to reach the net emission reductions target

Specify the policies and measures planned for each sector

Reinforce and promote sufficiency policies in the NECP update (e.g. decrease the size and weight of vehicles)

CLIMATE AMBITION

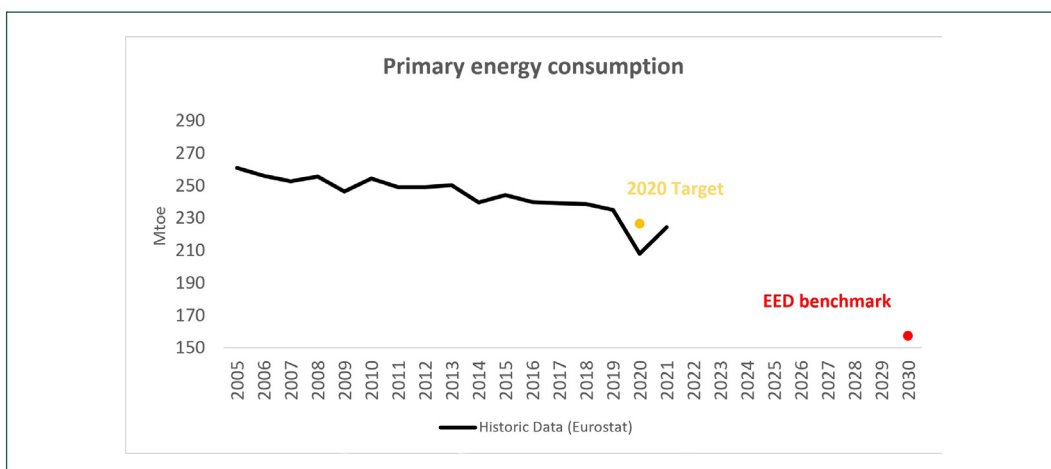
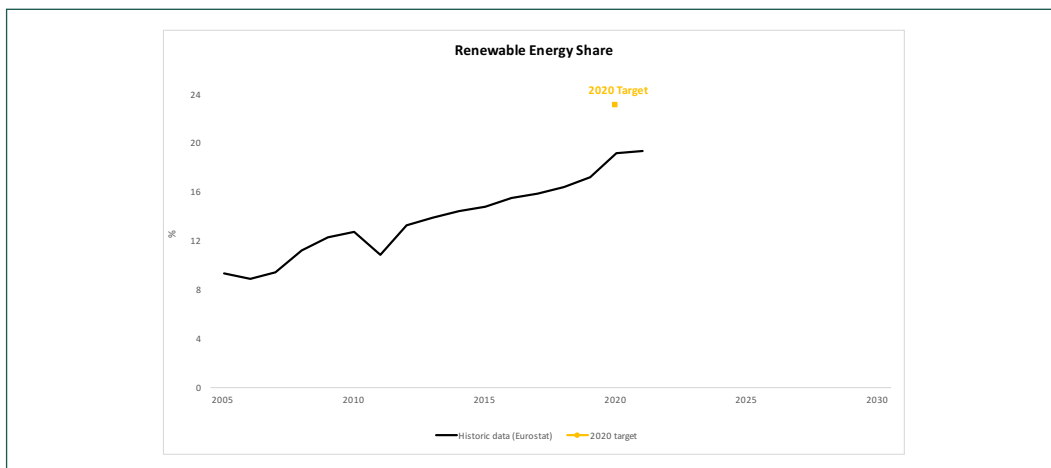
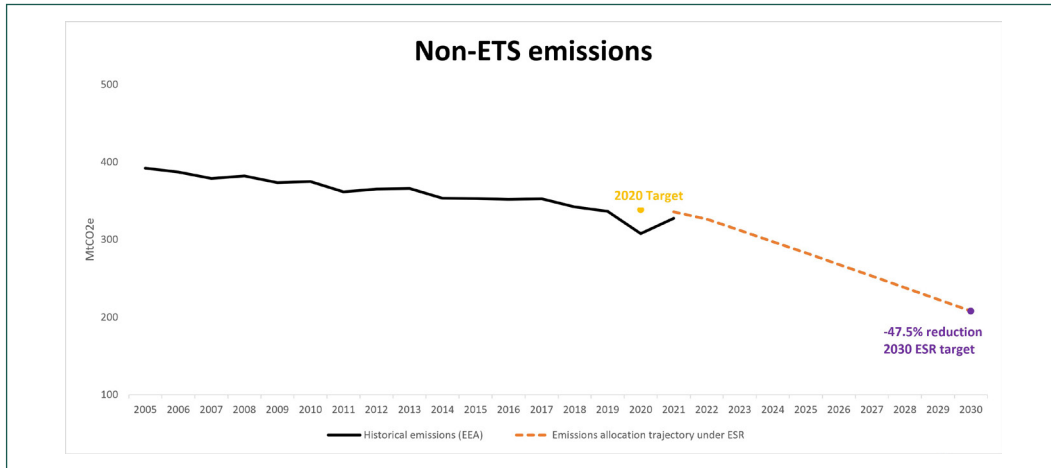
The Plan sets a new **economy-wide** 55% net emission reductions target by 2030 (compared with 1990 levels). This improves the current 2030 economy-wide target (-40% in gross emissions) and should put France in line with EU ambition levels. The target, however, relies heavily on carbon sinks, whose capacity has halved in the past decade. France should reinforce its new gross emissions target (-50.5%), to ensure ambition is met even if carbon sinks do not increase as much as expected.

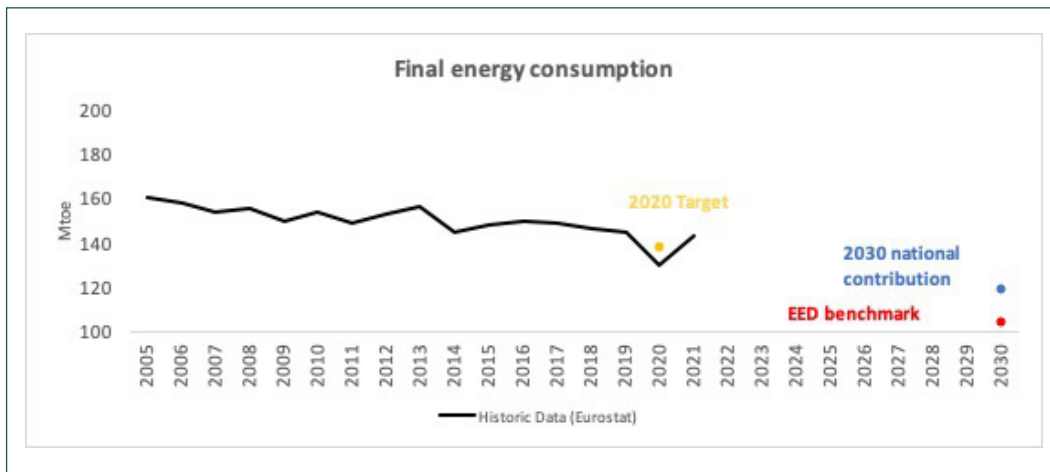
The Action Plan does not distinguish between Emission Trading System (ETS) and non-ETS sectors – hence, no detailed comparison with Effort Sharing Regulation (ESR) ambition levels is possible (France has an **ESR target** of -47.5% by 2030, compared to 2005 levels). However, it provides a breakdown of emission reductions by sector: emission cuts are expected to be significant in the transport and buildings sector, while they remain unambitious for agriculture. The biggest question mark remains whether these objectives will be backed up by robust PAMs. The NECP update must be the place where PAMs are spelled out in detail.

ENERGY TRANSITION

France did not include a 2030 national **renewable energy** contribution in its Action Plan. The national renewable energy contribution should be backed up with detailed policies and measures in the NECP update to ensure that France, after failing to meet its 2020 renewables target, manages to deliver an ambitious contribution for 2030.

On **energy savings**, France’s Action Plan foresees a 17% reduction in final energy consumption by 2030 compared to 2021 levels. This could equal 118.86 Mtoe compared to 2021 Eurostat data, which would not be in line with the requirements of the 2023 Energy Efficiency Directive (EED) and with the 2030 EU energy efficiency target. The gap towards the required contribution as per formula in the 2023 directive would amount to 14.85 Mtoe for final energy; with a possible deviation of 2.5% the gap would still amount to 12.25 Mtoe. France fails to indicate the level of primary energy consumption in 2030. This contribution for primary energy consumption should surpass a reduction of 157.34 Mtoe as per formula in the directive. Policies and measures for energy efficiency and energy sufficiency needed to reach the 2030 target are not sufficiently laid out in detail in the Action Plan.





FALSE SOLUTIONS ALERT

The Plan puts too much hope on Carbon capture, utilisation and storage (5Mt of CO₂ per year from 2030 onwards). The government plans to invest significantly in CO₂ capture facilities at major industrial sites.



SNEAKY SUBSIDIES

The Action Plan does not discuss fossil fuel subsidies. This should be addressed in the NECP update, as subsidies exist that are clearly in conflict with climate and energy transition objectives (67 billion euros in 2023 according to RAC France's calculations).



PUBLIC PARTICIPATION

France's Action Plan was not discussed with the general public. **Public consultations** took place only on the energy mix (with great margins for improvement). The NECP update must be the opportunity for the government to develop a proper consultation process.

The National Council for Ecological Transition (CNTE) is a permanent forum for **dialogue** with civil society and other relevant stakeholders, which was asked to give feedback on the Action Plan. However, it is still not clear whether feedback will be incorporated.

