

Annex 1 IReplies to the draft updated version of the NECP 2030

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PROPOSALS	ANSWERS
<p>Ministry of Regional Affairs and Agriculture, Neme Great e-mail 9.8.2023</p> <p>Greeting!</p> <p>I am sending my suggestions. As I have said, they derive directly from the content of Koal and VVTP. Articles 5.2.1 and 5.2.3 of the Agreement respectively.</p> <p>Page 76 Proposal for change.</p> <p>For land use, land use change and forestry (LULUCF), carbon stock changes shall be assessed in the following land use categories: forests, arable land, grassland, wetlands (including peat production areas), settlements and other land. Greenhouse gas emissions and removals from LULUCF are mainly influenced by the age structure of forests, management practices on forest and arable land (including harvesting volumes), deforestation, the cultivation of peat soils and the extraction and use of horticultural peat, as well as long-term carbon storage in harvested wood products. Thus, the future role of the LULUCF sector as a sink or source of GHG depends mainly on the maintenance of forest land and the reduction of deforestation, on forest management activities to increase forest backup and carbon sequestration capacity in the long term, as well as on the use of peat soil and horticultural peat, and on cropland and grassland cultivation methods. The Forest Act sets out the legal framework for the management of forests in Estonia. The primary objective of the Forests Act is to ensure the conservation and sustainable management of forests as an ecosystem. The Forest Act includes a reforestation measure aimed at contributing to forest recovery following logging or natural disasters. Under the Forests Act, the forest owner is obliged to ensure reforestation no later than five years after the harvest or natural disaster. Support for rapid post-harvest reforestation promotes consistent carbon sequestration on forest land and thereby maintaining the level of GHG removal of Estonian forests. The Ministry of the Environment has prepared a draft Forest Development Plan 2021-2030 and a programme for its implementation is under preparation. The aim of the development plan is to ensure sustainable forest management, taking into account social, economic, climate change, environmental and cultural aspects. Sustainable forest management refers to the use of forests in such a way as to ensure the diversity, productivity, regeneration, viability and potential of their biota and to enable forests to continue to perform all their functions without damaging other ecosystems. The Government of the Republic of Estonia has set itself the objective that economic forests must not lose their backup and agreed that forest management and wood valorisation as a whole must ensure that the forestry sector is a carbon sink. The following planned policies in the draft FDP will affect the LULUCF sector: 1. Adaptation of forestry to climate change – The objective of the measure is to increase the carbon sequestration (in economic forests) and storage (in protected forests) of forests in order to mitigate climate change and increase the resilience of forests to climate change; 2. Improving the biodiversity of forest ecosystems – forest management takes into account biodiversity, environmental and climate objectives; 3. Increasing the competitiveness of forestry – one of the objectives of the policy is to ensure</p>	<p>Taken into account. Chapter 3.1.1.i and Chapter 4.2.1.(ii) specified.</p>

<p>higher productivity, quality and good health of forests; 4. Better valorisation of wood – F & W industries encourage and support more efficient and resource-efficient use of wood.</p> <p>Page 138 – Required change</p> <p>Changes in forest cover depend mainly on the age distribution of forests and management practices, whereas changes in stock were estimated as 10-year averages. As the age structure of Estonian forests is dominated by mature stands (around 39 % of stands are over 60 years old), annual net root growth has been lower than in previous years. The relatively high harvesting rate over the last decade, the combined share of flat-surfaced areas, unknown areas and adolescents, as well as the stabilised forest area, have reduced carbon sequestration in recent years and a similar trend will continue in the coming decades. In this scenario with existing measures (11.5 Mm/year), forest backup will be around 11 % lower in 2050 than at present and net issuer of forest land. The Government of the Republic of Estonia has set itself the objective that economic forests must not lose their backup and agreed that forest management and wood valorisation as a whole must ensure that the forestry sector is a carbon sink.</p>	
<p>Ministry of the Interior, Maris Neeno email 9.8.2023</p> <ul style="list-style-type: none"> - The high share of mature forests, the relatively high harvesting volume of the last decade, the steady increase in the total share of flat-blocked areas, undefined areas and adolescents, and the stabilised forest area, have reduced the carbon sequestration of biomass in recent years. (page 133) - The scenario with existing measures (harvest volume of 11.5 million m/year) will be about 11 % lower in 2050 than at present in forests and net issuer of forest land. (page 138). <p>All others are correct, but ripe forests are wrong in this list. The substitution of fossil fuels with wood-based products, also referred to.</p> <p>We would ask for the removal of mature forests and the replacement of fossil fuels.</p> <p>A positive ambition to reduce deforestation could also be reflected.</p>	<p>Taken into account. Chapter 4.2.1.i specified.</p>
<p>Climate and Energy Ministry Latvia, e-mail of Helēna Rimša 2.6.2023</p> <p>Thank you very much for initiating the discussion on the chapter of regional cooperation. We this specific chapter on cross-border projects as a good start to develop relevant chapter of all our NECPs where in NECP of Finland, Estonia, Latvia, Lithuania the relevant chapter could be quite similar.</p> <p>We did this for original NECP (NECP1 as we call it) where we developed text of regional cooperation chapter together. I have added several cross-border projects to the list and also proposed some cooperation opportunities on soft measures such as studies, development of methodologies or statistical improvements (cross-border projects included within attached file).</p> <p>We don't have specific comments on the proposed measures of Estonia's NECP.</p>	<p>Taken into account. Joint actions betweenLatvia and Estonia specified.</p>
<p>Ministry of the Interior, Drafts Information System 31/05/2023</p> <p>Please remove measure No EN14 "Introduction of renewable energy at PPA maritime surveillance radar stations in small islands" from the NEC 2030 Action Plan (Annex IV) or designate the Ministry of Defence as responsible for the measure in the future. We explain that, as of 1 January 2023, with regard to the Act on the Organisation of the Defence</p>	<p>Taken into account. Annex IV as amended and the reference to Order No 1-3/46 deleted.</p>

<p>Forces and other Act amending the Act, the maritime situational awareness and maritime border surveillance function, together with the fleet and the necessary surveillance equipment, has been transferred to the area of government of the Ministry of Defence, and the Defence Force has been responsible for maritime surveillance, including managing and operating the maritime surveillance system, ensuring, inter alia, the availability of the service to domestic partners (including the Police and Border Guard Board, the Transport Board). The Act on the conditions for the use of support for measure No EN14 financed from the proceeds of the European Union greenhouse gas emission allowance trading scheme in accordance with Section 161(1) of the Atmospheric Air Protection Act, established by Order No 1-3/46 of the Minister of the Interior of 26 April 2021, shall be repealed.</p>	
<p>Ministry of Education and Research, Anu Lihtmaa e-mail 30.5.2023</p>	
<p>Please complete chapter 1.1.i “The political, economic, environmental and social context” with a reference to TAIE’s roadmaps for focus areas. While the TAIE Development Plan is not in itself aimed at supporting specific energy savings and renewable energy targets, there are important links. TAIE’s roadmaps for focus areas formulate R & D & I activities tailored to their societal needs. The needs were formulated in light of the importance of supporting the green transition and further explanation can be found in the roadmaps. On this basis, we ask you to indicate the roadmaps as an additional supporting strategic basis already in the introductory chapter 1.1.i. (See the Roadmap in Nuts and Sustainable Energy Solutions in attachment).</p>	<p>Taken into account. Revised Chapter 1.1 List of development documents.</p>
<p>On the basis of the above, please complete Table 1 on page 9 of the energy sub-heading by adding thematic TA programmes, one of which is smart and sustainable energy solutions. (See presentation slides in attachment). The Roadmap “Smart and Sustainable Energy Solutions” outlines in several tables both HTM and MKM actions supporting this area across specific activities (e.g. TA, networking, capacity building, etc.). (See Roadmap in attachment)</p>	<p>Taken into account.</p>
<p>On page 61, please reword the sentence as follows: Old wording: The development of this type of cooperation with other timber companies in different networks from the European Union must also be fully supported through the development activities of the Estonian Research Agency and Enterprise Estonia. New wording: The development of this type of cooperation with other timber companies in different networks from the European Union can also be supported through development actions carried out by the Estonian Research Agency and the EIS.</p>	<p>Not taken into account. This paragraph has been copied from the FDP, in which case the corresponding paragraph should also be redrafted in the draft FDP.</p>
<p>Please complete page 70 with information on green investment support for R & D institutions and higher education institutions. This is Decree No 62 of the Minister for Education and Research of 2 March 2023. “Procedure for support to research and development agencies and bodies supporting their work for smart investments in energy efficiency in buildings”. The allocation of support to research and development agencies for smart investments in energy efficiency in buildings. The objective of the grant is to improve the energy efficiency and sustainable use of energy in buildings through the introduction of smart energy solutions, including the visibility and awareness in society of the impact of building energy efficiency and energy sustainability, managed by the Ministry of Education and Research and the</p>	<p>Partially taken into account. Chapter 3.1.1 and Annexes III and IV set out the measures that served as the basis for the GHG projections, including taking into account the measure in the final version of the interim GHG forecast and the 2030 NECP.</p>

National Archives and Foundation supporting R & D objectives. Support will be allocated to investments 2022-2023 with a total volume of EUR 14.8 million					
On page 126, please correct the sentence “Knowledge Centres of Excellence are financed by the EU Regional Development Fund through SA Archimedes”, as the Arhi measure of SA ended with the creation of the Education and Youth Agency. There are two measures to support centres of excellence: a support measure for research centres of excellence and a measure for the development of services for centres of excellence. The first is aimed at supporting the creation of a centre of excellence; the second is to support the development of a portfolio of services for an already existing Centre of Excellence. The former is financed from the State budget; the second has been financed by the Regional Fund. Both are implemented by the Estonian Research Agency (ETAG). (See more details in the attachment from the presentation lades.)	Taken into account.				
<p>Please complete the table on page 129 below, but in particular we recommend referencing the roadmap for smart and sustainable energy solutions with more details on what actions will be supported in this area in the next period. If the information provided for the REKK is too voluminous, reference can be made to the roadmaps (indicated both on the HTM homepage and on a separate page created for TAIE.ee). The financing measures are organised through the following implementing bodies:</p> <table border="1" data-bbox="253 727 1397 986"> <thead> <tr> <th data-bbox="253 727 770 767">Enterprise and Innovation Foundation</th> <th data-bbox="770 727 1397 767">Estonian Research Agency</th> </tr> </thead> <tbody> <tr> <td data-bbox="253 767 770 986"> <ul style="list-style-type: none"> •Applied research programme (RUP) •Development and innovation window •Support for product development •Business development programme • Supportfor innovation-promoting procurement •Raising awareness and capacity of R & D & I companies </td> <td data-bbox="770 767 1397 986"> <ul style="list-style-type: none"> •Thematic TAT programmes (under planning) <ul style="list-style-type: none"> • Support measure for scientific excellence •Top Centres and Research Infrastructure Services Action (planned) •National TA capacity action (RITA+) (under planning) •Institutional Knowledge Transfer Capacity Action (ASTRA+) (under planning) •Inter-sectoral mobility, including knowledge transfer doctorate (SekMo) •Its action for international scientific cooperation and mobility (Mobilitas++) (under planning) </td> </tr> </tbody> </table>	Enterprise and Innovation Foundation	Estonian Research Agency	<ul style="list-style-type: none"> •Applied research programme (RUP) •Development and innovation window •Support for product development •Business development programme • Supportfor innovation-promoting procurement •Raising awareness and capacity of R & D & I companies 	<ul style="list-style-type: none"> •Thematic TAT programmes (under planning) <ul style="list-style-type: none"> • Support measure for scientific excellence •Top Centres and Research Infrastructure Services Action (planned) •National TA capacity action (RITA+) (under planning) •Institutional Knowledge Transfer Capacity Action (ASTRA+) (under planning) •Inter-sectoral mobility, including knowledge transfer doctorate (SekMo) •Its action for international scientific cooperation and mobility (Mobilitas++) (under planning) 	Taken into account.
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Please use the same names/abbreviations throughout the document, e.g. on page 166, both Tallinn University of Technology and TalTech have been used in the same paragraph.	Taken into account.				
In order to find an appropriate place, please also enrich the document with information from the HTM RRF activity “Green Skills to support the green transition of companies”. The objective of the support is to create flexible learning opportunities in business that are responsive to the development of the labour market, and to provide learning for the green transition. The conditions are confirmed by Order No 208 of the Minister of Education and Research of 30 June 2022 laying down the conditions for granting support for the implementation of investment 1 “Green skills to support the green transition of enterprises” of the RRF reform “Green transition of enterprises”. (See TAT attachment)	Taken into account.				
Ministry of Rural Affairs, Drafts Information System					
1. In the file ‘Coordination of draft draft update of FCP 2030’, page 190 refers to the new Operational Programme for the European Maritime, Fisheries and Aquaculture Fund 2021-2027. This could also be mentioned in the list of documents on page 5.	Taken into account. The OP is referred to in Chapter 1.1 i, which mentions the sectoral development documents of Estonia on the basis of which this draft update has been drawn up.				

<p>2. The 'Annex IV' file contains two measures under the Estonian Maritime and Fisheries Fund (EMFF) on pages 27, 71 and 72: 'Support for improving the energy efficiency of fishing vessels and mitigating climate change' and 'Support for energy and resource audits of fishery and aquaculture products processing enterprises'. Both measures have now come to an end, so the end of their implementation can be set at 2022.</p>	<p>Taken into account.</p>
<p>3. In the Annex IV file, the measure "Investing in the valorisation of bio-resources" is presented on page 188. We ask to replace the intervention of the European Union's Common Agricultural Policy Strategic Plan 2023-2027 with a measure in Estonia's recovery and resilience plan (RRF) of the same name. The period of implementation of the action is 2022-2026</p>	<p>Taken into account.</p>
<p>4. We propose to include in the 'Annex IV' file the RRF investment measure 'Increase production and uptake of biomethane'. The objective of the measure is to support urgent upfront investments to increase biomethane production capacity in order to reduce dependence on Russian fossil fuel imports and accelerate the energy transition. As a result of the investment, Estonia's biomethane production capacity will increase by at least 4 million m³. The period of implementation of the measure is 2023-2026. The Ministry of Rural Affairs is responsible for the implementation of the measure.</p>	<p>Taken into account. Description of the measure included in Annex IV to measure PM11.</p>
<p>5. A number of issues (buildings, transport, LAs) relate to the tasks of the Regional Development Department and the Ministry of Economic Affairs and Communications of the Ministry of Finance, which joins the current Ministry of Rural Affairs, for which reason the draft could also be forwarded to Kaia Sarnet from the Ministry of Finance (Kaia.Sarnet@fin.ee).</p>	<p>Taken into account. Transferred Access to the Working Document for Supplements 30.5.2023</p>
<p>6. The mid-term review of the "Agriculture and Fisheries Development Plan 2030" for 2023-2024 also envisages reviewing the links with the REKK, including impact indicators and targets related to environmental and climate objectives.</p>	<p>Taken note of</p>
<p>VKG, Viljar Kirika, e-mail 30/05/2023</p>	
<p>Pursuant to Article 1(c) and (d) of the Regulation, the governance mechanism established by Regulation (EU) 2018/1999 aims, inter alia, to:</p> <ul style="list-style-type: none"> • ensuring timeliness, transparency, accuracy, consistency, comparability and completeness of the reporting by the Union and its Member States to the Secretariat of the UNFCCC and the Paris Agreement; • contribute to greater regulatory certainty as well as contribute to greater investor certainty and help take full advantage of opportunities for economic development, investment stimulation, job creation and social cohesion. <p>We ask the REC preparers to explain how the REKK and its updated material will allow for regulatory legal certainty and data quality for investors in Estonia under this governance framework. The REKK is not a legal instrument and needs to be clarified what is the legal consequence of what is stated in the NECP?</p>	<p>Let's explain. Chapter 1.2 states that "We have amended national legislation to make these targets legally binding, i.e. the targets set out in the related legislation of the NECQ 2030, but also the regulations governing the support measures regime in Annex IV, e.g. the regulations governing the support measures set out in Annex IV. The legal consequence of what is written in the NECP is, inter alia, that the legislation is amended in order to meet the objectives set out in the NECP. The projections for measures related to the reduction of greenhouse gas emissions described in the REKK have been carried out in accordance with international</p>

	requirements. Reporting on greenhouse gas information to the Secretariat of the UNFCCC and the Paris Agreement shall be made in accordance with Decision 18/CMA.1 of the Parties to the Paris Agreement, including the principles and requirements set out in paragraphs 3 and 34-36 of the Annex to that Decision, in order to ensure the quality of the data reported.
For the sake of clarity, we ask for the measures to be dealt with throughout the two categories – entry into force and design stage. The measures that have entered into force are those that have entered into force at the level of the law. All the others are at the design stage. The latter is also covered by the measures proposed in the VVTP and the potential ideas expressed in development documents and other thought papers.	Let's explain. In order to systematise the measures in Annexes III and IV, we will use the definitions provided in the Energy Union Governance Regulation (EU 2018/1999), which is the basis for the preparation of the REKK 2030: 'existing policies and measures' means implemented policies and measures and adopted policies and measures; and 'planned policies and measures' means options under discussion the adoption and implementation of which is realistically possible after the date of submission of the integrated national energy and climate plan or integrated national energy and climate progress report. The design and decision-making of state support measures is not based solely on the legal level of the law, e.g. operational programmes for financial funds.
We ask the Parliament to replace the word referring to the Estonian Parliament throughout the NNEW by the constitutional term.	Taken into account.
We consider it legally correct and not misleading to the public in the REKK on page 20 and in the rest of the document to remove references to development documents and other reflection papers than legislation.	Taken into account. Specified in the header of the table.
Please correct the incorrect reference in the NECP to the development document "Estonia 2035" adopted on 12 May 2021 as a separate development document. The category of the country's long-term strategy did not exist at that time, nor could the document then be processed as such.	Let's explain. The document 'Estonia 2035', adopted by Parliament on 21 May 2021, states that this is a long-term development strategy for the country.
In the references to the development document 'Estonia 2035', please specify that it is not a binding document of the Riigikogu – i.e. it does not replace the Act and cannot give rise to any right, obligation, expectation for anyone. It is therefore not correct, among other things, to communicate with the European Commission a paper of thought with such content (e.g. expressing a climate-neutrality objective or another numerical objective). This is because, by doing so, the European Commission knowingly misleads the effects of the document and as if it were a plan with legal force. In this context, we consider it appropriate to refer to the position of the Chancellor of Justice of 16 January 2023 on	Let's explain. It is not possible to regulate the functioning and direction of society, including the economy, by means of a single legislative act. Estonia 2035 provides the necessary changes and targets for sectoral development plans for the preparation, implementation, reporting, evaluation and amendment

<p>"Climate Protection and Fundamental Rights Limitations" in the REKK, and to recognise that Estonia has no climate neutrality objective or a legally secure plan.</p>	<p>of the Sectoral Development Plan and the Programme- Programme for Development Plans and Strategic Planning linked to the State budget in the State Gazette and their implementation by the Government of the Republic of "The Strategy gives a coherent orientation to policy makers and decision-makers in different areas and to the use of euro money. The preparation of the strategy was driven by the State Chancellery and the Ministry of Finance with the participation of all interested parties. The implementation of the strategy will be coordinated by the State Chancellery.' In order to update the Strateegia "Eesti 2035" Eesti Vabariigi Valitsus NECP 2030, we will build on the content of the broad-based development paper.</p>
<p>Page 18 of the REKK states: "Estonia's 2030 target according to the update of the LULUCF Regulation is a net greenhouse gas reduction of 2 545 kt CO2 eq. meaning that Estonia will have to increase GHG removals by 434 kt CO2 eq. compared to the baseline level (average for 2016-2018)". Please specify whether your target for 2030 is 2 545 kt CO2 or 434 kt CO2?</p>	<p>Taken into account.</p>
<p>Please add further clarifications on LULUCF that, unlike ETS or non-ETS, the LULUCF framework does not measure actual emissions but changes in carbon stocks. In order for the reader to understand that the result of the calculation of the LULUCF sector does not show actual carbon sequestration and these results cannot be operated as a whole with the objectives of the ETS and non-ETS sectors.</p>	<p>Taken into account.</p>
<p>The inclusion of one sub-fund of the Operational Programme for EU Structural Funds (ALF) for the 2021-2027 funding period in the context of the NECF remains unwarranted. This is all the more so since the ETF has no direct purpose and effect in relation to climate and energy policies. Furthermore, the ETCF clearly does not transform the economy in Ida-Virumaa and such references must be removed from the NECP. If it is considered necessary to highlight, with the support of EU money, potential investments in energy and the climate industry, this must be done throughout.</p>	<p>Let's explain. In preparing the draftupdate of the REKK 2030, we took into account inter alia the implementing act of the REKK 2030 progress report (Annex XX of the Implementing Act on Just Transition), the European Commission's 2020 assessment of the NECP 2030, the update guide chapter 3.4.2 Õ Publications Office (europa.eu)(Commission Notice on the Guidance to Member States for the update of the 2021-2030 national energy and climate plans (2022/C 495/02) and recommendations, including addressing the just transition of the Ministry of Economic Affairs and Communications (mkm.ee)</p>

	<p>The preparation of a territorial just transition plan as an essential part of the operational programme for the Cohesion Policy Funds 2021-2027 is defined in Regulation (EU) 2021/1060 of the European Parliament and of the Council (Art.22.8) and reflected in the law on the implementation of the European Union Cohesion and Internal Security Policy Funds for the period 2021-2027. The description of the use of public support for climate and energy objectives through this fund in Chapter 5.3 does not in any way reflect the drafters' assessment of what part of the transition from fossil-based to non-fossil activities in Estonia is supported by this specific fund (as well as a number of other public sources).</p>
<p>Page 26 and throughout the REKK, please complete and take into account the additional renewable energy capacity of BTT developed by the VKG from 2028, as expressed in the process of drafting ENMAK20235.</p>	<p>Let's explain. This has not been taken into account when drawing up therenewable energy trajectory, as we know that the decision on the capacities granted has not been taken. However, we have taken into account the additional renewable energy potential in Chapter 4.2.2. where we have also mentioned the potential of biomass-based electricity.</p>
<p>Email from the European Commission Directorate-General for Regional and Urban Policy Estonia, Finland, Latvia and Lithuania, Andreas von Busch, 17.5.2023</p>	
<p>1. The references to oil shale phase-out in the EE NECP should be more profound and explicit. Particular in case of Ida-Viru, references to oil shale phase-out need to be strengthened and presented clearly</p>	<p>Taken into account. Revised Chapter 2.1.1 (ii). Already today, oil shale extraction has decreased, with more use of renewable energy and imported electricity. Information on VVTP2023-2027 has also been included, according to which the Landground Act and the granting of future extraction permits for oil shale will be reviewed in the light of climate objectives. The VVTP also envisages paying attention to the construction of storage capacities in proportion to renewable energy.</p>
<p>2. EE NECP and action plan do not contain sufficient actions to address achievement of Estonia's LULUCF targets.</p>	<p>Taken into account. Chapter 3.1.1 i. Estonia acknowledges that existing policies and measures are insufficient to meet the LULUCF target and that additional measures are needed in all sectors covered by</p>

	<p>the Regulation. The Ministry of the Environment is assessing the impacts and volumes of the implementation of additional measures needed to rebuild the land sector into a sink of greenhouse gases and to enable the commitments made as a state to be met.</p>
<p>Society of Living and Population Development, Einar Eiland email 08.05.2023</p>	
<p>We hereby inform you that we received the offer prepared by Majandu and the Communication Stamp Irje Möldre to make proposals for the draft National Energy and Climate Plan and https://www.mkm.ee/energeetika-ja-maavarad/energiamaajandus/energia-ja-kliimakava on 12 April 2023. We have examined the draft National Energy and Climate Plan (NECP), which aims to give Estonian people, businesses and other Member States as much information as possible about the measures that your country intends to take to achieve the energy and climate policy objectives agreed in the European Union. As experts in the field, we are very interested in analysing the NECP and providing feedback to the Ministry, as this document will also feed into support measures for different activities.</p> <p>In order to provide you with a more in-depth analysis, together with the completion of the annexes, we need to distance at least two months from the core activities of our citizens' association and focus on the 165 pages of the NECP, plus hundreds of additional pages of annexes. We must then coordinate our positions with our development partners. It is inconceivable that we will be able to communicate to our development partners free of charge, to compel them to read it and to provide feedback, as a proper analysis would require, to communicate with our development partners free of charge, with all our annexes. We do not have the resources to process these volumes free of charge.</p> <p>We hereby inform you that 165 pages + annexes are unreasonably long and show, in a way, the incompetence of civil servants. Indeed, if the 2022 coalition agreement, which guides the country's country's developments, could be compressed on 10 pages, the same can be done for other strategic documents.</p>	<p>Let's explain. The NECP 2030 has been prepared in accordance with the general framework of the National Energy and Climate Plans (NECPs) of Annex I to the Energy Union Governance Regulation EU 2018/1999. 2019. The average volume of the National Energy and Climate Plans (europa.eu) submitted by Member States in 2030 is 200-400 pages. For example, the Spanish REKK 2030 425 pages, Ireland and Lithuania 2030 both 273 pages, Malta REKK 2030 258 pages, EEKK 2030 195 pages, Finland REKK 2030 183 pages, Latvia 2030 176 pages and Dutch NECP 2030 170 pages. In the final version of the update of the NECP 2030, we seek to concentrate the information requested in Regulation EU 2018/1999. However, it is not possible to transmit the content required by the general framework of the REKK in ANNEX I to Regulation EU 2018/1999 with e.g. 10 pages, but we try to concentrate content and keep below 200 pages in the final version.</p>
<p>A number of the objectives contained in the NECP make sense to achieve this in cooperation with other Member States, as well as with countries outside the EU, in the context of both technology and knowledge transfer, which requires the drawing up of joint projects, the formation of consortia and the submission of applications for funding for actions funded by the European Commission with significantly higher amounts available (e.g. the EU Innovation Fund). It is regrettable that the development of corresponding financing measures, which would finance similar external cooperation, cannot be read out of this NECP. There is also a clear lack of development of measures to finance mutual consultations and the purchase of expert services in order to write together the European Commission's projects or plan local developments. We also do not identify in the NECP concrete measures aimed at carrying out technology and knowledge transfer visits to familiarise themselves with technologies, as has already been done in the context of nuclear energy projects. This principle of best practice should be extended in the NECP. We therefore ask for the</p>	<p>Partially taken into account. Revised Chapter 3.4. The 2030REKK is a communication to the European Commission on the objectives and actions of a Member State, its associated impacts and investment needs in implementing the European Union's energy and climate policy. Estonia's NECP 2030 has been prepared as an overview of the objectives and measures set by legislation and existing development documents (see chapter 1.1. i) of the NECP 2030, and therefore the draft update of the NECP 2030 does not currently set new and</p>

<p>above measures to be included in the NECP so that we can bring the knowledge and technology transfer needed to implement the NECP.</p>	<p>related non-decided targets or measures. Joint projects for knowledge transfer have been funded through the European Horizon Research Partnership “ Clean Energy Transition Partnership” (cetpartnership.eu) and e.g. through the Baltic-Nordic Energy Research Programme – Nordic Energy Research Programme (REKK 2030 Modernisation Plan, section 1.4 ii) Estonia’s use of peer-to-peer consultations and expert services has been very high, notably through the European Commission’s Technical Support Instrument (TSI) (europa.eu), see Estonia (europa.eu), including e.g. the study on the transition to climate-neutral electricity generation, I Energiatalgu studies, the development of energy efficiency action plans and the development of the corresponding action plans.</p>
<p>On the basis of the above, we propose that a specific fund be set up to enable the preparation of international development projects in the order of 3 % of the total budget of the project, to be paid to applicants in order to be able to cover the European Commission’s project preparation costs. This would also create a level playing field with other Member States.</p>	<p>Let’s explain. The NECP 2030 format and process are not intended to create funds. For the preparation of cross-border cooperation projects, e.g. European projects of common interest in the field of energy and transport can apply for support from the Connecting Europe Facility for preparatory actions (e.g. for the preparation of a pumped hydroelectric storage project as a project contributing to the reduction of the use of fossil energy with a significant impact).</p>
<p>In the NECP, Einar Eiland and Vahur Luhtsalu spent a total of 40 hours of working time on the preliminary general analysis of the material in the National Energy and Climate Plan and the drafting of this letter by Einar Eiland, the Head of the Society for Living and Population Development and expert Vahur Luhtsalu. On the basis of the legislation in force in Estonia, the expert is paid an hourly rate of 10 to 40 times the minimum hourly wage established on the basis of Section 29(5) of the Employment Contracts Act. From 1 January 2023, the minimum hourly rate shall be EUR 4,30^[1]. Thus, the fee for the expert report is 40 x EUR 4.30 minimum hourly rate x 40 hours = EUR 6880 plus VAT of EUR 1376. Thus, a total of EUR 8256.</p> <p>^[1] The introduction of a minimum wage. Adopted on 9 December 2022, No 124 https://www.riigiteataja.ee/akt/113122022033</p>	<p>Let’s explain. We have used good practice of inclusion to provide feedback to all stakeholders on a voluntary basis. That involvement does not equate to the ordering of an analysis, which, in turn, is preceded by a request for a price and the conclusion of a contract for the execution of the works. There is no justification for invoicing in the inclusion process.</p>

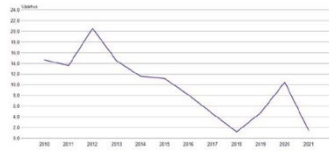
Tere,
we send the comments of the Statistical Office to the NECA 2030 document ([doc https://mkm.ee/energeetika-ja-maavarad/energiamaajandus/energia-ja-kliimakava](https://mkm.ee/energeetika-ja-maavarad/energiamaajandus/energia-ja-kliimakava))

- When using statistical data, please refer to this. The reference could be harmonised along the different drawings.
- The word “data sheet” is used instead of the tables in the statistical database?

● Puhukahe ja jäätmed ● Biogassid ● Jäätmekütus
● Muud taastuvad allikad ● Hidroenergia ● Tuuleenergia

Joonis 45. Taastuvatest allikatest toodetud elekter 2013-2021 (Statistikaamet)

Energiast sõltuvuse määr on nähtav alloleval joonisel.



Joonis 46. Energiasõltuvusmäär, % (KE36 www.stat.ee)

- The energy balance is published in tables KE0230 and KE0240 instead of KE024 (old methodology)! See Figure 4115. The structure of final energy consumption in Estonia 2005-2021 (Statistics Estonia Fact Sheet KE024) is expected to be KE0240

KE0230: ENERGY BALANCE BY FUEL OR TYPE OF ENERGY (EUROSTAT METHODOLOGY) [11.1.2023]

KE0240: ENERGY BALANCE BY FUEL OR TYPE OF ENERGY, TERAJOULE (EUROSTAT METHODOLOGY) [11.1.2023]

- On page 8, renewable electricity 2018 should be 2.1 TWh instead of 1.8 TWh
- Page 26: Table 7 Total Direct Energy Consumption (GWh) 2022 has been misled by thousands of units
- In the same table, wind energy output (2020) 708 MWh, but

KE033: Wind energy output 844 GWh of fuel consumed by power plants PRODUCTS AND ENERGIUM, as published by Eurostat

Taken into account. Additions introduced, including table 2.4, the amounts of electricity produced from biogas and bio-waste are included in electricity from biomass. Kwill establish the “Final Energy Consumption (Europe 2020-2030)” energy balance on the basis of the Eurostat Energy Balance Guide. The reference L K 131 has been used as the baseline parameter for the 2022 GDP forecast in the revised GHG projections

Environment and energy > Energy > Energy statistics - quantities > Energy statistics - quantities, annual data > Energy balances

Complete energy balances

Online data code: NRG_BAL_C last update: 28/04/2023 12:00 view: CUSTOM DATASET

Source of data: Eurostat

Selection Format Download

Row: Geopolitical entity (reporting) [1/41] 1 values displayed
 Column: Standard international energy product classification (SIEC) [2/72] 2 values displayed
 Page: Energy balance [5/138] Primary production

Time frequency: Annual Unit of measure: Gigawatt-hour [1/3] Time: 2020 [1/1]

Complete energy balances (online data code: NRG_BAL_C) Settings: Default

Table Line Bar Map

IT	SIEC	Wind	Solar photovoltaic
EU28		641,869	245,102

Special value: not available
 Available tags: not applicable

- Statistical office graph included on page 150, same error in graph
- Page 26 Table 7 does not reflect the amount of electricity produced from biogas and bio-waste, why?
- Page 33 Table 8 uses Eurostat data table, please review

Row: Energy balance [1/138] 1 values displayed
 Column: Time [4/32] 4 values displayed

Time frequency: Annual

Standard international energy pr... Total [1/72]
 Unit of measure: Terajoule [1/3]
 Geopolitical entity (reporting): Estonia [1/41]

Complete energy balances (online data code: NRG_BAL_C) Settings: Default

Table Line Bar Map

IT	TIME	2017	2018	2019	2020
NRG_BAL					
Final consumption - energy use		117,546,782	129,894,056	118,322,537	114,120,212

Special value: not available

- Page 33 Table 8 miscalculation of average final energy consumption by unit of measurement.
- Page 40 Table 14 and page 50 Table 22 misused GBP
- On pages 57 and 64, where external trade numbers are taken from the macro GDP table and once it is stated that the figure is for 2019, however, the same figure for 2020 is obviously a negligence error (2020 is correct). On page 57, R & D is also linked to GDP, but not all of these sites will be overcalculated and explore what is actually the case for the year.

<ul style="list-style-type: none"> Page 131 has used the GDP projections of the Ministry of Finance for 2019, simply commenting that since then there has been a pandemic, an energy crisis, etc., a recommendation could be made to correct with more recent forecasts. <p>The material was reviewed by analysts for energy statistics, environmental statistics and macro-economic statistics by the Statistical Office</p>	
<p>Estonian Association of Electricity Industry, e-mail from Tõnis VARE 08.05.2023</p>	
<p>SECTION A. National AVA Overview and plan development process</p> <p>Page 8, sixth bullet point – explain what is meant by the term "overall energy savings obligation" in the context of the European Union’s Energy Efficiency Directive. The Union notes that the national contribution to the overall EU energy efficiency target is an indicative and not a mandatory target.</p>	<p>Taken into account, supplemented by an explanation in Chapter 1.1 (iii) by a footnote. The overall energy savings commitment versus the general objective of energy efficiency are two different themes. Reducing the EU’s primary energy consumption and thereby contributing to the overall objective is indicative. At the same time, we are aware that the obligation to save when it comes to final energy consumption is, however, enshrined in the Directive. Each Member State shall set an indicative energy saving target on the basis of final energy consumption that plans to contribute to the collective binding Union target for final energy consumption. Perhaps, it is important to bear in mind: The primary energy consumption target is indicative, but the final energy consumption target is collectively binding.</p>
<p>Page 10 CHP electrical capacity target of 600 MW – Please explain which plants/projects are covered.</p>	<p>Taken into account. Reference to source added. The metered cogeneration plants can be found in Annex 1 of the Elering Security of Supply Report - https://elering.ee/sites/default/files/2023-05/elering_vka_2022.pdf</p>
<p>Page 10 Share of renewable transport fuels – In addition to biomethane, electro-mobility based on the use of renewable electricity must be included as a policy direction</p>	<p>Taken into account. The wording of the policies has been adjusted.</p>

<p>Page 16. The sentence appears to contain an incorrect unit of production capacity: “According to a recent study on the energy potential of offshore wind farms in the Baltic Sea, the total potential capacity of the Baltic Sea wind farms is over 93 GW (187 wind farms with a total electricity generation capacity of 500 MW).”</p>	<p>Taken into account. Wording as corrected in Chapter 1.4(ii).</p>
<p>National Objectives Lk. 21-22 – Indicate the following information (i) the financial volume of the scheme and the time limit for using the investment aid (by which date the co-financed projects must be completed); (II) noting that JTF investment aid must not be used in the oil shale sector, despite the potential of the oil shale industry, as the chemical industry, to significantly increase the added value of products (upgrading products to chemical levels) and to reduce greenhouse gas emissions. Therefore, it is likely that the Ida-Virumaa region will need a new package of assistance that would take a more integrated approach to the region’s economy.</p>	<p>Taken into account. Revised Chapter 3.1.3 (ii). The need for a new package of assistance will become apparent once this package has been completed by 2029. The JTF is worth ~EUR 340 million for Estonia + technical assistance (total EUR 353 million). Estonia receives the most money per inhabitant compared to other European countries. The ETF funds are divided into two strands. The first strand aims to help restructure and diversify the economy and workforce of the Ida-Viru region; the second strand will address the social, environmental and community aspects of the transition. 80/20 or 80 % of the funds go to entrepreneurship and 20 % to support the living environment. The timetable for the use of the ETF funds is tight: the absorption period is 2021-2029, but 2/3 of the volume of grants has to be disbursed already in 2026 (as a large part of the fund is made up of NGEU resources). According to the ETF regulation, activities related to fossil fuels (including oil shale) are not supported, including their production, processing, storage, distribution, combustion. In addition to the ETCF, other EU structural funds are available in Ida-Virumaa (including some activities specifically targeting Ida-Virumaa); at national level, the development of Ida-Virumaa, as an economically and strategically important region, has been supported by the Ida-Virumaa programme. See more information Ministry of Finance of Ida-Virumaa (fin.ee)</p>
<p>Page 24, second paragraph – delete the phrase “subject to limitations, the use of biomass shall be excluded when the Directives become more stringent”. Biomass is an important source of energy for Estonia and, therefore, when using biomass, Estonia must comply with EU legislation, not speculate on its development or set national conditions that are more stringent than EU requirements that hinder competition in the EU internal market.</p>	<p>Taken into account. Paragraph amended.</p>

<p>Page 25, first paragraph – Clarify the basis for the claim that 450 MWh of renewable electricity will be ‘surplus’ in 2030.</p>	<p>Taken into account. This is an estimated order of magnitude which takes into account the rapid development of solar electricity production, from which electricity might need to be maintained for a longer period during a period of low consumption. Hydrogen is one of the possible technologies for electricity storage.</p>
<p>Page 25 Table of projected renewable energy increments – The MEA should internally harmonise projections for at least the need for renewable electricity in 2030. At the meeting of the Renewable Energy Board of 3 May 2023, the representative of the MKM provided information that the demand for renewable electricity in 2030 was estimated to be between 5 and 6 TWh. This is a significantly different level from 6.5 TWh in the REKK. This table 6 also needs therefore to be corrected.</p>	<p>Taken into account. Table numbers have been corrected.</p>
<p>Page 26 Table 7 – explain why the substantial shutdown of solar energy production between 2025 and 2030 and the maintenance of biomass energy production is maintained at a steady level in the period 2025-2030, while biomass power generation capacity decreases to 110 MW (ca 10x decrease in capacity vs. Year 2022). Figure 5 (p. 27) should also be corrected if necessary.</p>	<p>Partially taken into account. Figures for electricity production from biomass in the corrected table. Solar energy production is expected to grow mainly through a reduction in bids. Further increases, although possible, have not been investigated and are therefore not reflected in the national targets. We completed Chapter 4.2.2 in this regard.</p>
<p>P. 29 Renewable Energy Communities – The Union points out that, according to the definition in the OJS, the main objective of an energy community cannot be to make a profit (an energy community is a legal entity whose primary purpose is to provide environmental, economic or social benefits to its members or to the area in which it operates, rather than financial profit). Thus, the community cannot aim to make a profit.</p>	<p>Let’s explain. The section sets out the opportunities for community energy development. All community activities do not fall within the field of community energy. For example, a community-based private limited liability company can be created, there are no barriers. It is also important to note that, in accordance with the rules, the creation of profits is not excluded but, on the contrary, economic sustainability is important for community projects.</p> <p>In addition, it is important to point out that the area of community energy seeks to address different challenges at Western European and Estonian level. Access to the electricity market is a challenge in Western Europe, but it is very well ensured in Estonia. Everyone can easily become a participant in the electricity market and choose service providers. In Estonia, the main concern that could be solved by community energy so far is not</p>

	<p>clearly identified. Work in this direction is ongoing, as indicated in the paragraph.</p> <p>As a box, it is necessary to point out that social controversial views have emerged at the electricity prices in May 2023, e.g. pv on the financial viability of panels, but on the other hand, in the long term, for example, the rooftop panel provides some utility (e.g. grid-free electricity consumption, etc.). Therefore, work on community energy is on-going to ensure the long-term and sustainable development of the community energy sector.</p>
<p>Page 30 Public energy use – The Union points out that the information provided is outdated. As you know, the procurement of renewable electricity in RKAS 2022 failed. The text therefore needs to be updated and the following concrete steps need to be outlined.</p>	<p>Taken into account. Paragraph supplemented accordingly.</p>
<p>Page 38, first paragraph (universal service subject) – The association points out that Eesti Energia cannot be a dominant electricity producer, since the regional electricity market is not limited to Estonia but is connected across borders. However, the universal service obligation was imposed on Eesti Energia, as the State was able to take advantage of the existence of a publicly owned company. The Union also notes that this is not a measure to ensure energy security, but a policy measure on consumer prices.</p>	<p>Taken into account. Improvements made to the text and raised issues related to maintenance, including crisis measures, to the chapter on livelihoods.</p>
<p>Page 39 – Please specify that Elering is expected to launch the frequency reserve market (e.g. aFRR for the product) in 2024 rather than in 2025.</p>	<p>Taken into account.</p>
<p>Page 39-40 Table 14 – CHP plant capacity (el) 600 MW in ENMAK 2030 is not consistent with the view expressed in this REKK (p. 40 and above) that oil shale power plants may not be competitive on the electricity market from 2027 onwards. Tables 13 and 14 – Target values submitted on the basis of the current ENMAK need to be updated.</p>	<p>Let's explain. The electrical capacity target of 600 MW of cogeneration plants comes from ENMAK2030. ENMAK2035 is under preparation, which is likely to be corrected by a number of existing meters. The objective of 600 MW does not include oil-shale power plants.</p>
<p>Page 45, fourth paragraph (3 rd paragraph) Finland Connectivity) – it should be added that one of the objectives must be to plan the connection not just as a point-to-point connection between electricity systems, but that a possible future 3 rd electricity connection would be built as a hybrid connection, which would also offer the possibility of joining Estonian maritime areas (e.g. in the northern shore of Hiiumaa, etc.) for the connection of planned offshore wind farms.</p>	<p>Let's explain. Additional external connections should benefit all manufacturers, not only those who would be connected to this potential hybrid connection. Today there is no good technological solution to design hybrid solutions, it would take more time and potential users in Western Estonia should be in place. Estlink 3 is currently being designed as a point-to-point solution between Fingrid and Elering. The reason for this is the speed and</p>

	<p>technological clarity of the solution. Work is ongoing to ensure that an investment decision can be taken in 2026. Other alternatives would certainly take more time and would be more expensive. An additional connection is necessary for all Estonian producers in order to eliminate the resulting price differential between Estonia and Finland as soon as possible.</p>
<p>Page 48, first paragraph – complete the paragraph with the following sentences: “Other initiatives to develop offshore wind farms in cooperation with other Member States and with recognised external partners (such as the Gulf of Riga offshore wind farm) are also important to achieve the objectives of the Energy Union Strategy in five dimensions. These initiatives are considered by Estonia as potential projects of common European interest.”</p>	<p>Counted</p>
<p>P. 53, first paragraph, last sentence ‘The transmission system operator Elering shall submit an annual security of supply report’ – The Union explains that, according to the ELTS, the network operator must submit to the Competition Authority its 10-year network development plan every two years (as also referred to in the same paragraph). This plan requires a public consultation and the Competition Authority may request that the plan be amended accordingly. According to the OJEU, the transmission system operator is also a system operator. Elering AS, as a transmission system operator, must therefore comply with this obligation and submit and explain its investment plans to the public every 2 years. So far this has not happened. Instead, Elering investments are channelled so far through owner’s expectations (e.g. investments in the electricity grids in Western Estonia and islands) and market participants and the public are not able to influence the design of Elering’s investment plans due to regulation. The obligation for the Elring to submit annual security of supply reports does not in any way replace the statutory obligation to submit every two years the next 10-year network development plans to the Elering. Therefore, Elering will have to announce its intentions to prepare the development plan and when consultations with market participants will start (as indicated in the text in the section on electricity) and complete the text of the REKK accordingly. Page 53 Table 22 – Target values submitted on the basis of the current ENMAK need to be partially updated.</p>	<p>Taken into account. ENMAK2030 targets will be updated during the preparation of ENMAK2035.</p>
<p>Policies and measures Lk. 82-83 offshore wind projects (Elwind) – Add text as follows: “In addition, there are offshore wind park projects developed by companies in Estonian waters. One of the projects at an advanced stage of development is the Gulf of Riga offshore wind farm developed since 2010 by Eesti Energia AS (https://liivimeretuulepark.ee/en/avaleht). It is a offshore wind farm project with a total capacity of around 1 GW, which is an important project for Estonia in terms of energy policy and has the potential to become a project of common European interest in order to attract additional support from the EU Connecting Facility (CEF. Three (the wind farm in the Gulf of Eesti Energia Live, the Utilitas Live-Saare wind farm and the Saare Windi wind farm on the west coast of Saaremaa) have now entered the environmental impact assessment phase of the development of the Estonian offshore wind farm.’</p>	<p>Partially taken into account. There is no justification for the inclusion in the name of all applicants for offshore wind farm projects, or by giving rise to a single distinction, thereby creating unequal treatment. Addition of wording’ In addition, there are offshore wind park projects developed by operators in the Estonian marine area. Building permit procedures have started for four offshore wind farms and one single turbine. The total capacities to be built are set out in the building permits. Applications for building permits have been submitted</p>

	over 30 as of May 2023. Three offshore wind projects (Estonian Energia AS Live Bay in the Gulf of Riga and the Live-Saare offshore wind park and the Saare Wind Energy offshore wind park on the west coast of Saaremaa) are now in the environmental impact assessment phase and have the greatest potential to become projects of common European interest.”
Page 83, last paragraph – rewording as follows: “The support for renewable energy shall no longer be paid for generating installations established as from 1 January 2021. In the future, price stability mechanisms will be valued through lower bids”. Please note that in the context of low bids it is no longer correct to talk about grants. Under-tenders share the risks of projects between the contracting authority (the country) and the operator (developer) and the price levels of the lower bids reflect the market-based level of risk pricing (price stability mechanism).	Taken into account.
Page 84 of the information provided on the low bids – specify that these are fewer renewable electricity offers and that the value of the price stability mechanism rather than the support will be determined as a result of the lower bids.	Taken into account.
Page 88 Deployment of offshore wind – Add text as follows: ‘Pursuant to the Electricity Market Act in force, the Minister responsible for the area (the Climate Minister) shall, by 1 October 2023 at the latest, propose to the Government of the Republic to organise a reduction in the supply of offshore wind generation capacity in order to achieve Estonia’s objective of producing renewable electricity up to the entire domestic demand in 2030.’	Partially taken into account. During this year, the Government of the Republic will decide whether it is necessary to implement an additional support scheme for the construction of offshore wind farms in order to meet the 2030 renewable target.
Page 88 Future energy solutions – specify that the PHEJ capacity planned for the Estonian mine is over 225 MW (> 225 MW).	Taken into account.
Page 88 on future energy solutions – add to the list the proposals of market participants, including Eesti Energia, a member of the Union, submitted to the roadmap for the green transition prepared by the State Chancellery (a.k.a. storage, consumption management, etc. – proposals have previously been communicated to the Ministry of Economic Affairs, among others).	Taken into account. Recording, DSR, Market Design with keywords.
Page 89 for the support scheme for renewable energy – the same comment as above (the result of the lower bids is not a subsidy, but a value of price stability, which is set on a market-based basis as a result of a low bid).	Taken into account.
There is an inconsistency between the figures in the first paragraph on page 90 (30 % of the RES-E target does not require adding 6.5 TWh of electricity by 2030). It is correct to refer to the 100 % RES target.	Taken into account. Wording corrected in Chapter 3.1.2 (iv).
Page 90, second paragraph – Add wording according to the law in force: ‘Pursuant to the Electricity Market Act in force, the Minister responsible for the area (the Climate Minister) shall, by 1 October 2023 at the latest, propose to the Government of the Republic to organise a reduction in the supply of offshore wind generation capacity in order to achieve Estonia’s objective of producing renewable electricity up to the entire domestic demand in 2030.’	Partially taken into account. During this year, the Government of the Republic will decide whether it is necessary to implement an additional support scheme for the construction of offshore wind farms in order to meet the 2030 renewable target.

<p>Page 92 Proof of sustainability of biomass – we continue to point out that the current regime in Estonia is of a temporary nature and its implementation needs to be clarified as a matter of urgency by the Minister responsible (the Minister for Climate).</p>	<p>Let's explain. Such arrangements shall enter into force on 1 July 2023. Section 32⁽³⁾(13) of the Energy Management Organisation Act: The detailed requirements for the principles for calculating the share of renewable energy produced from biofuels, bioliquids and biomass fuels and for demonstrating compliance with the sustainability requirements and criteria for biomass and for the publication of the information specified in subsection 12 of this Section shall be established by a regulation of the minister responsible for the area. [RT I, 7.3.2023, 21 – entered into force. 01.07.2023]</p>
<p>Page 92 Chapter 3.1.3 use of oil shale – replace the first paragraph with the following text: “Until now, the main participant in the European Union Emissions Trading System (EU ETS) is the production of electricity and liquid fuels from oil shale. Estonian companies in the oil shale sector are working intensively to reduce CO2 emissions from oil shale use, a shift from fuel production to chemical products is planned, which would significantly reduce emissions from the oil shale sector. For example, Eesti Energia AS plans to set up a chemical production plant from the light fraction of oil shale pyrolysis. This significantly increases the added value of the light fraction of oil shale pyrolysis produced in Estonia. The light fraction can be further processed into light naphthese, LPG, reformat and hydrogen-treated heavy fractions. These four products are valuable raw materials in the chemical and material industries. Therefore, instead of producing and burning the current fuel, it is possible to produce non-CO2 raw materials from the light-shale fraction of oil shale. All waste generated by the production process is disposed of in existing production facilities. Some of the CO2 generated is then absorbed by hydrogen and produced by methanol.’</p>	<p>Partially taken into account. In Chapter 3.1.3, reference is made to the fact that, when oil shale is being used, the sector is increasingly moving towards the production of various chemical compounds, which helps to reduce the sector’s greenhouse gas emissions.</p>
<p>Page 99-100 Just Transition Plan – delete the third paragraph on page 100 (extension of the concept of just transition beyond Ida-Virumaa). This measure is intended by the European Union to support a specific region and its extension beyond Ida-Viru would be inappropriate.</p> <p>On page 99, the following information should be added: (I) when the investment aid can be used (by which date the co-financed projects must be completed); (II) noting the principle that JTF investment aid must not be used in the oil shale sector and, consequently, that the facility is not an instrument supporting the gradual or sustainable transformation of IdaVirumaa, but the scheme aims to make the oil shale sector unsustainable; note that therefore, in the future, Ida-Viru County is likely to require a new package of aid that addresses the economy of Ida-Virumaa in a comprehensive view.</p>	<p>Taken into account. For the sake of clarity, the paragraph was reworded and additional information has been added to open the context. Furthermore, it has been confirmed that Ida-Virumaa will in any case remain the target region of the EU Just Transition Fund in Estonia.</p> <p>(I) Taken into account – information on the deadline attached.</p> <p>(II) Considered – information on the ineligibility of fossil fuels added. In addition, for the sake of clarity, we would point out that the objective of the ETC scheme is not ‘to</p>

	<p>make the oil shale sector unsustainable’, but is based on the objective of the ETF established by Regulation (EU) 2021/1056 of the European Parliament and of the Council: <i>‘enabling regions and people to address the social, employment, economic and environmental impacts of the European Union’s 2030 targets for energy and climate and the transition to a climate-neutral economy of the Union by 2050 under the Paris Agreement’</i>;</p> <p>(III) Accepted – text completed.</p>
<p>Page 100 last paragraph – The Union points out that the overall objective of ENMAK 2030 to provide consumers with a market-based price of energy supply is not met, as the State introduced in 2022 a so-called universal service obligation for the sale of electricity, which will apply until 2026. The information in this paragraph therefore needs to be updated.</p>	<p>Let’s explain. The general objective of ENMAK2030 is characterised by the result indicators listed in chapter 2 of ENMAK 2030 (page 13). ENMAK 2030 describes the most optimal solutions to ensure market-based prices and availability of energy for consumers by 2030. The universal service introduced in 2022 is a measure aimed at alleviating high electricity prices for consumers in the context of the energy crisis and supporting their livelihoods. As a result of the energy crisis, normal market conditions changed at a moment, with negative effects on the economy of the country and the EU. Once stable market conditions return, it is likely that the need for and use of universal service will decrease.</p>
<p>P. 105-106 renewable energy community – We would point out once again that according to the definition in the OJS, the main objective of the energy community cannot be to make a profit. Thus, the community cannot aim to make a profit</p>	<p>Let’s explain. The section sets out the opportunities for community energy development. Not all community activities are in the field of community energy. For example, a community-based private limited liability company can be created, there are no barriers. It is also important to note that, in accordance with the rules, the creation of profits is not excluded but, on the contrary, economic sustainability is also important for community projects.</p> <p>In addition, it is important to point out that the area of community energy seeks to address different challenges at Western European and Estonian level. Access to the</p>

	<p>electricity market is a challenge in Western Europe, but it is very well ensured in Estonia. Everyone can easily become a participant in the electricity market and choose service providers. In Estonia, the main concern so far is that community energy could be solved without clearly indicating. Work in this direction is ongoing, as indicated in the paragraph.</p> <p>As a box, it is necessary to point out that social controversial views have emerged at the electricity prices in May 2023, e.g. pv on the financial viability of panels, but on the other hand, in the long term, for example, the rooftop panel provides some utility (e.g. grid-free electricity consumption, etc.). Therefore, work on community energy is on-going to ensure the long-term and sustainable development of the community energy sector.</p>
<p>P. 106 Renewable Energy Community – The Union points out that the arguments put forward for “reducing social inequalities” are erroneous and do not solve real-life problems. It should be borne in mind that: (I) renewable energy investments have high entry costs (Capex) compared to later operating costs (Opex), so that the difference in shares between core investors vs consumers in this form of cooperation tends to amplify (i.e. increases social inequalities); (II) No technical generating facility is able to produce energy without planned or unplanned interruptions, while energy consumers constantly need energy according to their consumption profile. This means that any community still needs a reserve connection to the general electricity grid to meet its consumption. The maintenance and development of the general electricity network entails costs which so far have been paid by all consumers in most cases in terms of their energy consumption. If a ‘community’ emerges in a comprehensive electricity network with little consumption from the comprehensive network, but the connection to the comprehensive network cannot be abandoned because electricity must be guaranteed at any time, such a solution clearly increases the overall cost of the electricity network. According to the community concept, however, it would contribute proportionally to community-related costs rather than to the costs associated with the existence and development of the overall electricity grid. This means that the costs of the general electricity grid would increase for consumers who are not members of energy communities. This in turn means that members of energy communities would effectively act not to contribute themselves at the expense of the rest of the consumers/society (mostly those with lower incomes), which is likely to increase rather than reduce societal inequalities.</p>	<p>Let’s explain. The arguments put forward are important for the development of community energy in such a way as to safeguard the interests of the parties and the related challenges. The concept of community energy has the potential to reduce social inequalities, but whether and in what way it is still being developed in Estonia. The arguments put forward provide a very important input for the future work of the Community Energy Working Group.</p>
<p>Page 114 Strategic Objectives of Eesti Energia – Proposal to add that, according to the published EE strategy in force, the production of the whole company is carbon neutral at the latest by 2045.</p>	<p>Taken into account.</p>

<p>Page 120 Baltic Frequency Reserves – Please specify that Elering is expected to launch the electricity frequency reserve market for aFRR product in 2024 instead of 2025. It is important to know that the costs of reserve capacities, etc., must be allocated directly to consumers, e.g. in the form of network service costs or the cost of reserve capacity of the new electricity system as a separate line on the final customer’s electricity bill. These costs must not affect electricity generators, as this reduces the competitiveness of Estonian electricity producers on the regional electricity market. The choice not to weaken domestic electricity generation requires an energy policy decision and a clear mention in the NECP.</p>	<p>Partially taken into account. Standard terms and conditions and methodologies shall be developed by the system operator and coordinated by the regulator, thereby ensuring equal and fair treatment of market participants. In a strategic document such as the NECF, the position on cost allocation is not included, as specific terms and conditions will be developed by the above-mentioned parties. It is certainly important to ensure equal and fair treatment when developing conditions and allocating costs.</p>
<p>SECTION B. ANALYTICAL BASIS Current situation and projections for existing policies and measures Lk. 131, second paragraph, last sentence – redraft as follows: “Decreasing CO2 emissions from oil production and fuel production to chemical products in industrial sectors using oil shale”.</p>	<p>Taken into account.</p>
<p>Page 139, third paragraph, first sentence – Rephrase as follows: ‘The largest electricity producer in Estonia is Enefit Power AS, whose assets include, inter alia, the Estonian and Baltic power plants’.</p>	<p>Taken into account.</p>
<p>On page 162, last paragraph – it is incorrect to state that ‘the prices of electricity and gas as an energy carrier are not affected by the measures implemented in Estonia’. The Union points out that since 2022, Estonia has implemented the so-called ‘universal service regulation’ for electricity, which is in force until 2026.</p>	<p>Taken into account.</p>
<p>Assessment of the impact of proposed policies and measures Lk. 173 Table 42 first section – The Union would point out that if district heating is replaced by fuel-free local heating, the environmental impact of this replacement on ambient air can be assessed positively. In particular, where such a local heating solution uses electricity from a non-fuel-free renewable energy source.</p>	<p>Taken into account.</p>
<p>Page 174 Table 43 first section – same remark as previously made to Table 42.</p>	<p>Taken into account.</p>
<p>Page 182 (at the end of the sub-chapter “i.e. before the following sub-chapter “ii”) – add a new paragraph containing a non-exhaustive list of cross-border and/or cross-border energy projects that are considered by the country to be of energy policy relevance and which have the potential to become projects of common European interest, thereby mobilising the European Union’s financial instruments (such as the Connecting Europe Facility). Such projects are in particular in the areas of offshore wind and energy storage (pump hydro-accumulation plants).</p>	<p>Not accepted. In Estonia, a number of different projects are under preparation, making it difficult to identify, present and rank projects of common European interest, among other things, on the basis of their importance.</p>
<p>Table 45 on page 182 shows that Estonia’s private financing for energy until 2021 amounts to only EUR 147 million and that EUR 1288 million has been disbursed as support measures. Such a low level of private financing in the past is not plausible and the figure needs to be corrected.</p>	<p>Partially taken into account. Clarification in the header of the table that private funding related to grants is shown. There is no statistical dataset to estimate all private funding used in specific areas.</p>
<p>Page 184 paragraph “iii” – The Union points out that the project for synchronisation of electricity systems is not the only project with a major impact on regional cooperation. Such projects can also be in the offshore wind and energy</p>	<p>Taken into account.</p>

storage sectors, which have a potentially high positive impact.	
E-mail from Maia-Liisa Anton, Estonian Chamber of Environmental Associations 08.05.2023	
<p>We acknowledge the progress made compared to the previous National Energy and Climate Plan (NECP), for example in setting energy targets and in more comprehensively reflecting a just transition. However, Estonia’s approach to the NECP is incomplete, as the NECP should be a document which looks at the country’s future and paves the way for other development plans, and not merely a summary of the objectives set out in the national plans. In the update guide, the European Commission states that the updated NECPs must reflect the increased climate ambitions in the meantime. According to the Commission, Member States should “fully endorse the energy and climate targets included in the Fit for 55 and REPowerEU proposals, although the legislative process for their adoption has not yet been completed”.</p>	<p>Partially taken into account. Chapter 1.1 i of the NECP 2030 explains that the document is based on valid development documents. The REKK 2030 is a communication to the European Commission, a format which is not currently available in the framework of the strategic planning of development plans and strategic planning by the Government of the Republic of I. The possibility is under consideration that the final version of the NECP 2030 update could be drawn up and presented as a national energy development plan, which would require the document to be completed in order to comply with the requirements for development plans in the field of VV Regulation No 117of 19 December 2019.</p>
<p>It is also recalled that good practice in inclusion requires the involvement of stakeholders at the earliest possible stage and throughout the planning process. Instead of a one-off public consultation, the Ministry should also consult stakeholders even before preparing the draft update of the REKK, in order to examine the expectations and proposals of all parties. In addition, the European Commission (Regulation (EU) 2018/1999, Article 11) provides for Multilevel Climate and Energy Dialogues, which we know have not been established in Estonia.</p>	<p>Partially taken into account. Today, Estonia’s NECP 2030 is a communication to the European Commission of the objectives and measures set out in the current development documents and laws (which have already undergone related inclusion), i.e. not the national strategic planning document (sectoral development plan) Development plans and strategic planning by the Government of the Republic of I of Estonia. Therefore, this document does not propose further new objectives and actions to be discussed with stakeholders as agreed in the existing strategic development plans. Since the draft version of the NECP 2030 update had to be prepared after the submission of the NECP 2030 progress report on 15 March 2023, in essence 2-3 weeks (and in parallel, in the framework of the ENMAK 2035 working groups, the involvement of all interested parties took place in order to enable the publication, coordination and completion of the draft before being submitted to the Government of the Republic for approval in June), unfortunately, due to the limited</p>

	<p>timeframe, it was not possible for the NECY 2030 drafters to hold further meetings with the sector in addition to the ENMAK 2035 working groups. The final draft must be submitted in one year's time. In the event that further objectives and measures are envisaged in relation to the final draft, we will still have the necessary meetings and energy dialogues. So far, we have followed good practice of inclusion. Inclusion processes are continuing in ongoing sector strategy processes (e.g. ENMAK and spring) and partners' proposals to improve cooperation remain welcome in these processes. Avoiding duplication of existing processes will help, inter alia, to reduce the associated burden on all parties involved.</p>
<p>We see the most serious shortcomings in the commitment to the targets in the LULUCF sector. Estonia does not have an existing Forest Development Plan and the reference to the RDP 2011-2020 is inappropriate in the context of the changed climate policy objectives. The reduction of harvesting volumes and the reduction of peat extraction must be set out as clear targets, without which the targets for the LULUCF sector will not be achievable. The country cannot afford to be ambiguous and blurred about important concerns in such an important development agenda. It is also recalled that consistency with the strategic development documents does not imply automatic alignment with the Paris Agreement's objective of limiting global warming to below 1.5 °C. The measures foreseen in the Fit for 55 package are not sufficient to achieve the objective of the Paris Agreement, therefore Member States should contribute further than agreed. According to the latest IPCC report, the world needs to cut GHG emissions by 60 % to stay within 1.5 °C warming by 2035. Estonia's net greenhouse gas (including LULUCF) target for 2035 is 8 Mt CO₂eq, representing a reduction of only 43 % compared to 2019 (14 Mt CO₂eq). In addition, the achievement of climate objectives needs to be aligned with the achievement of biodiversity objectives in the NECF. The climate crisis does not exist in isolation, but it is interdependent and inextricably dependent on tackling the biodiversity crisis.</p>	<p>Partially taken into account. The REKK is not an autonomous strategic development plan and does not envisage any new measures (see reply to the previous comment). Please submit your suggestions in the process of amending the relevant development documents.</p> <p>Revised Chapter 3.1.1 of the draft, including an accompanying text pointing to the inadequacy of existing policies to meet the LULUCF targets and the need to implement additional measures. The wording of the corresponding subtitle has also been changed. The design of actions targeting biodiversity objectives and the consideration of related criteria in relevant processes is the subject of other implementation processes of strategies and measures. The achievement of these new agreements can be reflected in the future update of the NECP 2030.</p>
<p>Energy considers that, in addition to energy efficiency, the need to reduce energy consumption must also be mentioned in the section on national targets. It is right that more efficient forms of energy production, an energy efficient housing stock, systems that control energy consumption in a flexible and smart way, shortening transport chains, increased use of public transport and non-motorised means contribute to a reduction in energy consumption, but increasing</p>	<p>Partially taken into account, we consider including the term in the final version of the 2030 update of the NECP.</p>

<p>pressure through electrification requires a reduction in overall consumption. As the ENMAK 2035 working groups have gone through that energy efficiency improvements only reach a certain threshold for energy savings, and the working groups have adopted a definition of energy adequacy, we also recommend the introduction of the concept of energy adequacy into the REKK.</p>	
<p>Oil shale Please note that the REKK innovation continues to be based on the National Development Plan for the Use of Oil Shale 2016-2030, whose starting point and objectives are outdated from the current climate objectives. The decline in the oil shale sector is mentioned in the working version of the REKK, but there is currently no clarity on the timeframe. We therefore consider it essential to set out a specific exit time frame for oil shale in the REKK, which sends a clear signal to the oil shale industry and society as a whole. The NECP is proposed to be based on the Territorial Just Transition Plan (confirmed 2022), which is a much more recent and up-to-date document. The Just Transition Plan also outlines deadlines for exit from oil shale, which should certainly be reflected in the REKK: the phase-out of oil shale in electricity generation by 2035 at the latest and the phase-out of oil shale in energy production as a whole (including the production of liquid fuels) by 2040 (Territorial Just Transition Plan: page 29, Appendix c, Figure 1. In the light of the above, the REKK should certainly state that no new oil shale mining permits will be issued. We consider it positive that the reference to the pre-refinery has been removed on page 93. However, we believe that the REKK's cross-cutting message of increasing the efficiency of oil shale use is misleading for the sector and contradicts climate objectives. The State should state clearly that it does not support the creation of new oil mills. This is also not supported by the national direction and commitment to exit from the use of oil shale in energy (including the production of liquid fuels) taken from the use of EU Just Transition Fund support. The fact that the expected emissions of new oil factories are lower than the previous direct combustion of oil shale does not justify the construction of new plants from the point of view of their own climate objectives. More specifically: on page 131, the sentence 'Decreasing CO2 emissions from oil production in the oil shale sector'. This sentence gives the impression that producers switch to oil production, i.e. new oil factories are being built. This is misleading and such references should be removed. The REKK must specifically plan the closure of existing oil-shale-based power plants and oil factories, as also foreseen in the Territorial Just Transition Plan.</p>	<p>Let's explain. Today, neither the development documents nor the legislation set out the time frame for leaving oil shale. However, the draft update of the NECP 2030 does not set any new targets. The discontinuation of oil shale, including in the production of shale oil, is the subject of discussion of other processes. The JA Plan does not make any further commitments for the State to leave oil shale for energy production, but describes the framework that existed at that time and lists the agreements in force at the time when the plan was drawn up. According to the Energy Economy Organisation Act, renewable energy production will account for at least 100 % of gross final consumption of electricity by 2030. Reform No 2 of the Estonian Recovery Plan aims to boost the green transition in the energy economy through the renewal of sectoral development documents and the creation of a support system for the green transition (e.g.: guidance material, process descriptions, changes to legislation where necessary, removal of obstacles). The reform will include, inter alia, the adoption of the necessary legislation and guidance material to accelerate the roll-out of renewable energy generation installations, as well as measures to alleviate the protective height limits for wind farms. The implementation of the reform shall be completed by 31 December 2025. The reform will reduce the need to produce electricity from oil shale.</p>

<p>On fossil fuels in 2020, the European Commission provided feedback to Estonia’s REKK, which pointed out, inter alia, that there was no plan to phase out fossil fuel subsidies in the REKK. This is also missing in the updated version. It is positive that it is pointed out that capture and storage of CO2 is not appropriate and cost-effective in Estonia.</p>	<p>Partially taken into account. Supplemented at the end of P 2.1.1 by a reference to the proposed reform as part of the Estonian Recovery Plan “Increasing the green transition in the energy economy”. Chapter 3.1.3 iv of the draft update of the NECP 2030 points out that the overall objective of ENMAK 2030 is to provide consumers with a market-based energy supply, i.e. the need for fossil fuels will gradually be reduced by, inter alia, organising fewer offers for the transition to renewable energy. There are no financially supported actions for the deployment of fossil fuels among the measures in the draft upgrade of the NECP 2030 (see annexes 3 and 4 of the draft). The draft notes that support measures were implemented for domestic and household consumers in heating periods 2021/2022 and 2022/2023 to <u>compensate for the high energy price</u> for a total amount of EUR 282 million, including gas price compensation for around EUR 58 million. According to Chapter 4.6(iii), fossil fuel subsidies accounted for 22 % of the energy subsidies paid in 2021 (including 80 % of fossil fuel subsidies accounted for a more favourable excise duty on dedicated diesel). The re-establishment of excise duties on fossil fuels to pre-crisis levels is being planned in the light of the amendments to the Energy Taxation Directive.</p>
<p>Concrete proposals: Page 8: “Ensuring energy security by keeping imported energy reliable by ensuring that Russian natural gas is sparsely low in Russian soils, by increasing the use of indigenous renewable energy sources (wind on land and at sea) and by ensuring the existence of sufficient managed voiciness in electricity.”</p>	<p>Partially taken into account. A reduction in the use of fossil gas was added. In addition, ‘decommissioning of Russian natural gas’ was replaced by ‘maintaining full energy independence from the Russian Federation’. With regard to the latter, it is important that Estonia does not re-consume Russian gas in the future and maintains full energy independence from Russia in the future.</p>
<p>Page 42: ‘The consumption of natural gas in buildings is shrinking, but its role in power generation for peak hours and reserves is shrinking, but its role in power generation for peak hours and reserves will continue to exist (in the case of</p>	<p>Partially taken into account. In Estonia, the construction of additional gas plants is not prohibited today, nor will it be prohibited in the future. Built gas stations can</p>

<p>replacement gas plants, consumption may increase).’ Please specify that ‘additional gas plants’ refer to existing emergency gas power plants and not to new capacities.</p>	<p>partially or fully use biomethane alongside natural gas to cover electricity consumption. Today, Estonia operates the Kiisa Emergency Power Plant, which does not participate in the electricity market and operates for a small number of hours per year. The need for additional gas stations formulated in a more conditional manner: ‘in the case of the construction of additional gas stations or the privatisation of the Kiisa emergency power plant, consumption may increase’.</p>
<p>Page 64: ‘In order to establish hydrogen infrastructure, Elering AS, initiates capacity as hydrogen administrator in the future, is being prepared for the construction of hydrogen blending and/or separate hydrogen transport infrastructure into the existing natural gas infrastructure.’ Only consider that blending hydrogen into existing natural gas infrastructure is an inefficient use of hydrogen given the limited potential availability of green hydrogen and the limited impact on decarbonisation, especially given the increased efficiency of green hydrogen in reducing emissions in alternative direct uses (direct use). In addition, specify that only green hydrogen will be produced and used in Estonia.</p>	<p>Let’s explain. Based on the results of our analysis, we cannot yet make such a statement in the draft. A legal framework for the production and use of hydrogen is under development. The main directions for the production and use of hydrogen are set out in the Estonian Hydrogen Roadmap,¹ which deals with the use of green hydrogen in various sectors. The various possible support measures have been and are expected to be conditional on the production/consumption of green hydrogen.</p>
<p>Please update the ‘Global Trends’ sub-chapter because the information contained therein, including future scenarios for the share of fossil fuels, is outdated.</p>	<p>Taken into account.</p>
<p>Nuclear Energy Please note that the wording “new generation modular nuclear reactors” (p. 145) needs to be clarified whether it is to be understood for Generation III+ and/or Generation IV reactors. Reference should also be made to the National Memorandum entitled ‘Nuclear Energy Deployment Options in Estonia’, according to which only Generation IV technology could be authorised to mitigate the risk of reactor fusion. ¹ Furthermore, we recommend including the recommendation of the International Atomic Energy Agency in the interim report of the Nuclear Working Group to exclude the first reactor of its kind: “Estonia should not allow the reactor developer to build a first-of-a-kind plant in the country, as their operation may also be difficult for an experienced nuclear state and there are many uncertainties in the process. In selecting the appropriate reactor type, it is recommended to look at reactors already in commercial operation for which there is sufficient information and solutions regarding the construction process, cost, fuel and spare parts supply chain.” In the list of studies required, there is no estimate of the economic cost of a potential nuclear</p>	<p>Partially taken into account. The conclusions and clarifications of the attached interim report analysed the risk profile of the nuclear energy scenario. The cost assessment will be provided in the Final Report of the Nuclear Energy Working Group, which will be finalised by the end of the year and can then be included in the final version of the NECP 2030 update if necessary, which would not be clarified at the moment.</p>

¹[Hydrogen | Ministry of Economic Affairs and Communications \(mkm.ee\)](https://mkm.ee)

<p>plant by the State (p. 146). A reference to the MKM study “Transition to climate neutral power generation” should also be added, according to which the scenarios involving nuclear energy are the most risky for Estonia.</p>	
<p>Renewable energy LK 146: “In order to find the best solution for Estonia to ensure security of electricity supply, an analysis was carried out in 2020-2022 to identify the roadmaps for climate neutral electricity production for Estonia, the socio-economic impacts of the different road maps and action plans” Proposal to include here also a sentence on the results of the study: According to the results of the study, one of the most suitable options for Estonia was the route to store renewable energy+, and scenarios involving carbon capture and nuclear energy were more inappropriate. Please rephrase the following paragraph (p. 183) as it is based on an outdated WWF report: “Achievement of the objectives of the Baltic States’ National Energy and Climate Plans is not expected to have significant negative impacts on the other Baltic States. On the contrary, the development of offshore wind farms has a positive impact on the region’s energy supply. Under existing wind farm monitoring programmes, e.g. in the North Sea, it is possible to build offshore wind farms with appropriate plans and mitigation measures without significant harm to the environment. Planning must take into account that offshore wind parks, in addition to being technologically suitable solutions, could also provide different seabed habitats.” “Failure to meet the objectives of the Baltic States’ National Energy and Climate Plans (NECPs) could have significant negative impacts on the ecosystems and their functioning of the Baltic Sea and its surrounding countries if the Baltic Sea is overdeveloped. The massive development of offshore wind farms in the Baltic Sea could cause significant damage to the seabed, aquatic flora and fauna, and without assessing the cumulative effects of wind farms, significant disturbances can be expected on bats and bird migration routes and foraging areas, therefore cross-border and cooperative energy supply planning between the Baltic and Scandinavian countries is necessary for maritime areas that respect the highest environmental standards and be based on biodiversity conservation. 4” 4 – Worldwide Wildlife Fund Baltic (WWF Baltic) and Coalition Clean Baltic (CCB) recommendations for the planning and construction of Baltic Sea offshore wind farms (April 2023): https://irp.cdn-website.com/53007095/files/uploaded/ORE%20go-to-areas_21APRIL2023.pdf</p>	<p>Partially taken into account. Chapter 4.2.2 (ii) added “According to the risk analysis carried out in the framework of this study, Estonia is the most risky nuclear energy scenario. The final outcome of the study was the assessment of the most appropriate renewable energy and storage scenario for Estonia and the least suitable carbon capture and use scenario”. Chapter 5.4 (i) should describe the impact on the energy system of other countries and not directly on the environment. Reference to the recommended report on the establishment of natural positive offshore wind farms by 2030 and taking into account the principles of a sustainable blue economy. 15_1471_blue_economy_6_pages_final.pdf (panda.org) Since Estonia does not yet accept any offshore wind farm development argument. The location of offshore wind farms in Estonia is defined by the Maritime Plan Ministry of Finance (fin.ee) and the development of offshore wind farms in Estonia is based on best practice so far and in synergy with other countries final_bemip_offshore.pdf (europa.eu).</p>
<p>The NECF for forestry does not represent a lack of clarity of policies in relation to LULUCF and forestry, but wants to give the impression that the Estonian country had objectives and measures to progress towards them. It is particularly inappropriate to refer to the Forest Development Plan 2011-2020, which has expired and whose measures have not been analysed in the light of the new climate objectives of the European Union. It is also inappropriate to refer to the draft Forest Development Plan 2021-2030, which has not received political support and currently does not guide developments in forestry. In our vision, the REKK is a document that also helps to identify national bottlenecks and, as it stands, tends to hide shortcomings and blurr issues.</p>	<p>Partially taken into account. Reference to the 2011-2020 Development Plan removed. The proposal does not contain any bottlenecks, shortcomings or issues to which the draft should refer. The overall framework for the 2030 NECP is set out in ANNEX I to EU 2018/1999, which requires the Member State to present a first overview of the development of the plan, 2. national targets, 3 policies and measures, 4 projections and 5 impacts. Related problems, shortcomings, bottlenecks, challenges, etc. may or do not necessarily need to be described.</p>

<p>Specific observations: page 27: “The energy use of wood is at a level that takes into account the sustainable logging volume of the forestry development plan in force in Estonia. The use of wood and wood fuels has continued to grow and will continue to grow in the coming years. In 2020, a total of 11.2 million tonnes of wood was harvested from and outside forest land, with 5.9 million m³ nationally used in energy and 2.4 million m³ of wood exported in the form of wood pellets, i.e. less than half of the harvested wood.’ Please specify what is meant by ‘at a sustainable level of harvested wood’ and reworded to reflect that Estonia does not currently have a forestry development plan in force. In the last sentence, there is a need to correct the mathematical inconsistency: the volumes used for energy purposes are more than half of the wood harvested.</p>	<p>Taken into account. Wording corrected in Chapter 2.1.2 (iv).</p>
<p>on page 77, Chapter “Policy and measures” achieving the target under the LULUCF Regulation. Chapter 3 describes the history and nature of the different policies, but does not directly link it with the LULUCF target or the impact on 20 LULUCF emissions – we propose to include a corresponding analysis and links. An exception in this respect is included in Estonia’s CAP Strategic Plan 2023-27, for which measures are foreseen but for which the impact on LULUCF emissions has remained blurred. For example, MM2 and MM6 are considered to have opposite effects.</p>	<p>Partially taken into account. In section 3.1.1 i, the wording of the title of the paragraph referred to has been amended and added at the beginning of the chapter, a paragraph on which LULUCF emissions and removals depend mainly to establish a clearer link between the description in the chapter and the LULUCF target.</p>
<p>page 92: ‘In Estonia, compliance with the sustainability criteria (Forest Act, Nature Conservation Act, EU Timber Regulation) is ensured.’ We do not agree with this conclusion, nor with the superficial assessments made in the document ‘Technical assistance for the preparation of guidance for the implementation of the new bioenergy sustainability criteria set out in the revised Renewable Energy Directive’.</p>	<p>Taken note. The comment does not include a proposal.</p>
<p>page 137: ‘ The removals and emissions of greenhouse gases in the LULUCF sector are mainly influenced by the age structure of forests, management practices in forestry and agriculture, the use of peat soils and horticultural peat, and carbon storage in harvested wood products.’ Please make it clear</p>	<p>Taken into account.</p>
<p>page 143: ‘Changes in forest cover depend mainly on the age distribution of forests and management practices, whereas changes in stock were estimated as ten-year averages. The high share of ripe forests, the combined share of flat-surfaced areas, areas that are not clear and juveniles, and the area of stabilised forest land have reduced carbon sequestration in recent years and a similar trend will continue in the coming decades. In the scenario with existing measures (11.5 Mm/year), forest backup will be around 11 % lower in 2050 than at present and the net issuer of forest land.’ The outlook for reduced forest cover and continued emissions until 2050 is undesirable and could be prevented by reducing logging. “High share of mature forests” does not contribute to emissions and needs to be removed from an equal list of factors causing emulsion</p>	<p>Not accepted. However, the age structure of forests is, among other parameters, an important indicator influencing the carbon sequestration of forest land.</p>
<p>Wetlands Lk 137 have been highlighted as “forest land and wetlands with the highest net emissions in the LULUCF sector”. Nevertheless, peat extraction is expected to continue in existing volumes, although peat extraction needs to be clearly reduced in order to reduce emissions. It is incomprehensible why emissions from today’s wetlands are expected to continue unchanged for several decades. Emissions from the use of organic soils are estimated in the</p>	<p>Partially taken into account. What is written in the CAP Strategic Plan can be reflected in the NECF, but it is not appropriate to set additional tasks or deadlines in</p>

<p>GHG report to be around 0.7 Mt CO₂. This could be significantly reduced by the conversion of all organic soils into grassland, but there is no guidance either. In addition, the EKO has repeatedly pointed out the need for a clear definition of the eligibility for aid for wetland cultivation. We propose once again to exclude the renovation of drainage systems on organic soils, except to the extent necessary to ensure the functioning of upstream mineral land improvement systems and to drain the organic soil itself. The EKO has sent its proposals for possible emission-reducing activities in the context of the CAP Strategic Plan. Moreover, it is worth reiterating that peat is not a renewable resource, as mentioned on page 98: “The use of renewable energy sources such as biomass and peat is more vulnerable than oil shale energy due to seasonality of stockpiling and the need for interim storage”.</p>	<p>addition to the agreements defined in the existing strategic plans and legislation.</p> <p>Peat has been removed from the list of referenced renewable resources.</p>
<p>Estonian Renewable Energy Chamber, Mihkel Annus email 8.5.2023 and 15.6.2023</p>	
<p>The update of the National Energy and Climate Plan (NECP 2030) fits well in today's conditions where energy security and security of supply, not to mention the continued need for environmental sustainability, have a very different dimension from just a few years ago. The original NECQ 2030, approved in 2019, is inevitably irrecoverably outdated in a number of substantive aspects. We also recognise the involvement of market participants and stakeholders in the process of updating the document by the Estonian Renewable Energy Chamber (E TEK).</p>	<p>Let's explain. The NECP 2030 was prepared and updated according to the timeline, content, inclusion, etc. set out in the EU 2018/1999 Regulation.</p>
<p>In order to ensure that the updated plan best reflects today's developments and needs in the energy sector, we present the following views and observations:</p> <p>1. For obvious reasons, the NECP 2030 document sets updated and endorsed renewable energy targets. In our view, the sectoral targets differ to some extent from the expected pronoses of renewable energy shares, which the framework of the Energy and Climate Plan guides into its content. According to ETEK: a. The projected share of renewable energy sources in the heat economy is clearly underestimated – in essence, the share is not foreseen in the updated REKK dataset over a decade of growth. ETEK estimates, inter alia, that the share of renewable energy in the heat economy will increase significantly more than foreseen in the NEW 2030 working document, inter alia due to the active abandonment of fossil fuel-based heating solutions, both connected to district heating networks and localised heat pumps, storage units integrated in district heating systems, continued deployment of district cooling, gradual increase in energy efficiency, climate policy measures (e.g. ETS₂), etc. In doing so, the deployment of heat pumps will also have a significant impact on the consumption of renewable electricity on both the individual building and district heating network scales, i.e. up to 2.5 TWh by 2030, according to ETEK. The additional electricity consumption needs shall in turn be reflected in trajectories describing the production of renewable electricity (e.g. Table 6 and Table 7);</p>	<p>Taken note. The achievement of the objectives must be done in the most socially beneficial way. In the transmission of national forecasts, the usual approach is a degree of prudence, which ensures this. In addition, it is due to the uncertainty of input parameters that are directly independent of the State (e.g. investment decision by market participants, consumer choice to purchase electric vehicles). Although the State develops the necessary regulation, investment environment, etc., the main development of renewables is consumers and producers. The country, as a consumer, is also taking the lead (2021 ruling that at least 50 % of the electricity consumed by the central government is consumed by renewable electricity).</p> <p>Consequently, if sectoral developments exceed forecasts, it has succeeded in realising the national vision of achieving climate neutrality (renewable energy transition) on the basis of well-designed policies, in the most socially beneficial way.</p>

<p>b. The share of renewable energy in the transport sector also needs to be revised upwards, inter alia due to the higher-than-expected uptake of electric vehicles. ETEK estimates that the electrification of railways, the completion of Rail Baltic, the faster-than-expected electrification of both road transport and public transport, the emissions trading system applicable to the transport sector from 2027, the implementation of measures resulting from the need to comply with the ESR obligations, etc. will also lead to a significant increase in electricity consumption in the transport sector by the end of this decade. ETEK estimates that the additional electricity consumption needs in the transport sector could amount to 2.5 TWh. Including the impact of the use of electricity on the share of renewable energy has been leveraged through the use of multipliers. The additional electricity consumption needs to be reflected in the respective trajectories of renewable electricity. The reduction in transport emissions and the share of renewable energy are also influenced by a number of the strategic objectives described in the Transport and Mobility Development Plan and the measures implemented on their behalf (including fiscal policy). Based on Eleva, ETEK proposes to complete and refine these projections, not necessarily on the basis of the fixed minimum targets, but on the impact of today's actual trends and business activities today. To illustrate the level of predictability of these projections, it is also possible to display trajectories using confidence intervals. This will allow the NEW 2030 document to be more relevant and up-to-date than hitherto</p>	<p>Taken note. In addition to the agreements defined in existing strategic plans and legislation, it is not appropriate to set additional tasks or deadlines in the NECP. (This can be done e.g. in the ENMAK 2035 process and in the renewal of the Transport and Mobility Development Plan.)</p>
<p>2. Based on the above justified increase in demand and Section 594(1) of the Electricity Market Act, it is also necessary to adjust the trajectory for renewable electricity production until 2030 (e.g. Tables 6 and 7) in order to ensure the accuracy of the REKK forecast. ETEK estimates that electricity use in both the heat and transport sectors will increase by around 2.5 TWh, which is why we propose an upward revision of the forecast demand for renewable electricity in the REKK working document from 9.5 TWh to 14.5 TWh. We underline that this has not yet taken into account the potential need for renewable electricity for the production of hydrogen and its derivatives. This correction for electricity consumption is significant, but we consider that it is more precise, but more reasonable and safe when considering macrotrends, both when drawing up the NECP 2030 document and in the overall direction of national energy policy, to take into account a higher increase in electricity consumption compared to the forecasts previously written. A sufficient amount of renewable electricity and a competitive electricity price in the region are also a prerequisite for attracting energy intensive and value-added industrial investments and improving the competitiveness of existing industries. Due to renewable energy input, their products would have a lower environmental footprint, which is increasingly important to compete on export markets.</p>	<p>Partially taken into account. The forecast tables have been corrected, as explained in Table 2.4. The forecast (including underlying assumptions) is specified in the updated version of the NKK 2030.</p>
<p>3. There is a clear need to put more emphasis on reducing total emissions from the sectors covered by the Effort Sharing Regulation (ESR). This is becoming a challenging task in view of the trend in emissions from the LULUCF sector. ETEK estimates that the greatest potential for reducing total ESR emissions is clearer and more targeted work to implement measures to reduce both transport emissions and emissions from small-scale energy. In addition, in order to reduce emissions from agriculture alone and to promote the uptake of domestic biofuels, the targets for biomethane production should be increased several times to 1.0-1.2 TWh. If the measures described in the NECP are</p>	<p>Took note of. Ministries are involved in the implementation of existing and planned measures to meet the GHG reduction target in the sectors covered by the JJM, as well as the mapping and assessment of additional additional measures. The optimal need for biomethane and the production potential complying with</p>

<p>not implemented clearly and in a timely manner in the ESR sectors, there is a high likelihood of becoming a buyer of the corresponding deficit CO2 quota.</p>	<p>sustainability criteria may be refined as a result of the biomethane audit currently initiated by the State.</p>
<p>4. As regards heat management, the document refers throughout to the tightening of the Renewable Energy Directive (RED III). In this regard, ETEC considers that the NECP requires further clarification on the expected impact and constraints on the sector.</p>	<p>Let's explain. Indeed, the Renewable Energy Directive, which is under development, has added areas that are unsuitable for the sourcing of forest biomass in view of sustainable forestry. In particular, the restrictions on agricultural biomass have been extended to forest biomass, meaning that forest biomass may not be sourced from the area that had been in 2008:</p> <ul style="list-style-type: none"> • Old-growth forest(<i>old-growth forest</i>) • forest or other wooded land of high diversity • highly diverse natural or semi-natural grassland • Heath • Wetland • Peatland <p>Each is also subject to certain exceptions. In addition, the concept of old forests has been introduced, which is to be defined by each Member State. Since these are so much new criteria for sustainable forest procurement, the effects of the so-called '<i>no-go</i>' areas and of their exceptions have not yet been thoroughly assessed and the definition of old-growth forests has not been defined. It is therefore too early to make a meaningful assessment of how the new restrictions affect us. As these are more stringent, there is a presumption that this will also have an impact on the use of biomass in energy. More needs to be done to assess the magnitude of the impact.</p> <p>The Directive has also added to the application of the cascade principle, which is directly linked to the payment of subsidies. However, certain exceptions to the cascade principle have been granted to Member States with lower valorisation capacity. The effects of the application of the cascade principle are also expected at present and require a more in-depth assessment.</p>

	As a consequence, we also corrected the paragraph in Chapter 2.1.2 (ii) in the heating sector of renewable energy.
5. It is understood that the content of the NECF working document refers to the current ENMAK 2030 document, but throughout, e.g. for indicative targets in Table 13 (p. 39), it is reasonable to adjust the proposed targets in the context of the update of the NECY 2030 and the changed circumstances. It is clear that under the current 2030 target of at least final consumption of renewable electricity, the share of fuel-free energy sources in final electricity consumption is well above the 25 % indicated in the table. We propose to highlight this in Table 13. This would also be a fit-for-purpose correction taking into account the update of the NEW 2030 document. The same comment applies throughout the document (e.g. also Table 22).	Taken into account. The related tables have been corrected.
6. ETEK considers that the sub-chapter on how to facilitate the deployment of offshore wind energy is currently too general. Market participants expect the country to spell out the issue in detail in the NECD, in line with the guidance provided by the European Commission. In this context, we highlight the current situation where the planned investment in offshore wind farms in many parts of Europe is currently well above the existing construction capacity in the region. Moreover, these investments, amounting to 10-15 GW in the coming years, are planned in markets with an existing favourable regulatory framework (preparation of network infrastructure, national price floors similar to the European Commission's proposal for a market design reform package, and many more) and previous experience of building similar infrastructure from developers, financiers, builders, technology suppliers, policy makers, etc. Given the lack of experience in establishing marine parks in Estonia and the geopolitical location of the country and the resulting risks in the eyes of the various parties, it is unrealistic to assume that it will be possible to build offshore wind farms in Estonia this decade without the support of the State. Moreover, in a context of clearly increased demand and tight supply chains, supply chain links favour projects whose risks are minimised. We would clarify that no renewable energy developer's exclusive objective is to apply for a price floor, but that the actual situation, the risks and the position of Estonia on the global market must necessarily be taken into account when designing and guiding national energy policies.	Let's explain. This year, the MCCM/Ministry of Climate will carry out an analysis to determine whether the contribution of offshore wind is also indispensable to achieving Estonia's 2030 renewable electricity targets or whether the ongoing onshore renewable electricity developments today are sufficient to achieve Estonia's 2030 targets. In the event that the analysis concludes that it is necessary to forge the development of offshore wind farms in order to achieve the 2030 targets, the Minister for Climate will come forward with his proposal 2023. Autumn 2009. If the analysis shows that Estonia's 2030 target of 100 % renewable electricity can also be achieved by more favourable production facilities on land, there is no reason to create an additional support scheme for offshore wind farms, and in this case the sea wind would also develop in Estonia on a market-based basis, as in Lithuania, Finland, Sweden and many other countries.
7. The REKK working document highlights the need and importance of simplifying planning and permitting procedures for the ongoing process and reducing obstacles to renewable energy developments. For our part, we further highlight the need to increase investment in the development of the electricity grid with a view to removing bottlenecks and integrating renewable energy capacities, including offshore wind, into the grid and aiming at a more efficient grid deployment. In ETEK's view, the development obligation is interpreted narrowly, so that there is no substantive preparation for, for example, the integration of offshore wind farms into the network. We therefore propose that, by analogy with central European countries, there should be a regulatory obligation for the core network to connect marine	Not accepted. The drafting of the draft version of the NECP 2030 update does not create any new national obligations, nor does it create any additional rules.

<p>parcs on a fixed-term basis. Otherwise, penalties should be imposed to compensate developers for loss of revenue in situations where it is not possible to feed electricity into the grid upon completion of the marine park because the transmission system has not been able to cope with its works in due time.</p>	
<p>In addition, we highlight as additional observations the minor corrections needed before the document is finalised. 1. Table 6 (p. 25) needs to be corrected, as its figures represent rather a human error in completing the table. Moreover, the content of Figure 4 (p. 25) does not coincide with the figures presented in Table 6, let alone above our estimates of real developments in this decade.</p>	<p>Taken into account. The tables and the figure (numbering changed) have been aligned and corrected.</p>
<p>2. The same page (p. 25) describes the perspective of hydrogen production and use in the transport sector. This perspective is not reflected in Figure 4. In addition, the units and volumes of the hydrogen segment should be reviewed (e.g. 450 MWh of the described surplus of renewable energy is questionable).</p>	<p>Taken into account. 1095 hydrogen requires the use of approximately 50MWh of electricity.</p>
<p>3. We expressed the clear need to promote the production of biomethane in Estonia beyond what was stated in the REKK working document. With this in mind, however, we refer to the current inconsistency in the information on biomethane. At the same time, Chapter 2.1.2(ii) mentions that “by 2030, up to 340 GWh of biomethane will be needed to meet the targets” and “we want to cover the consumption of second generation fuels as much as possible with domestically produced fuel. The greatest potential is for domestic biomethane production and use in transport.” This is not in line with the information from Figure 4 (p. 25), where the share of biofuels in generation II is close to 400 GWh without multipliers, which is in turn more consistent with the information in Table 7, which foresees a biomethane consumption of 383 GWh in 2030. Harmonisation of inputs would be the minimum necessary, but we will continue to stress the need to further promote and stimulate the uptake of biomethane, also in view of the continued dependence of imports on the use of gaseous fuels.</p>	<p>Taken into account. The table and the figure (numbering changed) have been aligned and corrected.</p>
<p>4. As regards Table 7 (pages 26-27), we make the following observations: a. The consumption of heat pumps is underestimated, including no evidence of the addition of high capacity heat pumps linked to the district heating network; b. The generation of solar energy is not expected to increase in the period 2025-2027. ETEK estimates that the construction of larger and smaller solar power plants in Estonia – PV stations are being built in hybrid and/or with storage, in view of the energy efficiency objectives of buildings, will continue to be built in Estonia to cover local consumption by industries or service providers.</p>	<p>Partially taken into account. The additional ambition in the heating and cooling sector is described in Chapter 4.2.2. These projections have not yet been translated into the national targets, as the study on heat management with an action plan prepared by consultants has just been finalised and we will develop more precise measures on how to realistically ensure the projected share of renewable energy in the heating and cooling sector. Solar energy production is expected to grow mainly through a reduction in bids. Further increases, although possible, have not been investigated and are therefore not reflected in the national targets. We also completed Chapter 4.2.2 in this respect.</p>
<p>c. We expect the sharp decrease in installed biomass capacity in 2025 to be a human error;</p>	<p>Taken into account. The table has been corrected.</p>

<p>D. It is not clear from the table (and from Figure 5, p. 27) whether and how the political decision not to use biomass for electricity generation in condensation mode and the corresponding prospective production capacity will influence. In one way or another, policy intentions should be taken into account in the updated final document of the NECF.</p>	<p>Let's explain. The first update of the REKK contains existing decisions and trends. The work plan of the Government of the Republic is not a sufficiently precise document on the basis of which the forecasts in the draft REKK can be corrected. By the time of the final version of the REKK, the specific measures affecting the use of biomass should be clear and taken into account. The VVTP is a suspension of support for biomass use, the classification as renewable energy does not stop. The question is whether the discontinuation of subsidies puts an end to the use of biomass.</p>
<p>5. Regarding heat management, there is an inconsistency in different chapters of the REKK – Table 7 (p. 25) shows an increase in renewable energy consumption in the heat economy (around 150 GWh, 11 % over a decade), Figure 33 (should be Figure 3, p. 24) shows a steady decrease in heat demand, while Figure 2 (p. 23) shows only a few % increase in the share of renewable energy in the heat economy (stand at the same level as in 2022). These data are not consistent with each other. In particular, we reiterate that the share of renewable energy in the heat economy will increase significantly over a decade, based on these developments, than is reflected in the REKK working document.</p>	<p>Partially taken into account. We adjusted the numbering of the figure and the correlation between the table and the figure. The additional ambition in the heating and cooling sector is described in Chapter 4.2.2. These projections have not yet been translated into the national targets, as the study on heat management with an action plan prepared by consultants has just been finalised and we will develop more precise measures on how to realistically ensure the projected share of renewable energy in the heating and cooling sector. We will further clarify that the forecast of heat demand took into account the pace of renovation in the long-term building renovation strategy. Industrial heat demand, which is a growing trend, is not reflected in this graph. The growth of renewable energy is shown in the light of known developments and plans. The corresponding additions have been added to the figure.</p>
<p>6. Table 13 (p. 40) erroneously uses incomprehensible and non-comprehensive units – pound sterling (£). The same comment applies to Table 22 (p. 53).</p>	<p>Taken into account.</p>
<p>7. Table 17 (p. 67) describing the scenario of GHG emission savings per sector requires some adjustment. In some cases, the percentage of change does not reflect a change in the corresponding direction, i.e. there is no necessary negative sign (e.g. for energy), which also affects the final result of the table.</p>	<p>Taken into account. Table corrected.</p>
<p>15.06.2023: We would like to draw your attention to the fact that the current draft update of the National Energy and Climate Plan (NECP 2030) does not fully take into account changes in the energy sector and, however, builds on the</p>	<p>Partially taken into account. Justifications for forecast revisions included in Table 2.4 with an asterisk, including</p>

study [to determine Estonian electricity demand scenarios](#) (2022) and the [study on the transition of gas](#) consumption by 2030 (9.4 TWh) significantly underestimated in the draft.

reference [ESTONIA-PROGNOOS-ASEAN-2030.pdf \(renewable energy.ee\)](#)

With the broad support of market participants, the Estonian Renewable Energy Chamber (ETEK) has assessed the values contained in Table 2.4 of the draft NECP 2030 and makes reasoned proposals to correct the figures in the 2030 column as follows:

1. **Renewable energy consumption in the heat economy – district heating: 4800-> 6 000 GWh.** The increase is mainly due to electrification, including the deployment of heat pumps. The Tallinn seawater heat pump planned today alone will consume 600 GWh in 2030. In smaller district heating networks, market participants are also known to plan the deployment of heat pumps (and energy storage), which, taking into account the development perspective of district cooling, has reached an estimate of 6 000 GWh of consumption.
2. **Renewable energy consumption in the heat economy – heat pumps: 1400-> 2 500 GWh.** At present, the REKK table foresees a trend of 45 GWh/a for the deployment of heat pumps, which is already underestimated today on the basis of the available information and is significantly accelerating with the emissions trading system for buildings in the second half of the decade. This table line covers the replacement of local gas boilers for heat pumps, as well as consumers in the industrial and service sectors.
3. **Renewable energy consumption in the heat economy – local heating: 4 800 GWh.** It is important to highlight the substantive change in this column, i.e. the replacement of locally used biofuels by electricity-using heat pumps in about 40 % of cases by 2030.
4. **Renewable energy consumption in transport – electro-mobility: 132-> 800 to 1 200 GWh.** The consumption of 300 GWh of Rail Baltic to be completed by 2030, the additional consumption of around 140 GWh of existing rail infrastructure and the increase in the electricity consumption of road transport at least by the analysis underlying the REKK (365 GWh), which is still modest in the analysis of market players in the electric vehicles sector, must be taken into account.
5. **Renewable energy consumption in transport – Biomethane: 383-> 900 GWh.** In addition to ETEK, several market participants preparing investments have estimated that the use of biomethane as foreseen in the draft RUKK will be achieved in the coming year or a few years. In particular, the sector operates with a production volume of around 1 TWh by the end of the decade.

In addition, we strongly recommend a revision of the industry consumption forecast until 2030. Today, based on the above analysis, the REKK assumes that electricity consumption in the industrial sector will not increase significantly and will remain below, for example, 2018 levels in 2030. However, this does not take into account the country's economic development perspective, additional (energy intensive) industrial investments (Fibenol wood chemistry, VKG wood refining plant, Neo Performance Materials magnetite plant in Ida-Virumaa jpt) and the rule that the availability of more and cheaper renewable electricity also has an incentive effect on the electrification of industrial processes.

<p>Against this background, it is clear that Estonia's forecast of 9.4 TWh for 2030 is currently underestimated by at least 3.5 TWh in the REKK, in addition to prospective industrial demand.</p> <p>We are in favour of an open debate and wider involvement of market participants for high-quality and multifaceted input by updating a working document that is important for market participants. High-quality data and reliable forecasts are undoubtedly the seeds of wise orientation of energy policy.</p>	
<p>Ministry of Finance, email from Andres Levald 8.5.2023</p>	
<p>The adaptation-related chapters on pages 20 and 94 repeat each other. In providing input to the 2030 implementation, ENMAK 2035 discussions and the drafting of the spring, it has been repeatedly proposed to identify adaptation measures as adaptation measures in various parts of the document as an active intervention to mitigate climate impacts. So far, the proposal has been rejected because the 2030 Climate Change Adaptation Development Plan includes a passive form of adaptation, which in turn stems from the adaptation strategy adopted by the Commission in 2013 entitled 'Adaptation to climate change: Towards a European framework for action" in Estonian. It is appropriate to repeat the proposal as:</p> <ol style="list-style-type: none"> 1. The planning of active adaptation activities corresponds in substance to the content of the Commission's operational framework (see page 18 of the document analysed for the description of the content of the operational framework). 2. It also supports the content objective of the SF 21 + TAT implementation project 'Climate Awareness and Awareness Raising', which is to complement spatial planning guidance through pilot projects. 3. The approach is also more consistent with the principles of spatial planning, the objectives of the types of plans and the climate change adaptation activities described in the guidance material at different levels of adaptation². 	<p>Partially taken into account. The text has been corrected and the repetitive parts have been deleted. When using the adaptation term, we rely on the EKI 2023 Joint Vocabulary, according to which adaptation is to become accustomed to something or something fits, accustomed to something or someone; adapt – adapt to certain conditions, make it fit for purpose, make it fit to match something. Coping with climate change is also possible passively, e.g. many species (also crops) are able to adapt to changing climate conditions, and the agricultural sector, for example, can be positively affected by climate change, in which case we are not talking about active action, which does not mean that this area should be neglected. The Ministry of the Environment has consulted the EKI and asked what term should be used in this context. According to the EKI, adaptation to climate change may also involve adaptation of some areas.</p>
<p>Competition Authority, email from Triin Kangro 8.5.2023</p>	
<p>Figure 3 Correction of the two words on page 92 and correction, page 111 outdated data, Figure 26 position, page 124 "s" no letter in the word, p. 126 add the word "Estonia", p. 129 digits in Boldis, delete and half sentence, page 132 spelling mistakes and sentence to update</p>	<p>Taken into account.</p>
<p>On page 53, comments: The deadline for submitting the electricity development plan is 15 June 2023. In the context of REKK2030, it is irrelevant when exactly electricity consultations are conducted or when the development plan is presented. It is important that this is done by operation of law. Under the law, like distribution system operators, the</p>	<p>Taken into account.</p>

² E.g. [Klimaschutz in Kommunen: Praxisleitfaden](#), Deutsches Institut für Urbanistik (Difu) 2023; [Klimaschutz in der Stadt- und Regionalplanung](#), Difu 2016

transmission system operator is obliged to submit the 10-year network development plan to the Competition Authority every two years. This paragraph gives the impression that Eleringis's requirement does not apply.	
Page 117, clerical error and half sentence	Taken into account.
On page 118, Chapter 3.4 and 4.6 refer to smart nets. The term "smart grid" is now in place. One could be chosen and maintained. Personally, I think that a smart grid would be the right choice.	Taken into account.
Page 153 old data on transmission lines of the core network	Taken into account.
E-mail of 11 April 2023 from Fermi Energia OÜ, Kalev Kallemets	
<p>Nuclear energy, as one of the potential options to cover Estonia's electricity needs after 2030, requires thorough political preparatory work at national level, training of suitably trained people and the establishment of a legislative base. The introduction of nuclear energy requires the creation of legislation laying down the conditions and process for the construction of a nuclear power plant in Estonia and, where necessary, the establishment of the necessary structures. At present, Estonia does not have the necessary legal framework, competent authorities and sectoral experts for the construction of nuclear power plants. According to the Radiation Act, such an activity can only be applied for after the Riigikogu has adopted a decision on the commissioning of a nuclear installation (in 2024). It is also important to mention the conditions in Estonia for smaller modular reactors which are not yet operational in the world.</p> <p>Fermi Energia's choice is not a 'modular reactor that is not yet in operation in the world', but a welded water reactor, with 6 reactors in operation in the Nordic countries, nearly 15 in Europe and 48 in operation worldwide. The small welded water reactors Humboldt Bay 63 MWe, Dodewaard 60MWe, Mühleberg 305MWe (upgraded 385MWe) and 4 welded water reactors (Oyster Creek, Nine Mile Point 1, Monticello, Millstone 1) were also in 600MWe size class. Generation III+ PC reactors are also in operation, which are larger: AP1000: Vogtle 3, Sanmen; EPR: Tajshhan, Olkiluoto 3. This sentence is therefore incorrect because the 'modular reactor' is not a type name, but the typical nature of the IAEA classification is either a pressure or a boiling water reactor or a gas or molten reactor.</p> <p>It would be precise and less predicated to write: 'In Estonia, previously certified reactor types with a capacity of less than 400MWe, experienced by nuclear regulators in the formal licensing process, are likely to reach power generation in the next 5 to 7 years.'</p> <p>Such a proposal. Please consider.</p> <p>Proposal specified on 17.04.2023: "Smaller nuclear reactors could be suitable for Estonian conditions. So far, for example, the feasibility of implementing a water-cooled reactor type with a capacity below 400MWe in Estonia has been analysed, but the introduction of these reactors (in the United States, Canada and the United Kingdom) is in the process of building permit and in preparation for construction.'</p>	Partially taken into account. Wording clarified in line with the interim report of the Nuclear Working Party.

