

**Report of the Advisory Division of the Council of State on the Dutch government's draft 2024 Climate Memorandum**

**Summary**

In fulfilment of its task in the Climate Act, the Advisory Division of the Council of State is issuing a reflection on the draft Policy Document on Climate Change. It does so partly in the light of figures presented by the PBL Netherlands Environmental Assessment Agency in its annual Climate and Energy Outlook ("KEV").

PBL figures show that estimates than last year. Back then, estimates were within a range of 46% to 57% based on enacted, planned and tabled policies. The KEV foresees a reduction of between 45 and 52% for this year, based on the enacted, planned and tabled policies that could be impacted. This year's KEV considers it "very unlikely" that the national climate target of 55% emissions reduction in 2030 compared to 1990 will be met. There is a less than 5% chance of achieving climate targets.

The probability of meeting the indicative sectoral emission targets is considered very low in the KEV for most sectors. In many sectors, developments are not moving fast enough. In industry, for example, the tailored approach is too slow. The agriculture sector remains as problematic as ever when it comes to meeting climate targets. In the electricity sector, the ambition of climate neutrality by 2035 seems unachievable. For instance, offshore wind development is delayed and grid congestion is a major bottleneck in making supply and demand sustainable.

As grid congestion is a major impediment to sustainability initiatives, addressing it should be an absolute priority in further shaping the government's climate policy, both in word and deed.

When it comes to energy efficiency, the Netherlands is also not on track to meet (European) targets. The Netherlands is expected to contribute a 39% share of renewable energy consumption to the European total. According to the estimates in the 2030 KEV, the chances of meeting this target are very low. Thus, there are still steps to be taken in the field of energy saving and renewable energy as well.

In the draft Policy Document on Climate Change, the government acknowledges that it is unlikely that the existing climate and energy targets can be met with current policies, even when including those policies that have been tabled. The government therefore considers it of utmost importance that everything is done to expeditiously implement the existing and previously announced measures, with the adjustments from the framework coalition agreement and the government program.

The government has announced that alternative policies will be decided on in spring. While this shows the government's awareness of the urgency of pursuing effective climate policy, the Division points out the risks to the achievement of climate targets by the choices made in the draft Policy Document on Climate Change, viewed in conjunction with the government program. These include the decision to postpone or cancel a number of measures decided by the previous government, the decision to limit space for offshore and onshore wind, and the abolition or reduction of a number of subsidies. It is uncertain whether the alternative policies announced for the spring decision will be sufficient and timely to meet the 2030 targets.

The Division recommends taking effective measures to meet climate targets as soon as possible.