The transport sector, the plan is to move from 0.4 per cent in 2016 to 14 per cent in 2030 just through biofuels and without consideration of other options like electric vehicles. In the energy sector, a biomass and peat field development is the key component of RES production. There is however a huge question mark about the sustainability of the amount of biomass and peat fields planned, as figures in the NECPs are conflicting, since one of the sources is needed to keep forests as a carbon sink according to the Estonian land use plan. Dubious at best is the claim that peat – instead of oil – can reduce CO2 emissions.

In Estonia, the draft NECP was announced to the public on 24 September 2018. However only on 9 October 2018 during the public consultation organised by the government did it become clear that the draft is almost complete and not open for discussions or changes. The draft NECPs is based on two pre-Paris agreements plans: the 2030 Energy Plan (ENMAK 2030) and the 2050 Climate Policy (KPPA), which the government believes precludes the need for an update to the targets at least until 2023. The public was given the opportunity to submit comments on the draft NECP by February 2019, which is positive though there is still a question if the comments will be considered properly and impact the final draft. The plan was developed in cooperation between the Ministry Energy, Environment and Finance, but whether an independent assessment of the plan is to be carried remains unclear. Estonia also consulted neighbouring countries on the draft NECP before submission to the Commission in December 2018.

### Level of ambition

Estonia plans a 43 per cent overall GHG reduction in the energy sector by 2030, which is the most GHG-intensive sector in the country. However an increase of GHG in the transport sector is hidden in the overall figure. The NECP has ambitious targets in RES, with 42 per cent of renewables in final energy consumption one of the highest in central and eastern Europe.

However the level of details about how this target will be achieved is not convincing. In the transport sector, the plan is to move from 0.4 per cent in 2016 to 14 per cent in 2030 just through biofuels and without consideration of other options like electric vehicles. In the energy sector, a biomass and peat field development is the key component of RES production. There is however a huge question mark about the sustainability of the amount of biomass and peat fields planned, as figures in the NECPs are conflicting, since one of the sources is needed to keep forests as a carbon sink according to the Estonian land use plan. Dubious at best is the claim that peat – instead of oil – can reduce CO2 emissions.

In the energy sector measures to increase prosumers and energy cooperatives are not among the options like electric vehicles. In the energy sector, a biomass and peat field development is the key component of RES production. There is however a huge question mark about the sustainability of the amount of biomass and peat fields planned, as figures in the NECPs are conflicting, since one of the sources is needed to keep forests as a carbon sink according to the Estonian land use plan. Dubious at best is the claim that peat – instead of oil – can reduce CO2 emissions.

A red flag is the plan to invest in new oil shale diesel plants and to continue to use shale-oil for electricity production. Investment needs are not clearly assessed, apart from the new shale-oil plants that evidently are a priority for the country, whose exports of CO2 and cannot be seen as a measure to reduce emissions. The NECP should include a year-by-year reduction plan for emissions in every sector and devise how much funding is needed to meet such a goal.