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2025 Environmental Implementation Review
Country Report - SPAIN

Accompanying the document

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions

2025 Environmental Implementation Review for prosperity and security

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Executive summary

In May 2016, the European Commission launched the Environmental Implementation Review (EIR), a regular reporting tool based on analysis, dialogue and collaboration with EU Member States to improve the implementation of existing EU environmental policy and legislation ([1]). Following previous cycles in 2017, 2019 and 2022, this report assesses the progress made while describing the main outstanding challenges and opportunities regarding environmental legal implementation in Spain. The purpose of this report is to provide information on the implementation performance and highlight the most effective ways to address the implementation gaps that impact human health and the environment and hamper the economic development and competitiveness of the country. The report relies on detailed sectoral implementation reports collected or issued by the Commission under specific environmental legislation.

The main challenges set out below have been selected from Part I of this report, 'Thematic areas', taking into consideration factors such as the gravity of the environmental implementation issue in light of the impact on the quality of life, the distance to target and financial implications.

There has been some progress on **circular economy and waste management**. Spain approved in 2020 a national Circular Economy Strategy that is under implementation. Many Autonomous Communities have also adopted regional strategies on circular economy. A new Law on waste and contaminated soils for a circular economy was adopted in 2022. However, despite this progress, waste management remains a significant challenge. Spain is one of the countries that missed the EU target of recycling 50 % of municipal waste by 2020. Achieving the next targets will require further efforts.

On **water management**, Spain approved in 2021 the Plan DSEAR on wastewater, sanitation, water efficiency, saving and reuse. In 2023, it adopted the third cycle River Basin Management Plans under the Water Framework Directive and the second cycle Flood Risks Management Plans under the Floods Directive. Progress is being made on wastewater, although many agglomerations do not yet comply with the Urban Wastewater Treatment Directive, and Spain is still paying fines following a ruling of the Court of Justice of the EU of 2018. Many challenges remain in the water sector, especially in terms of water governance, water body rehabilitation and water efficiency. Further infrastructure investment is needed in many areas.

Spain stands out within the EU in terms of **natural capital**, which provides opportunities but implies a special responsibility too. Spain has a very rich biodiversity and contributes the largest terrestrial surface to the EU Natura 2000 network, covering 27.3 % of its territory (the EU average is 18.6 %). Some designations are still needed in the marine part. The main challenge is the adoption of site-specific conservation objectives and measures, together with allocating sufficient resources to manage the Natura 2000 network. Spain could also further capitalise on its very valuable natural capital to promote green growth and job creation.

Anticipating and adapting to the adverse effects of **climate change**, such as floods, coastal and soil erosion, desertification, droughts, heat waves and forest fires, remains a core challenge in Spain, which is one of the most affected countries in the EU. In addition, **sustainable development** could be further mainstreamed into other policy areas.

EU funding has significantly contributed to improving the implementation of EU environmental law and policy in Spain. However, Spain still faces considerable investment needs in this area. To meet the four environmental objectives beyond climate change, the investment gap in Spain is estimated at EUR 10.7 billion per year, around 0.81 % of its national GDP, above the EU average (0.77%), with the highest needs for biodiversity and ecosystems. EU funds will continue to play a key role in narrowing the investment gap.

On **environmental governance**, there is room to improve the coordination and cooperation among the competent authorities in the environment. Moreover, environmental enforcement needs to be strengthened in Spain.

On the **positive side**, Spain has implemented several **good practices**, such as Spain's good performance in applying the INSPIRE Directive and managing LIFE projects, or the creation of a division within the Ministry for the Ecological Transition to implement the 'do no significant harm' (DNSH) principle in the Recovery and Resilience Plan.

([1]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Delivering the benefits of EU environmental policies through a regular environmental implementation review, COM(2016) 316 final of 27 May 2016, http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2016%3A316%3AFIN.

Part I: Thematic areas

1. Circular economy and waste management

Transitioning to a circular economy

Advancing the transition to a circular economy in the EU will reduce the environmental and climate impact of our industrial systems by reducing input materials, keeping products and materials in the loop for longer and reducing waste generation, thus decoupling economic growth from resource consumption. A circular economy has considerable potential to increase competitiveness and job creation and will also promote innovation and provide access to new markets. With the 2020 circular economy action plan (CEAP) ([2]) measures going through the legislative process, EU Member States will now have to focus on a swift and effective implementation.

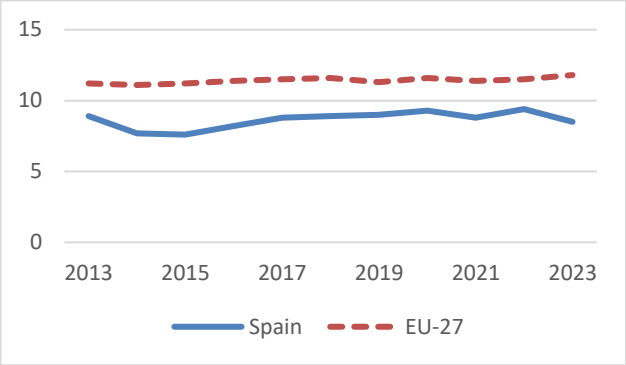
The 2020 CEAP launched the legislative process for a set of initiatives that will now have to be implemented by national governments across the EU. These initiatives were all introduced following a holistic life-cycle approach, with measures addressing the different stages of a product's life cycle, from design through use to end of life.

In the CEAP, the EU sets as its overarching objective the doubling of its circular material use rate (CMUR) by 2030.

The CMUR is a measure of one aspect of circularity: the share of the total amount of material used in the economy that is accounted for by recycled waste. A higher CMUR value means that more secondary materials were used as a substitute for raw materials, thus reducing the environmental impacts of extracting primary material.

Spain's circular use of material was 8.5 % in 2023 (Figure 1). While there was progress between 2014 and 2020, Spain remains below the EU average of 11.8 % due to decreases in 2021 and 2023 setting the country back to the level of 2016. However, it is premature to draw conclusions, since in 2022 the rate reached 9.4 %, the highest in the historical series.

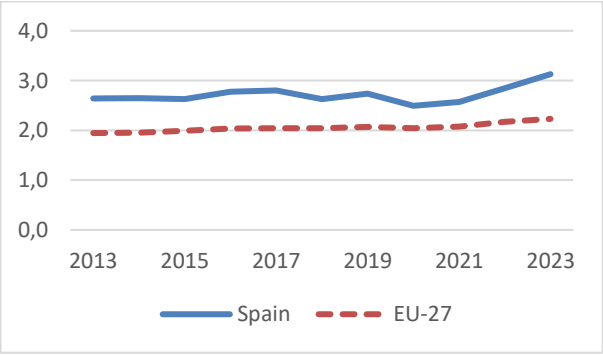
Figure 1: CMUR (%), 2013–2023



Source: Eurostat, 'Circular material use rate', env_ac_rp, last updated 13 November 2024, https://ec.europa.eu/eurostat/databrowser/view/cei_srm030/default/table?lang=en.

Resource productivity measures the total amount of materials directly used by an economy in relation to gross domestic product (GDP). Improving resource productivity can help to minimise negative impacts on the environment and reduce dependency on volatile raw material markets. As shown in Figure 2, with EUR 3.13 generated per kg of material consumed in 2023, Spain's resource productivity is well above the EU average of EUR 2.23 per kg. This positive performance is reflected in an overall increase in the resource productivity of Spain over the last decade.

Figure 2: Resource productivity (EUR/kg), 2013–2023



NB: The unit of measurement used is EUR/kg chain-linked volume (2015). Chain-linked volumes focus on changes on quantities and prices of commodities in previous years, taking account of inflation, and are indexed to the nearest appropriate year, in this case 2015.

([2]) Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – A new circular economy action plan for a cleaner and more competitive Europe, COM(2020) 98 final of 11 March 2020, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A98%3AFIN.

Source: Eurostat, 'Resource productivity', env_ac_rp, last updated 7 August 2024, https://ec.europa.eu/eurostat/databrowser/view/cei_pc030/default/table?lang=en.

Policies and measures

In parallel with European initiatives under the CEAP, Member States are encouraged to adopt and implement circular strategies at the national, regional and city levels. These should be tailored to each national and local reality, to harness the proximity economy's ([3]) potential, while following the principles of a holistic whole-value-chain approach.

Since the launch of the online European Circular Economy Stakeholder Platform in 2017 ([4]) national, regional, and local authorities have used the platform to share their strategies, roadmaps and good practices, for example alternative business models and innovative technologies.

In June 2020, Spain adopted a comprehensive Circular Economy Strategy titled "España Circular 2030" ([5]), which sets out the long-term vision for the country's circularity transition. The Spanish strategy's objectives will be achieved with the approval of three-year action plans. A first Circular Economy Action Plan 2021–2023 ([6]) has been implemented, and a second Circular Economy Action Plan for 2024–2026 is expected to be published shortly.

Under the Recovery and Resilience Facility (RRF), Spain's Recovery and Resilience Plan (RRP) ([7]) places strong emphasis on the circular economy as a cross-cutting topic, being part of its commitment to the green transition. In addition, part of Component 12 of the RRP is specifically dedicated to advancing circular economy efforts, including measures (reforms and investments) aiming at reducing waste generation, enhancing recycling and supporting private sector circularity. The Strategic Project for Economic Recovery and Transformation (PERTE) on Circular Economy will invest in improving the circular economy in industrial sectors and in three key sectors: plastics, textiles and equipment for renewable energy.

Spain's regional and local authorities are committed to circular economy policies, with most of the regions and many cities having their own strategies or action plans. For example, Andalusia, Asturias, the Balearic Islands, the Basque Country, the Canary Islands, Cantabria, Castile and Leon, Catalonia, Extremadura, La Rioja, the Community of Madrid and the Valencian Community all have regional strategies or action plans for the circular economy. So, at the local level, do cities such as Barcelona, Fuenlabrada, Gijon and Malaga. Regional strategies on the circular economy play a key role in supporting the circular transition on the ground. Civil society and the business community are also playing a crucial role in helping to shape this transition in Spain.

Green public procurement

Public procurement accounts for a large proportion of European consumption, with public authorities' purchasing power representing around 14 % of EU GDP. Public procurement using green or circular criteria (life-cycle analysis, PaaS (platform as a service), second hand) can help drive the demand for sustainable products that meet reparability and recyclability standards.

The national legal framework on public procurement in Spain (Law 9/2017 of 8 November, on Public Sector Contracts (LCSP), Royal Decree-Law 3/2020, Law 7/2021, of 20 May, on Climate Change and Energy Transition, and Law 7/2022, of 8 April, on waste and contaminated soils for a circular economy) makes green public procurement (GPP) mandatory, across all levels of government. Thus, environmental considerations should be integrated across the different phases of the procurement procedure.

In Spain, a first national action plan for green public procurement was adopted in 2008. Two implementation reports on this plan were published in 2011 and 2015. An interministerial commission for the incorporation of ecological criteria in public procurement was created in 2018. The second national plan for green public procurement in the central public administration for 2018–2025 was approved in December 2018 and is currently under implementation ([8]).

The plan sets out examples of environmental award criteria within a group of 20 priority goods, works and services in accordance with EU GPP. As an innovation with respect to the European criteria, specific criteria have

([3]) European Commission, 'Proximity and social economy ecosystem', European Commission website, https://single-market-economy.ec.europa.eu/sectors/proximity-and-social-economy_en.

([4]) Circular Economy Stakeholder Platform (https://circulareconomy.europa.eu/platform/en/strategies).

([5]) Ministry for the Ecological Transition and the Demographic Challenge (MITECO), 'Estrategia española de economía circular' [Spanish strategy on circular economy], Spanish Government website, https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/economia-circular/estrategia/.

([6]) MITECO, *I plan de acción de economía circular 2021–2023* [First circular economy action plan 2021–2023], https://www.miteco.gob.es/content/dam/miteco/es/calidad-y-evaluacion-ambiental/temas/economia-circular/plan_accion_eco_circular_def_nipo_tcm30-529618.pdf.

([7]) European Commission, 'Spain's Recovery and Resilience Plan', European Commission website, https://commission.europa.eu/business-economy-euro/economic-recovery/recovery-and-resilience-facility/country-pages/spains-recovery-and-resilience-plan_en.

([8]) The details can be consulted on MITECO, 'Plan de Contratación Pública Ecológica', Spanish Government website, https://www.miteco.gob.es/es/ministerio/planes-estrategias/plan-de-contratacion-publica-ecologica.html.

been included for holding events and conferences. The plan incorporates the legal criteria related to sustainable production, including waste management and the circular economy. It integrates any updates to EU criteria automatically without the need to approve them.

Beyond these basic award criteria, various Ministries have developed specific sectoral criteria, such as the following:

- Civil Guard's supply service (Ministry of the Interior): a minimum of 50 % recycled fibres in garments.
- Treasury: sustainability and CE award criteria to be included in framework agreements; sustainability award criteria applied to various categories of vehicles, laptops and monitors, fuel, electricity service, software, supply of communications equipment, servers and storage systems. CE award criteria applied to printers, copiers and scanners, servers and storage systems, paper, audiovisual equipment and furniture.

Some regions have also implemented measures on GPP. For example, Catalonia and the Basque Country have GPP policies based on the EU GPP criteria. Other regions are also working on their action plans. At the municipal level, there are also many actions to promote GPP.

The EU Ecolabel and the eco-management and audit scheme

The numbers of EU Ecolabel ([9]) products and eco-management and audit scheme (EMAS) ([10])-licensed organisations in each country provide some indication of the extent to which the private sector and national stakeholders in that country are actively engaged in the transition to a circular economy. The EU Ecolabel is awarded to products with best-in-class environmental performance. EMAS is a voluntary environment management scheme aimed at reducing the environmental impacts of organisations.

As of September 2024, Spain had 14 570 Ecolabel products out of 98 977 in the EU, and 377 licences out of 2 983 registered in the EU Ecolabel scheme. In fact, Spain has the highest number of products in the EU. Moreover, in October 2024, 91 866 organisations from Spain were registered in EMAS, 48 fewer than in October 2021.

It is also worth mentioning that the city of Valencia was designated as European Green Capital in 2024 ([11]). Moreover, the city of Viladecans has won the European Green Leaf Award in 2025l ([12]).

The 2022 EIR included a priority action on adopting further measures to increase the circular material use rate. Spain's CMUR has decreased by 1.1 percentage points in 2023. This represents no progress towards this 2022 priority action. Spain's efforts to transition to a circular economy are considerable, but quick and consistent implementation is needed.

2025 priority actions

- Adopt measures to increase the circular material use rate.
- Speed up the transition to a circular economy by implementing an updated national strategy and the EU framework and recommendations, in particular to complement it with upstream circularity measures.

Waste management

Turning waste into a resource is supported by:

(i) addressing the full life cycle of products, from conception to end of life, by setting requirements on the design of products to ensure that they are more sustainable;
(ii) fully implementing EU waste legislation, which includes the waste hierarchy, the obligation to ensure separate collection of waste, landfill diversion targets, etc.;
(iii) reducing waste generation per capita and in absolute terms;
(iv) increasing the recycling rates of waste containing critical raw materials, with a view to reducing dependencies and building resilient value chains, and stimulating demand for recycled content in all products;
(v) limiting energy recovery to non-recyclable materials; and
(vi) phasing out landfilling of recyclable or recoverable waste.

One of the main objectives of EU waste law is to decouple economic growth from its environmental impacts.

([9]) European Commission, 'EU Ecolabel facts and figures', http://ec.europa.eu/environment/ecolabel/facts-and-figures.html.

([10]) EMAS is a European Commission programme to encourage organisations to behave in a more environmentally sustainable way. See European Commission, 'Eco-management and audit scheme (EMAS)', European Commission website, https://ec.europa.eu/environment/emas/emas_registrations/statistics_graphs_en.htm.

([11]) European Commission, European Green Capital Award, https://environment.ec.europa.eu/topics/urban-environment/european-green-capital-award/winning-cities/valencia-2024_en

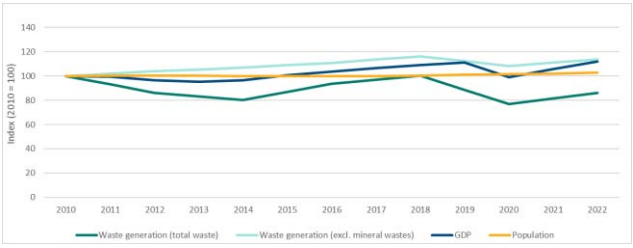
([12]) European Commission, 'European Green Leaf Award, https://environment.ec.europa.eu/topics/urban-environment/european-green-capital-award/winning-cities/viladecans-2025_en

The EU's approach to waste management is based on the waste treatment hierarchy: prevention, preparing for reuse, recycling, recovery and, as the least preferred option, disposal (which includes landfilling and incineration without energy recovery).

All legislative proposals in the field of waste management put forward by the Commission since 2021 are intended to encourage Member States to promote better product design, to require producers to cover the costs of managing the waste resulting from their products and to ensure that waste is managed at the higher levels of the waste hierarchy.

The total amount of waste generated in Spain has decreased over the last 12 years (Figure 3), mainly driven by mineral and solidified wastes, particularly from the mining and quarrying sector. If major mineral wastes are excluded, the waste generation trend shows an overall small increase, largely driven by sorting residues and recyclables. Spain's GDP decreased in 2020, most likely due to the Covid-19 outbreak, which led to a temporary drop in waste generation as well. Overall, there appears to be no decoupling between waste generation and economic growth.

Figure 3: Generation of waste (total and excluding major mineral waste), population and GDP, 2010–2022



Sources: Eurostat, 'GDP and main components (output, expenditure and income)', nama_10_gdp, accessed 15 October 2024, https://ec.europa.eu/eurostat/databrowser/view/nama_10_gdp__custom_9301905/default/table.

Critical raw materials

Spain has published a roadmap for the sustainable management of mineral raw materials ([13]). In Spain, there is specific legislation on batteries, electrical and electronic equipment, vehicles, and construction and demolition waste, which includes measures to improve the circularity of these products. In the case of ashes and slag, although there is no specific end-of-life regulation, Spain is working on end-of-waste criteria for different types of slag.

Construction and demolition waste

Construction and demolition waste accounts for almost 40 % of all waste generated in the EU. A recent study ([14]) by the Joint Research Centre shows that preparing for reuse and recycling operations are preferred over incineration and landfilling from an environmental perspective for most of the individual fractions of construction and demolition waste. However, the economics are often not right to favour preparing for reuse and recycling over incineration and landfilling. If available technology were to be applied, it is estimated that the increase in preparing for reuse and recycling would save an additional 33 Mt of GHG emissions annually (more than, for example, the combined annual GHG emissions from Estonia, Latvia and Luxembourg).

The rate of preparing mineral construction and demolition waste for reuse and recycling in Spain in 2022 was 70.1 %, compared with the EU average of 79.8 %. Measures to further increase the rate include separate collection at source, for instance through digitalised pre-demolition audits ([15]) ('resource assessments'), and Extended Producer Responsibility (EPR) and other economic instruments as well as upstream measures such as increasing the recycled content in construction products and the circular design ([16]) of construction works.

Boosting implementation – the 2023 *Waste Early Warning Report*

This section focuses on the management of municipal waste, for which EU law sets mandatory recycling targets ([17]). It is worth recalling that Spain is one of the countries that missed the EU target of recycling 50 % of municipal waste by 2020.

([13]) MITECO, *Hoja de ruta para la gestión sostenible de las materias primas minerales*, 2022, https://www.miteco.gob.es/content/dam/miteco/es/ministerio/planes-estrategias/materias-primas-minerales/hr-materias-primas-minerales_23-8-22_web_tcm30-544770.pdf.

([14]) European Commission: Joint Research Centre, *Techno-economic and environmental assessment of construction and demolition waste management in the European Union*, Publications Office of the European Union, Luxembourg, 2024, https://data.europa.eu/doi/10.2760/721895.

([15]) European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, *EU Construction & Demolition Waste Management Protocol including guidelines for pre-demolition and pre-renovation audits of construction works – Updated edition 2024*, Publications Office of the European Union, Luxembourg, 2024, https://op.europa.eu/en/publication-detail/-/publication/d63d5a8f-64e8-11ef-a8ba-01aa75ed71a1/language-en.

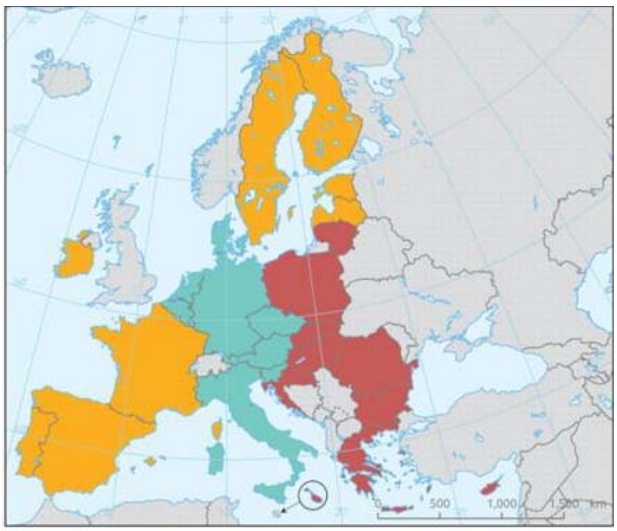
([16]) European Commission, *Circular Economy – Principles for buildings design*, Brussels, 2020, https://ec.europa.eu/docsroom/documents/39984.

([17]) Municipal waste consists of (i) mixed waste and separately collected waste from households, including paper and cardboard, glass, metals, plastics, biowaste, wood, textiles, packaging, waste electrical and electronic equipment, waste batteries and accumulators, and bulky waste, including mattresses and

In June 2023, the Commission published a new *Waste Early Warning Repor*t ([18]) identifying the general trends in waste management and the Member States at risk of missing 2025 waste targets (see Figure 4).

Spain is in the category of countries at risk of missing the municipal waste targets. Spain is also at risk of not meeting the 2035 target of a maximum of 10 % of municipal waste landfilled.

Figure 4: Member States' prospects of meeting the preparing for re-use and recycling targets for municipal waste and packaging waste



Reference data: ©ESRI

- Member States not at risk of missing the 55 % preparing for reuse and recycling target for municipal waste and the 65 % recycling target for packaging waste
- Member States at risk of missing the preparing for reuse and recycling target for municipal waste but not at risk of missing the recycling target for packaging waste
- Member States at risk of missing both targets
- Outside coverage

Source: European Environment Agency (EEA), 'Many EU Member States not on track to meet recycling targets for municipal waste and packaging waste', briefing No 28/2022, Copenhagen, 2023. Reference data © ESRI.

Under certain conditions, EU waste legislation enables some Member States to postpone the deadlines for reaching certain waste management targets for municipal and packaging waste. Member States that want to use this possibility must notify the Commission 24 months in advance of the deadline and submit an implementation plan laying down the steps they envisage to reach the postponed targets within a new time frame. Regarding the 2025 targets, 11 Member States, not including Spain, have used this prerogative.

In the *Waste Early Warning Report*, the Commission recommended that Member States accelerate their efforts to improve their recycling performance.

On one hand, the Commission is working with the national authorities and stakeholders to speed up the implementation of appropriate measures to meet the targets, including through dedicated financing.

On the other hand, the Commission is pursuing enforcement actions against those Member States that, based on data submitted to the Commission, do not achieve the targets of the Waste Framework Directive ([19]), the Packaging and Packaging Waste Directive 2024 ([20]) and the Directive on Waste Electrical and Electronic Equipment ([21]).

Like other Member States, Spain has failed to attain the 2020 target for preparing for reuse and recycling 50 % of waste from households, and hence an infringement procedure (2024/2147) was launched in July 2024 ([22]).

Municipal waste

Spain's municipal waste generation shows a small decrease over the last 10 years (Figure 5). In 2022, Spain generated 467 kg per capita of municipal waste, which is slightly below the estimated EU-27 average of 513 kg per capita.

furniture; and (ii) mixed waste and separately collected waste from other sources, where such waste is similar in nature and composition to waste from households (Directive 2008/98/EC, Article 3.2b).

([18]) https://environment.ec.europa.eu/publications/waste-early-warning-report_en.

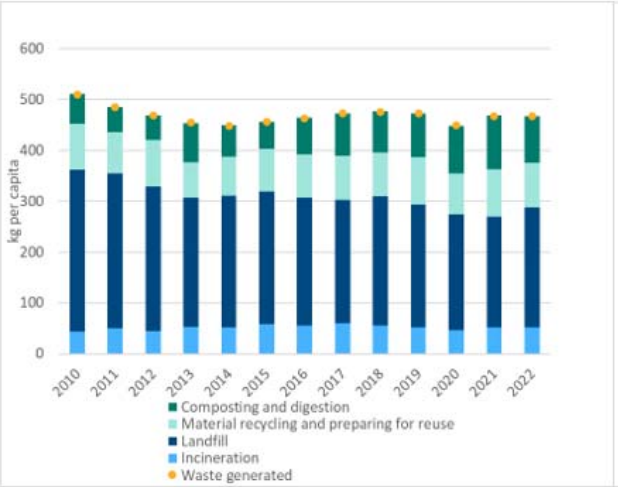
([19]) Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, Directive - 2008/98 - EN - Waste framework directive - EUR-Lex

([20]) European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste, Directive - 94/62 - EN - EUR-Lex.

([21]) Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE), Directive - 2012/19 - EN - EUR-Lex.

([22]) European Commission, 'July infringement package: Key decisions', https://ec.europa.eu/commission/presscorner/detail/en/inf_24_3228.

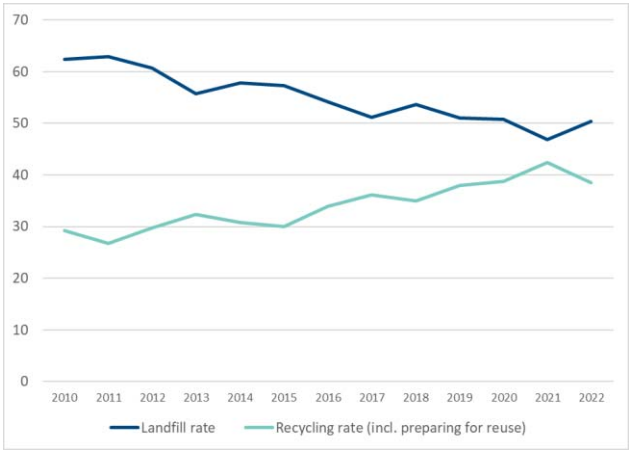
Figure 5: Municipal waste management and recycling (including preparation for reuse), 2010–2022



Source: Eurostat, 'Municipal waste by waste management operations', env_wasmun, accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASMUN/default/table.

The rate of preparing municipal waste for reuse and recycling shows a moderate increase from 29 % in 2010 to 39 % in 2022 (Figure 6), which is significantly below the estimated EU-27 average of 49 %. The share of incineration remained stable during this time frame and was 11 % in 2022. Spain relies heavily on mechanical biological treatment (MBT) for the pretreatment of mixed municipal solid waste. Currently, the composted and digested category includes some outputs from MBT plants (municipal biowaste treated and recovered in these plants, and other recovered materials subsequently sent to recycling). However, as of 2027 these outputs (from the municipal biowaste treated) will not be considered recycled waste according to the Waste Framework Directive, indicating an urgent need to speed up separate collection and treatment of biowaste in Spain.

Figure 6: Recycling (including preparation for reuse) and landfill rates (%), 2010–2022

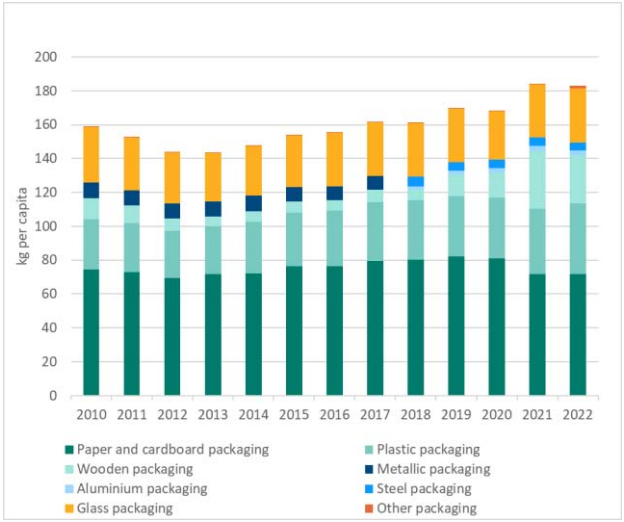


Source: Eurostat, 'Municipal waste by waste management operations', env_wasmun, accessed 22 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASMUN/default/table.

Packaging waste

Packaging waste generation in Spain has shown a moderate increase since 2010 (Figure 7). The country generated 183 kg per capita in 2022, which is close to the estimated EU-27 average of 186 kg per capita in the same year ([23]).

Figure 7: Packaging waste generation, 2010–2022

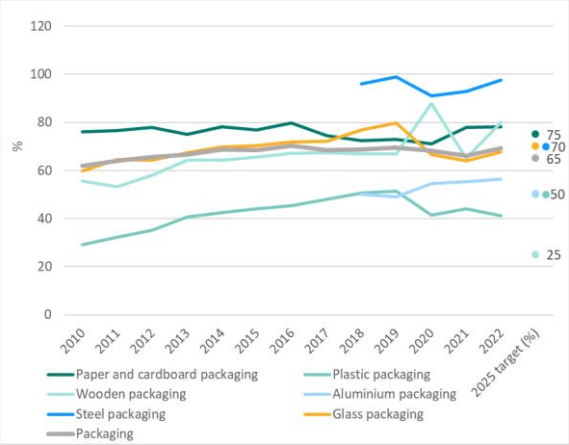


Source: Eurostat, 'Packaging waste by waste management operations', env_waspac, last updated 23 October 2024, accessed 28 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASPAC__custom_842634/default/table?lang=en.

([23]) The EU average might have been influenced by not all Member States fully applying the reporting rules for packaging waste set out in Commission Implementing Decision (EU) 2019/665.

Spain's overall packaging waste recycling rate shows a small increase between 2010 and 2022, reaching 69 % in 2022 (Figure 8). The overall packaging recycling rate is strongly influenced by paper and cardboard packaging, as this is the largest fraction. In 2022, the recycling rates for all materials except plastics were above the 2025 recycling targets. The shift to the new reporting rules in 2020 seems to have led to decreases in recycling rates, especially for plastic, glass and steel packaging. However, there are indications that the generated packaging waste is under-reported and thus the recycling rate over-reported.

Figure 8: Packaging waste recycling rates, 2010–2022



Source: Eurostat, 'Packaging waste by waste management operations', env_waspac, last updated 23 October 2024, accessed 28 October 2024, https://ec.europa.eu/eurostat/databrowser/view/ENV_WASPAC__custom_842634/default/table?lang=en.

Legal framework and waste management plans

By 5 July 2020, Member States had to bring their national laws into line with modifications included in the revised Waste Framework Directive, the Packaging and Packaging Waste Directive and the Landfill Directive ([24]).

Waste management plans and waste prevention programmes are instrumental to the full implementation of EU waste legislation. They set out key provisions and investments to ensure compliance with existing and new legal requirements (e.g. on waste prevention, on separate collection for certain waste streams, on recycling and on landfill targets). Revised plans and programmes were also due on 5 July 2020.

Spain has adopted the new Law 7/2022, of 8 April, on waste and contaminated soils for a circular economy ([25]). This legislation implements the modifications introduced by Directive (EU) 2018/851 on waste and Directive (EU) 2019/904 on single-use plastics. This law requires Spain to develop a national waste framework plan and to establish the basic goals regarding waste generation prevention and reduction, as well as separate collection and reuse and recycling measures. In addition, regional waste management plans are also required.

Following the previous national legislation in this field, Spain adopted the 2016–2022 National Framework Plan for Waste Management (PEMAR) ([26]), which sets out the strategic guidelines for waste management in Spain and the measures needed to meet EU targets. This plan and the national waste prevention programme (NWPP) for 2014–2020 ([27]) have still to be revised in line with the new EU requirements in the waste sector. During the last few years, the new PEMAR for 2023–2035 has been in preparation, but it is still in the process of adoption. The regional waste management plans for the 17 Autonomous Communities and the 2 Autonomous Cities have also to be updated; many of them are still pending. This fact prevents Spain from meeting the waste enabling condition for the 2021–2027 European Regional Development Fund (ERDF). It is worth mentioning that several regions have already communicated their revised waste management plans to the Commission.

The main goal of the new national waste management plan is to guide the Spanish waste policy, as well as provide all the measures needed to alleviate the inefficiencies detected in previous policies and to promote actions that can guarantee the achievement of legislative goals and deliver better environmental results. The PEMAR refers to municipal waste, industrial waste, waste with specific legislation, hospital waste and agricultural waste, among others. The strategy for the reduction of biodegradable waste is also included in the new PEMAR ([28]).

([24]) Directive (EU) 2018/851, Directive (EU) 2018/852, Directive (EU) 2018/850 and Directive (EU) 2018/849 amend the previous waste legislation and set more ambitious recycling targets for the period up to 2035.

([25]) https://www.boe.es/buscar/pdf/2022/BOE-A-2022-5809-consolidado.pdf.

([26]) Ministry of Agriculture, Food and the Environment, Plan estatal marco de gestión de residuos (PEMAR) – 2016–2022, https://www.miteco.gob.es/content/dam/miteco/es/calidad-y-evaluacion-ambiental/planes-y-estrategias/pemaraprobado6noviembrecondae_tcm30-170428.pdf.

([27]) Ministry of Agriculture, Food and the Environment, Programa estatal de prevención de residuos 27.11.2013, https://www.miteco.gob.es/content/dam/miteco/es/calidad-y-evaluacion-ambiental/planes-y-estrategias/Programa_de_prevención_aprobado_actualizado_ANFABRA_11_02_2014_tcm30-192127.pdf.

([28]) EEA, 'Early warning assessment related to the 2025 targets for municipal waste and packaging waste', EEA website, last updated 9 October 2024, https://www.eea.europa.eu/publications/many-eu-member-states/early-warning-assessment-related-to.

Policies to encourage waste prevention

Spain's 2014–2020 NWPP is a stand-alone document that aimed to reduce the annual generation of waste by 10 % by 2020 compared with 2010, measured in tonnes. The primary goals of the NWPP connected to waste prevention were to promote product reuse and the extension of product lifetimes ([29]). A new NWPP is under development and is expected to be approved together with the new PEMAR.

Spain's 2014–2020 NWPP prioritised the following waste streams: food waste, construction and demolition waste, hazardous waste, household waste, municipal waste, paper waste, packaging waste, waste tyres, vehicles, furniture, toys and books, textile waste, waste electrical and electronic equipment, manufacturing waste and bulky waste ([30]).

In addition, Spain has adopted several waste prevention targets within the national Circular Economy Strategy, to be achieved by 2030:

- Reduce waste generation by 15 % compared with the 2010 level.
- Reduce food waste generation by 50 % per capita in retail and households and by 20 % in production chains and supply compared with 2020 levels.

This strategy also includes measures related to food redistribution, as well as measures to valorise food resources and to create new market opportunities.

Furthermore, Spain has promoted the reduction of packaging and the use of reusable or refillable packaging within public procurement; eco-design for vehicles; and the founding of shops for the repair and second-hand sale of electrical and electronic equipment, furniture, toys, books and textile.

Policies to encourage separate collection and recycling

Law 7/2022 has required the separate collection of waste paper, metals, plastics, glass and biowaste from households since the beginning of 2024, while textile waste, bulky waste, hazardous household waste and used cooking oil have to be collected separately as of the end of 2024.

Different separate collection systems are in place in different locations, as this is a local authority responsibility. The most widespread separate collection system consists of using four different waste bins for lightweight packaging, glass packaging, paper and cardboard, and mixed residual waste. Door-to-door separate collection of biowaste is limited to some towns and suburbs. This system is usually complemented with a network of civic amenity sites that allow the separate collection of other waste streams such as waste electrical and electronic equipment, bulky waste or textiles ([31]).

Pay-as-you-throw schemes are scarcely applied and are usually volume based ([32]). Law 7/2022 introduced provisions aimed at advancing the implementation of pay-as-you-throw schemes such as specific and differentiated fees that reflect the real cost of municipal waste management, and a national tax of EUR 0.45/kg levied on non-reusable non-recycled plastic packaging.

In Spain, the EPR system in place for cans, plastics, beverage cartons, paper and cardboard, and glass packaging covered only household packaging until 2024 ([33]). As of 2025, EPR systems for commercial and industrial packaging will also be in operation. Different fees are applied for different packaging material such as steel and aluminium in metal packaging, or polyethylene terephthalate and high- and low-density polyethylene in the plastic packaging group. Law 7/2022 does not include more advanced fee modulation apart from the possibility of introducing eco-modulation in generic terms. However, the recently adopted packaging decree includes a system of advanced fee modulation and introduced EPR schemes for commercial and industrial packaging waste ([34]).

Currently, Spain has no mandatory deposit return system in place. Law 7/2022 establishes separate collection targets for single-use plastic bottles: 70 % by weight of what was put on the market by 2023, and 90 % by 2027. If those objectives are not met, Spain will implement a deposit return system at the national level. Recent data for reference year 2023 indicate a collection rate of

([29]) EEA, 'Country profiles on waste prevention', EEA website, https://www.eea.europa.eu/themes/waste/waste-prevention/countries.

([30]) EEA, 'Technical note accompanying the EEA briefing "Economic instruments and separate collection – key instruments to increase recycling"', https://www.eea.europa.eu/publications/economic-instruments-and-separate-collection/technical-note-accompanying-the-eea/view.

([31]) EEA, 'Early warning assessment related to the 2025 targets for municipal waste and packaging waste', EEA website, last updated 9 October 2024, https://www.eea.europa.eu/publications/many-eu-member-states/early-warning-assessment-related-to.

([32]) EEA, 'Technical note accompanying the EEA briefing "Economic instruments and separate collection – key instruments to increase recycling"', https://www.eea.europa.eu/publications/economic-instruments-and-separate-collection/technical-note-accompanying-the-eea/view.

([33]) EEA, 'Early warning assessment related to the 2025 targets for municipal waste and packaging waste', EEA website, last updated 9 October 2024, https://www.eea.europa.eu/publications/many-eu-member-states/early-warning-assessment-related-to.

([34]) EEA, 'Early warning assessment related to the 2025 targets for municipal waste and packaging waste', EEA website, last updated 9 October 2024, https://www.eea.europa.eu/publications/many-eu-member-states/early-warning-assessment-related-to.

41.3 %, and the Ministry concluded that a deposit return system should be implemented within two years ([35]).

Policies to discourage landfilling or incineration

Spain has a national landfill tax, set by Law 7/2022, which establishes the minimum baseline for a landfill tax for regional authorities. The national landfill tax is EUR 40/tonne for municipal solid waste and EUR 30/tonne for rejects from the treatment of municipal solid waste, which is close to the EU average. The landfilling of waste without prior treatment, of separately collected waste and of unsold surpluses of non-perishable products is banned. However, this ban is not fully implemented.

Law 7/2022 also sets a tax on incineration at the national level, which can be increased by regional authorities in their regions ([36]). A ministerial order established a list of waste that can be prepared for reuse or recycling and that cannot be destined for incineration. The incineration taxes are lower for facilities with energy recovery.

Illegal or substandard landfilling is still present in Spain. The Commission is closely monitoring the situation through several horizontal infringement procedures, including rulings of the Court of Justice of the EU condemning Spain.

Moreover, as explained in the 2022 EIR, a study ([37]) launched by the Commission to examine the landfilling of untreated non-hazardous municipal solid waste has identified some possible shortcomings. The Commission services opened investigations to assess whether the waste disposal sites in Spain comply with the landfilling standards (i.e. obligation of appropriate treatment and removal of the organic fraction before landfilling), as required by the Court of Justice of the EU in its judgment of 15 October 2014, *Commission* v *Italy*, C-323/13, (Malagrotta ruling). The Commission decided in 2024 to open an infringement procedure (2024/2013) against Spain.

In the abovementioned 2023 *Waste Early Warning Report*, the European Commission issued a number of policy recommendations to improve Spain's waste management performance:

- Support preparing for reuse of municipal waste and reuse systems for packaging.
- Improve separate collection systems.
- Further develop waste treatment infrastructure in line with the waste hierarchy and ensure that there is appropriate treatment capacity dedicated to separately collected biowaste.
- Implement restrictions on landfilling of all waste that is suitable for recycling by means of implementing landfilling taxes.
- Introduce enforcement mechanisms to clarify allocation of responsibilities and strengthen coordination to meet the recycling targets.

Spain has made some progress in increasing the preparing for reuse and recycling rate for municipal waste and reducing the landfill rate, but still needs to speed up its progress towards reaching the 2025 target for the preparing for reuse and recycling rate for municipal waste, which stood at 39 % in 2022. Spain also needs to speed up progress to shift municipal waste away from landfilling. With respect to packaging waste, more efforts are especially needed to move towards higher recycling rates for plastic packaging waste. Spain also needs to improve the effectiveness of the separate collection system, especially for biowaste, and to incentivise sorting at source.

It is important to note that, in line with the EIR assessment, in the framework of the 2022 European Semester ([38]), Spain received a Country Specific Recommendation (CSR-3) on circular economy and waste management:

- 'Increase recycling rates to meet EU targets and promote the circular economy by enhancing coordination among all levels of government and undertaking further investment to meet separate collection of waste and recycling obligations, as well as to enhance water reuse.'

Moreover, the 2022 EIR also included several priority actions addressed to Spain on waste management, concerning adequate and up-to-date planning, cooperation among the competent authorities, optimisation of the use of existing waste treatment

([35]) MITECO 'Informe relativo al cálculo de la recogida separada de botellas de plástico de un solo uso para bebidas en el año 2023', November 2024, https://www.miteco.gob.es/content/dam/miteco/es/calidad-y-evaluacion-ambiental/sgecocir/plasticos--sup/INFORME%20RECOGIDA%20SEPARADA%20BOTELLAS%20SUP%20A%C3%91O%202023_.pdf

([36]) EEA, 'Technical note accompanying the EEA briefing "Economic instruments and separate collection – key instruments to increase recycling"', https://www.eea.europa.eu/publications/economic-instruments-and-separate-collection/technical-note-accompanying-the-eea/view.

([37]) European Commission: Directorate-General for Environment, Study to assess the implementation by the EU Member States of certain provisions of Directive 1999/31/EC on the landfill of waste', Publications Office of the European Union, Luxembourg, 2017, https://op.europa.eu/en/publication-detail/-/publication/cd1748fb-0884-11e7-8a35-01aa75ed71a1.

([38]) European Commission, Recommendation for a Council recommendation on the 2022 national reform programme of Spain and delivering a Council opinion on the 2022 stability programme of Spain, COM(2022) 610 final of 23 May 2022, https://commission.europa.eu/document/download/41387043-7d64-4c75-9cea-398b260b026c_en?filename=2022-european-semester-csr-spain_en.pdf. In particular, see CSR 3 and recital 25.

infrastructure, and the closure and rehabilitation of non-compliant landfills.

Some progress can be observed on the above recommendations and priority actions. For instance, the addendum to Spain's RRP includes as a new reform the establishment of a working group within the Waste Coordination Committee to monitor compliance with waste legislation. This measure should improve governance and coordination among the different competent authorities. In addition, the adoption and implementation of Law 7/2022 is a significant positive step. Moreover, the measures and significant investments included in Component 12 of Spain's RRP should also improve the results in the medium term.

Nevertheless, as explained in this section, many challenges regarding waste management in Spain remain.

2025 priority actions

- Complete closure of non-compliant landfills.
- Improve separate collection at source e.g. through economic instruments, investing in infrastructure for separate collection, sorting and recycling, and increasing public awareness.
- Increase reuse of products and scale up waste recycling infrastructure associated with the higher steps of the waste hierarchy. In particular, improve collection and increase treatment capacity for bio-waste.
- Improve municipal waste preparation for reuse and recycling.
- Increase the collection and recycling rate of waste electronic and electric equipment (WEEE).
- Invest in waste prevention measures to reduce the total amount of waste generated.
- Ensure the achievement of the 2025 waste targets, following the recommendations made by the Commission in the Early Warning Reports where applicable.

2. Biodiversity and natural capital

Global and EU biodiversity frameworks

Biological diversity and healthy ecosystems are critical for our societies, underpin our economies and well-being and are essential for climate change adaptation and mitigation. The Kunming–Montreal Global Biodiversity Framework (GBF), adopted in December 2022, sets comprehensive and measurable targets to tackle biodiversity loss by 2030. To implement this global framework and integrate biodiversity considerations into national decision-making, the EU and all Member States had to submit national biodiversity strategies and action plans (NBSAPs), or to communicate national targets aligned with the global targets, by the end of 2024.

The EU Biodiversity Strategy for 2030 (BDS) aims to put EU biodiversity on a path to recovery by 2030. It sets quantified targets intended to protect and restore nature and manage ecosystems in a sustainable manner, as well as measures to enable implementation and commitments to support global biodiversity. A BDS actions tracker ([39]) and a dashboard of indicators ([40]) provide information on implementation progress.

The recently adopted EU Nature Restoration Regulation ([41]) is the first EU-wide, comprehensive law of its kind and a key instrument for the EU to deliver on the global biodiversity targets for 2030. It lays down an overarching objective at the EU level to put in place effective restoration measures on 20 % of EU land and sea by 2030 and for all ecosystems in need of restoration by 2050. To achieve this, it sets binding targets for Member States to restore and maintain ecosystems, as well as an effective implementation framework based on national restoration plans.

The BDS is the main instrument used by the EU to deliver on its obligation under the GBF. The Commission has submitted to the Convention on Biological Diversity (CBD) its report on GBF-aligned EU targets that stem from the BDS and from other policy instruments under the European Green Deal.

EU Member States' National Biodiversity Strategy and Action Plans (NBSAPs) need to provide coherent frameworks for national delivery of the global and EU 2030 biodiversity targets. In line with the global obligations, NBSAPs should also include a biodiversity financing plan and a capacity-building plan, based on needs assessments, as well as an overview of the national indicators used to measure progress.

In December 2022, the Spanish government approved the State Strategic Plan for Natural Heritage and Biodiversity for 2030 ([42]). It sets the objectives, targets and actions for the conservation and sustainable use of biodiversity and natural heritage in Spain. The plan implements Spain's commitments in the field at the international and EU levels, especially those arising from the GBF for 2030 and the EU's BDS. The strategic plan is the result of a participatory drafting process involving cooperation across government ministries with the involvement of the regions, as well as consultations with the scientific community, economic and social organisations, non-governmental organisations (NGOs) and the public. Spain was the first party to submit an NBSAP to the CBD after the 15th Conference of the Parties of the Stockholm Convention, and it has also uploaded its national targets to the CBD Online Reporting Tool ([43]).

Spain has also adopted other important strategies and plans in the biodiversity field, most of them part of reforms in the framework of the RRP for Spain ([44]). This is the case with the National Strategy for Biodiversity and Science, also adopted in December 2022 which aims to be an integrating tool that seeks to serve as a link between national initiatives in biodiversity and natural heritage and those in science, technology, and innovation, fostering the generation and transfer of knowledge and improving planning and management.

Spain also adopted in December 2022 the Master Plan for the Spanish Marine Protected Areas Network, together with the criteria for shared and consistent

([39]) EU Biodiversity Strategy Actions Tracker (https://dopa.jrc.ec.europa.eu/kcbd/actions-tracker/).

([40]) EU Biodiversity Strategy Dashboard (https://dopa.jrc.ec.europa.eu/kcbd/EUBDS2030-dashboard/?version=1).

([41]) Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869; (OJ L, 2024/1991, 29.7.2024), http://data.europa.eu/eli/reg/2024/1991/oj; see also the Commission web page on the law (https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en).

([42]) Adopted by Royal Decree 1057/2022 of 27 December 2022 (https://www.boe.es/eli/es/rd/2022/12/27/1057/con).

([43]) https://ort.cbd.int/national-targets?countries=es.

([44]) In particular, in Component 4 (Biodiversity and Ecosystems) of the RRP Spain.

management of the network, with the political commitment to protect 30 % of land and sea in Spain in 2030, with an intermediate milestone of 25 % protection in 2025, ensuring all the necessary discussions and participatory actions with the sectors and the Autonomous Communities involved.

In November 2022, Spain also approved the Strategic Plan on Wetlands to 2030, highlighting a number for measures to ensure the protection, conservation and restoration of these very important ecosystems.

Spain has also adopted a number of strategies for the conservation and recovery of protected species, such as the fan mussel, the ribbed Mediterranean limpet (*Patella ferrugiena*), the loggerhead turtle and other marine turtles. the Iberian freshwater crayfish, the marble duck, the red-knobbed coot, the white-headed duck, the ferruginous duck, the Iberian lynx, the wolf and threatened bird species associated with agro-steppe ecosystems, as well as Guidelines with regard to *ex situ* flora conservation or the conservation and management of marine meadows. The national plan for the reduction of bycatch, adopted in January 2022, aims to reduce the impact of fishing activities to a level that no longer poses a risk to the populations of sensitive species.

The EU aims to allocate to biodiversity objectives at least 7.5 % of annual spending under the EU budget in 2024, rising to 10 % in 2026 and 2027. For details on biodiversity financing and investments in Spain, see Chapter 5.

Nature protection and restoration – Natura 2000

Natura 2000 ([45]), the largest coordinated network of protected areas in the world, is key to the achievement of the objectives set out in the Birds and Habitats Directives. These objectives are to ensure the long-term protection, conservation and survival of Europe's most valuable and threatened species and habitats and the ecosystems they underpin. Key milestones towards meeting the objectives of the Birds and Habitats Directives are (i) the setting up of a complete and coherent Natura 2000 network; (ii) the designation of Sites of Community Importance (SCIs) as Special Areas of Conservation (SACs) ([46]); and (iii) effective management of all Natura 2000 sites through the setting of site-specific conservation objectives and measures.

Setting up a complete and coherent network of Natura 2000 sites

The setting up of a complete and coherent network of Natura 2000 sites is a cornerstone of the EU's international commitments, under the BDS and GBF, to legally protect a minimum of 30 % of its land area and 30 % of its sea area.

Meeting these commitments requires the full implementation of Article 3 of the Habitats Directive. The Natura 2000 network should represent a complete and coherent ecological network composed of sites hosting natural habitat types and species of community interest. The Natura 2000 network enables the natural habitat types and the species' habitats concerned to be maintained or, where appropriate, restored to a favourable conservation status in their natural range.

Spain boasts a very rich biodiversity. It covers four of the nine biogeographical regions defined for the implementation of the Habitats Directive – Alpine, Atlantic, Mediterranean and Macaronesian – and three of the five marine regions: Atlantic, Mediterranean and Macaronesian. Spain hosts 117 habitat types ([47]) and 426 species ([48]) covered by the Habitats Directive. The country also hosts populations of 405 bird taxa covered by the Birds Directive ([49]).

As shown in figure 9, in 2023, 27.3 % of Spain's national land area is covered by Natura 2000 (EU coverage: 18.6 %), with Special Protection Areas (SPAs) classified under the Birds Directive covering 20.2 % of Spain's territory (EU coverage: 12.8 %) and Sites of Community Importance (SCIs under the Habitats Directive covering 23.4 % (EU coverage: 14.3 %). In addition, 16.8 % of

([45]) Natura 2000 comprises Sites of Community Importance (SCIs), designated pursuant to the Habitats Directive, as well as Special Protection Areas (SPAs), classified pursuant to the Birds Directive. Numbers of protected areas in Figure 9 do not add up to the total of SCIs plus SPAs, because some SCIs and SPAs overlap. An SAC is an SCI designated by a Member State.

([46]) SCIs are designated pursuant to the Habitats Directive, whereas SPAs are designated pursuant to the Birds Directive. Figures of coverage do not add up because some SCIs and SPAs overlap.

([47]) European Environment Agency (EEA), 'Number of habitats and species per Member State', Article 17 dashboard, Annex I total, 19 December 2019, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/general-information-on-habitats-and-species.

([48]) EEA, 'Number of habitats and species per Member State', Article 17 dashboard, 19 December 2019, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/general-information-on-habitats-and-species.

([49]) EEA, 'Number of bird species/populations per Member State', Article 12 dashboard, Annex I total, last updated 11 May 2023, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-12-national-summary-dashboards/general-information-on-bird-species-populations. This counting only takes into account birds taxa for which information was requested.

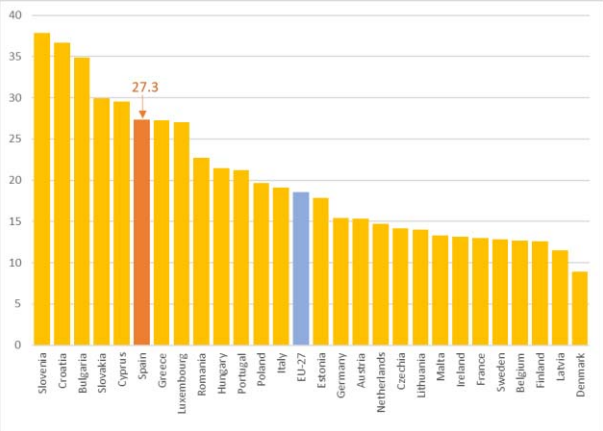
Spain's national marine area is covered by Natura 2000, with SPAs under the Birds Directive covering 5.7 % and SCIs under the Habitats Directive covering 13.4 %.

This makes Spain the Member State contributing the largest surface area to the EU Natura 2000 network (138 663 km² of terrestrial area), although it does not contribute the highest percentage, as Figure 9 shows.

In addition, Spain contributes 180 508.96 km² of marine area to Natura 2000. The LIFE integrated project INTEMARES is contributing to identifying the areas protected and to ensuring the effective management of the marine Natura 2000 Network ([50]). It is a major step forward in marine research and knowledge. It will contribute to eliminating all the unknowns in marine protected species and habitats and it is very relevant to the Nature Restoration Regulation. Eliminating the high level of uncertainty in the marine environment will facilitate the design of marine restoration measures in the future National Restoration Plan. The knowledge gained is also very important to prevent or mitigate potential damage to marine biodiversity from the rapid development of the energy sector.

Considering both Natura 2000 and other nationally designated protected areas, Spain legally protects 28.1 % of its terrestrial areas (EU-27 coverage: 26.1 %) and 12.4 % of its marine areas (EU-27 coverage: 12.3 %) ([51]).

Figure 9: Natura 2000 terrestrial protected area coverage, 2023



Source: European Environment Agency (EEA), 'Natura 2000 Barometer', 2023 data, accessed March 2025, https://www.eea.europa.eu/data-and-maps/dashboards/natura-2000-barometer.

Designating Special Areas of Conservation and setting site-specific conservation objectives and measures

In order to ensure that SCIs contribute to the objectives of the Habitats Directive, Member States must designate them as SACs, setting site-specific conservation objectives based on the ecological needs of the species and habitats present on the sites. The site-specific conservation objectives must be defined in terms of attributes and targets that cover the properties of the feature of interest that are necessary to describe its condition as either favourable or unfavourable. These objectives must address the key pressures and threats present on the site. Article 6 of the Habitats Directive requires Member States to establish and implement conservation measures for the realisation of the objectives of the site.

Natura 2000 management and nature protection is mainly the responsibility of the regions in Spain, except for the marine sites, which are under the jurisdiction of the national administration if they do not have ecological continuity with adjacent terrestrial sites.

Spain's basic legislation transposing the Habitats Directive is, overall, adequate. It requires management plans to be drawn up before sites can be designated as SACs. This ensures that the SAC designation triggers the adoption of conservation measures, as required under Article 6(1) of the Habitats Directive.

The six-year deadline set under the Habitats Directive to designate SCIs as SACs and set appropriate conservation objectives and measures has expired for all sites in Spain.

Spain has already designated the Macaronesian biogeographical region's SCIs as SACs. These sites are in the Canary Islands.

However, in the other biogeographical regions, site-specific conservation objectives and measures have not been adopted for all designated SACs, and the quality of many of those adopted does not fulfil the required standards. An infringement procedure (2015/2003) is ongoing to address these problems, as for some other Member States. In this context, Spain has adopted in July 2024 specific guidelines for the conservation of the Natura 2000 network.

2025 priority actions

- Complete the Natura 2000 site designation process.

([50]) As highlighted in the 2019 EIR, the use of the LIFE programme – LIFE project INDEMARES (https://webgate.ec.europa.eu/life/publicWebsite/index.cfm?fuseaction=search.dspPage&n_proj_id=3370) and LIFE integrated project INTEMARES (https://webgate.ec.europa.eu/life/publicWebsite/index.cfm?fuseaction=search.dspPage&n_proj_id=6101) has been very helpful to designate a consolidated network of marine Natura 2000 sites in Spain.

([51]) Eurostat dataset env_bio4, protected area percentage for 2022, accessed March 2025, https://ec.europa.eu/eurostat/databrowser/view/env_bio4/default/table?lang=en.

- Finalise the establishment of site-specific conservation objectives and measures for all Natura 2000 sites (including by adopting their management plans) and ensure their effective implementation.
- Ensure the effective implementation of Natura 2000 management plans and sufficient administrative capacity and financing both for Natura 2000 and the implementation of the Nature Restoration Regulation. Ensure implementation of Prioritised Actions Framework 2021-2027 (PAFs).

Recovery of species

One objective set by the BDS is that, by 2030, there should be no further deterioration in conservation trends or the status of any protected species. The BDS also states that Member States should ensure that at least 30 % of species not currently in favourable conservation status achieve that status or show progress towards doing so (e.g. by exhibiting positive population dynamics or stable or increasing range and habitat size), by 2030. According to the European Environment Agency (EEA), based on reporting required under Article 17 of the habitats directive, a quarter of species in the EU were of good conservation status as of 2018 ([52]).

One of the primary objectives of the Habitats Directive is the maintenance of or restoration to favourable conservation status of all species of community interest. Moreover, the Birds Directive also aims to ensure that all wild birds in the EU enjoy a secure status. In order to achieve these objectives, it will be necessary to address key pressures and threats. The Birds Directive and the Habitats Directive lay down a framework of species protection rules and rules on the conservation of habitats and species in order to combat these threats.

To measure the performance of Member States, Article 17 of the Habitats Directive and Article 12 of the Birds Directive require reporting on the progress towards maintaining or restoring favourable conservation status of species and habitats.

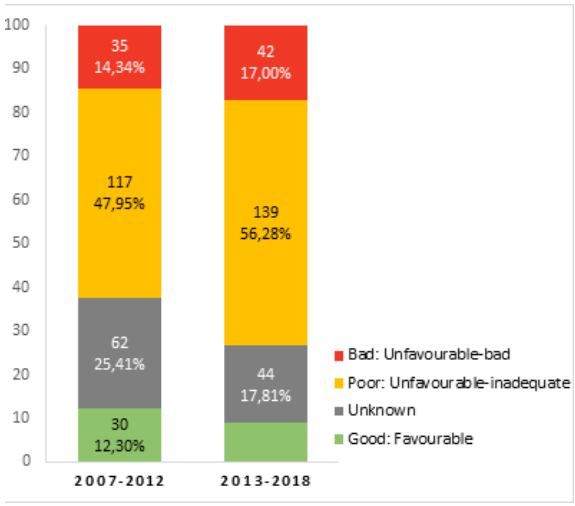
The current reporting cycle, covering 2019 to 2024, is due for submission in July 2025. Figures 10 and 11 show the latest available conservation status data.

According to the report submitted by Spain on the conservation status of habitats and species covered by Article 17 of the Habitats Directive for 2013–2018, the share of assessments of habitats in good conservation status in 2018 (8.91 %) is less than the 12.3 % reported in the previous reporting period (2007–2012). On protected species, the share of assessments in good conservation status in 2018 is 18.93 %, less than the 21.63 % reported in the previous reporting period.

As far as birds are concerned, the EU protects over 460 species of wild birds throughout their entire life cycle under the Birds Directive. According to the latest assessment, around half of these wild bird species have a good population status at the EU level, which is slightly less (by 5 percentage points) than in the last reporting period (2008–2012). In Spain, the proportion of birds having a poor or bad conservation status has increased by 7 % to reach a total of 39 %. Moreover, 60 % of the breeding species showed short-term and long-term increasing or stable population trends (for wintering species this figure was 71.16 % for short-term trend and 65.39 % for long-term trend).

At the same time, the share of habitats having a bad conservation status has increased to 17 % and the share of assessments for species having a bad conservation status has increased to 26.63 %.

Figure 10: Assessments of conservation status of habitats for the 2007–2012 and 2013–2018 reporting periods



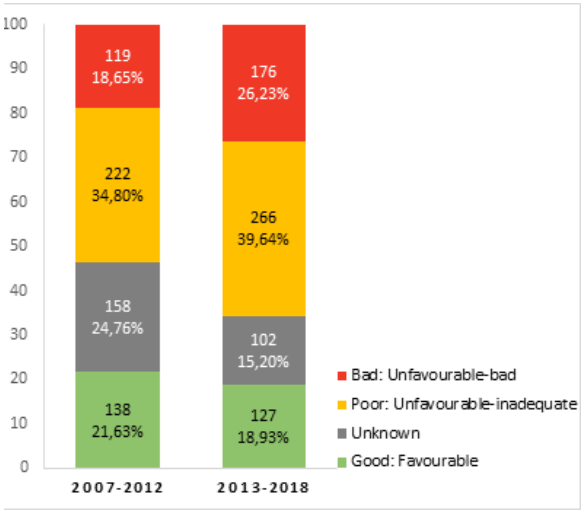
NB: The values shown for 2007–2012 and 2013–2018 are not necessarily directly comparable because changes in area conservation status in a Member State may result from changes to methods or use of better data, rather than reflecting genuine changes.

Source: EEA, 'Conservation status and trends of habitats and species', 19 December 2019, accessed December 2021, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/conservation-status-and-trends.

([52]) EEA, *State of Nature in the EU: Results from reporting under the Nature Directives 2013–2018*, Publications Office of the European Union, Luxembourg, 2020, https://www.eea.europa.eu/publications/state-of-nature-in-the-eu-2020.

The main pressures and threats on habitats are agricultural development, construction and use of residential, commercial, industrial and recreational infrastructure and areas, development and operation of transport systems, forestry, alien species and climate change. For species, the reported pressures and threats are similar. For bird species, the main pressures and threats are not reported.

Figure 11: Assessments of conservation status of species for the 2007–2012 and 2013–2018 reporting periods



NB: The values shown for 2007–2012 and 2013–2018 are not necessarily directly comparable because changes in area conservation status in a Member State may result from changes to methods or use of better data, rather than reflecting genuine changes.

Source: EEA, 'Conservation status and trends of habitats and species', 19 December 2019, accessed December 2021, https://www.eea.europa.eu/themes/biodiversity/state-of-nature-in-the-eu/article-17-national-summary-dashboards/conservation-status-and-trends.

As in other Member States, Spain showed a worsening in the conservation status of species and habitats of community interest. However, knowledge has improved since the previous reporting period (2007–2012), when the conservation status was unknown for 25 % of the habitat assessments, while it was 17.81 % in the latest report (2013–2018). In the case of breeding birds, twice as many species are reported as having a downward trend, in both the short and the long term, as in the previous period. However, the percentage of species presenting an upward trend has increased in the short term as well as the long term, comparing both periods. The main pressures on bird species are agriculture, forestry, and extraction and cultivation of biological living resources (other than agriculture and forestry).

The Commission receives a high number of complaints about the implementation of the Nature Directives in Spain. These mainly concern the degradation of designated sites, inadequate management and the poor quality of appropriate assessments under Article 6(3) of the Habitats Directive. The degradation of protected water-dependent habitats within Natura 2000 is also a frequent concern.

In the framework of the infringement procedure launched by the Commission, the Court of Justice of the EU ruled in June 2021 on the failure to correctly implement the EU nature and water legislation in the Doñana area ([53]). The Commission is monitoring the implementation of the Court ruling by Spain.

An infringement procedure was opened against Spain in February 2021 for failing to prevent deterioration of the Natura 2000 site Delta del Llobregat following the construction of the expansion of Barcelona airport and other infrastructure in the area.

An infringement procedure was opened against Spain in 2020 for failing to protect marine species such as cetaceans and sea turtles from by-catch. The procedure concerns the lack of by-catch monitoring and of effective conservation measures to prevent or reduce the impact on protected species, including in Natura 2000 sites and the lack of monitoring of the conservation status of certain species.

As regards concerns about the implementation of the Birds Directive in Spain, another infringement was opened for failure to adequately protect the turtle dove. The commitment of authorities across Spain to take action to reverse the declining status of the turtle dove, by declaring a hunting moratorium for several consecutive years and engaging in setting an adaptative harvesting mechanism, is yielding positive results. The species population is increasing for the first time after a prolonged decline since 2007. Spain has now to consolidate this trend by defining and implementing a governance system for sustainable hunting, and adopting habitat management measures at sufficient scale, including agri-environmental measures and the necessary monitoring and research activities to ensure the effectiveness of the measures.

The most significant factors limiting the achievement of the objectives of the Nature Directives are the lack of sufficient financial resources and the lack of scientific knowledge of some species and habitat types to support appropriate management.

The management plans for Natura 2000 sites must provide for the necessary budget to apply defined

([53]) Judgment of 21 June 2021, *European Commission* v *Kingdom of Spain*, in Case C-559/19.

measures to achieve specific targets and preventive measures to avoid deterioration. They need to focus on improving the situation. The definition of conservation objectives and measures is also key to reflect real needs in the Priority Action Framework (PAF) and gain access to available funds. This must also be taken into account in the review of the existing and future Natura 2000 sites' management plans.

Regarding the knowledge, monitoring and data necessary for implementing the Nature Directives, it is worth noting the active involvement of Spain in the framework of the biogeographical process. As regards the Macaronesian region, the Spanish authorities led the work of two working groups in the region: 1) Pilot action plan for a habitat type of community interest (Laurel forest type H9360); 2) Maintaining ecological coherence of the Natura 2000 network in the Macaronesian region. They were initiated after the Macaronesian biogeographical seminar of 2018, and their results were presented at the seminar held in November 2023.

The Spanish initiative 'Grazing to preserve Natura 2000 habitats and species: a Pyrenees example from France and Spain' can be highlighted as a good practice. Led by Fundación HAZI and co-financed by the EU LIFE programme, it addressed inappropriate grazing practices and restored 1 670 hectares of grassland habitats. It defined parameters for pro-biodiversity grazing and established the grazing capacity of specific grasslands according to the kinds of livestock grazed. This initiative, which improved the conservation status of pasture habitats in 8 French and 15 Spanish Natura 2000 sites, won the 2024 Natura 2000 award in the cross-border category and it is highly replicable for other mountain pasture lands across the EU.

Spain has implemented a system to recognise sustainable nature-based tourism in Natura 2000, and in December 2021 signed a licence agreement with the Commission to use the Natura 2000 logo on the activities accredited by the national system. Since then, over 90 companies in a total of 28 Natura 2000 sites in five autonomous communities have used the Natura 2000 logo on tourism services that are aligned with or contribute to the conservation of the Natura 2000 sites.

In the same vein, as also highlighted in the previous EIRs, special attention should be paid to Spain's potential to take advantage of its very valuable natural capital to create jobs. Spain makes the largest contribution to the EU Natura 2000 network. Therefore, jobs related to the protection of biodiversity, reforestation, green infrastructure and ecosystem services have a great potential in Spain. In this regard, for instance, Castile-La Mancha created an Alliance for ecosystem services to recognise the value of the services that the region's ecosystems contribute to the well-being of citizens and the economy as a whole ([54]).

As highlighted in the 2022 EIR, the RRP for Spain contains a dedicated Component 4, 'Conservation and restoration of ecosystems and their biodiversity', which makes a significant contribution to the enhancement of biodiversity, which is also reflected in other components. This provides a great opportunity to face many existing challenges. Moreover, as explained in Chapter 5, other EU funds are also available.

On the priority actions that Spain received in this section in the 2022 EIR, there has been limited progress. Therefore, they are reiterated, since they are key to achieving the Habitats and Birds Directives' objectives, as well to addressing key pressures and threats on biodiversity.

2025 priority actions

- Strengthen the integration of biodiversity actions into other policies, e.g. energy, agriculture, fisheries, forestry, urban and infrastructure planning and sustainable tourism, and promote communication between stakeholders.
- Reinforce action for habitats and species in unfavourable conservation status, for example through restoration measures, increased connectivity, better policy coordination and integration, and increased funding.

Recovery of ecosystems

Agricultural ecosystems

The BDS works alongside the common agricultural policy (CAP) to support the transition to sustainable agriculture.

The strategy has set five common agriculture-related targets for 2030, namely to:

— reduce by 50 % the overall use of – and risk from – chemical pesticides;
— reduce by 50 % the use of more hazardous pesticides;
— reduce by 50 % losses of nutrients from fertilisers (which will result in a 20 % reduction in the use of fertilisers) while ensuring that there is no deterioration of soil fertility;
— restore at least 10 % of agricultural area to have

([54]) https://www.castillalamancha.es/gobierno/desarrollosostenible/estructura/dgapfyen/actuaciones/alianza-por-los-servicios-de-los-ecosistemas-de-castilla-la-mancha.

high-diversity landscape features; and
— increase the area under organic farming to at least 25 %.

The "Vision for agriculture and food", adopted by the European Commission in February 2025, sets a roadmap to an agri-food system that is attractive, competitive, sustainable and fair for current and future generations. To ensure a sustainable future for EU agriculture, it is crucial that these four priority areas are pursued together, and that public and private support are adequately targeted toward this objective ([55]).

The CAP and national CAP strategic plans are key instruments to facilitate and strengthen the efforts of European farmers to protect biodiversity and the environment at large. The Commission approved Member States' CAP strategic plans in 2022 for the programming period 2023-2027. The CAP is the largest source of funding dedicated to supporting biodiversity and plays a significant role in implementing EU environmental policy. Strategic plans should continue to support the protection of soil, water, air quality and biodiversity.

While certain CAP result indicators focus on the national measures favouring sustainable agriculture practices that regenerate the ecosystems, the impact of these measures is difficult to assess. The uptake of the eco-schemes is voluntary for farmers.

The utilised agricultural area in Spain increased from 23 463 120 ha in 2012 to 24 692 570 ha in 2022 ([56]).

Landscape features are small fragments of non-productive and typically – but not exclusively – semi-natural vegetation present in or adjacent to agricultural land. They provide ecosystem services and support for biodiversity. The indicator 'share of agricultural land covered with landscape features' is the ratio between the area covered by landscape features and the area covered by agricultural land. Based on the Land Use/Cover Area Frame Survey landscape features estimates ([57]), the share of agricultural land covered by non-productive landscape features in Spain is 5.3 %, slightly below the EU average of 5.6 % of agricultural land.

In 2024, the CAP basic regulations were amended ([58]) regarding, inter alia, the standards for the good agricultural and environmental condition (GAEC) of land. These changes removed the obligation for farmers benefiting from CAP area-related support to have a minimum share of 3–4 % of non-productive areas or landscape features in their farms. However, the amended regulation does not remove the obligation under the GAEC 8 to maintain existing landscape features and sets out an obligation for Member States to establish and provide support for eco-schemes covering practices for the maintenance of non-productive areas, such as land lying fallow, and for the establishment of new landscape features on arable land.

The recently adopted Nature Restoration Regulation ([59]) focuses on the restoration of agricultural ecosystems and requires Member States to put in place measures that aim to achieve an increasing trend at the national level of at least two out of three indicators for agricultural ecosystems ([60]). One of these indicators is the 'share of agricultural land with high-diversity landscape features'.

Organic farming practices are highly beneficial to biodiversity. As shown in Figure 12, it is estimated that 10.83 % of Spain's land area is used for organic farming. This is marginally higher than the EU average of 10.50 % ([61]). Spain, with a steady positive trend, is contributing to achieving the target to have 25 % of the EU's agricultural land being used for organic farming by 2030.

([55]) https://agriculture.ec.europa.eu/overview-vision-agriculture-food/vision-agriculture-and-food_en

([56]) Eurostat, 'Utilised agricultural area by categories', tag00025, accessed 5 December 2024, https://ec.europa.eu/eurostat/databrowser/view/tag00025/default/table?lang=en.

([57]) European Commission, JRC, Landscape features in agricultural land: what is the extent? https://joint-research-centre.ec.europa.eu/jrc-news-and-updates/landscape-features-agricultural-land-what-extent-2024-09-30_en

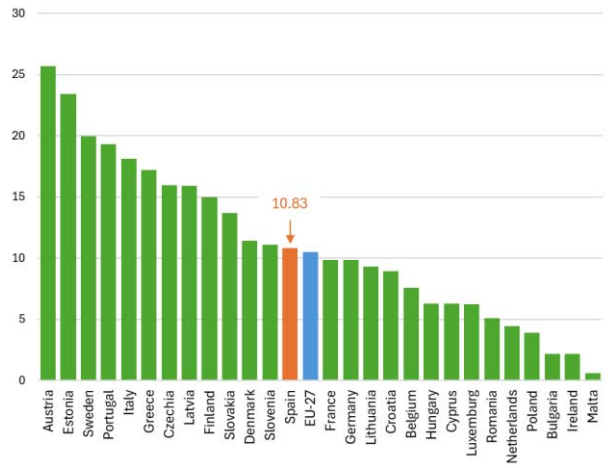
([58]) Regulation (EU) 2024/1468 of the European Parliament and of the Council of 14 May 2024 amending Regulations (EU) 2021/2115 and (EU) 2021/2116 as regards good agricultural and environmental condition standards, schemes for climate, environment and animal welfare, amendment of the CAP strategic plans, review of the CAP strategic plans and exemptions from controls and penalties (OJ L, 2024/1468, 24.5.2024), http://data.europa.eu/eli/reg/2024/1468/oj.

([59]) Regulation (EU) 2024/1991 of the European Parliament and of the Council of 24 June 2024 on nature restoration and amending Regulation (EU) 2022/869 (OJ L, 2024/1991, 29.7.2024), http://data.europa.eu/eli/reg/2024/1991/oj; see also European Commission, 'Nature Restoration Law', European Commission website, https://environment.ec.europa.eu/topics/nature-and-biodiversity/nature-restoration-law_en.

([60]) The three indicators are 'grassland butterfly index', 'stock of organic carbon in cropland mineral soils' and 'share of agricultural land with high-diversity landscape features'.

([61]) This is based on the latest available information from Eurostat, which is currently under review; European Commission, *Agriculture biologique au sein de l'union européenne*, factsheet, Brussels, 2024, https://agriculture.ec.europa.eu/document/download/c67458ed-ec50-4762-ae68-341763ab93c2_fr?filename=factsheet-organic-farning_fr.pdf&prefLang=en.

Figure 12: Share of total utilised agricultural area occupied by organic farming per Member State (%), 2022



Source: Eurostat, 'Area under organic farming', sdg_02_40, accessed 5 December 2024, https://ec.europa.eu/eurostat/databrowser/view/sdg_02_40/default/table?lang=en.

2025 priority action

- Implement eco-schemes and agri-environmental measures and practices to address the environmental needs of Spain.

Soil ecosystems

Soil is an essential, finite and extremely fragile resource. Its increasing degradation poses a threat to EU food security and climate resilience, adaptation and mitigation.

The EU soil strategy, adopted in November 2021, aims to support soil protection, sustainable soil management and the restoration of degraded soils to achieve the Green Deal objectives as well as land degradation neutrality by 2030.

This entails:
— preventing further soil degradation;
— making sustainable soil management the new normal;
— taking action for ecosystem restoration.

The proposed Directive on soil monitoring and resilience ([62]) aims to introduce the first comprehensive legislation on the protection of all soils in the EU. Should the Directive be adopted, Member States will have to transpose it into national legislation and implement it, starting with putting in place the governance systems and a sound monitoring framework building on existing national soil monitoring frameworks. The objective of the proposed Directive is to provide better and more comparable soil health data with a view to attaining healthy soils by 2050.

Degradation of soil ecosystems encompasses several aspects. The proposed Directive requires Member States to assess soil health according to a set of common indicators and to define the necessary regeneration measures. The area of soil that is sealed is an important factor in monitoring land-use change and represents an important pressure on nature and biodiversity. Other soil issues related to land degradation are soil erosion, soil compaction, loss of soil organic carbon, soil contamination, soil salinisation and the presence in soil of nitrogen and phosphorus in excess. The impact assessment accompanying the proposal, which builds on the data available in the EU Soil Observatory, points to the following soil degradation issues in Spain ([63]).

A fifth of Spain is affected by loss of soil organic carbon in mineral soils ([64]), representing 86 % of total cropland and grassland area. 18 % of the national territory is experiencing unsustainable soil erosion by water, wind, tillage and harvest, representing 72 % of total cropland area.

By the end of 2022, Spain had finalised the integration at the national level of all the elements of the National Soil Erosion Inventory. This process included the harmonisation of all provincial soil erosion inventories. The National Soil Erosion Inventory is an essential instrument for analysing, quantifying and mapping the main erosion processes in Spain, as well as for determining their development over time. The integration of the different provincial inventories allows for a broader perspective on erosion processes over the entire surface of the country. Although erosion should not be confused with desertification, the National Soil Erosion Inventory is also an essential instrument for the implementation of actions to combat desertification.

([62]) Proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law), COM(2023) 416 final of 5 July 2023, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52023PC0416.

([63]) Commission staff working document – Impact assessment report: Annexes – Accompanying the proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law), SWD(2023) 417 final of 5 July 2023, https://environment.ec.europa.eu/system/files/2023-07/IMPACT ASSESSMENT REPORT ANNEXES SWD 2023 417 part4.pdf.

([64]) De Rosa, D., Ballabio, C., Lugato, E. et al., 'Soil organic carbon stocks in European croplands and grasslands: How much have we lost in the past decade?', *Global Change Biology*, Vol. 30, No 1, 2023,, e16992, https://doi.org/10.1111/gcb.16992.

In June 2022, Spain adopted the National Strategy to Combat Desertification (ENLD), which updates the 2008 National Action Programme against Desertification. This strategy sets out a new framework for desertification policies and initiatives in Spain. The document sets out objectives and principles, analyses the policies that have the greatest impact on desertification, draws up a diagnosis of the situation in Spain (causes, impacts, main desertification scenarios and analysis) and proposes measures and actions to improve the governance of the fight against desertification and promote land management that prevents land degradation. This strategy has been developed by the Ministry for the Ecological Transition and the Demographic Challenge (MITECO), in collaboration with the other ministries, in particular the Ministry for Agriculture, Fisheries and Food (MAPA), and with the participation of the Autonomous Communities, the scientific community, NGOs and the rest of society through a public participation procedure. The ENLD implements Spain's commitment as an affected party to the UN Convention to Combat Desertification. The ENLD can be considered to mark substantial progress on addressing the following priority action received by Spain in the 2022 EIR: 'Take additional measures to fight against land degradation, soil erosion and desertification.'

Grasslands

Grasslands are among the most diverse ecosystems in the EU; they can contain as many as 80 different plant species per square metre and are home to a large variety of animals, ranging from small insects, birds and rodents to large herbivores. Grasslands are essential for agriculture and livestock herding. Natural grasslands also play an important role in storing carbon. However, changes in agricultural practices and land uses have caused grasslands to disappear at an alarming rate, making them one of Europe's most threatened ecosystems.

Out of the 32 reports ([65]) on grassland habitat types, only 3 (9.4 %) indicate favourable conservation status ([66]). The conservation status of four habitat types (12.5 %) ([67]) is unknown. The conservation status of 25 habitat types (78.1 %) is unfavourable.

Major pressures on and threats to grasslands in Spain are due to agriculture activities, followed by forestry and human-induced changes in water regimes. The development, construction and use of residential, commercial, industrial and recreational infrastructure and areas, followed by the development and operation of transport systems, are also significant pressures on and threats to these habitats.

Wetlands/peatlands

Wetlands act as water sources and purifiers; they are the planet's greatest natural carbon stores and they are crucial to agriculture and fisheries. Peatlands are a special type of wetlands dominated by peat-forming plants such as *Sphagnum* mosses. Nearly all peatlands in the EU are habitat types listed in Annex I of the Habitats Directive. Drained peatlands under intensive agricultural use constitute only 3 % of the EU's utilised agricultural area. At the same time, they are responsible for 25 % of the greenhouse gas (GHG) emissions from the EU's agricultural sector. Restoring peatlands brings multiple benefits, as peatlands improve water retention and quality, store carbon, reduce GHG emissions and increase biodiversity.

For wetlands, 2 habitat types ([68]) are reported as having favourable conservation status, 21 coastal habitat types are reported as having unfavourable conservation status and 13 habitat types are reported as unknown. Regarding dune habitat types, 5 are reported as having favourable conservation status, while 15 are reported as having unfavourable conservation status. Of freshwater habitat types, 2 are reported as having favourable conservation status, 21 as unfavourable and 8 as unknown.

The main pressures and threats affecting coastal habitats are the development, construction and use of residential, commercial, industrial and recreational infrastructure and areas. Agriculture and climate change are a major pressure on these habitats while alien and problematic species and the development and operation of transport systems are also considered major threats to these habitat group.

In the case of dune habitats, the main pressures and threats are the development, construction and use of residential, commercial, industrial and recreational infrastructure and areas, followed by alien and problematic species and the development and operation of transport systems.

Regarding freshwater habitats, the main pressures are the development, construction and use of residential, commercial, industrial and recreational infrastructure and areas, followed by agriculture and human-induced changes in water regimes. The main threats are

([65]) Article 17 web tool, 'Habitat assessments at Member State level', https://nature-art17.eionet.europa.eu/article17/habitat/report/?period=5&group=Bogs%2C+mires+%26+fens&country=ES&region=.

([66]) 6140, 6230 and 6420, all of them in the Alpine region.

([67]) 6110, 6220 and 6230 in the Alpine region, and 6170 in the Mediterranean region.

([68]) 1250 and 1420, both in the Macaronesian region.

agriculture and human-induced changes, followed by the development, construction and use of residential, commercial, industrial and recreational infrastructure and areas.

For peatlands, 15 out of 17 habitat types reported are in unfavourable conservation status, and 2 are reported as unknown ([69]).

Agriculture and human-induced changes in water regimes are the major pressures on and threats to peatlands in Spain. After these, the development, construction and use of residential, commercial, industrial and recreational infrastructure and areas, followed by the development and operation of transport systems, are also reported as broad categories of pressures and threats affecting peatlands (bog, mire and fen habitat types).

Forest ecosystems

Forests are important carbon sinks, and conserving them is vital if the EU is to achieve climate neutrality by 2050. The EU forest strategy for 2030, adopted in July 2021, is a plan of actions to promote the many services that forests provide. Its key objective is to ensure healthy, diverse and resilient EU forests that contribute significantly to the achievement of the EU's biodiversity and climate ambitions. About 27 % of the forest area in the EU is covered by habitat types listed in Annex I of the Habitats Directive. Moreover, forests host several species protected under the Birds and Habitats Directives, including those for which there is a requirement to designate Natura 2000 sites and to protect breeding sites and resting places.

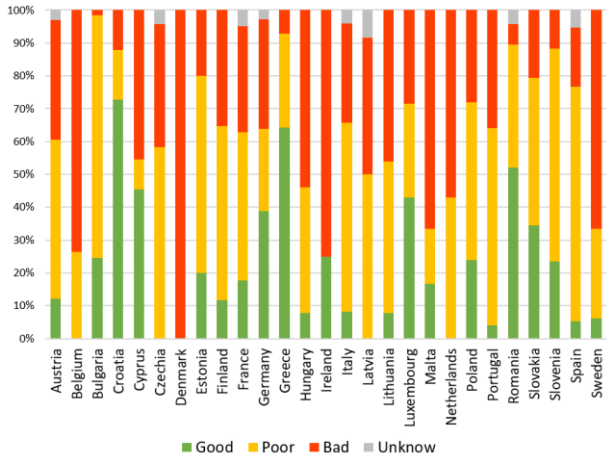
Several guidelines on forestry management were published by the Commission in 2023 ([70]). They covered biodiversity-friendly afforestation, reforestation and tree planting; closer-to-nature forest management; and defining, mapping, monitoring and strictly protecting primary and old-growth forests. They include further guidance on payment schemes for ecosystems services.

In 2023, the Commission proposed a new Forest Monitoring Law ([71]) that aims to create a comprehensive forest knowledge base, address information gaps and enable a better response to growing pressures on forests.

Assessments show that, of the 27 % of EU forest area protected under the Habitats Directive, less than 15 % is of favourable conservation status ([72]). The share of forested areas in the EU with a bad conservation status increased from 27 % in 2015 to 31 % in 2018.

In Spain, forests covered 37.2 % of the territory in 2020 ([73]), and more than 90 % of the forest habitat assessments covered by the Habitats Directive reveal a bad to poor status ([74]).

Figure 13: Conservation status of forests protected under the Habitats Directive per Member State (% of assessments), 2013–2018



Source: Commission staff working document – New EU forest strategy for 2030, SWD(2021) 652 final of 16 July 2021, p. 24, eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021SC0652.

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Spain has updated its national forestry programme, made up of the Spanish Forest Strategy Horizon 2050 and the 2022–2032 Spanish Forest Plan, both approved by agreement of the Council of Ministers of 20 December 2022.

([69]) 7720 in the Atlantic region and 7230 in the Alpine region.

([70]) European Commission: Directorate-General for Environment, *Guidelines on Closer-to-Nature Forest Management*, Publications Office of the European Union, Luxembourg, 2023, https://environment.ec.europa.eu/publications/guidelines-closer-nature-forest-management_en.

([71]) European Commission, 'Forest monitoring', European Commission website, https://environment.ec.europa.eu/topics/forests/forest-monitoring_en.

([72]) EEA, *State of Nature in the EU: Results from reporting under the nature directives 2013–2018*, EEA Report No 10/2020, Publications Office of the European Union, Luxembourg, 2020.

([73]) EEA, Forest information system for Europe, 'Country – FISE country factsheets', forest information system for Europe website, https://forest.eea.europa.eu/countries.

([74]) Commission staff working document – Stakeholder consultation and evidence base accompanying the document Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – New EU forest strategy for 2030, SWD(2021) 652 final of 16 July 2021, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021SC0652.

Among forest disturbances contributing to loss of forest integrity and related biodiversity loss, wildfires constitute a particular reason for concern. In 2022, the EU saw a record number (2 700) of wildfires affecting more than 30 ha, which led to the destruction of 785 605 ha of forest, the second highest annual figure recorded. Recent years have also witnessed the occurrence of widespread uncontrollable fires (so-called megafires), which are associated with loss of life and an enormous cost in terms of damage to the environment, businesses and society (over EUR 2 billion annually) and carbon dioxide (CO_2) emissions. Megafires are practically beyond suppression capacity and can be prevented only by an integrated risk management approach. Wildfires prevention is also essential to preserve resources for the bioeconomy.

The EU Timber Regulation (EUTR) ([75]) prohibits the placing on the EU market of illegally harvested timber.

On 29 June 2023, the Regulation on Deforestation-free Products (EUDR) ([76]) entered into force ([77]). The regulation seeks to guarantee that products in the EU that are made using any of seven commodities have no links to deforestation. The EUDR repeals the EUTR.

Marine ecosystems

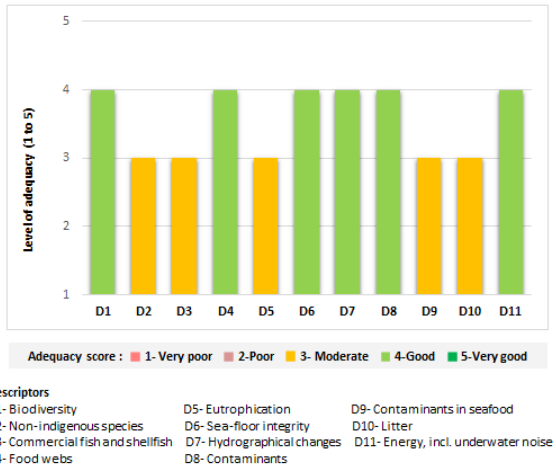
The Marine Strategy Framework Directive (MSFD ([78])) requires Member States to achieve good environmental status (GES) for their marine waters. To that end, Member States must draw up marine strategies for their marine waters and cooperate with other Member States sharing the same marine region or subregion. These marine strategies comprise different steps to be developed and implemented over six-year cycles.

Since the 2022 EIR report, no additional data regarding Member States' set of GES characteristics for each descriptor in the MSFD have become available. Nevertheless, Member States have to report updates by October 2024, and these will be assessed by the Commission. In the context of this next round of reporting, in accordance with the MSFD and the Commission GES Decision ([79]), Member States must include as part of their set of GES characteristics any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level ([80]).

The Commission assessed the updated monitoring programme reported by Member States in 2020 ([81]). At that time their updates on the elements, features and parameters identified monitoring gaps. The Commission recommended that Member States should prioritise work to address those gaps at all levels of implementation of the MSFD.

Member States also reported their updated Programme of Measures, that is required under Article 13 of the MSFD and must be updated every six years. The Commission has assessed them.

Figure 14: Level of adequacy of Spain's updated programme of measures under Article 13 of the MSFD (2022 reporting exercise)



([75]) Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market (OJ L 295, 12.11.2010, p. 23), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010R0995.

([76]) Regulation (EU) 2023/1115 of the European Parliament and of the Council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010 (OJ L 150, 9.6.2023, p. 206), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32023R1115&qid=1687867231461.

([77]) This new legislation will apply to large and medium-sized companies starting on 30 December 2025, and to micro and small enterprises starting on 30 June 2026.

([78]) Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive) (OJ L 164, 25.6.2008, p. 19), http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0056.

([79]) Commission Decision (EU) 2017/848 laying down criteria and methodological standards on good environmental status of marine waters and specifications and standardised methods for monitoring and assessment, and repealing Decision 2010/477/EU (OJ L 125, 18.5.2017, p. 43), https://eur-lex.europa.eu/eli/dec/2017/848/oj/eng.

([80]) Commission Notice on the threshold values set under the MSFD (Directive 2008/56/EC) and Commission Decision (EU) 2017/848 (C/2024/2078).

([81]) Communication from the Commission – Commission notice on recommendations on the 2020 updated reports for Article 11 of the Marine Strategy Framework Directive (2008/56/EC), C(2023) 2203 final of 4 April 2023, https://environment.ec.europa.eu/system/files/2023-04/C_2023_2203_F1_COMMUNICATION_FROM_COMMISSION_EN_V5_P1_2532109.PDF.

Source: Technical assessment carried out by the European Commission, pursuant to Article 16 of the MSFD, based on the data reported by the Member State in January and March 2023.

Spain's updated Programme of Measures shows moderate to good levels of adequacy across all descriptors, revealing balanced progress overall, although improvements could be made in several areas.

Progress can be noted on biodiversity (D1), with additional measures on the development of marine protected areas and on bycatch reduction. Regarding non-indigenous species (D2), commercial fish and shellfish (D3), eutrophication (D5), contaminants in seafood (D9) and marine litter (D10), coverage of pressures is only partial, pointing to areas for improvement. On marine litter for instance, although Spain defined measures to address urban activities, fishing and tourism, greater coverage is needed on more specific types of litter such as microlitter.

Spain has not ratified the Protocol for the Protection of the Mediterranean Sea against Pollution Resulting from the Exploration and Exploitation of the Continental Shelf and the Seabed and its Subsoil (Offshore Protocol to the Barcelona Convention).

Spain received two priority actions in the 2022 EIR: (i) ensure regional cooperation with Member States sharing the same marine (sub)region to address predominant pressures; and (ii) implement the recommendations made by the Commission in the 2022 MSFD legal reporting. It is not possible to evaluate these priority actions currently, as relevant data have not yet been evaluated.

2025 priority actions

- Report updates on the assessment of the state of Spain's marine waters, its target and its determinations of GES ([82]), which are expected to include any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level.
- Ratify the Protocol for the Protection of the Mediterranean Sea against Pollution Resulting from the Exploration and Exploitation of the Continental Shelf and the Seabed and its Subsoil (Offshore Protocol to the Barcelona Convention).

Prevention and management of invasive alien species

Invasive alien species (IAS) are a major cause of biodiversity loss in the EU. Besides inflicting direct and indirect damage on nature and the economy, some IAS also carry and spread infectious diseases, posing a threat to humans and wildlife. Regulation (EU) No 1143/2014 (the IAS Regulation) aims to prevent, minimise and mitigate the adverse impacts of IAS on biodiversity. It focuses action on a list of IAS of EU concern (the 'Union list'), which is regularly updated ([83]).

The IAS Regulation ([84]) currently lists 88 species subject to restrictions on keeping, importing, selling, breeding, growing and releasing into the environment. Member States are required to take measures to (i) prevent the introduction of IAS, (ii) ensure early detection and rapid eradication of IAS and (iii) manage species that are already widespread on their territory.

The third update of the Union list entered into force on 2 August 2022. The fourth update is in preparation. The BDS also aims to decrease by 50 % the number of Red List species threatened by IAS. This aligns with target 6 of the GBF to reduce the introduction of IAS by at least 50 % by 2030 and minimise their impact.

Preventing the introduction and spread of IAS, and managing them, including through eradication and control, can result in a substantial cost saving. Studies estimate that the total cost of IAS in Europe (damages and management) amounted to EUR 116.61 billion between 1960 and 2020 ([85]). More recent studies have put this cost at USD 28 billion per year in the EU, increasing to USD 148.2 billion by 2040 ([86]), and at USD 423 billion annually at the global level ([87]).

The total number of IAS of Union concern in the country

([82]) In accordance with Article 17 of Directive 2008/56/EC.

([83]) Commission Implementing Regulation (EU) 2016/1141 of 13 July 2016 adopting a list of IAS of Union concern pursuant to Regulation (EU) No 1143/2014 of the European Parliament and of the Council (OJ L 189, 14.7.2016, p. 4), as amended by Commission Implementing Regulations (EU) 2017/1263, (EU) 2019/1262 and (EU) 2022/1203 (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02016R1141-20220802&from=EN).

([84]) Regulation (EU) No 1143/2014 of the European Parliament and of the Council of 22 October 2014 on the prevention and management of the introduction and spread of invasive alien species (OJ L 317, 4.11.2014, p. 35).

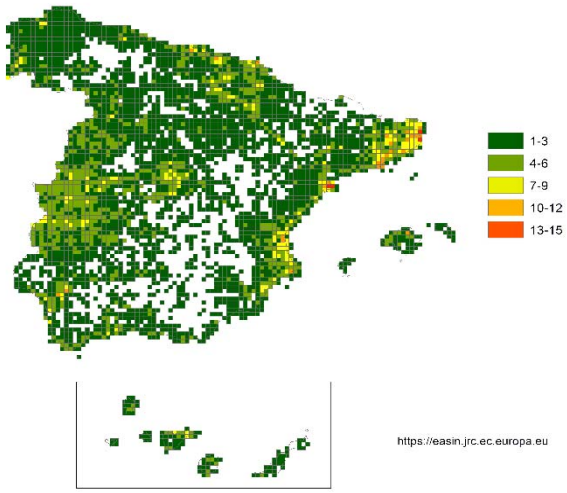
([85]) Haubrock, P. J., Turbelin, A. J., Cuthbert, R. N. et al., 'Economic costs of invasive alien species across Europe', *NeoBiota*, Vol. 63, 2021, pp. 153–190.

([86]) Henry, M., Leung, B., Cuthbert, R. N. et al., 'Unveiling the hidden economic toll of biological invasions in the European Union', *Environmental Sciences Europe*, Vol. 35, No 1, 2023, p. 43.

([87]) IPBES (Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services), *Summary for Policymakers – Invasive alien species assessment*, Bonn, 2023, https://www.ipbes.net/document-library-catalogue/summary-policymakers-invasive-alien-species-assessment.

is 57. This includes 36 species recorded in the previous (2022) EIR and 21 new additions. Of these new additions, 10 were already on the Union concern list in 2021, and 11 were added later under Commission Implementing Regulation (EU) 2022/1203.

Figure 15: Number of invasive alien species of EU concern, based on available georeferenced information for Spain, 2024



In the 2022 EIR, Spain received a priority action on taking further measures to combat IAS and improve the control of their pathways as well as to advance their control and eradication. There has been substantial progress, and the action can be considered fulfilled. Moreover, the infringement procedure open under the IAS Regulation has been closed.

2025 priority action

- Step up implementation of the IAS Regulation, including with regard to enforcement and capacity of inspection authorities.

Ecosystem assessment and accounting

The BDS calls on Member States to better integrate biodiversity considerations into public and business decision-making at all levels and to develop natural capital accounting.

Similarly, target 14 of the GBF ([88]) aims to ensure the full integration of biodiversity and its multiple values into policy and planning and, as appropriate, national accounting. This requires effective and coherent biodiversity observation and reporting on ecosystem condition in the EU ([89]).

The amended Regulation (EU) No 691/2011 on European environmental economic accounts ([90]) introduces new requirements for Member States to report on the condition of ecosystems including urban ecosystems, croplands, grasslands, forest and woodlands, coastal beaches, dunes and wetlands. Data reported by the Member States will feed into the second European ecosystem assessment, due in 2027, and can also be used to support policy decisions.

An ecosystem assessment is an analysis of the condition of ecosystems and the pressures acting on them, as well as the benefits that they provide to people, either directly or indirectly through the economy.

An increasing number of platforms, networks and communities of practice involve businesses in protecting biodiversity, including the EU Business & Biodiversity Platform ([91]). These platforms and communities are key tools for promoting and facilitating natural capital assessments among businesses and financial services providers.

Natural capital assessments help private businesses to better understand both the negative and positive impacts that they have on nature, and to appreciate how nature contributes to their success. Such understanding contributes to the implementation of the EU's BDS.

There are two Spanish business and biodiversity network members of the EU Business & Biodiversity Platform.

In Spain, the development of ecosystem accounting is seen as complementary to a broad range of national and international policy needs. It contributes in particular to

([88]) Decision 15/4 adopted by the Conference of the Parties to the Convention on Biological Diversity: Kunming–Montreal global biodiversity framework (https://www.cbd.int/doc/decisions/cop-15/cop-15-dec-04-en.pdf).

([89]) European Commission: Joint Research Centre and EEA, *EU Ecosystem Assessment – Summary for policymakers*, Publications Office of the European Union, Luxembourg, 2021, https://op.europa.eu/en/publication-detail/-/publication/81ff1498-b91d-11eb-8aca-01aa75ed71a1/language-en.

([90]) Proposal for a regulation of the European Parliament and of the Council amending Regulation (EU) No 691/2011 as regards introducing new environmental economic accounts modules, COM(2022) 329 final of 11 July 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM:2022:329:FIN.

([91]) The EU Business & Biodiversity Platform (https://green-business.ec.europa.eu/business-and-biodiversity_en) aims to promote the business case for biodiversity to businesses and financial institutions through workshops, seminars, reports and a cross-media communication strategy.

the System of Environmental Economic Accounting Ecosystem Accounting, the European Environmental Economic Accounts, and the EU and Spanish Biodiversity Strategies.

Ecosystem accounting is progressing with a strong focus on addressing key gaps and building a robust framework for evaluating natural assets. Within the framework of official national accounts, Spain has undertaken its first pilot project on extent accounts. Complementing this effort, the experimental work of the 'Mapping and assessment for integrated ecosystem accounting' project has led to the development of ecosystem extent accounts and forest condition accounts at the national level. In addition, progress continues on the development of ecosystem services and biodiversity accounts, including the development of plans to establish comprehensive ecosystem asset accounts in the near future.

Despite this progress, a number of challenges still persist. In particular, there is a need to address data gaps for certain ecosystem services, such as regulating and cultural services, as well as in the development of accounts for complex systems like marine ecosystems. Key priorities include fostering collaboration with institutions providing critical data; enhancing data accessibility; and promoting political and legislative frameworks to strengthen ecosystem accounting. In 2022, ecosystem accounting was identified as a priority action for Spain, but progress has been constrained by insufficient data.

At the regional level, Andalusia has made valuable contributions to these efforts by developing monetary accounts for forest assets, along with accounts for ecosystem services, carbon storage and biodiversity. These regional initiatives complement national progress and underscore the potential for local efforts to enhance ecosystem accounting practices across Spain.

In 2022, Spain received a priority action on ecosystem accounting, which cannot be assessed due to the lack of data.

3. Zero pollution

Clean air

EU clean air policies and legislation have successfully reduced emissions of key air pollutants and significantly improved air quality, which is now moving towards the levels recommended by the World Health Organization (WHO). This has resulted in clear health benefits and reduced adverse impacts on ecosystems and biodiversity. However, to achieve the WHO-recommended levels, more efforts are needed, including full compliance with EU legislation. To guide these efforts, the EU zero pollution action plan sets targets for 2030 relative to 2005. These are to reduce the health impacts of air pollution by 55 % and to reduce the EU ecosystems threatened by air pollution by 25 %.

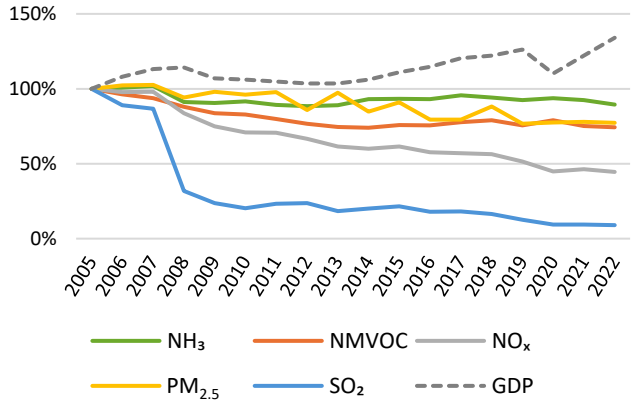
The EU has developed a comprehensive suite of air quality policies ([92]). These set health-based EU air quality standards ([93]) and stipulate Member States' national emission reduction commitments ([94]) for several air pollutants.

On air pollution, Spain presents a mixed picture. While emissions of several air pollutants have fallen in recent decades, air quality in Spain continues to give cause for concern in some parts of its territory, mainly related to nitrogen dioxide (NO_2). In particular, private transport exacerbates seasonal problems with air quality and traffic congestion in the major metropolitan areas, namely Madrid and Barcelona, leading to health and economic costs. The Spanish authorities are taking further measures to tackle this issue, which have to be rigorously implemented.

The latest available annual estimates (for 2022) by the EEA ([95]) for Spain attribute 18 500 deaths each year (or 184 200 years of life lost (YLL)) to fine particulate matter ($PM_{2.5}$) ([96]); 5 500 deaths each year (or 54 500 YLL) to NO_2 ([97]); and 6 100 deaths each year (or 61 300 YLL) to ozone ([98]).

The emissions of several air pollutants have decreased significantly in Spain since 2005, while GDP growth has continued (see Figure 16). According to the inventories submitted under Article 10(2) of the National Emission Reduction Commitments Directive (NECD) ([99]) in 2024, Spain has met its emission reduction commitments for 2020–2029 for the air pollutants nitrogen oxides (NO_x), non-methane volatile organic compounds (NMVOC), sulphur dioxide (SO_2), ammonia (NH_3) and $PM_{2.5}$. According to the latest projections submitted under Article 10(2) of the NECD, Spain is projected to meet its emission reduction commitments for 2030 onwards for NO_x, SO_2, NH_3 and $PM_{2.5}$, but not for NMVOC.

Figure 16: Emission trends of main pollutants / GDP in Spain (%), 2005–2022



Source: EEA, 'National air pollutant emissions data viewer 2005–2022', 25 June 2024, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/national-air-pollutant-emissions-data-viewer-2005-2022.

([92]) European Commission, 'Air', European Commission website, https://environment.ec.europa.eu/topics/air_en.

([93]) European Commission, 'EU air quality standards', European Commission website, https://environment.ec.europa.eu/topics/air/air-quality/eu-air-quality-standards_en.

([94]) European Commission, 'Reducing emissions of air pollutants', European Commission website, https://environment.ec.europa.eu/topics/air/reducing-emissions-air-pollutants_en.

([95]) EEA, *Harm to human health from air pollution in Europe: Burden of disease 2024*, briefing No 21/2024, Copenhagen, 2024, https://www.eea.europa.eu/en/analysis/publications/harm-to-human-health-from-air-pollution-2024.

([96]) Particulate matter (PM) is a mixture of aerosol particles (solid and liquid) covering a wide range of sizes and chemical compositions. PM_{10} refers to particles with a diameter of 10 µm or less. $PM_{2.5}$ refers to particles with a diameter of 2.5 µm or less. PM is emitted from many human sources, including combustion.

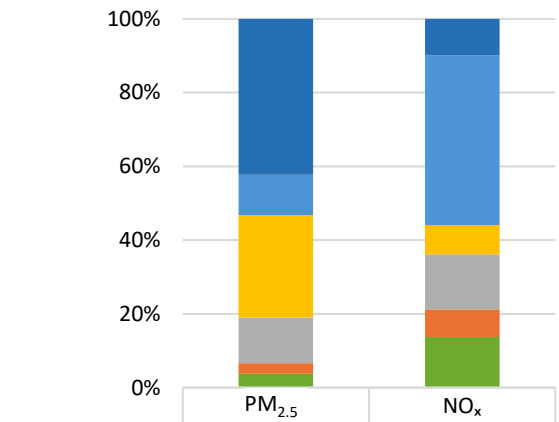
([97]) Nitrogen dioxide (NO_2) here pertains to a group of gases called NO_x, which also comprises nitrogen monoxide (NO). NO_x is emitted during fuel combustion – for example, from industrial facilities and the road transport sector.

([98]) Low-level ozone is produced by photochemical action on pollution. This year, for the first time, the impact of long-term exposure to ozone has also been taken into account. In previous analysis by the EEA, only the impact of short-term exposure was estimated.

([99]) Directive (EU) 2016/2284 of the European Parliament and of the Council of 14 December 2016 on the reduction of national emissions of certain atmospheric pollutants, amending Directive 2003/35/EC and repealing Directive 2001/81/EC (OJ L 344, 17.12.2016, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2016.344.01.0001.01.ENG.

Spain submitted its updated national air pollution control programme (NAPCP) to the Commission on 18 January 2024.

Figure 17: $PM_{2.5}$ and NO_x emissions by sector in Spain (%), 2022)



	$PM_{2.5}$	NO_x
Waste	42,28%	9,93%
Transport	10,93%	46,00%
Residential, commercial & institutional	27,74%	7,96%
Manufacturing and extractive industry	12,43%	14,86%
Energy supply	2,85%	7,53%
Agriculture	3,77%	13,72%

Source: EEA, 'National air pollutant emissions data viewer 2005–2022', 25 June 2024, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/national-air-pollutant-emissions-data-viewer-2005-2022.

In 2023, exceedances above the limit values set by the Ambient Air Quality Directive (AAQD) ([100]) were registered for PM_{10} in two air quality zones ([101]) in Spain. Furthermore, the target values for ozone concentrations were not met for several air quality zones, and neither was the target value for arsenic in one air quality zone ([102]).

Persistent breaches of air quality requirements, which have severe negative effects on health and the environment, are being followed up by the European Commission through infringement procedures covering all Member States concerned, including Spain for exceedances of PM_{10} and NO_2 limit values. The Court of Justice of the EU delivered a judgment about exceedances of NO_2 limit values in 2022 ([103]) confirming non-compliance with Directive 2008/50/EC. The aim is that appropriate measures are put in place to bring all air quality zones into compliance. This case is still open and the Commission is assessing the measures adopted by Spain to comply with the ruling.

In the 2022 EIR, Spain received two priority actions. The first was to further reduce emissions in the context of the NAPCP. Spain has made some progress on this. While the latest data show compliance with the 2020–2029 emission reduction commitments, Spain is still projected not to reach the emission reduction commitment for NMVOC for 2030 onwards. The second priority action was to ensure full compliance with EU air quality standards and maintain downward emission trends. Based on the latest data, Spain has made some progress in this regard. However, exceedances above limit values and target values remain for PM_{10}, ozone and arsenic, requiring further action. Since 2019, downward emission trends have been reported for all main pollutants, except for $PM_{2.5}$, requiring further action.

2025 priority actions

- As part of the NAPCP, take action towards reducing emissions of air pollutants.
- Ensure full compliance with the current AAQD standards, also in light of future stricter requirements under the revised AAQD.

Industrial emissions

The main objectives of EU policy on industrial emissions are to:
(i) protect air, water and soil and to prevent harmful effects on human health and the environment;
(ii) prevent and manage waste;
(iii) improve energy and resource efficiency, including water;
(iv) contribute to decarbonisation.
The cornerstone of the policy is the Industrial Emissions Directive (IED), which was revised in 2024 ([104]). The revision improves the directive's contribution to the zero pollution objective. It has a strong focus on innovation, and builds solid links between depollution, decarbonisation and circularity, making it a key regulatory tool to accompany the green transformation of EU

([100]) Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe (OJ L 152, 11.6.2008, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0050.
([101]) Avilés and Plana de Vic.
([102]) EEA, Eionet Central Data Repository (https://cdr.eionet.europa.eu).
([103]) Judgment of 22 December 2022, *Commission* v *Spain*, C-125/20.
([104]) Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial and livestock rearing emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17), as amended by Directive (EU) 2024/1785 of the European Parliament and of the Council of 24 April 2024, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02010L0075-20240804&qid=1725983863299. Informal consolidated text.

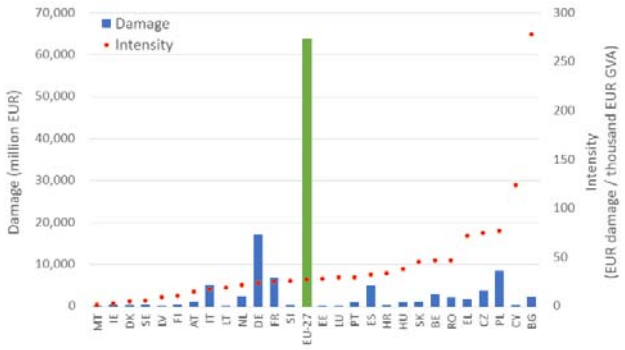
industry by 2050.

The overview of industrial activities regulated by the IED below is based on data reported to the EU Registry in 2022 ([105]) .

In Spain, around 7 000 industrial installations are required to have a permit based on the IED, with the majority of them falling in the intensive rearing of poultry and pigs sector (56 %), followed by the food and drink sector (7 %) and mineral production (7 %).

Figure 18 shows the damage to health and environment due to the main industrial air pollutants. As this depends on, among other factors, the size of the industrial sector in each Member State, the figure also shows the ratio between the damage and the industrial activity (expressed in gross value added (GVA)), which gives an indication of the emissions 'intensity'. Spain has relatively high damage (the fifth highest in the EU) and it is above the EU average of EUR 27.5/EUR 1 000 GVA in emissions intensity (11th highest in the EU). The main industrial contributors to emissions to air ([106]) are the energy sector (including refineries, gasification, etc.), the mineral sector and the metal sector.

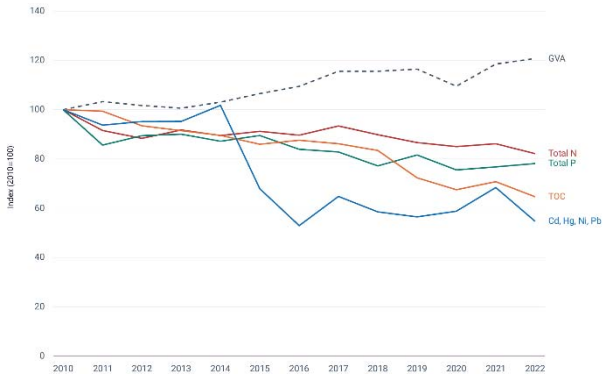
Figure 18: Industrial air pollution damage and intensity per Member State, 2021



Source: EEA, 'Industrial pollution intensity indicators – EU large industry air pollution damage costs intensity', European Industrial Emissions Portal, 2024, https://industry.eea.europa.eu/analyse/industrial-emissions-indicator.

Overall, the industrial emissions to water in the EU have decreased over time for all the main pollutants. On average in the EU, they appear to be decoupled from the industrial activity, which has increased over the same period (expressed in GVA), as shown in Figure 19.

Figure 19: Industrial releases of pollutants to water and industrial activity in the EU-27

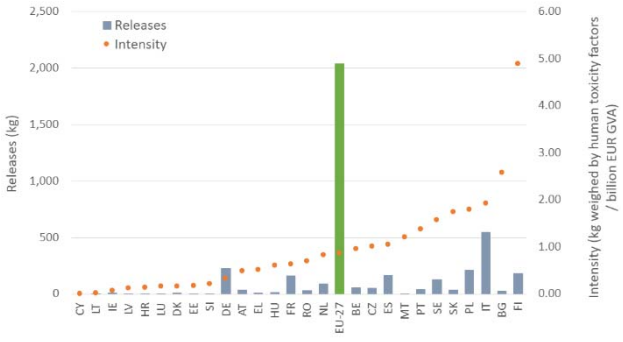


NB: Cd, cadmium; Hg, mercury; Ni, nickel; Pb, lead; total N, total nitrogen; total P, total phosphorus.

Source: EEA, 'Industrial pollutant releases to water in Europe', 30 May 2024, https://www.eea.europa.eu/en/analysis/indicators/industrial-pollutant-releases-to-water.

Concerning Spain in particular, Figure 20 shows the industrial emissions of heavy metals to water, taking into account the human toxicity of each metal, as well as the emissions intensity, based on its ratio with industrial activity (expressed in GVA). Spain has the 5th highest emissions of heavy metals to water and is in 9th position for emissions intensity (with same intensity as the EU average, 0.864 kg/EUR 1 billion GVA).

Figure 20: Industrial releases and intensity of heavy metals to water per Member State, 2022



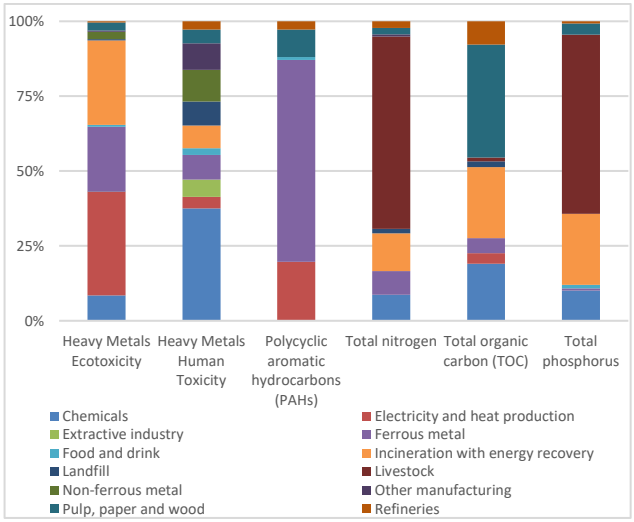
Source: EEA, 'Industrial pollution intensity indicators – EU large industry water pollution intensity', European Industrial Emissions Portal, 2024, https://industry.eea.europa.eu/analyse/industrial-emissions-indicator.

As shown in Figure 21, the main industrial contributors to emissions to water in Spain are the energy sector, the chemical sector, the metal sector and livestock rearing.

([105]) EEA, European Industrial Emissions Portal, https://industry.eea.europa.eu/, 2022 being the baseline year for all reports.

([106]) European Environment Agency, LRTAP, Air pollutant emissions data viewer (Gothenburg Protocol, LRTAP Convention) 1990-2022, https://www.eea.europa.eu/en/topics/in-depth/air-pollution/air-pollutant-emissions-data-viewer-1990-2022.

Figure 21: Relative releases to water from industry in Spain (%), 2022



Source: EEA, 'Industrial reporting under the Industrial Emissions Directive 2010/75/EU and European Pollutant Release and Transfer Register Regulation (EC) No 166/2006 – ver. 12.0 Sep. 2024 (tabular data)', EEA Geospatial Data Catalogue, 13 September 2024, https://doi.org/10.2909/cf5e54c1-be99-4426-bcad-baa26c4f27a0.

IED provisions on public information and participation require Member States to adopt transposition legislation enabling members of the public to have access to relevant information and participate in the approval process for potentially polluting installations. Thus, the public and NGOs, alongside competent authorities, play a role in ensuring compliance of these permits with EU legislation. The IED contains mandatory requirements on environmental inspections, requiring a site visit to take place at least every 1–3 years, using risk-based criteria. In addition, IED enforcement provisions require Member States to determine effective, proportionate, and dissuasive penalties applicable to infringements of IED-based national provisions. In the revised directive, the provisions set that worst infringements can be sanctioned by fines of at least 3% of the annual EU turnover of the legal person. The revised IED will also introduce a right to compensation for people whose health has been harmed by such infringements.

The development of best available techniques (BATs), BAT reference documents and BAT conclusions ensures effective collaboration between stakeholders and enables better implementation of the IED.

Since the 2022 EIR, the Commission has adopted BAT conclusions on (i) ferrous metal processing, (ii) the textiles industry, (iii) common waste gas management and treatment systems in the chemical sector and (iv) smitheries and foundries.

The Commission relies on the efforts of national competent authorities to implement the legally binding BAT conclusions and associated BAT emission levels in environmental permits. This should result in considerable and continuous reductions in pollution.

In 2022, Spain received priority actions to review permits to ensure that they comply with the newly adopted BATC conclusions, and to strengthen monitoring and enforcement to ensure compliance with BAT conclusions. Spain also received a priority action to address air and water pollutant emissions and the odour from plants engaged in the intensive rearing of poultry or pigs. Spain was also asked to tackle air pollution from coal-fired power generation plants and from the co-incineration of waste in cement plants. There are no data available to assess progress towards these priority actions.

2025 priority actions

- Reduce industrial air pollution damage and intensity.
- Reduce industrial releases to water and their intensity.
- Engage with industry and environmental NGOs to ensure proper contribution to and implementation of BAT conclusions and ensure timely updates to permits following the publication of BAT conclusions.
- Ensure effective public participation and access to justice in relation to the IED.

Major industrial accidents prevention – Seveso

The main objectives of EU policy on the prevention of major industrial accidents are to:
(i) control major-accident hazards involving dangerous substances, especially chemicals;
(ii) limit the consequences of such accidents for human health and the environment;
(iii) continuously improve the prevention of, preparedness for and response to major accidents.
The cornerstone of the policy is Directive 2012/18/EU (the Seveso III Directive) ([107]).

The overview below of industrial plants regulated by the Seveso III Directive ('Seveso establishments') is based on data reported on eSPIRS (e-Seveso Plants Information Retrieval System) for 2022–2024 ([108]) and the report by

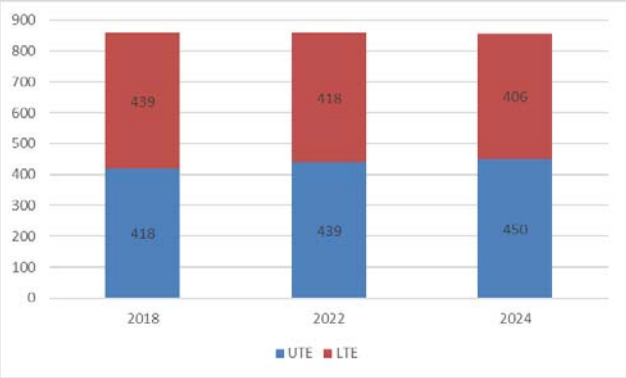
([107]) Directive 2012/18/EU of the European Parliament and of the Council of 4 July 2012 on the control of major-accident hazards involving dangerous substances, amending and subsequently repealing Council Directive 96/82/EC (OJ L 197, 24.7.2012, p. 1), https://eur-lex.europa.eu/eli/dir/2012/18/oj.

([108]) https://espirs.jrc.ec.europa.eu/en/espirs/content; data extracted in September 2024.

Spain on the implementation of the Seveso III Directive for 2019–2022 ([109]).

In Spain, in 2024, among the 856 Seveso establishments, 406 are categorised as lower-tier establishments and 450 as upper-tier establishments (UTEs), based on the quantity of hazardous substances likely to be present. UTEs are subject to more stringent requirements. The changes in the number of Seveso establishments are presented in Figure 22.

Figure 22: Number of Seveso establishments in Spain, 2018, 2022 and 2024

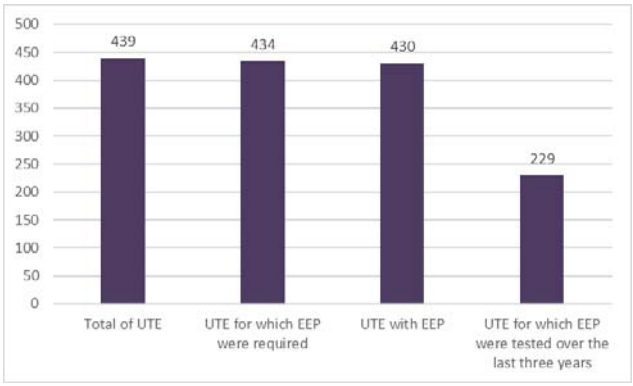


NB: LTE, lower-tier establishment.

Sources: European Commission: Directorate-General for Environment, *Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances)*, Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en.

According to Spain, in 2022, an external emergency plan (EEP) was required for 434 UTEs, out of a total of 439. That same year, 430 UTEs had EEPs, of which 229 had been tested over the previous three years. The summary is shown in Figure 23. The establishment of EEPs is essential to allow proper preparation and effective implementation of the necessary actions to protect the environment and the population should a major industrial accident nevertheless happen.

Figure 23: Situation regarding EEPs in Spain. 2022



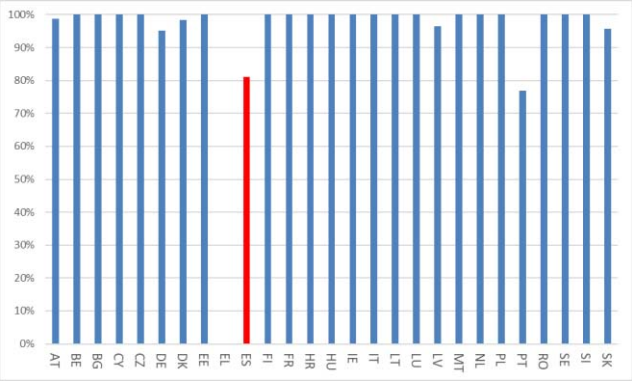
Sources: European Commission: Directorate-General for Environment, *Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances)*, Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en

The information for the public referred to in Annex V to the Seveso III Directive – especially about how the public concerned will be warned if there is a major accident, the appropriate behaviour in the event of a major accident and the date of the last site visit – is permanently available for 81 % of the Seveso establishments in Spain.

The shares of UTEs for which information on safety measures and requisite behaviours was actively made available to the public in 2022 in the EU-27 are presented in Figure 24. This provision on knowledge is an important provision of the Seveso III Directive, as awareness by the public of this information may reduce the consequences of a major industrial accident.

([109]) As provided for by Article 21(2) of the Seveso III Directive.

Figure 24: Share of UTEs for which information on safety measures and requisite behaviours was actively made available to the public per Member State (%), 2022



NB: No data available for Greece.

Sources: European Commission: Directorate-General for Environment, *Assessment and summary of Member States' implementation reports for Implementing Decision 2014/896/EU (implementing Directive 2012/18/EU on the control of major accident hazards involving dangerous substances)*, Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/94d57d74-735b-11ec-9136-01aa75ed71a1/language-en/format-PDF/source-search; eSPIRS data, extractions from 2022 and 2024; Analysis and summary of Member States' reports on implementation of Directive 2012/18/EU on the control of major accident hazards involving dangerous substances according to the format established by Commission Implementing Decision 2014/896/EU - Publications Office of the EU, https://op.europa.eu/en/publication-detail/-/publication/9bd73087-e9b8-11ef-b5e9-01aa75ed71a1/language-en

In 2022, Spain received a priority action to strengthen control and enforcement to ensure compliance with Seveso III Directive provisions, especially those on public information and EEPs. Data reported on the implementation of the Directive for 2019–2022 show improvement in the numbers of EEPs established for UTEs in Spain, but an insufficient number of EEP were tested over the previous three years.

2025 priority actions

- Strengthen compliance with requirements on safety measures to prevent major accidents and ensure appropriate preparedness and response in relation to UTEs, in particular as regards reviewing, testing and updating EEPs, at intervals of no more than three years.
- Ensure access to transparent and clear information towards citizens on risks and behaviour in case of accidents.

Mercury Regulation

The Mercury Regulation establishes measures and conditions concerning the use and storage of and trade in mercury, mercury compounds and mixtures of mercury, the manufacture and use of and trade in mercury-added products and the management of mercury waste, in order to ensure a high level of protection of human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds. The revision of the Mercury Regulation adopted in 2024 sets out rules to address the last intentional uses of mercury in the EU by phasing out the use of dental amalgam by 1 January 2025 except when deemed strictly necessary by the dental practitioner based on the specific medical needs of the patient, and prohibiting the manufacture and export of additional mercury-containing lamps from 1 January 2026 or 1 January 2027 (depending on the lamp category).

Measures should have been put in place in Spain to ensure a socially and economically sound phase-out of dental amalgam, including an adequate reimbursement of the alternatives through the health insurance scheme and the training of dental practitioners. The Commission is monitoring whether the phase-out of the dental amalgam has taken place under the terms and conditions of the regulation. Spain will also need to ensure that the manufacture and export of mercury-containing lamps are prohibited by the deadlines set out in the Mercury Regulation.

Noise

The Environmental Noise Directive ([110]) requires a common approach to avoid, prevent and reduce the harmful effects of noise. The designated authorities are responsible for making and approving noise maps and action plans for agglomerations, major roads, major railways and major airports. Member States decide on noise limits that are not set at the EU level. Nevertheless, the zero pollution action plan sets as a 2030 target a 30 % reduction compared with 2017 in the share of people chronically disturbed by transport noise.

Excessive noise from aircraft, railways and roads is one of the main causes of environmental health-related issues in

([110]) Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002 relating to the assessment and management of environmental noise – Declaration by the Commission in the Conciliation Committee on the directive relating to the assessment and management of environmental noise (OJ L 189, 18.7.2002, p. 12), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32002L0049.

the EU. It can cause ischaemic heart disease, stroke, interrupted sleep, cognitive impairment and stress ([111]).

In Spain, environmental noise is estimated to cause at least around 1 800 cases of ischaemic heart disease annually ([112]) and some 395 000 people to suffer from disturbed sleep ([113]).

Based on the latest set of information analysed, Spain has completed its noise mapping of airports, but noise mapping of agglomerations, roads and railways remains incomplete.

Action plans for noise management for agglomerations, roads, railways and airports must be updated and submitted to the Commission every five years. The deadline for reporting noise action plans under the most recent reporting cycle was 18 January 2025; these plans have not been assessed yet.

There is an infringement procedure ongoing for Spain related to lack of reporting on the strategic noise maps and the adoption of noise action plans.

Spain received two priority actions in the 2022 EIR, to complete noise mapping and noise action plans. There has been no progress on the first priority action, on noise mapping, as detailed above. Given that reporting under the most recent reporting cycle for noise action plans was due in early 2025, these have not been assessed.

2025 priority actions

- Complete noise mapping.
- Complete and implement action plans on noise management.

Water quality and management

EU legislation and policy requires that the impact of pressures on transitional waters, coastal waters and fresh water (including surface waters and groundwater) be significantly reduced. Achieving, maintaining or enhancing a good status of waterbodies as defined by the Water Framework Directive will ensure that EU citizens and the environment benefit from good-quality and safe drinking and bathing water. It will further ensure that the nutrient cycle (nitrogen and phosphorus) is managed in a more sustainable and resource-efficient way.

Water Framework Directive

The Water Framework Directive (WFD) ([114]) is the cornerstone of the EU water policy in the 21st century ([115]). The WFD and other water-related directives ([116]) form the basis of sustainable and integrated water management in the EU. They aim to achieve a high level of protection of water resources, prevention of further deterioration and restoration to good status. These objectives are very important for the EU's competitiveness, strategic autonomy and security, yet have become even more challenging in the face of climate change affecting our precious water resources.

The WFD establishes a procedural framework for reaching good surface water ecological and chemical status and good groundwater quantitative and chemical status. This implies monitoring and classification of all waterbodies, assessment of pressures and impacts and identification of the most cost-effective measures to achieve the objectives of the directive. The directive dates from 2000 and set an initial deadline of 2015 for achieving its objectives, with the option to extend the deadline to the end of 2027. Every six years, Member States must report

([111]) WHO, Environmental Noise Guidelines for the European Region, Copenhagen, 2018, https://www.who.int/europe/publications/i/item/9789289053563.

([112]) These figures are an estimation by the EEA based on (i) the data reported by Member States on noise exposure covered by Directive 2002/49/EC for the round of noise mapping of 2022; (ii) European Topic Centre on Air Pollution, Transport, Noise and Industrial Pollution (ETC/ATNI), *Noise Indicators under the Environmental Noise Directive 2021: Methodology for estimating missing data*, ETC/ATNI No 2021/06, Kjeller, 2021; and (iii) the methodology for health impact calculations in European Topic Centre on Air Pollution and Climate Change Mitigation (ETC/ACM), *Implications of environmental noise on health and wellbeing in Europe*, Eionet report ETC/ACM No 2018/10, Bilthoven, 2018, https://www.eionet.europa.eu/etcs/etc-atni/products/etc-atni-reports/eionet_rep_etcacm_2018_10_healthimplicationsnoise.

([113]) More information on the adverse health effects of noise pollution is available at: https://www.eea.europa.eu/themes/human/noise/noise-2.

([114]) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy (OJ L 327, 22.12.2000, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0060.

([115]) https://ec.europa.eu/environment/water/index_en.htm.

([116]) This includes the Groundwater Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006L0118), the Environmental Quality Standards Directive (https://eur-lex.europa.eu/eli/dir/2008/105/oj), the Bathing Water Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32006L0007), the Urban Wastewater Treatment Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A31991L0271), the new Drinking Water Directive (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020L2184), the Nitrates Directive (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=celex%3A31991L0676), the Marine Strategy Framework Directive (https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32008L0056) and the IED (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32010L0075).

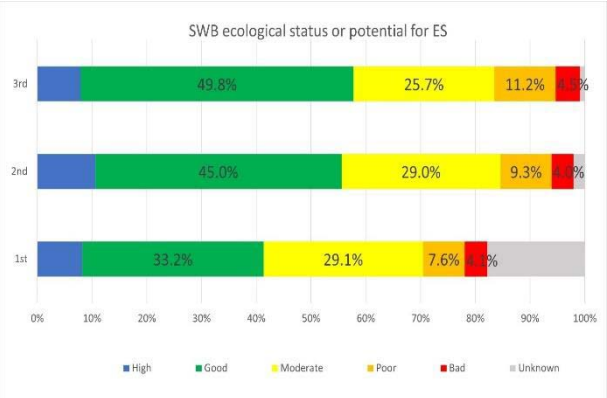
their river basin management plans (RBMPs) to the Commission. They should cover river basin districts (RBDs) in their countries, some of which may be shared with other countries. The Commission has assessed the third cycle of RBMPs, which were to be submitted by March 2022, and has reported its findings to the European Parliament and to the Council on 4 February 2025 ([117]).

Spain has 25 RBMPs in terms of the WFD, related to the corresponding RBDs ([118]). The Spanish RBDs count 5470 surface waterbodies and 804 groundwater bodies. 70 % of all lake waterbodies are heavily modified (a significant increase since the second RBMPs), as well as approximately 17 % of rivers, 40 % of transitional waterbodies and 20 % of coastal waterbodies. 5 % of lake waterbodies are artificial.

Figures 25–28 show the changes in ecological status/potential and in chemical status of surface waters, and in quantitative and chemical status of groundwaters in 2010, 2015 and 2021. Heavily modified water and artificial waterbodies must reach good ecological potential rather than good ecological status, which means that all measures must be taken to mitigate the adverse impact of the sustainable human development activities causing the waterbody to be heavily modified/artificial, while not significantly affecting these activities.

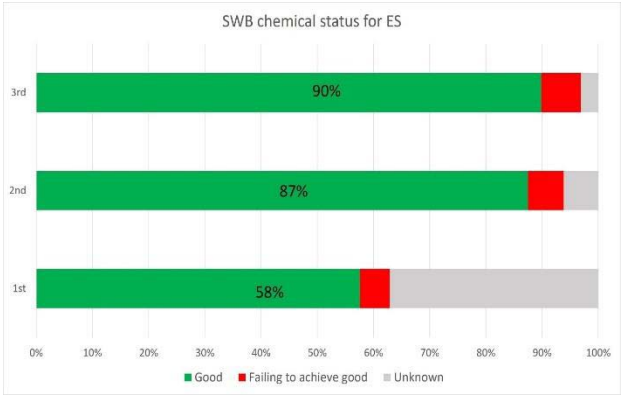
It follows from the assessment of the third RBMPs that the ecological status/potential of surface waterbodies has only slightly improved since the second RBMPs, with 58 % of surface waterbodies having good status/potential. Furthermore, the chemical status remains broadly the same but with some improvement, with 90 % of surface waterbodies having good chemical status.

Figure 25: Ecological status/potential of surface waterbodies in each RBMP cycle (%)



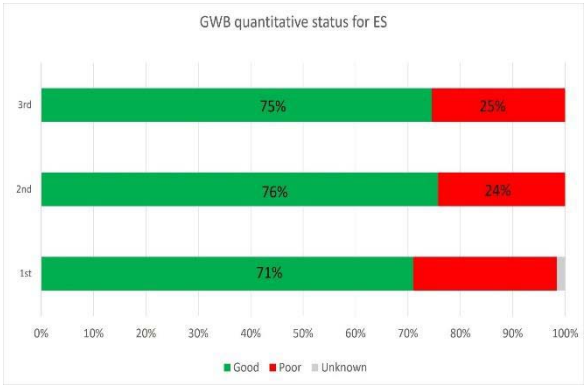
The most significant pressures come from diffuse sources of agriculture (mainly nutrients) and point sources from urban wastewater, as well as morphological changes resulting in altered habitats. Electricity from hydropower accounts for 20 % of total electricity production.

Figure 26: Chemical status of surface waterbodies in each RBMP cycle (%)



The principal substances that cause failure to achieve good chemical status are metals (nickel, cadmium, mercury and lead), followed by perfluorooctanesulfonic acid (PFOS) and pesticides (cypermethrin, chlorpyrifos, hexachlorocyclohexane, endosulfan and dicofol). Among these, ubiquitous, persistent, bioaccumulative, toxic substances (mercury and PFOS) play just a minor role in the number of failures, while others (hexachlorocyclohexane, endosulfan, dicofol and PFOS) are recognised persistent organic pollutants under the Stockholm Convention listed for elimination or restriction.

Figure 27: Quantitative status of groundwater bodies in each RBMP cycle (%)



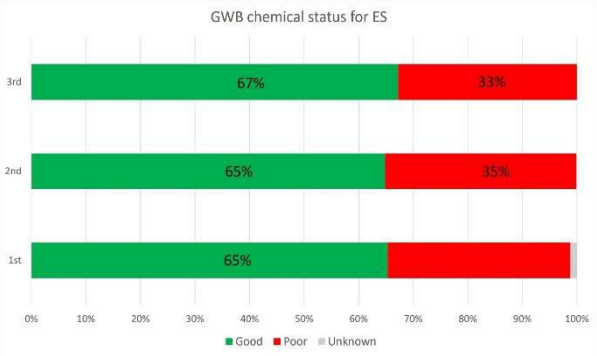
([117]) Commission Staff Working Document – EU overview, Third River Basin Management Plans, Second Flood Hazard and Risk Maps and Second Flood Risk Management Plans, Member State: Spain, accompanying the document report from the Commission to the Council and the European Parliament on the implementation of the Water Framework Directive (2000/60/EC) and the Floods Directive (2007/60/EC), SWD(2025) 13 final of 4 February 2025, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=SWD%3A2025%3A24%3AFIN&qid=1738746144581

([118]) MITECO, 'Demarcaciones hidrográficas', https://www.miteco.gob.es/es/agua/temas/planificacion-hidrologica/marco-del-agua/demarcaciones_hidrograficas.html.

The quantitative status of groundwater bodies has slightly deteriorated since the second RBMPs, with 75 % reported to have good quantitative status. In some RBDs, however, the classification may be biased, since it does not fully consider, as required under the WFD, the water needs of dependent aquatic and terrestrial ecosystems. The very severe natural degradation in the case of the Doñana National Park, a flagship biodiversity hotspot in the EU, has highlighted the crucial importance of considering the needs of groundwater-dependent terrestrial and aquatic ecosystems.

The main reason for failing to achieve good quantitative status is over-abstraction, followed at a considerable distance by saline/other intrusions resulting from anthropogenically induced changes in flow direction, which in coastal areas is caused by over-abstraction. Recent studies show that the combined impacts of climate change and groundwater pumping will significantly decrease natural groundwater recharge, reduce soil moisture and increase actual evapotranspiration, while predictions regarding desertification and prolonged droughts are becoming more certain.

Figure 28: Chemical status of groundwater bodies in each RBMP cycle (%)



The chemical status of groundwater bodies has slightly improved since the last cycle, with at least 67 % now reported as having good chemical status. However, 43 % of groundwater bodies are at risk of failing to achieve good chemical status by 2027. The main reasons for failing to achieve good chemical status are general water quality, followed by saline/other intrusion resulting from anthropogenically induced changes in flow direction and deterioration in quality of water for human consumption. Nitrate, chloride, conductivity, sulphates and pesticides are the main pollutants causing failure, with most of them also showing sustained upward trends.

Until the end of 2027, Member States can still apply time-related exemptions, subject to providing evidence of compliance with the strict criteria set out in the WFD. After 2027, the possibilities for applying exemptions will be much more limited.

The 2022 EIR identified the following priority actions: (i) assess new physical modifications of waterbodies in line with Article 4(7) of the WFD; and (ii) increase efforts to reduce nitrates from agriculture in groundwater and address eutrophication of surface waters where agriculture pressure is significant.

Spain has made some progress. In this context, it is positive that the third RBMPs provide measures to address all significant pressures in both groundwater and surface water, including both environmental measures and water-demand-related measures. Many measures aim at reducing pollution from nutrients and pesticides.

2025 priority actions

Without prejudice to the list of recommended actions in the Commission report to the European Parliament and to the Council on the assessment of the third RBMPs, the following priority actions can be highlighted.

- Improve river continuity and ecological flows, boosting efforts on nature-based solutions to reduce hydromorphological pressures.
- Ensure periodic reviews of permits for discharges, abstractions and other water uses, including hydropower pressures.
- Reduce pollution from nutrients, chemicals, metals and saline discharges
- Better justify exemptions to the achievement of good status.
- Improve the classification of water bodies and strengthen monitoring systems.
- Develop more robust programmes of measures, tackle obstacles identified in the implementation of measures and ensure adequate financing for implementation, including through better use of the cost recovery and polluter pays principle.

Floods Directive

Every six years, following the same reporting cycle as the RBMPs, all Member States also report their flood risk management plans (FRMPs), based on the flood hazard and risk maps and the preliminary flood risk assessments drawn up during the second cycle (2016–2021).

The Commission assessed the FRMPs and, as above mentioned, on 4 February 2025 reported on both the third RBMPs and second FRMPs to the European Parliament and to the Council.

The second FRMPs in Spain have improved insofar as:

- Objectives are linked to both measures and indicators, making it possible to verify progress on achieving objectives.

- Greater emphasis is put on the role of land use / spatial planning in addressing flood risks, as well as on nature-based solutions.
- Public awareness is considered.

However, there is room for improvement for the future FRMPs.

2025 priority actions

- FRMPs should provide details on how the FHRMs were used in the choice of measures and how to consider pluvial flooding.
- Consider future climate scenarios in FRMPs.
- Better explain the choice and implementation of flood prevention and protection measures (prioritisation, monitoring, costs of measures).
- Improve public consultation and stakeholder involvement.

Drinking Water Directive

The recast Drinking Water Directive is now applicable, and Member States were required to transpose its provisions into their national legal systems by 12 January 2023. Since the entry into force of the recast directive, the Commission has adopted several delegated and implementing acts establishing (i) a watch list of substances and compounds of concern for drinking water ([119]), (ii) a methodology for measuring microplastics in drinking water ([120]) and (iii) an EU system for testing and approving materials that will be allowed to be in contact with drinking water ([121]). Member States will have to take these various Commission acts into account when implementing the recast directive.

Finally, the Commission has now received data from Member States on the quality of drinking water in 2017–2019. The quality of drinking water (supplied by large water suppliers) in Spain does not give rise to concern ([122]).

From January 2026, the European quality standards for PFAS in drinking water will apply, ensuring harmonised Member States' reporting of PFAS monitoring data in the future.

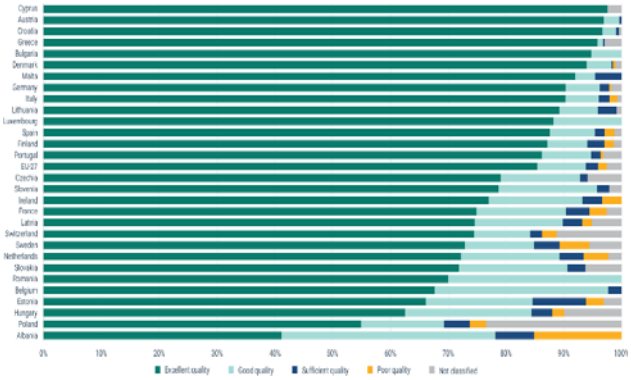
Bathing Water Directive

The Bathing Water Directive requires Member States to monitor and assess bathing water. It requires that, during the bathing season, Member States disseminate to the public information on bathing water quality actively and promptly. In particular, notices banning or advising against bathing should be rapidly and easily identifiable.

Figure 29 shows that in 2023, out of the 2 275 Spanish bathing waters, 1 993 (87.6 %) were of excellent quality, 177 bathing waters (7.8 %) of good quality and 38 bathing waters (1.7 %) of sufficient quality. 39 bathing waters (1.7 %) were found to be of poor quality. 28 bathing waters were not classified (1.2 %).

Detailed information on the Spanish bathing waters is available from a national portal ([123]) and through an interactive map viewer of the EEA ([124]).

Figure 29: Bathing water quality per Member State, Albania and Switzerland (%), 2023



Source: EEA, *European Bathing Water Quality in 2023*, briefing No 04/2024, Copenhagen, 2024, https://www.eea.europa.eu/publications/european-bathing-water-quality-in-2023/.

([119]) https://environment.ec.europa.eu/publications/implementing-decision-drinking-water-directive-watch-list_en.

([120]) Commission Delegated Decision (EU) 2024/1441 of 11 March 2024 supplementing Directive (EU) 2020/2184 of the European Parliament and of the Council by laying down a methodology to measure microplastics in water intended for human consumption (notified under document C(2024) 1459) (OJ L, 2024/1441, 21.5.2024), http://data.europa.eu/eli/dec_del/2024/1441/oj.

([121]) OJ L, 2024/365, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/365/oj; OJ L, 2024/367, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/367/oj; OJ L, 2024/369, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/369/oj; OJ L, 2024/368, 23.4.2024, http://data.europa.eu/eli/dec_impl/2024/368/oj; OJ L, 2024/370, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/370/oj; OJ L, 2024/371, 23.4.2024, http://data.europa.eu/eli/reg_del/2024/371/oj; see the Commission web page on all six delegated acts for more information (https://environment.ec.europa.eu/publications/delegated-acts-drinking-water-directive_en).

([122]) In summary, the compliance for all parameter groups in Spain was at least 99.59 % in 2017, 99.64 % in 2018 and 99.26 % in 2019.

([123]) Ministry of Health, NAYADE Information System.

([124]) EEA, 'State of bathing water', EEA website, 2024, https://www.eea.europa.eu/en/topics/in-depth/bathing-water/state-of-bathing-water.

Nitrates Directive

The Nitrates Directive ([125]) aims to protect water quality across Europe by preventing nitrates from agricultural sources that can pollute groundwater and surface waters and by promoting the use of good farming practices.

The latest Commission report on the implementation of the Nitrates Directive, dating back to 2021, warns that nitrates are still causing harmful pollution to water in the EU. Excessive nitrates in water are harmful to both human health and ecosystems, causing oxygen depletion and eutrophication. Cleaning of waters by national authorities or farmers, where it has been undertaken, has had a positive impact on the drinking water supply and on biodiversity. It has also benefited the sectors – such as fisheries and tourism – that depend on biodiversity and on a good supply of drinking water. Nevertheless, excessive fertilisation remains a problem in many parts of the EU. The report on the implementation of the Nitrates Directive covering 2020–2023 will be available in 2025.

The analysis of Spain's RBMPs has identified nutrients from agriculture as an important pressure on groundwater / surface water that is affecting these waters' good status and as one of the main factors in not meeting the WFD objectives.

As explained in previous EIRs, in 2018 the Commission launched a new horizontal infringement procedure against Spain on the Nitrates Directive. The Commission decided in December 2021 to refer Spain to the Court of Justice of the EU for failing to take sufficient action on nitrates pollution. This case covers most of the Spanish Autonomous Communities. On 14 March 2024, the Court delivered its judgement in Case C-576/22, condemning Spain for bad application of the Nitrates Directive. The Commission is now monitoring the implementation by Spain of the Court judgment through the implementation of the necessary measures. Spain has adopted the Royal Decree 47/2022, of 18 January, on the protection of waters against diffuse pollution caused by nitrates from agricultural sources, which is a positive step to improve the existing difficult situation on this matter. It is also a Reform included in Component 3 of the RRP of Spain.

2025 priority action

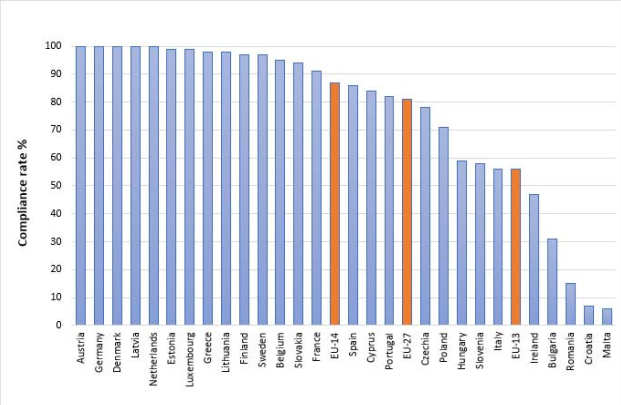
- Tackle nutrient pollution, especially nitrates from agriculture, through the implementation of the Nitrates Directive.

Urban Wastewater Treatment Directive

The Urban Wastewater Treatment Directive (UWWTD) aims to protect human health and the environment from the effects of untreated urban wastewater. It therefore requires Member States to collect and treat (secondary or biological treatment) wastewater in all urban areas of more than 2 000 people, and to apply a more stringent treatment than secondary, with nitrogen and/or phosphorus removal, to the wastewater generated in urban areas, also known as agglomerations, of more than 10 000 people, before they are discharged into waters and their catchments, when they are sensitive to nitrogen and/or phosphorus (i.e. eutrophic or tending to become eutrophic).

In Spain, the overall compliance rate was 86 % in 2020. Around 450 agglomerations did not comply yet with the requirements of the Directive.

Figure 30: Proportion of urban wastewater that fully complied with the UWWTD, 2020



Source: European Commission, 12th technical assessment of UWWTD implementation - Publications Office of the EU

Spain approved in July 2021 the national Plan DSEAR on wastewater, sanitation, water efficiency, saving and reuse ([126]). This plan is a positive step, a governance tool for all the competent administrations and include water investments in the entire Spanish territory.

Despite the improvement in compliance over the years, for which the use of EU funding has been fundamental, Spain has experienced significant difficulties in properly implementing the UWWTD. This partial implementation has forced the Commission to take legal actions that have led to rulings of the Court of Justice of the EU.

The European Commission currently has four horizontal infringement procedures in progress against Spain, covering the agglomerations in breach of the UWWTD.

([125]) European Commission, Nitrates Directive.

([126]) See MITECO, 'Plan DSEAR', https://www.miteco.gob.es/es/agua/temas/planificacion-hidrologica/planificacion-hidrologica/planes-programas-relacionados/.

For the most advanced case (concerning normal areas), the Court of Justice of the EU issued a second ruling on 25 July 2018 (Case 205/17), imposing for the first time in the environmental sector pecuniary sanctions on Spain ([127]). Two other infringement procedures are already before the Court of Justice and awaiting the first ruling.

Therefore, it is essential that Spain take the necessary measures and implement the necessary projects without delay, to fully comply with the requirements of the UWWTD, taking advantage of the available EU funding (i.e. the ERDF and the RRF).

This is all the more important as the Directive has been revised. The recast Directive 2024/3019 builds on the current *acquis* and strengthens existing treatment standards establishing a new additional treatment of micropollutants in urban wastewater. Other new requirements relate to moving towards the energy neutrality of the sector, establishing an EPR system to ensure sustainable financing of micropollutant treatment by the most polluting industries and ensuring access to sanitation, especially for vulnerable and marginalised groups. Spain has until 31 July 2027 to transpose the new Directive into its national legal system.

The 2022 EIR included as priority action the need to complete the implementation of the UWWTD for all agglomerations, by building up the necessary infrastructure, as well as develop the potential of water reuse. In this respect, some progress has been made. However, there is clearly room for further efforts.

2025 priority actions

- Take the necessary measures to ensure full implementation of the current Urban Wastewater Treatment Directive, taking into account the new requirements of the recast Directive.

Larges areas of Spain suffer from water scarcity. The water exploitation index plus (WEI+), a measure of how much water is being used compared with the total renewable freshwater resources available for a given territory and period, shows that, especially in summer months, the country's total water consumption exceeds its renewable freshwater resources ([128]). The last available data refer to 2022 ([129]), the WEI+ in Spain was 33 in the third quarter of 2022. Although in recent years the highest WEI+ value (46) was reached in the third quarter of 2019 and the second highest value (37) in the third quarter of 2021. This seasonal index at national level does not reflect the situation at river basin level where more acute water stress can be recorded ([130]).

It is important to note that, in line with the EIR assessment, in the framework of the 2024 European Semester ([131]), Spain has received a Country Specific Recommendation (CSR) on water management and adaptation to climate change:

"Improve water management to better address the adaptation to present and future effects of climate change and ensure long-term economic, social and environmental resilience, by improving coordination among all levels of government and administration and scaling up existing solutions for drought risk reduction and sustainable water management in agriculture, water efficiency and infrastructure investments, and by supporting the development of nature-based solutions."

Therefore, Spain should take the necessary measures to address this specific and comprehensive recommendation. In this sense, Spain is already preparing and developing some measures in line with the Strategic Orientations on Water and Climate Change adopted by the Council of Ministers in July 2022.

Chemicals

The EU seeks to ensure that chemicals are produced and used in a way that minimises any significant adverse effects on human health and the environment. In October 2020, the Commission published its chemicals strategy for sustainability towards a toxic-free environment ([132]),

([127]) A lump sum of EUR 12 million, and a penalty payment of almost EUR 11 million per six-month period of delay for the nine pending agglomerations. As of January 2025, Spain has already paid around EUR 90 million in this case, and it is still paying fines for three non-compliant agglomerations.

([128]) Values above 20% are generally considered to be a sign of water scarcity, while values equal to or greater than 40% indicate situations of severe water scarcity.

([129]) European Environment Agency (EEA) https://www.eea.europa.eu/en/analysis/indicators/use-of-freshwater-resources-in-europe-1

([130]) EEA, Seasonal water scarcity conditions for European sub-units for the four quarters of 2022, as measured by WEI+. https://www.eea.europa.eu/en/analysis/indicators/use-of-freshwater-resources-in-europe-1/seasonal-water-scarcity-conditions

([131]) European Commission, Recommendation for a Council Recommendation on the economic, social, employment, structural and budgetary policies of Spain, COM(2024) 609 final of 19 June 2024, https://commission.europa.eu/document/download/60c2e201-7e09-45fc-b9ba-e702a11a6796_en?filename=com_2024_609_1_en.pdf. See CSR 3 and Recital 23.

([132]) Chemicals Strategy for Sustainability and Regulation (EC) No 1272/2008Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions – Chemicals strategy for sustainability: Towards a toxic-free environment, COM(2020) 667 final of 14 October 2020, https://eur-

which led to some systemic changes in EU chemicals legislation. The strategy is part of the EU's zero pollution ambition – a key commitment of the European Green Deal.

The EU's chemicals legislation ([133]) provides a baseline protection for human health and the environment. It also ensures stability and predictability for businesses operating in the internal market.

Since 2007, the Commission has gathered information on the enforcement of the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation and the Classification, Labelling and Packaging (CLP) Regulation. In December 2020, the Commission assessed the Member States' reports ([134]) on the implementation and enforcement of these regulations ([135]). It is apparent from the Commission's report that there are still many disparities in the implementation of the REACH and CLP Regulations, notably in the area of law enforcement. Recorded compliance levels in Member States, generally quite stable over time, appear to be getting slightly worse. This may be because (i) enforcement authorities are becoming more effective in detecting non-compliant products/companies; and (ii) more non-compliant products are being placed on the EU market.

In August 2021, the Commission published a measurable assessment of the enforcement ([136]) of the two main EU regulations on chemicals using a set of indicators on different aspects of enforcement. Since 2021, the list of chemicals subject to restrictions has been expanded as new entries have been added to Annex XVII to the REACH Regulation ([137]).

In 2023, new hazard classes were added to the CLP Regulation, and the revision of the regulation was tabled (published on 20 November 2024) ([138]). The new hazard classes cover endocrine disruptors and persistence-related hazards while the revision of the regulation encompasses new rules on online sales to better tackle non-compliances observed over the years. Also in 2023, the Conference of the Parties of the Stockholm Convention decided to include, in its Annex A (which lists banned substances), three new chemicals ([139]). The Commission is working on the delegated acts to include these substances in Annex I to the Persistent Organic Pollutants Regulation by 2025 at the latest.

The Member States' reporting exercise set out in Article 117 of the REACH Regulation and Article 46 of the CLP Regulation is conducted every five years. The results of the coming one are expected in 2025, hence the absence of new country-specific data on enforcement since 2022.

Spain had devised but partially implemented strategies ([140]) for enforcement of both the REACH and CLP Regulations. Of the 17 enforcement authorities, 12 had developed an individual enforcement strategy for REACH and 13 for CLP. Strategies were focused on raising industry awareness of the obligations under REACH rules, performing enforcement campaigns (including ECHA's

lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2020%3A667%3AFIN; Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1), https://publications.europa.eu/resource/cellar/c6b6a31d-8359-11ee-99ba-01aa75ed71a1.0004.02/DOC_2.

([133]) Namely, Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the registration, evaluation, authorisation and restriction of chemicals (REACH), establishing a European Chemicals Agency, amending Directive 1999/45/EC and repealing Council Regulation (EEC) No 793/93 and Commission Regulation (EC) No 1488/94 as well as Council Directive 76/769/EEC and Commission Directives 91/155/EEC, 93/67/EEC, 93/105/EC and 2000/21/EC (OJ L 396, 30/12/2006, p. 1), https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32006R1907; and Regulation (EC) No 1272/2008 of the European Parliament and of the Council of 16 December 2008 on classification, labelling and packaging of substances and mixtures, amending and repealing Directives 67/548/EEC and 1999/45/EC, and amending Regulation (EC) No 1907/2006 (OJ L 353, 31.12.2008, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02008R1272-20221217.

([134]) European Commission, *Technical assistance to review the existing Member States reporting questionnaire under Articles 117(1) of REACH and 46(2) of CLP – Final report*, Publications Office of the European Union, Luxembourg, 2020, https://circabc.europa.eu/ui/group/8ee3c69a-bccb-4f22-89ca-277e35de7c63/library/a4abce8c-8425-455f-b7e6-0ead917bde6b/details.

([135]) In line with Article 117(1) of the REACH Regulation and Article 46(2) of the CLP Regulation.

([136]) European Commission: Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, *REACH and CLP Enforcement: EU-level enforcement indicators*, Publications Office of the European Union, Luxembourg, 2021, https://op.europa.eu/en/publication-detail/-/publication/e5c3e461-0f85-11ec-9151-01aa75ed71a1/.

([137]) These are substances in tattoo inks and permanent make-up, *N*,*N*-dimethylformamide, formaldehyde (and formaldehyde releasers), lead in PVC (polyvinyl chloride), siloxanes (D4, D5, D6) and, finally, microplastics.

([138]) Regulation (EU) 2024/2865 of the European Parliament and of the Council of 23 October 2024 amending Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (Text with EEA relevance), OJ L, 2024/2865, 20.11.2024, p.1 (Regulation - EU - 2024/2865 - EN - EUR-Lex)

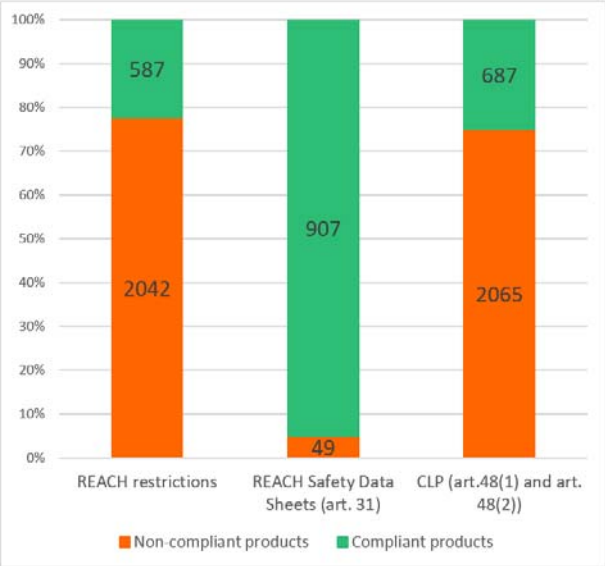
([139]) These are methoxychlor, dechlorane plus and UV-328. In the case of the pesticide methoxychlor, there are no exemptions from the ban. However, for the two plastic additives, dechlorane plus and UV-328, the COP decision lists some time-limited specific exemptions.

([140]) Final report REACH-CLP MS reporting 2020.pdf (europa.eu), p. 76.

inspection projects) and investigating complaints in order to reduce public health risks.

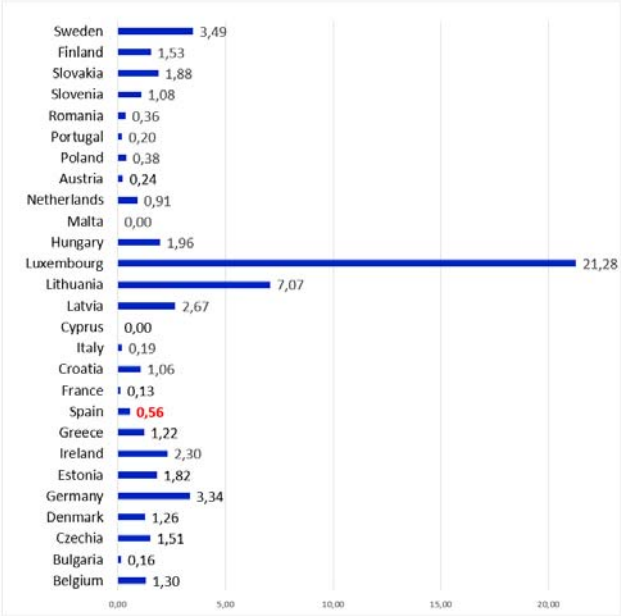
In 2020, Spain participated in an EU-coordinated enforcement project on products sold online, called REACH-EN-FORCE (REF)-8 ([141]). The report was adopted in November 2021, so it could not be taken into account in the previous EIR.

Figure 31: Compliances of imported products – results of the REF-8 project (%)



A risk approach was used for the targeting of control measures in order to maximise the chances of identifying non-compliances. Therefore, the non-compliance rates presented above cannot be considered the average non-compliance rates of products in the EU. However, the proportion of non-compliance cases found in the REF-8 project are of concern.

Figure 32: Number of REF-8 checks performed per 100 000 inhabitants (EU average = 1.24)



Spain participated to a slight extent in the coordinated enforcement project (REF-8), while online sales have been proven to correspond consistently to higher non-compliance rates in checks performed across the EU, in particular when related to imported products.

In 2022, Spain received a priority action related to the upgrading of administrative capacities in implementation and enforcement to move towards a policy of zero tolerance of instances of non-compliance. In the absence of reporting since 2022, no progress has been reported.

2025 priority actions

- Upgrade the administrative capacities in implementation and enforcement to move towards a policy of zero tolerance of non-compliance.
- Increase involvement in the activities of the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, including in the coordinated enforcement projects, called REF projects.
- Increase customs controls and controls of products sold online with regard to compliance with chemicals legislations.

([141]) European Chemicals Agency, *REF-8 project report on enforcement of CLP, REACH and BPR duties related to substances, mixtures and articles sold online*, Helsinki, 2021, https://echa.europa.eu/documents/10162/17088/project_report_ref-8_en.pdf/ccf2c453-da0e-c185-908e-3a0343b25802?t=1638885422475, p. 20.

4. Climate action

The impacts of climate change have continued to increase in recent years, inflicting damage and suffering in the EU and around the world. Globally, 2023 was the hottest year on record, while Europe has been warming twice as quickly as the global average and is now the fastest-warming continent. The frequency and severity of extreme climate events are also increasing. Against this backdrop, the EU has demonstrated its determination to implement the European Green Deal and to become climate neutral and resilient by 2050, ensuring sustainable competitiveness and supporting EU industry in the net-zero transition. The European Climate Law is the EU's response to the need for action. It sets the objective of achieving climate neutrality by 2050 and a midterm target of a reduction in GHG emissions of at least 55 % by 2030 and outlines the adaptation efforts necessary to adjust to climate change's present and future impacts. Almost all the 'Fit for 55' proposals set out in the European Green Deal have been agreed in law, and the European Commission recommended a new intermediate climate target of a 90 % reduction in emissions by 2040. In 2024, the Member States submitted updated national energy and climate plans for 2021–2030, reflecting the increased ambition of the revised EU legislation. In 2024, the European Commission also released, jointly with the EEA, the first-ever European climate risk assessment.

Over the last three decades, since 1990, the EU has achieved steady decreases in its emissions, reaching a running total in 2022 of – 32.5 % ([142]). However, the EU and its Member States need to step up their implementation efforts and accelerate emissions reduction to stay on track to reach their targets of a 55 % reduction in net GHG emissions by 2030 and climate neutrality by 2050. Between 1990 and 2022, net GHG emissions of Spain decreased by 3 %, making it one of the countries with below-average decrease.

The 'Fit for 55' legislative package reflects the need to speed up the green transition. It includes: (i) strengthening and expanding the EU emissions trading system (ETS), with the creation of a new, second, ETS for transport and buildings together with a dedicated Social Climate Fund to help citizens during the transition; (ii) increasing targets under the Effort Sharing Regulation; and (iii) a revised Regulation for Land Use, Land-Use Change and Forestry ([143]). The package has been fully adopted, and the Member States have been implementing the legislation.

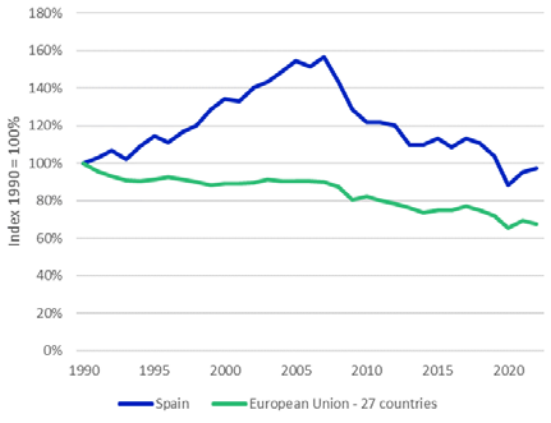
The key strategic document at the country level is the National Energy and Climate Plan (NECP) ([144]). Spain submitted its updated plan in September 2024, after the deadline set ([145]). The European Commission assessed the plan and the extent to which Spain has followed the recommendations for the draft version.

The findings from the assessment are:

- Emissions under the Effort Sharing Regulation will decrease by 45% in 2030 compared to 2005, and Spain will meet its target of 38%.
- The latest projections show a gap to the LULUCF target, meaning that current levels of removals have been insufficient.
- Spain is in line with its target for the share of renewable energy.
- There are still gaps in energy efficiency targets that must be closed.

To minimise the impacts of climate policies on vulnerable people and sectors, Spain is using the Just Transition Fund and will use the Social Climate Fund from 2026 (for more information, see Chapter 5.)

Figure 33: Total GHG emissions (excluding international aviation) (%), 1990–2022



([142]) EU net domestic emissions, including the land use, land-use change and forestry (LULUCF) sector and excluding international aviation.

([143]) A full overview of the Fit for 55 package is available at https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/delivering-european-green-deal/fit-55-delivering-proposals_en.

([144]) European Commission, 'National energy and climate plans', https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en.

([145]) Article 14 of Regulation 2018/1999 on the Governance of the Energy Union and Climate Action.

The EU emissions trading system

The EU ETS is the key tool for reducing GHG emissions cost-effectively across all Member States. It is the world's biggest carbon market, covering around 40 % of the EU's total GHG emissions from electricity and heat generation, the manufacturing industry, aviation within Europe ([146]) and, from 2024, maritime transport also.

The system sets a limit or cap on the total amount of GHGs that can be emitted at the EU level. Within this limit, companies buy emissions allowances (one allowance gives the right to emit 1 tonne of CO_2 eq (carbon dioxide equivalent)), in auctions or through trading allowances with others. The cap is reduced annually to ensure that overall emissions in the sectors covered decrease over time.

The emissions under the ETS decreased by 56 % from 2005 to 2023 in Spain.

In 2023, about 39 % of GHGs emitted by Spain's ETS installations came from power generation, less than the EU overall (57 %) ([147]). Of the total emissions from all industry sectors, 28 % came from cement and lime production, 26 % from refineries, 13 % from metals processing, 11 % from the chemical industry and 22 % from other sectors. Since 2019, the power sector has registered a higher emissions reduction (34 %) than the industry sectors (20 %). Since 2013, GHG emissions have declined by 50 % in power generation and by 18 % in the industry sectors. Nearly all this decline in the industry sectors has occurred since 2019.

From 2027, a new emissions trading system, called ETS2, for buildings, road transport and additional sectors (mainly industry not covered by the current ETS), will become fully operational ([148]). Member States should have notified full transposition of the provisions of the revised EU ETS Directive related to the new ETS2 into national law by 30 June 2024. Spain did not communicate full transposition into national law by this deadline. The Commission therefore opened an infringement procedure against Spain on 25 July 2024, by sending a letter of formal notice for failing to fully transpose the provisions into national law. In the absence of a satisfactory response, the Commission may decide to issue a reasoned opinion.

The Commission also opened an infringement procedure against Spain on 25 January 2024, by sending a letter of formal notice for failing to fully transpose previous revisions of ETS Directives ([149]) into national law.

Effort sharing

The Effort Sharing Regulation (ESR) ([150]) covers GHG emissions from domestic transport (excluding CO_2 emissions from aviation), buildings, agriculture, small industry and waste. Emissions from these sectors account for around 60 % of the EU's domestic emissions. The regulation sets the EU-wide target to reduce emissions from the effort sharing sectors by 40 % by 2030 compared to 2005 levels. This overall target for the EU translates to binding national emission reduction targets for each Member State. Spain's target is – 37.7 %.

In addition to the 2030 targets, Member States have annual GHG emissions limits (annual emission allocations), reducing every year until 2030.

There is some flexibility to take account of annual fluctuations in emissions, by trading emissions and transfers from the ETS and LULUCF.

Based on historical emissions and the most updated projections Spain is on track to achieve its 2030 ESR target. Projected emission reduction is 6.9 percentage points above its 2030 target.

The key sectors are transport and buildings. Spain has taken measures to reduce emissions in these sectors, including through the development of national action plans to increase the adoption of electric vehicles, expand energy efficiency initiatives in buildings, and increase investments in renewable energy and waste management technologies (see below).

The largest contributor is the domestic transport sector, which accounted for 45 % of all effort sharing emissions in 2022. Sustainable transport has yet to take off in Spain despite domestic initiatives to decarbonise transport. Road transport is the dominant mode in Spain; trains provide only 4 % of freight transport, which is well below the EU average of 16 %. Only 0.4 % of Spain's car fleet were battery electric vehicles in 2023, and Spain has about 29 200 publicly accessible charging points, or 1 for every 8 e-vehicles (above the EU average of 1:10).

The buildings sector is a significant concern for Spain as well. Spain needs to step up its efforts to achieve meaningful contribution to its long-term renovation strategy. Spain expects 14 % of savings in building energy consumption in 2030 compared with 2020. However,

([146]) Flights between the EU Member States including departing flights to Norway, Iceland, Switzerland, and the United Kingdom.

([147]) EEA. EU Emissions Trading System (ETS) data viewer. EU Emissions Trading System (ETS) data viewer | European Environment Agency's home page

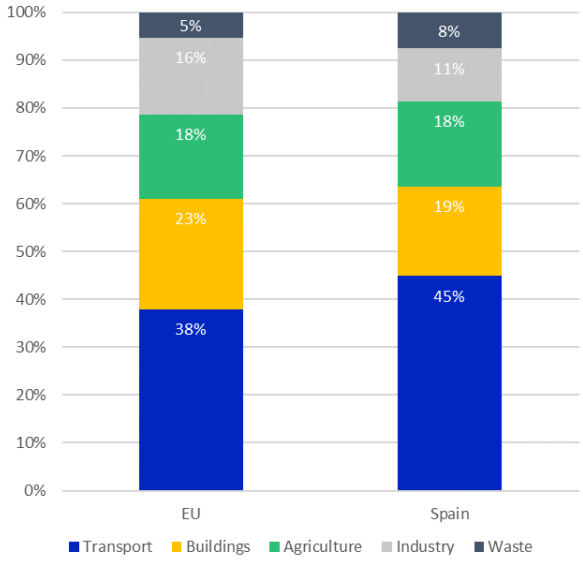
([148]) Directive (EU) 2023/959 (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2023.130.01.0134.01.ENG).

([149]) Directive - 2023/959 - EN - EUR-Lex and Directive - 2023/958 - EN - EUR-Lex.

([150]) Regulation (EU) 2018/842 (https://eur-lex.europa.eu/eli/reg/2018/842).

between 2020 and 2022 final energy consumption in residential buildings rose by 3.1 %. The share of renewables in heating and cooling of buildings is still low (20 % in 2022) compared with the target of 35 % in 2030. However, in 2023 Spain was the world's largest recipient of greenfield renewable projects, and Spain accounts for 20 % of the world's renewable hydrogen projects announced in 2022.

Figure 34: Effort-sharing emissions by sector (%), 2022



Land use, land use change and forestry

The LULUCF sector plays a significant role in achieving the EU's climate neutrality goal. In the EU, this sector absorbs more GHGs than it emits, removing significant volumes of carbon from the atmosphere. Thus, it is the only sector with negative emissions.

Spain's LULUCF sector saw a gradual increase in net carbon removals between 1990 and 2006, with forests playing a major role. Recent years have, however, shown a plateau in the amount of total net removals.

Spain's target in 2030 is to enhance land removals by additional – 5.3 Mt of CO_2 eq compared with the yearly average of 2016–2018. The latest available projections show a gap to target of 6.1 Mt of CO_2 eq in 2030. Therefore, Spain needs to apply additional measures to reach its 2030 target.

Adaptation to climate change

Halting all GHG emissions would still not prevent climate impacts that are already occurring. Therefore, adaptation to climate change is also a key component of climate policy.

Spain is in all three regions identified as hotspots of climate risks most affected by climate change: Southern Europe, low-lying coastal regions and the Canary Islands as an outermost region ([151]).

Spain is taking action to build resilience to climate impacts, with major challenges remaining on water management. Spain is one of the Member States most affected by droughts, and it is also vulnerable to wildfires and heatwaves. Power generation will be increasingly affected by changes to rainfall patterns, lower flow rates, higher frequency and intensity of droughts and higher water temperatures.

Spain adopted its climate adaptation law in 2021 and has national, regional and sectoral adaptation plans.

Spain received five priority actions regarding climate action in the 2022 EIR.

There is still little progress in decarbonisation of transport sector and in renovation of buildings stock. Uptake of renewables is well on track and Spain will probably achieve its ambitious target of 81 % renewable energy share in electricity production.

In March 2022, the Spanish government approved a biogas roadmap for 2022–2030, which focuses on sustainable biogas production, specifically from waste and materials of agricultural origin. The roadmap includes 45 measures to support the achievement of Spain's biogas production target for 2030.

2025 priority action

- Implement all polices and measures that are needed to achieve targets laid down in the Effort Sharing Regulation (ESR) and the Land Use, Land Use Change and Forestry (LULUCF) Regulation. More detailed priority actions are set out in the assessment of the final National Energy and Climate Plan (NECP) ([152]).

([151]) EEA, *European Climate Risk Assessment*, EEA Report 01/2024, Publications Office of the European Union, Luxembourg, 2024, https://climate-adapt.eea.europa.eu/en/eu-adaptation-policy/key-eu-actions/european-climate-risk-assessment.

([152]) European Commission, National energy and climate plans, https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en

Part II: Enabling framework – implementation tools

5. Financing

The EU budget supports climate investment in Spain with significant amounts in 2021–2027, with revenues from the EU ETS also feeding into the national budget. During 2020–2022, Spain's revenues from auctioning reached EUR 6 954 million in total, with 74 % of it spent on climate and energy, corresponding to EUR 5 136 million.

In addition, the annual investment needed to meet its environmental objectives in the areas of pollution prevention and control, the circular economy and waste, water protection and management, and biodiversity and ecosystems is estimated to be EUR 32.6 billion per year in Spain.

These four environmental areas currently receive total funding of around EUR 21.8 billion per year; thus, there is a gap of EUR 10.7 billion per year.

Of the annual environmental investment gap, EUR 5 billion concerns biodiversity and ecosystems, EUR 2.3 billion circular economy and EUR 1.7–1.8 billion pollution prevention and control and water (each).

Climate finance landmarks

EU funding for climate action

The EU budget supports climate action in the EU-27 with EUR 657.8 billion in the 2021–2027 budgetary period across the various programmes and funds, representing an overall 34.3 % contribution level. Of this, cohesion policy provides EUR 120 billion (over half of it through the ERDF), the RRF 275.7 billion and CAP 145.9 billion ([153]).

In Spain, the EU cohesion policy (considering EU contribution amounts) provides EUR 10.4 billion for climate action in 2021–2027 (with around 80 % of this via the ERDF), with a further EUR 636 million from the European Maritime, Fisheries and Aquaculture Fund ([154]).

The RFF contributes to climate finance in Spain with EUR 65 billion up to 2026, representing 39.9 % of the RRP ([155]).

The European Investment Bank (EIB) provided EUR 109.9 billion financing across the EU-27 between 2021 and mid-2024 to support energy, transport and industry projects that are aligned with the EU's climate objectives. Of this amount, EUR 17.1 billion was assigned to Spain in the reference period ([156]).

National financing, including EU emissions trading system revenues

Revenues from the auctioning of emission allowances under the EU ETS, which feeds directly into national budgets, amounted to EUR 1 240 million in 2020, EUR 2 483 million in 2021 and EUR 3 231 million in 2022 in Spain, totalling EUR 6 954 million in the three-year period. In Spain, estimated revenues are earmarked for energy and climate purposes ahead of each year, so actual revenues may differ from the allocated estimate. All estimated revenues that do not go to indirect cost compensation (a maximum of 25 %, 5.6% in 2022, not included as spent here) are used for climate and energy purposes. National legislation includes a minimum of EUR 450 million for renewable energy production support plus a maximum of 30 % for energy transition. Revenues higher than estimated go to the general budget, without a predefined purpose ([157]).

The amount allocated to energy and climate purposes from EU ETS revenues amounted to EUR 1 084 million in 2020, EUR 2 036 million in 2021 and EUR 2 057 million in 2022 (budget execution data).

From the remaining part of the EU ETS revenues that feed into the Innovation Fund and the Modernisation Fund, further support is available to climate action at the EU level.

([153]) European Commission, *Statement of Estimates of the European Commission – For the financial year 2025*, Publications Office of the European Union, Luxembourg, 2024, pp. 94–96, https://commission.europa.eu/document/download/7a0420e1-599e-4246-9131-ccb7d505d6d9_en?filename=DB2025-Statement-of-Estimates_1.pdf.

([154]) See the Cohesion Open Data Platform (https://cohesiondata.ec.europa.eu/).

([155]) EU Commission datasets and the Recovery and Resilience Scoreboard (https://ec.europa.eu/economy_finance/recovery-and-resilience-scoreboard/index.html).

([156]) A list of financed projects is provided by the EIB (https://www.eib.org/en/projects/loans/index.htm).

([157]) European Commission: Directorate-General for Climate Action, *Progress Report 2023 – Climate action*, Publications Office of the European Union, Luxembourg, 2023, https://climate.ec.europa.eu/news-your-voice/news/climate-action-progress-report-2023-2023-10-24_en.

It should be noted that investment in climate action also supports the environment and, therefore, the environmental investments described in the following sections cannot be regarded as entirely additional to climate investment ([158]).

Environmental financing and investments

This section describes Spain's investment needs, current financing and gaps as they relate to the four environmental objectives beyond climate objectives, namely tackling pollution, the circular economy and waste, water protection and management, and biodiversity and ecosystems ([159]).

The environment overall

Investment needs

The overall environmental investment needs to enable Spain to meet its objectives in the areas of pollution prevention and control, the circular economy and waste, water protection and management, and biodiversity and ecosystems are estimated to be EUR 32.6 billion per year (in 2022 prices).

A significant part of the estimated needs, around EUR 10.8 billion per year, can be attributed to the circular economy. Around EUR 8 billion a year each is required for biodiversity and ecosystems and for pollution prevention and control, and around EUR 5.6 billion for water (in 2022 prices).

Current investments

To implement the environmental investments needed, the available financing is estimated to currently reach an annual EUR 21.8 billion in Spain from EU and national sources combined (in 2022 prices).

Total environmental funding from the multiannual financial framework (MFF) is estimated to reach around EUR 16.7 billion for Spain in total, during 2021–2027 (or EUR 2.4 billion per year).

Table 1: Key environmental allocation from EU funds to Spain (million EUR), 2021–2027

Instrument	Allocations
Cohesion policy	**6 223.7** ([a])
ERDF	6042
Cohesion Fund	0.0
Just Transition Fund	181.7
CAP	**7 247.1** ([b])
European Agricultural Guarantee Fund	5 061.5
European Agricultural Fund for Rural Development (EAFRD)	2 185.6
European Maritime, Fisheries and Aquaculture Fund (EMFAF)	**447.5**
Other MFF	2 732.6 ([c])
RRF ([d]) (2021–2026)	**47 212**

([a]) European Commission, 2021-2027 cohesion policy (planned) allocations in *EU amount* excluding national co-financing, based on the tracking in the Common Provisions Regulation (CPR, 2021) Annex I. Please note potential data changes that may have arisen between the EIR preparation cut-off date (31 October 2024) and its publication date. Note that Spain is not eligible for Cohesion Fund funding. Source and further information: https://cohesiondata.ec.europa.eu/2021-2027-Categorisation/2021-2027-Planned-finances-detailed-categorisation/hgvj-gyin/about_data.

([b]) Regulation (EU) 2021/2115 of the European Parliament and of the Council of 2 December 2021 establishing rules on support for strategic plans to be drawn up by Member States under the common agricultural policy (CAP strategic plans) and financed by the European Agricultural Guarantee Fund (EAGF) and by the European Agricultural Fund for Rural Development (EAFRD) and repealing Regulations (EU) No 1305/2013 and (EU) No 1307/2013 (OJ L 435 6.12.2021, p. 1), Annex XI, https://eur-lex.europa.eu/eli/reg/2021/2115.

Note that 2021-2027 combines factual data for 2021 and 2022 and expenditure under the relevant specific objectives (SOs) of the CAP strategic plans from 2023, using the EU biodiversity tracking methodology (https://commission.europa.eu/system/files/2023-06/Biodiversity%20tracking%20methodology%20for%20each%20programme%202023.pdf). Source: European Commission.

([c]) Space Fund, Horizon Europe, financial instrument for the environment and the Connecting Europe Facility.

([d]) Outside the MFF. Note that the RRF applies a similar environmental tracking scheme (set in the RRF Regulation, Annex VI) as the EU's cohesion policy. RRF dataset version used: July 2024, prior to 2025 revisions. Source: European Commission.

Spain is the third largest beneficiary, in absolute terms, of the 2021–2027 EU Cohesion Policy. The support to the environment comes essentially from the ERDF, which in Spain is organised in a large national Programme (POPE) and 19 regional Programmes.

It is worth recalling that the implementation of the ERDF 2021–2027 is linked to the fulfilment of the enabling conditions, including the three environmental ones. Spain already met the nature enabling condition in 2022 when the Partnership Agreement and Programmes were adopted. In 2025, Spain has completely met the water enabling condition. However, further efforts are needed to comply with the waste enabling condition.

([158]) NB: Indirect investments (from climate and other policies) in support of the environment are accounted for via the tracking.

([159]) Research, development and innovation is accounted for under each environmental objective. The financing needs, baselines and gaps estimates are based on the Directorate-General for Environment's internal analysis (of 2024). Throughout this chapter, specific references are provided to the most important data sources used.

Spain also participates in various programmes of territorial cooperation (transnational and cross-border cooperation) under the ERDF in which the environmental investments carry considerable weight, and outstanding projects and good practices can be found ([160]).

Environmental integration has been ensured in the Partnership Agreement 2021–2027 and the different Programmes for the ERDF and the Just Transition Fund through the application of the Strategic Environmental Assessment (SEA) Directive and by other means.

The Spanish Network of Environmental Authorities, with the participation of the Commission services, plays an important role in fostering environmental integration into EU funding in Spain ([161]).

Spain, in addition to receiving EU funds earmarked specifically for it in 2021–2027, can also benefit from funding programmes that can be accessed at the EU level and which are open to all Member States. These include the financial instrument for the environment (LIFE) programme (EUR 5.4 billion) ([162]), Horizon Europe (EUR 95.5 billion) ([163]), the Connecting Europe Facility (EUR 33.7 billion) ([164]) and funds that can be mobilised through the InvestEU programme ([165]).

Under NextGenerationEU, Spain is the second largest beneficiary in absolute terms, after Italy, of the RRF. The RRP of Spain ([166]) has a total budget of around EUR 163 billion (EUR 80 billion in grants and EUR 83 billion in loans).

The revised RRP of Spain comprises 31 components along four main axes (green and digital transitions; social and territorial cohesion; and gender equality). It includes 109 investments and 102 reforms, articulated in 416 milestones and targets to be met during 2021–2026.

The RRP of Spain supports climate objectives with EUR 65 billion (39.9 % of total), with an additional EUR 11.66 billion (7.2 % of total) for the environment.

In the RRP of Spain, there are some components with a genuine and ambitious environmental dimension, covering a wide range of environmental sectors. Their initial budgets have been increased following the revision of the plan approved in October 2023, including the incorporation of the loans envelope. These are:

- Component 4 'Conservation and restoration of ecosystems and their biodiversity'.
- Component 5 'Preservation of the coastline and water resources'.
- Component 3 'Environmental and digital transformation of the agri-food and fisheries sectors'.
- Component 12 'Industrial policy', which has a relevant part on waste management and circular economy, and moreover the circular economy is mainstreamed throughout the RRP.

There are also other components relevant to the environment and with considerable budgets; for instance, components 1 and 6, on sustainable urban mobility and sustainable transport (important to reduce air pollution). This is also the case of the other green components, more focused on energy topics: 2 (building renovation), 7 (renewable energies), 8 (energy infrastructure), 9 (hydrogen), 10 (just transition strategy) and 31 (REPowerEU). Component 14 (tourism) is very focused on the green transition. Component 28 (taxation) has a relevant section on improving environmental taxation.

Regarding also Spain's RRP, it can be highlighted as a good practice the creation within the Ministry for the Ecological Transition and the Demographic Challenge (*Subsecretaría*) of a specific division on the implementation of the 'do no significant harm' (DNSH) principle ([167]) to advise and support the different actors during the implementation of

([160]) Like the RISC_PLUS Interreg project, under the POCTEP 2021-2027, which is based on prevention, preparedness and digitisation, aiming to strengthen resilience to the risks of floods and droughts derived from the impact of climate change in the International Basins of the Miño and Limia Rivers, in Spain and Portugal. It aims to extend and improve the RISC_ML initiative supported under the POCTEP 2014-2020. https://risc-plus.eu/en/

([161]) The Spanish Network of Environmental Authorities (https://www.miteco.gob.es/es/ministerio/servicios/red-de-autoridades-ambientales-raa.html), a technical forum created in 1997, which has had a successful track record, was highlighted as a point of excellence and good practice in the 2017 EIR (country report and general communication).

([162]) https://cinea.ec.europa.eu/programmes/life_en.

([163]) European Commission, Horizon Europe, , https://research-and-innovation.ec.europa.eu/funding/funding-opportunities/funding-programmes-and-open-calls/horizon-europe_en.

([164]) The Connecting Europe Facility for Transport (https://cinea.ec.europa.eu/programmes/connecting-europe-facility/transport-infrastructure_en) also includes EUR 11.3 billion transferred from the Cohesion Fund, of which 30 % will be made available, on a competitive basis, to all Member States eligible for the Cohesion Fund. The remaining 70 % will respect the national envelopes until 31 December 2023.

([165]) The InvestEU Fund (https://investeu.europa.eu/investeu-programme/investeu-fund_en) is set to mobilise over EUR 372 billion of investment through an EU budget guarantee of EUR 26.2 billion to back the investment of financial partners such as the EIB group and others.

([166]) European Commission, 'Spain's recovery and resilience plan', European Commission website, https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility/spains-recovery-and-resilience-plan_en.

([167]) https://www.miteco.gob.es/en/prensa/ultimas-noticias/2021/12/el_miteco_crea_unadivisionparaelseguimiento delaaplicaciondelanor.html.

the measures included in the RRP, including drawing up guidance ([168]) in this regard.

The EIB provided around EUR 7.1 billion in environment-related financial contributions to Spain in from 2021 to mid-2024, most of which, EUR 6.4 billion (91 %), was in the area of sustainable energy, transport and industrial projects, which provides significant co-benefits to reducing air pollution, environmental noise and other pollution.

The EU's total national expenditure on environmental protection (operating plus capital expenditure) was EUR 298 billion in 2020 and EUR 321 billion in 2021, representing around 2.2% of EU-27 GDP. In Spain, the total national environmental protection expenditure was EUR 19.4 billion in 2020 and EUR 21.7 billion in 2021, representing 1.7 % and 1.8 % of GDP, respectively.

Of the total environmental expenditure, the national capital expenditure (investment) on environmental protection amounted to EUR 54.5 billion in 2020 and EUR 59.9 billion in 2021 in the EU-27, representing around 0.4 % of the EU's GDP. In Spain, the national environmental protection investment reached EUR 2.6 billion in 2020, rising to EUR 3.3 billion in 2021, representing around 0.2–0.3 % of GDP.

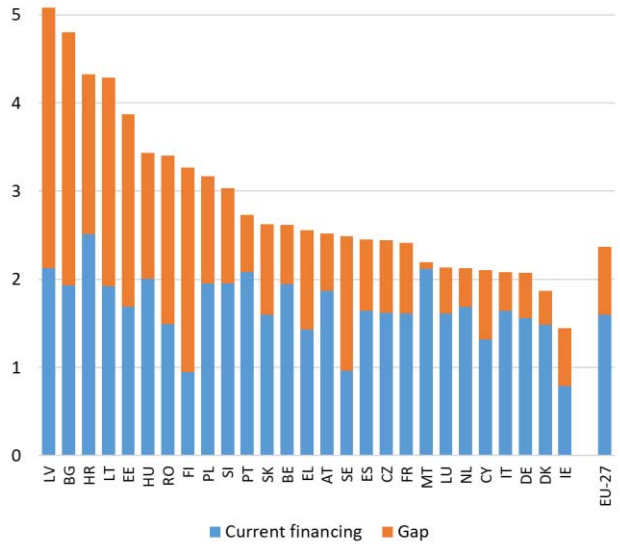
Split by institutional sector, 45 % of Spain's national environmental protection investment (capital expenditure) comes from the general government budget, with 26 % coming from specialist private-sector producers (of environmental protection services, such as waste and water companies) and 29 % from the general business sector, whose environmental activities are usually ancillary to its main activities. At the EU level, 38 % of environmental protection investment comes from governments, 40 % from specialist private-sector producers and 22 % from the general business sector ([169]).

Spain's total financing for environmental investment reaches an estimated EUR 21.8 billion per year (in 2022 prices), including EU funding and national public and national private expenditure. Of the total, the share of EU funds (including EIB funds) reaches 43.5 %, with around 57 % national financing. The total public financing (EU plus national public) represents 69 % of the total.

The gap

To meet its four environmental objectives beyond climate change, the additional investment need over the current levels (i.e. the gap) reaches an estimated EUR 10.7 billion per year in Spain, representing around 0.81 % of the national GDP, close to the EU average (0.77 %).

Figure 35: Environmental financing, needs and gaps per Member State (% of GDP)



Source: Analysis of Directorate-General for Environment.

The following table provides the distributions of Spain's environmental investment gap (expressed in various forms) by environmental objective.

Table 2: Summary of environmental investment gaps in Spain, per year, 2021–2027

Environmental objective	Investment gap, per year		
	Million EUR (2022 prices)	% of total	% of GDP
Pollution prevention and control	1 707	15.9	0.13
Circular economy and waste	2 256	21.1	0.17
Water management and water industries	1 783	16.7	0.13
Biodiversity and ecosystems	4 964	46.4	0.37
Total	**10 711**	**100.0**	**0.81**

Source: Directorate-General for Environment analysis.

([168]) https://www.prtr.miteco.gob.es/es/obligaciones-medioambientales/guias-y-normativa-relacionada.html.

([169]) Eurostat, 'Environmental protection expenditure accounts', env_ac_epea.

Pollution prevention and control

Investment needs

In pollution prevention and control, Spain's investment needs are estimated to reach EUR 8 billion per year (including baseline investments) in 2021–2027. Most of this, EUR 7 billion, relates to air pollution control, to comply with the clean air requirements for the five main air pollutants under the NECD by 2030. The estimated needs to reduce environmental noise reach EUR 2 billion per year, most of which is delivered by the (same) sustainable energy and transport investments that also benefit clean air ([170]). Industrial site remediation requires an estimated EUR 243 million per year. Microplastics pollution and the chemicals strategy require around EUR 100–200 million per year (each) ([171]).

Current investments

The current investment levels supporting pollution prevention and control reach an estimated EUR 6.3 billion per year in Spain in 2021–2027. Most of the financing concerns clean air (EUR 5.9 billion per year). Protection from environmental noise receives around EUR 1.6 billion per year, with a further EUR 63 million for site remediation.

In Spain, the EU MFF provides an estimated 8.3 % of the clean air financing (mostly via cohesion policy), with a further 64 % from the RRF, adding up to 72.4 % of the total. EIB financing contributes 13.7 % and national sources reach 13.9 % ([172]).

The gap

To meet its environmental objectives concerning pollution prevention and control (towards zero pollution), Spain needs to provide an additional EUR 1.7 billion per year (0.13 % of GDP), mostly related to clean air and noise. The adequate implementation of the NECP with the investments included for sustainable energy and transport would largely deliver this, while in many Member States additional measures and investments may be required to comply with the ammonia reduction requirements.

According to the latest (2023) NAPCP review report ([173]), Spain complied with ammonia reduction requirements in 2020 and 2021, and it is not at risk of non-compliance with ammonia concerning the NECD's 2030 emission reduction commitments, based on the policies and measures in its NAPCP that take into account climate, energy and CAP plans and financing baselines.

Circular economy and waste

Investment needs

Spain's investment needs in circular economy and waste reach EUR 10.8 billion per year (including baseline investments). Most of this, around EUR 8.8 billion per year, relates to circular economy measures in the mobility, food and built environment systems, with a further EUR 2 billion necessary for waste management (municipal and packaging waste), covering waste collection, biowaste treatment, recycling reprocessors, waste-sorting facilities and digitalisation of the waste registry. The amount for waste excludes the investments needed for the uptake of circularity and waste prevention across the economy ([174]).

Current investments

Circular economy investments across the economy reach around EUR 6.8 billion per year in Spain in 2021-2027, with a further EUR 1.8 million provided for waste management that does not constitute circular economy.

Around 0.6 % of this combined financing for circularity and waste comes from the EU MFF, with a further 8.9 % from the RRF, adding up to 9.5 % of the total. EIB loans identified in support of circularity and waste represent 0.4 % of the total. National sources provide the

([170]) 2021 Phenomena project assessment (https://op.europa.eu/en/publication-detail/-/publication/f4cd7465-a95d-11eb-9585-01aa75ed71a1) and the Commission's 2023 Environmental Noise Directive implementation report (https://environment.ec.europa.eu/system/files/2023-03/COM_2023_139_1_EN_ACT_part1_v3.pdf).

([171]) European Commission, *Third Clean Air Outlook*, Brussels, 2022, https://environment.ec.europa.eu/topics/air/clean-air-outlook_en. See also the impact assessment for the revision of the AAQD, available from the Commission web page on the proposed revision (https://environment.ec.europa.eu/publications/revision-eu-ambient-air-quality-legislation_en).

([172]) Through the tracking of EU funds, EIB projects and national expenditure (EPEA accounts, Eurostat). Note that the bulk of clean air financing is provided as a contribution from climate (energy and transport) measures, as per the tracking schemes in the Common Provisions Regulation Annex I and the RRF Regulation Annex VI. Further information on clean air tracking: https://commission.europa.eu/document/download/0a80484e-2409-4749-94c6-3b23bc6bae8f_en?filename=Clean%20air%20methodology_0.pdf

([173]) European Commission, 'National air pollution control programmes and projections', European Commission website, https://environment.ec.europa.eu/topics/air/reducing-emissions-air-pollutants/national-air-pollution-control-programmes-and-projections_en.

([174]) See Systemiq and Ellen MacArthur Foundation, *Achieving 'Growth Within'*, 2017; and European Commission: Directorate-General for Environment, *Study on investment needs in the waste sector and on the financing of municipal waste management in Member States*, Publications Office of the European Union, Luxembourg, 2019, https://op.europa.eu/en/publication-detail/-/publication/4d5f8355-bcad-11e9-9d01-01aa75ed71a1.

predominant share, reaching 90.1 % of the total financing ([175]).

The gap

To meet its environmental objectives concerning the circular economy and waste, Spain needs to increase circular economy investments by an estimated EUR 2 billion per year, with an additional EUR 278 million concerning waste management action, not belonging to circular economy. Combined, this amounts to EUR 2.3 billion per year, representing 0.17 % of Spain's GDP.

Of the circular economy gap, EUR 518 million relates to recent initiatives, such as the eco-design for sustainable products, packaging and packaging waste, labelling and digital tools, CRM recycling and measures proposed under the amendment of the Waste Framework Directive, and EUR 1.5 billion constitutes further investment need to unlock Spain's circular economy potential.

Water protection and management

Investment needs

The annual water investment needs reach an estimated EUR 5.6 billion (in 2022 prices) in Spain. This comprises investment needs both for the water industry and for the protection and management of water. Of this annual need, EUR 2 billion relates to the management of wastewater (also including additional costs associated with the revised UWWTD), a further EUR 2.7 billion is necessary for drinking-water-related investments and around EUR 842 million for the protection and management of water ([176]).

Current investments

Water investments in Spain are estimated to be around EUR 3.8 billion per year (in 2022 prices) in 2021–2027. Of this, EUR 751 million supports wastewater management, EUR 2.3 billion drinking water and around EUR 800 million the other aspects of the WFD (water management and protection).

Of the total financing, 6.7 % is provided by the EU MFF (mostly through cohesion policy), with a further 32.4 % from the RRF, reaching 39.1 % combined. EIB financing is around 1.5 % of the total, while the bulk of financing comes from national sources (around 60 %) ([177]).

The gap

To meet the various environmental targets under the WFD and the floods directive, Spain's water investment gap reaches EUR 1.8 billion per year (0.14 % of GDP), with most of it related to wastewater (EUR 1.3 billion per year). Drinking water measures require an additional EUR 438 million per year and the other aspects of the WFD around EUR 39 million per year over the existing levels of financing.

Biodiversity and ecosystems

Investment needs

The investment needs for biodiversity and ecosystems are estimated to be EUR 8.1 billion per year (in 2022 prices) in Spain in 2021–2027. This includes the following financing needs:

- Spain's Prioritised Action Framework (PAF) ([178]), concerning the Natura 2000 areas: EUR 1.4 billion per year, mostly running costs.
- Additional Biodiversity Strategy to 2030 costs ([179]): EUR 4.6 billion per year on top of the PAF.
- Sustainable soil management costs: EUR 2.1 billion per year ([180]).

Current investments

The current level of biodiversity financing is estimated to be EUR 3.1 billion per year (in 2022 prices) in 2021–2027. 75.8 % of this is considered direct financing to biodiversity and ecosystems, with a 100 % coefficient in the tracking schemes.

([175]) Waste management and circular economy expenditure tracking in the EU funds, EIB projects and in the national expenditure (Eurostat). Datasets: EPEA accounts (env_epi) and circular economy private investments (cei_cie012).

([176]) European Commission, 'Estimating investment needs and financing capacities for water-related investment in EU Member States', 28 May 2020, https://commission.europa.eu/news/estimating-investment-needs-and-financing-capacities-water-related-investment-eu-member-states-2020-05-28_en; and OECD, *Financing Water Supply, Sanitation and flood Protection: Challenges in EU Member States and policy options*, OECD Publishing, Paris, 2020, https://www.oecd-ilibrary.org/environment/financing-water-supply-sanitation-and-flood-protection_6893cdac-en.

([177]) Water investment levels are estimated through tracking EU funds, EIB projects and national expenditure (EPEA accounts, Eurostat).

([178]) European Commission, 'Financing Natura 2000 – Prioritised action frameworks', European Commission website, https://environment.ec.europa.eu/topics/nature-and-biodiversity/natura-2000/financing-natura-2000_en.

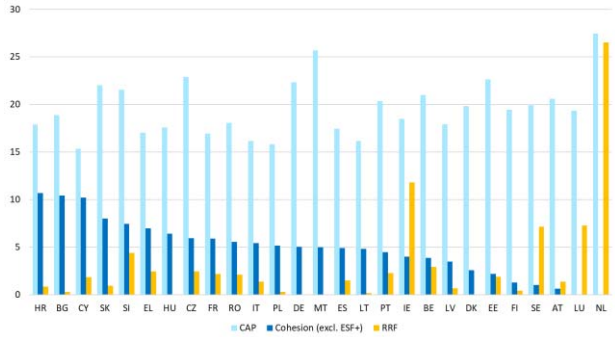
([179]) European Commission: Directorate-General for Environment, *Biodiversity Financing and Tracking – Final report*, Publications Office of the European Union, Luxembourg, 2022, https://op.europa.eu/en/publication-detail/-/publication/793eb6ec-dbd6-11ec-a534-01aa75ed71a1/language-en.

([180]) Proposal for a directive of the European Parliament and of the Council on soil monitoring and resilience (Soil Monitoring Law) COM(2023) 416 final of 5 July 2023, https://environment.ec.europa.eu/publications/proposal-directive-soil-monitoring-and-resilience_en.

4.1 % of the total financing is estimated to come from EU cohesion policy, 31 % from CAP, 5.5 % from Horizon Europe and around 2.1 % from LIFE. The EU MFF altogether accounts for 45 % of the financing and the RRF for 8.7 %, adding up to a total of 54 % from the EU budget. The rest, 46 %, comes from national sources ([181]).

Spain has programmed 17.5 % of its CAP budget, 4.9 % of its cohesion policy EU contribution amount (disregarding ESF+) and 1.5 % of RRF funding for investments in biodiversity. This is just below the EU average for all three funds (see Figure 36).

Figure 36: 2021–2027 contributions to biodiversity from the main EU instruments per Member State (% of policy total)



NB: ESF+, European Social Fund Plus.

The gap

To meet the environmental objectives concerning the protection and restoration of biodiversity and ecosystems and other relevant cross-cutting measures, Spain's investment gap is estimated to be around EUR 5 billion per year, corresponding to 0.37 % of its GDP.

Public financial management

Green budgeting practices

Green budgeting refers to the use of budgetary tools to achieve climate and environmental goals. Some Member States, including Spain, already use green budgeting tools for identifying and tracking green expenditures and/or revenues ([182]). Green budgeting practices ([183]) provide increased transparency on the environmental implications of budgetary policies.

The Commission has developed a non-mandatory green budgeting reference framework that brings together methodologies for assessing the impacts of budgets on climate and environmental goals ([184]).

To help Member States develop national green budgeting and thereby improve policy coherence and support the green transition, the Commission facilitated a technical support instrument (TSI) project on green budgeting in 2021 ([185]). Spain participated, introducing a green budgeting methodology and integrating it into the budgetary process in a structured way.

Spain has also been selected for the next round of TSI projects on green budgeting, starting in 2025, where the country will expand peer-to-peer learning through civil servants' exchanges.

In Spain, the mandate for a green budget came from Law 7/2021 on climate change and energy transition, which includes emission reduction targets for 2030 and 2050, providing predictability to guide Spanish investment decisions. In Component 29 'Improving the efficiency of public spending', Spain's RRP includes reform C29.R3 'Alignment of the general state budget with the ecological transition (green budgeting)'. The first report on Spanish budget alignment with the ecological transition was published in 2022 accompanying the proposal of the 2023 general State Budget ([186]).

More generally regarding performance-based budgeting, at the local level, Barcelona City Council has been developing methodologies jointly with other European cities to align local budgeting processes with sustainable development goals (SDGs) as part of a 2024 TSI project (see chapter 6). The regional dimension of the EU Green Deal has also been emphasised by the Committee of the Regions by means of the Green Deal Going Local initiative ([187]).

([181]) Based on biodiversity tracking in the EU budget (https://circabc.europa.eu/ui/group/3f466d71-92a7-49eb-9c63-6cb0fadf29dc/library/8e44293a-d97f-496d-8769-50365780acde), and national expenditure on biodiversity from the Classification of the Functions of Government accounts.

([182]) European Commission, *Green Budgeting in the EU. Key Insights from the 2023 European Commission Survey of Green Budgeting Practices*, 2023, https://economy-finance.ec.europa.eu/economic-and-fiscal-governance/national-fiscal-frameworks-eu-member-states/green-budgeting-eu_en#:~:text=European%20Commission%20Green%20Budgeting%20Survey%C2%A0.

([183]) https://economy-finance.ec.europa.eu/economic-and-fiscal-governance/national-fiscal-frameworks-eu-member-states/green-budgeting-eu_en.

([184]) European Commission, 'European Union green budgeting reference framework', 2022, https://economy-finance.ec.europa.eu/economic-and-fiscal-governance/green-budgeting-eu_en.

([185]) https://reform-support.ec.europa.eu/what-we-do/revenue-administration-and-public-financial-management/supporting-implementation-green-budgeting-practices-eu_en.

([186]) https://www.sepg.pap.hacienda.gob.es/sitios/sepg/es-ES/Presupuestos/InformesImpacto/IAPGETE2023/Paginas/IATE2023.aspx.

([187]) Committee of the Regions, https://cor.europa.eu/en/our-work/political-priorities/green-deal-going-local.

Beyond green budgeting, to improve policy outcomes, the Commission has also drawn up climate-proofing and sustainability-proofing guidance ([188]) as tools to assess project eligibility and compliance with environmental legislation and criteria.

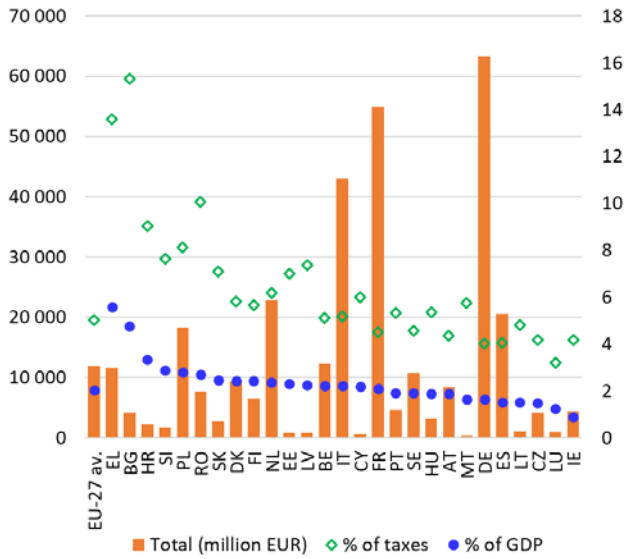
Green taxation and tax reform

Total environmental taxes amounted to EUR 20.5 billion in Spain in 2022, representing 1.5 % of its GDP (EU average: 2.0 %). Energy taxes formed the largest component of environmental taxes, accounting for 1.23 % of GDP, which is lower than the EU average of 1.6 %. Transport taxes, at 0.22 % of GDP, were under the EU average (0.4 %), while taxes on pollution and resources, at 0.07 %, were close to the EU middle value (EU average 0.08 %). In 2022, environmental taxes in Spain accounted for 4.1 % of total revenues from taxes and social security contributions (under the EU average of 5.0 %) ([189]).

Therefore, environmental taxes in Spain are below the EU average. It is worth recalling that 'Increasing environmental taxation, as well as reducing environmentally harmful subsidies' was identified as one of the three main environmental challenges facing Spain in the previous EIRs (assessments in more depth can be found in those reports). This issue has also been repeatedly stressed in European Semester country reports. Shifting taxation away from labour towards taxes that are less harmful to growth was even included several years in the country-specific recommendations (CSRs) to Spain.

In recent times, some progress can finally be observed on environmental taxation. Thus, as part of the reforms included under the RRP, new taxes have been introduced on single-use plastics and waste management (landfill, incineration and co-incineration), and the tax on fluorinated gases has been reformed. The RRP also provides for adopting further measures in the field of green taxation, if agreed in the context of the wider tax reform. In this respect, a Committee of Experts was created in the context of the RRP to study the reform of the Spanish tax system, including the improvement of environmental taxation ([190]).

Figure 37: Environmental taxes per Member State, 2022



The EU Green Deal emphasises the role of well-designed tax reforms (e.g. shifts from taxing labour to taxing pollution) to boost economic growth and resilience, and to foster a fairer society and a just transition through the right price signals. The Green Deal promotes the 'polluter-pays principle', which makes polluters bear the costs to prevent, control and remedy pollution.

According to a 2024 study ([191]), Spain applies environmental taxes to discourage environmentally harmful behaviour in the fields of pollutant emissions to air, water and soil, levies on plastics, a hunting and fishing tax and volumetric charges on water abstraction and disposal.

Green bonds and sustainable bonds

In 2023, the total value of green bonds issued by Member States was USD 245 billion (EUR 227 billion), up from USD 234 billion (EUR 198 billion) in 2021.

During 2021–2023 combined, Spain issued green bonds worth USD 57.6 billion (EUR 48.7 billion). Of this, the issuance in 2023 amounted to USD 21.8 billion (EUR 20.1 billion) ([192]). Since the inaugural issuance in September 2021, the Spanish Treasury has tapped the green bond five times. The Spanish government decided

([188]) Commission, notice – Technical guidance on the climate proofing of infrastructure in the period 2021–2027 (OJ C 373, 16.09.2021, p. 1), https://op.europa.eu/en/publication-detail/-/publication/23a24b21-16d0-11ec-b4fe-01aa75ed71a1/language-en.

([189]) Eurostat, 'Environmental taxes accounts', env_eta.

([190]) The report or White Paper on the reform of the Spanish tax system was issued by the Committee of Experts in March 2022. This committee was highlighted as a good practice in the 2022 EIR.

([191]) European Commission: Directorate-General for Environment, *Candidates for Taxing Environmental Bads at National Level*, Publications Office of the European Union, Luxembourg, 2024, Annex 2, https://op.europa.eu/en/publication-detail/-/publication/35c1bbdf-2931-11ef-9290-01aa75ed71a1/language-en.

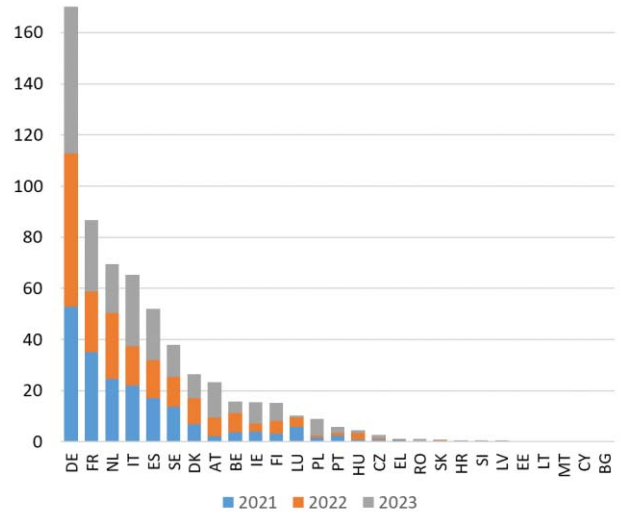
([192]) Climate bonds initiative (https://www.climatebonds.net/). NB. Additionally (and not included in this), national sources indicated EUR 544.8 million issuance for Croatia, in 2022-2023, and a slightly higher amount for Slovenia (+0.27 billion) during 2021-2023 in total.

to establish an interministerial working group to coordinate the structuring and monitoring of Spain's sovereign green bond programme. Regions have also issued their own green bonds, for instance Andalusia.

During 2014–2023, 83 % of the green bonds issued by EU countries (excluding supranational entities) served objectives in energy, buildings or transport, while 5 % supported objectives in water, 5.1 % related to land use (with links to nature and ecosystems) and 3.8 % applied to waste management. By 2023, the combined share of energy, buildings and transport had decreased to 73 %, the shares of waste management and land use had increased (to 5.9 % and 8.4 %, respectively) and the share of water had remained around 5 %.

In 2021–2023, 31.7 % of the EU green bonds (excluding supranational issuances) was issued by financial corporates, 29.1 % by sovereign governments and 23.1 % by non-financial corporates. 8.3 % of the issuances was linked to government-backed entities, 6.4 % to developments banks and 1.4 % to local governments.

Figure 38: Value of green bonds issued per Member State (billion EUR), 2021, 2022 and 2023



Data source: Climatebonds.net, with some additional data from national sources (e.g. Croatia, Slovenia).

Environmentally harmful subsidies

Addressing and phasing out environmentally harmful subsidies (EHSs), in particular fossil fuel subsidies (FFS), is a further step towards achieving the 8th Environment Action Programme objectives and the enabling conditions ([193]). FFS are costly for public budgets and make it difficult to achieve European Green Deal objectives.

The overall downward trend of FFS mentioned in past EIRs was disrupted from 2022 due to the EU response to the 2021 energy crisis and subsequent increase in energy prices.

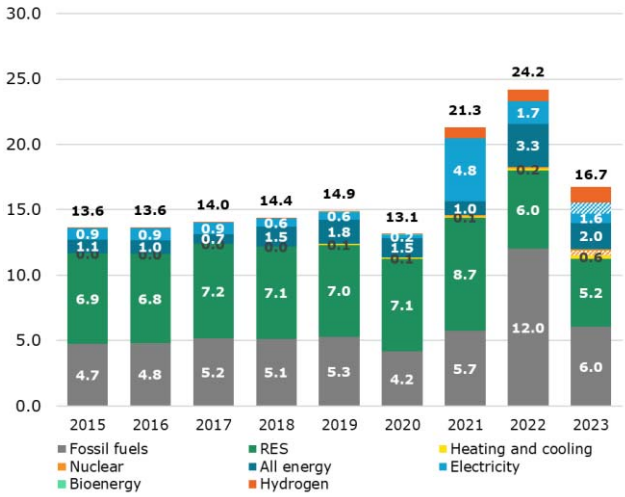
As a direct consequence, annual FFS in the EU increased to EUR 109 billion in 2023 from EUR 57 billion in 2020. From 2021 to 2023, there was a marked increase in annual FFS of 72 % in the EU ([194]).

For the majority of the Member States (16) 2022 saw a peak in the amount of overall FFS. A decline was then observed in 2023 ([195]). In particular, FFS for coal and lignite, natural gas and oil increased in 2022, and a strong increase was observed for natural gas subsidies.

In Spain, the energy subsidies were broadly stable between 2015 and 2020, with annual FFS ranging between EUR 4.7 billion and EUR 5.3 billion. After a slight decrease in 2020, energy subsidies increased significantly in 2021 and 2022 but began to fall in 2023. FFS reached EUR 5.7 billion in 2021 and EUR 6 billion in 2023 (apart from a temporary spike of EUR 12 billion in 2022).

As a share of GDP, FFS in 2022 ranged from 1.8 % in Croatia to less than 0.1 % in Denmark and Sweden. Spain's value reached 0.9 %, slightly above the EU average (0.8 %) ([196]).

Figure 39: Energy subsidies by energy carrier (billion EUR), 2015–2023



NB: RES, renewable energy source.

Source: analysis of Directorate-General Energy

([193]) Article 3(h) of the 8th Environmental Action Plan.

([194]) European Commission, 2024 Report on Energy Subsidies in the European Union, COM(2025), https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2025)17&lang=en

([195]) 16 Member States: BE, EE, IE, EL, ES, FR, HR, IT, CY, LT, HU, NL, AT, PT, RO and SE.

([196]) European Commission, 2024 Report on Energy Subsidies in the European Union, COM(2025), https://ec.europa.eu/transparency/documents-register/detail?ref=COM(2025)17&lang=en

The EIR 2022 included in its Chapter 5 a priority action to adopt and implement the envisaged measures on environmental taxation and explore further ones in the context of the upcoming tax reform, including the reduction of environmentally harmful subsidies.

Spain has an overall environmental investment gap of around 0.81 % of GDP (close to the EU-average), signalling that one-third of the overall financing needs are unmet.

Spain should take advantage of the available EU funding to improve environmental compliance and to develop the potential of the green economy for competitiveness and job creation.

2025 priority action

In light of the existing investment gaps, the following priority action is identified for Spain.

- Use more national funding (for instance, by increasing taxes in favour of the environment and reducing environmentally harmful subsidies), EU funding and private funding to help close the investment gap.

6. Environmental governance

Information, public participation and access to justice

Citizens can more effectively protect the environment if they rely on the three 'pillars' of the Aarhus Convention: (i) access to information, (ii) public participation in decision-making and (iii) access to justice in environmental matters. It is of crucial importance to public authorities, the public and businesses that environmental information is shared efficiently and effectively ([197]). Public participation allows authorities to make decisions that take public concerns into account. Access to justice is a set of guarantees that allows citizens and NGOs to use national courts to protect the environment, safeguard the rights of citizens and ensure accountability of authorities ([198]). It includes the right to bring legal challenges ('legal standing') ([199]) .

Environmental information

This section focuses on the implementation of the Infrastructure for Spatial Information in the European Community (INSPIRE) Directive. The INSPIRE Directive aims to set up a European spatial-data infrastructure for sharing environmental spatial information between public authorities across Europe. It is expected that this will help policymaking across boundaries and facilitate public access to this information. Geographic information is needed for good governance at all levels and should be readily and transparently available.

Spain's performance in implementing the INSPIRE Directive is substantial and has been reviewed based on the country's 2023 country fiche ([200]) (see Table 3).

Table 3: Spain dashboard on the implementation of the INSPIRE Directive, 2016–2023

	2016	2023
Effective coordination and data sharing		
Ensure effective coordination	■	■
Data sharing without obstacle	■	■
INSPIRE performance indicators		
(i) Conformity of metadata	■	■
(ii) Conformity of spatial datasets	■	■
(iii) Accessibility of spatial datasets through view and download services	■	■
(iv) Conformity of network services	■	■

Legend

- ■ Implementation of this provision is well advanced or (nearly) completed. Outstanding issues are minor and can be addressed easily. Percentage > 89 %
- ■ Implementation of this provision has started and made some or substantial progress but is still not close to being completed Percentage = 31–89 %
- ■ Implementation of this provision is falling significantly behind. Serious efforts are necessary to close implementation gap. Percentage < 31 %

Source: European Commission, 'Spain', Inspire Knowledge Base, https://knowledge-base.inspire.ec.europa.eu/spain_en.

Public participation

Public involvement at both the planning and the project phase maximises transparency and social acceptance of programmes and projects. Consultation with the public (including NGOs) and environmental, local and regional authorities is a key feature of an effective impact

([197]) The Aarhus Convention (https://unece.org/environment-policy/public-participation/aarhus-convention/text), the Access to Environmental Information Directive (Directive 2003/4/EC) (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32003L0004) and the Inspire Directive (Directive 2007/2/EC) (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32007L0002) together create a legal foundation for the sharing of environmental information between public authorities and with the public.

([198]) These guarantees are explained in the European Commission's 2017 notice on access to justice in environmental matters (https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52017XC0818(02)) and a related 2018 citizen's guide (https://op.europa.eu/en/publication-detail/-/publication/2b362f0a-bfe4-11e8-99ee-01aa75ed71a1/language-en/format-PDF).

([199]) This EIR focuses on the means used by Member States to guarantee rights of access to justice and legal standing and to overcome other major barriers to bringing cases on environmental protection.

([200]) European Commission, 'Spain', Inspire Knowledge Base, https://knowledge-base.inspire.ec.europa.eu/spain_en.

assessment procedure. Such consultation also provides an opportunity for public authorities and project promoters to engage with the public actively and meaningfully by making information on the likely significant effects widely available. If carried out with due diligence and taking into consideration useful public input, this process leads to better-informed decision-making and can promote public acceptance. Making information available increases stakeholder involvement, thus lessening resistance and preventing (or minimising) litigation. On the other hand, it is paramount that the procedure is effective.

This section examines how public involvement and transparency are ensured under two instruments, namely the Environmental Impact Assessment (EIA) Directive ([201]) and the Strategic Environmental Assessment (SEA) Directive ([202]).

EU law provides for a flexible framework concerning environmental impact assessments. The aim of this framework is to ensure the application of the necessary environmental safeguards, while enabling speedy approval of projects. The Commission has contributed to simplifying and accelerating permitting for renewable energy projects and continues to support the Member States in this regard ([203]). Spain has already taken steps aiming to accelerate permit-issuing procedures taking advantages of the broad flexibilities offered by the EU legal framework, such as the establishment of one-stop shops and accelerated short deadlines for issuing permits for renewable energy projects.

The average speed in the EU for issuing permits involving an EIA procedure is 20.6 months, with a minimum duration of 11.4 months and a maximum duration of 75.7 months ([204]). The duration of each step in an EIA process (screening, scoping, EIA report, public consultation, reasoned conclusion, development consent) varies considerably between Member States and projects. Complete data for Spain are not available. A priority action is included for 2025 to provide more detailed information on the different stages of the EIA process. Effective use of EU procedures can positively influence the timely approval of activities underpinning the decarbonisation of the economy on the way to net zero by 2050.

A new report is not yet available on the application and effectiveness of the SEA Directive in the EU. Nevertheless, a support study has been published with information by Member State ([205]).

In Spain, public participation in environmental matters is ensured by Law 27/2006 ([206]), which is the national legislation incorporating the three pillars of the Aarhus Convention into the Spanish legal system.

Moreover, there are various tools to foster public participation. The Ministry for the Ecological Transition and the Demographic Challenge (MITECO) published in 2021 an online guide on public information and consultation procedures in environmental impact assessments ([207]). This guide provides useful information on the procedure for public participation, on each of the different steps to participate in national and cross-border consultations and on the outcomes that can be expected from them.

The Ministry has also developed SABIA, a portal that aims to improve the management of environmental assessments and public participation by pulling together in one place links to all SEA and EIA procedures. It provides a tool to check the status of plans, programmes and projects undergoing environmental assessment dealt with by the national administration ([208]). Many Autonomous Communities have also developed similar tools, but not all of them with the same degree of information.

([201]) Directive 2014/52/EC of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment (OJ L 124, 25.4.2014, p. 1), https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32014L0052.

([202]) Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (OJ L 197, 21.7.2001, p. 30), https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32001L0042.

([203]) Commission Staff Working Document (SWD/2022/0149 final), 18 May 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52022SC0149&qid=1653034229953)

([204]) European Commission: Directorate-General for Environment, *Collection of information and data on the implementation of the revised Environmental Impact Assessment (EIA) Directive (2011/92/EU) as amended by 2014/52/EU)*, Publications Office of the European Union, Luxembourg, 2024, https://op.europa.eu/en/publication-detail/-/publication/8349a857-2936-11ef-9290-01aa75ed71a1/.

([205]) European Commission: Directorate-General for Environment, Lundberg, P., McNeill, A., McGuinn, J., Cantarelli, A. et al., *Study supporting the preparation of the report on the application and effectiveness of the SEA Directive (Directive 2001/42/EC) – Final study*, Publications Office of the European Union, 2025, https://data.europa.eu/doi/10.2779/1615072

([206]) Law 27/2006, of 18 July, regulating the rights of access to information, public participation and access to justice in environmental matters (transposing Directives 2003/4/EC and 2003/35/EC), https://www.boe.es/buscar/act.php?id=BOE-A-2006-13010#:~:text=Ley%2027%2F2006%2C%20de%2018%20de%20julio%2C%20por%20la,medio%20ambiente%20%28incorpora%20las%20Directivas%202003%2F4%2FCE%20y%202003%2F35%2FCE%29..

([207]) MITECO, 'Guía para la realización de trámites de información pública y consultas en las evaluaciones de impacto ambiental', https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/guiaipenero21formatoarticulo25012021_tcm30-522384.pdf.

([208]) The SABIA portal was already highlighted as a point of excellence in the first 2017 EIR. https://www.miteco.gob.es/es/calidad-y-evaluacion-ambiental/temas/evaluacion-ambiental/.

However, overall, information published on public information on environmental matters is not disaggregated and it is not possible to determine which requests for information refer to impact assessments. There is a lack of available statistical data on public participation regarding the EIA and SEA Directives. Thus, it is not possible to determine whether public participation is increasing or decreasing.

Furthermore, public participation in decision-making is also ensured through the functioning of the Environment Advisory Council' (CAMA) on which civil society groups such as the G5 (the Group of the five biggest environmental NGOs) and the Spanish Green Growth Group are represented.

Access to justice

Access to justice, guaranteed by Article 19(1) of the Treaty on European Union and Article 47 of the EU Charter of Fundamental Rights, is a fundamental right and part of the democratic process. It is vital to ensure the full application of EU law in all Member States and the legal protection of the rights of individuals, including in environmental matters. Access to justice is essential to enable judicial review of the decisions of public authorities and to allow the correction of any wrongdoing committed by these authorities.

This section provides a snapshot of the state of play of access to courts by the public, particularly when it comes to challenging plans, or the non-adoption of plans, under EU law, in the areas of water, waste, air quality and noise, irrespective of the form of the legal act (i.e. regulatory act or administrative decision).

As mentioned in the 2022 EIR, the Spanish legal system grants the public (individuals and recognised NGOs) the possibility of bringing environmental cases to the courts.

Associations and groups that may be affected by the challenged administrative act or regulation or are legally entitled to defend collective rights and legitimate interests have legal standing.

Depending on the case, judges or courts can review the procedural and substantive legality of plans, and also acts of a regulatory nature, based on the request lodged by the plaintiff or the defendant in a lawsuit.

However, in case of omissions and inactivity by the public administration, the public seems to have difficulties in obtaining legal standing to challenge the situation. Moreover, bringing administrative cases to the courts seems to be expensive sometimes and the expected cost may prevent the public from taking legal action ([209]). Furthermore, the long duration of the cases though the different judicial instances sometimes poses an obstacle to obtaining an effective solution for the environment if interim measures are not decided.

The 2022 EIR included priority actions to (i) better inform the public about their right to access to justice in environmental matters and (ii) ensure that the outcomes of judicial cases on environmental matters are effective in practice. The assessment of these actions is deferred to a future EIR. A new priority action on data on the duration of the EIA procedures is added.

2025 priority actions

- Ensure that relevant information on EIA and SEA procedures (including on public participation opportunities and on publication of final decisions) is electronically accessible in a timely manner, through at least a central portal or easily accessible points of access, at the appropriate administrative level.
- Provide information on the average duration of all steps in the EIA process.
- Improve access to courts in national environmental cases by the public concerned and eliminate practical barriers, such as length of proceedings and excessive costs.

Compliance assurance

Environmental compliance assurance covers all work undertaken by public authorities to ensure that industries, farmers and others fulfil their obligations to protect water, air, and nature, to manage waste ([210]) and to remedy any environmental damage. It includes measures such as (i) compliance promotion, (ii) compliance monitoring (i.e. inspections and other checks), (iii) enforcement, that is, steps taken to stop breaches and impose sanctions, and (iv) ensuring damage prevention and remediation in line with the polluter-pays principle.

Compliance promotion, monitoring and enforcement

Non-compliance with environmental obligations may occur for different reasons, including poor understanding or lack of acceptance of the rules, opportunism or even

([209]) The situation is likely to improve as a result of the national implementation plan adopted by Spain in 2022 regarding free legal aid for environmental NGOs in line with the Supreme Court case-law and Aarhus Convention decision VII/8p.

([210]) The concept is explained in detail in the European Commission's 2018 communication on EU actions to improve environmental compliance and governance (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52018DC0010) and the related Commission staff working document (https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52018SC0010).

criminality. Compliance promotion activities help duty-holders to comply by providing information, guidance and other support. This is particularly important in areas where new and complex legislation is put in place.

When inspections and other control activities identify problems, a range of responses may be appropriate, including the use of administrative and criminal enforcement tools.

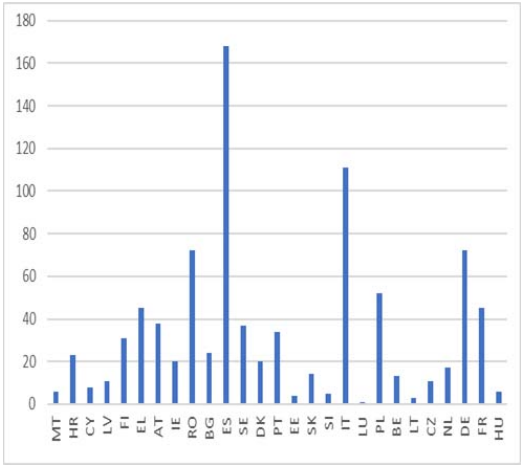
Since the 2022 EIR, Spain has made further efforts in the field of environmental compliance assurance through the specialised police unit *Servicio de Protección de la Naturaleza* (SEPRONA – Guardia Civil) to combat environmental crime and a specialised Environmental Prosecution Authority (*Fiscalía de Medio Ambiente*). Both have been successful in investigating and prosecuting organised environmental crime and were highlighted as good practices in the 2019 EIR.

The specialist environmental police force (SEPRONA) also gathers information on the number of environmental crimes investigated. That information is available in the annual statistics reports published by the Ministry of the Interior ([211]).

The specialised Environmental Prosecution Authority publishes information on its activities in general and specifically on the number of prosecutions it promotes. That information is available in the General Prosecutor's annual report ([212]).

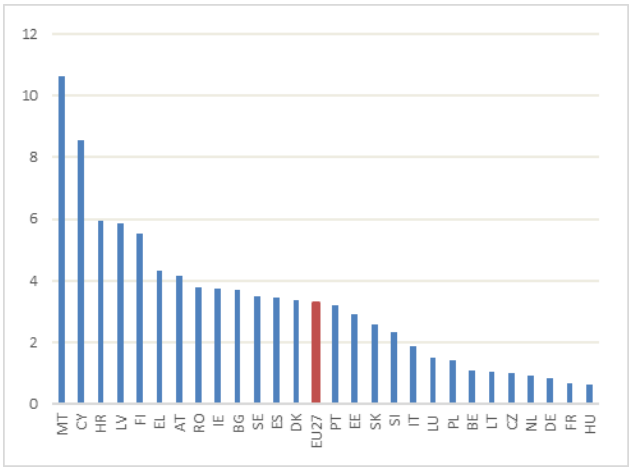
Since the last 2022 EIR (between 15 May 2022 and 31 December 2024), the Commission has received 168 complaints relating to the environment in Spain, making it the Member State with the highest number of complaints for this period, although in terms of complaints per million inhabitants the amount is 3.45, just above the EU average of 3.2 (figures 40 and 41). The cases concern alleged breaches of EU law in all the environmental sectors. Around one third relate to the Nature Directives, while another significant proportion concerns EIA and water cases.

Figure 40: EU complaints 15 May 2022-31 December 2024



Source: DG Environment complaints data.

Figure 41: EU complaints per million inhabitants, 15 May 2022-31 December 2024



Source: Eurostat, 'Population' tps00001, accessed 22 January 2025, https://ec.europa.eu/eurostat/databrowser/view/tps00001/default/table?lang=en, and DG Environment complaints data.

The 2022 EIR recommended that Spain (i) increase online information on the Nitrates Directive and develop promotion tools to help farmers comply with it; (ii) better inform the public and farmers about compliance with the Nature Directive; (iii) publish information on the outcome of enforcement actions and on the follow-up to detected breaches on nitrates and nature; (iv) further improve cooperation among the public authorities responsible for combating environmental crime; and (v) raise awareness among citizens about tools to alert the authorities to cases of environmental damage, or breaches of environmental law. Concerning compliance promotion, monitoring, and criminal and administrative enforcement, the 2022

([211]) See the 2023 annual report 'Anuario Estadístico del Ministerio del Interior 2023', https://www.interior.gob.es/opencms/es/archivos-y-documentacion/documentacion-y-publicaciones/anuarios-y-estadisticas/anuarios-estadisticos-anteriores/anuario-estadistico-de-2023/

([212]) See Chapter III.3.3 of the 2023 annual report: Memoria 2023 de la Fiscalía General del Estado.

priority actions are not assessed here due to lack of systematic information. Similarly, the Commission is not aware if information for farmers is easily available online at the national level regarding compliance with the Nitrates and Nature Directives, and hence that 2022 priority action is not assessed.

The new EU Environmental Crime Directive

The EU has recently strengthened its legal framework on tackling the most serious breaches of environmental obligations, notably by the adoption of the new Environmental Crime Directive (ECD) ([213]) and new sectoral legislation with stronger provisions on compliance monitoring, enforcement and penalties. Issues important for the transposition and the implementation of the relevant new instruments are highlighted below; a detailed assessment of these topics will be included in the next EIR once more implementation measures are put in place and more systematic information is available.

The new ECD replaced the 2008 ECD and introduced several new offence categories, such as unlawful ship recycling, unlawful water abstraction, and serious breaches of EU legislation on chemicals, mercury, fluorinated GHG and IAS of EU concern. It also covered the establishment of qualified offences, subject to more severe penalties where one of the offences defined in the Directive leads to serious widespread and substantial damage or destruction of the environment. Concrete provisions on the types and levels of penalties for natural and legal persons who commit an offence were also introduced. Other provisions will help considerably to improve the effectiveness in combating environmental crime of all actors along the enforcement chain. These include obligations to ensure adequate resources and investigative tools, specialised regular training and the establishment of cooperation mechanisms within and between Member States as well as national strategies on combating environmental crime.

Member States are required to transpose the new ECD into national law by 21 May 2026 and to take additional measures to combat environmental crime more effectively, in particular through training, coordination, cooperation and strategic approaches. The Commission will provide support, including by facilitating the identification and sharing of good practices. Member States are expected to ensure the necessary resources and specialised skills required and they are invited to encourage their authorities to support and cooperate with the recognised EU-level networks of environmental enforcement practitioners, such as the EU Network for the Implementation and Enforcement of Environmental Law ([214]), EnviCrimeNet ([215]), the European Network of Prosecutors for the Environment ([216]) and the EU Forum of Judges for the Environment ([217]). The European Union Agency for Law Enforcement Cooperation and European Union Agency for Criminal Justice Cooperation mechanisms for cooperation on cross-border cases should be used more systematically for environmental offences.

Environmental Liability Directive

The Environmental Liability Directive (ELD) ([218]) aims to ensure that environmental damage is remediated in kind at the expense of those who have caused it, in line with the polluter-pays principle. It helps to halt the net loss in biodiversity, as well as reducing the number of contaminated sites and protecting the environmental quality of groundwater and surface waters. The ELD is a cross-cutting tool and a key enabler for better implementation of EU environmental law.

The ELD addresses cases of significant environmental damage to protected species and natural habitats, and, when caused by operators carrying out certain potentially hazardous activities, also damages to water and to soil. The Commission has a legal obligation to periodically evaluate the ELD. The ELD has undergone the second evaluation ([219]), which will be finalised in 2025, and which was supported by an external study ([220]), containing, among other things, evidence, views, reports and other relevant information gathered from different stakeholder groups, including Member States.

([213]) Directive (EU) 2024/1203 of the European Parliament and of the Council of 11 April 2024 on the protection of the environment through criminal law and replacing Directives 2008/99/EC and 2009/123/EC (OJ L, 2024/1203, 30.4.2024), https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32024L1203.

([214]) https://www.impel.eu/en.

([215]) LIFE+SATEC project (https://webgate.ec.europa.eu/life/publicWebsite/project/LIFE20-PRE-ES-000001/fight-against-environmental-crime-at-a-strategic-level-through-the-strengthening-of-envicrimenet-network-of-experts-in-environmental-criminal-investigations).

([216]) https://www.environmentalprosecutors.eu/.

([217]) https://www.eufje.org/index.php?lang=en.

([218]) Directive 2004/35/EC on environmental liability with regard to the prevention and remedying of environmental damage (OJ L 143, 30.4.2004, p. 56), https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02004L0035-20190626&qid=1568193390794&from=EN.

([219]) Commission staff working document - Evaluation of the Environmental Liability Directive, forthcoming 2025.

([220]) European Commission: Directorate-General for Environment and Fogleman, V., *Study in support of the evaluation of the Environmental Liability Directive and its implementation – Final report*, Publications Office of the European Union, Luxembourg, 2024, https://op.europa.eu/en/publication-detail/-/publication/006d90e5-980a-11ef-a130-01aa75ed71a1/language-en.

One of the most relevant indicators in assessing implementation and enforcement of the ELD is the number of environmental damage cases handled under the ELD, especially when this number is compared with the previous reporting period. Fewer ELD cases were reported in the second reporting period (2013–2022) the in the first one (2007–2013). However, the downward tendency in the number of ELD occurrences and their overall low number do not necessarily mean that the ELD has achieved its objectives, as it needs to be compared with the overall number of environmental damage cases, some of which may have been handled under the other liability instruments.

The ELD has not always been effective in ensuring that the polluter pays, because the liable operators often lack financial capacity to carry out remediation measures. While the ELD does not provide for a mandatory financial security system, it explicitly calls for Member States to encourage the development of financial security instruments and markets, with the aim of enabling operators to use financial guarantees to cover their responsibilities under this Directive.

From 1 May 2013 to 31 December 2021, Spain reported 28 occurrences of an imminent threat of environmental damage and 21 occurrences of environmental damage under the ELD. In the previous reporting period, there were 12 occurrences of environmental damage reported under the ELD (10 land and water damage cases, 1 water damage case and 1 land damage case). Spain is among the Member States with the highest overall numbers of reported ELD occurrences and with an upward trend of ELD occurrences between two reporting periods. Moreover, Spain is among the few Member States that have most heavily invested in developing training and methodologies assisting ELD implementation.

Spain was the first Member State to introduce a detailed mandatory financial security system for ELD liabilities together with methodologies, guidance and other tools to determine the amount of financial security for individual operators. The mandatory financial security system covers the remediation of land/soil, water and biodiversity damage on an insured operator's own site as well as the remediation of off-site damage that migrates from the operator's own site. The mandatory system does not cover the costs of complementary or compensatory remediation under the ELD. Environmental insurance policies that provide cover for all on-site and off-site ELD liabilities are widely available and supplied by individual insurers and members of the Environmental Risks Pool. Environmental extensions to general liability policies that provide cover for environmental liabilities are available on a limited basis; mostly they do not provide cover for complementary or compensatory remediation under the ELD.

The 2022 EIR recommended in relation to ELD that Spain increase awareness among citizens about tools to alert the authorities to cases of environmental damage, or breaches of environmental law. Spain has achieved substantial progress in implementing this 2022 priority action; for example, Spain reported on its Environmental Liability Information System (SIRMA), created in April 2022, to gather all the information related to the Spanish Environmental Liability Law (Law 26/2007), as well as to provide access to all the documents, guides and tools developed to facilitate its implementation in Spain. However, Spain continues to apply the restrictive interpretation of water damage which is not compliant with the Commission guidelines ([221]).

2025 priority action

- Encourage the use of training programmes provided by the Commission (or developed at the national level) covering the ELD and its interaction with the other national liability-related instruments, to ensure more efficient ELD implementation, improve the expertise of the competent authorities and raise awareness among all stakeholder groups.

EU-supported environmental capacity building

The Commission's 2023 Compact ([222]) initiative to enhance the administrative space identifies the capacity to lead the green transition as one of three key pillars, along with the public administration skills agenda and the capacity for Europe's Digital Decade. Compact also recognises the role of the EIR reporting tool in improving environmental governance. The two main capacity-building opportunities for the environment provided by the European Commission are the TSI ([223]) and TAIEX-EIR PEER 2 PEER tool ([224]). The technical assistance available through the

([221]) Commission Notice of 7 April 2021, Guidelines providing a common understanding of the term 'environmental damage' as defined in Article 2 of Directive 2004/35/EC of the European Parliament and of the Council on environmental liability with regard to the prevention and remedying of environmental damage, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52021XC0407(01)&from=EN

([222]) See the European Commission web page on Compact (https://reform-support.ec.europa.eu/public-administration-and-governance-coordination/enhancing-european-administrative-space-compact_en).

([223]) See the European Commission web page on the TSI (https://commission.europa.eu/funding-tenders/find-funding/eu-funding-programmes/technical-support-instrument/technical-support-instrument-tsi_en).

([224]) See the European Commission web page on the TAIEX-EIR PEER 2 PEER tool (https://environment.ec.europa.eu/law-and-governance/environmental-implementation-review/peer-2-peer_en). TAIEX: Technical Assistance and Information Exchange.

cohesion policy is subject to shared management and is not dealt with in this subsection.

The Commission's technical support instrument

The TSI provides Member States with tailor-made technical expertise on the design and implementation of reforms. The support is demand driven and does not require national co-financing.

The TSI had annual calls in 2021, 2022, 2023, 2024 and 2025. The TSI supported several environment-related projects in Spain during the period since the last EIR:

- Integration of environmental dimensions in public finances – implementing the 'do no significant harm' (DNSH) principle in public funding programmes, Ministry of Ecological Transition and Demographic Challenge (2023).
- Capital markets for a vibrant and sustainable Spanish economy and corporate sector, National Securities Market Commission (CNMV) (2023).
- Sustainability in Local Public Finances, Barcelona City Council (2024).
- Integrated environmental monitoring informs adaptive management of coastal wetlands, Consejería de fomento, cooperación local y prevención de incendios. Gobierno del Principado de Asturias (2025).

The Commission's TAIEX-EIR PEER 2 PEER tool

The Commission launched the TAIEX-EIR PEER 2 PEER tool in 2017. It aims to facilitate peer-to-peer learning among Member States' environmental authorities through workshops (single or multi-country), expert missions (where a delegation of experts travels to the requesting institution) and study visits (where a delegation from the requesting institution travels to a host country). Flagship multi-country workshops are those requested by the Commission to present new and upcoming environmental legislation and policy in all Member States ([225]).

Workshops involving Spain are as follows:

- Climate adaptation and blue infrastructure (31 May to 1 June 2022).
- Good practices on noise abatement measures and noise mapping (26–27 September 2022).
- Circular economy (in the Irish Midlands) (4–6 October 2022).
- Eco-management and audit scheme (EMAS) (28–30 September 2022).
- Future challenges for air protection (24 November 2022) with the Czech Presidency.
- Making space for biodiversity: Regional action to mainstream biodiversity and empower stakeholders (21–23 March 2023).
- Decentralised bio-waste recycling in Austria (9–11 October 2023).
- Green budgeting at regional level (9 April 2024).
- Online platforms: EU Batteries, Packaging and Packaging Waste Regulation (28–29 October 2024).
- New aspects in the cross-border cooperation against environmental crime (19–20 November 2024).

Spain was involved in an expert mission on dune protection in Bulgaria (28–29 February 2024). Manresa City Council in Spain took part in a study visit on 6–8 June 2023 on circular economy, textile industry, zero waste and peri-urban organic agriculture in Prato and Capannori (Tuscany).

In 2022, Spain received priority actions on (i) further addressing regional and local fragmentation by developing better environmental coordination mechanisms and (ii) further improving its overall environmental governance, such as transparency, citizen engagement, compliance and enforcement, as well as administrative capacity and coordination. Limited progress has been made in this regard. Therefore, a similar priority action is proposed for 2025.

2025 priority action

- Improve overall national environmental governance, in particular administrative capacity to support the green transition and coordination at the regional and local levels.

([225]) Flagship multi-country workshops in the reporting period are: Recast Drinking Water Directive (3 April 2025); Environmental compliance and governance (18 March 2025); Planning of Renewable Energy Projects (20 February 2025); Air Quality: Implementation of the revised Air Quality Directive (16 January 2025); Industrial safety: awareness raising of emerging risks linked with climate change and decarbonation (12 December 2024); Air quality: implementation of the NEC Directive to further mainstream air and broader pollution reduction in agricultural policy (25 September 2024); Industrial emissions transposition and implementation of the revised directive (12 September 2024); Noise: progress towards meeting Member States' noise limit values and EU reduction targets (5 June 2024); Best practice use of environmental footprint methods on the EU market (30 May 2024); Sustainable finance (9 November 2023); Textile waste separate collection, treatment and markets (3 October 2023); EU environmental funding and support (13 June 2023); Advisory service for businesses to go circular (24 April 2023); Digital product passport implementation (6 December 2022); Public involvement in planning and approval of renewable energy projects (17 November 2022); Environmental compliance and governance (14 November 2022); Biowaste management (19–20 September 2022); and Renewable energy projects: permit granting processes (13 June 2022). NB: The first flagship workshop on zero pollution for air, water and soil took place 9 February 2022.

Annex

2025 priority actions

Circular economy

- Adopt measures to increase the circular material use rate.
- Speed up the transition to a circular economy by implementing an updated national strategy and the EU framework and recommendations, in particular to complement it with upstream circularity measures.

Waste management

- Complete closure of non-compliant landfills.
- Improve separate collection at source e.g. through economic instruments, investing in infrastructure for separate collection, sorting and recycling, and increasing public awareness.
- Increase reuse of products and scale up waste recycling infrastructure associated with the higher steps of the waste hierarchy. In particular, improve collection and increase treatment capacity for bio-waste.
- Improve municipal waste preparation for reuse and recycling.
- Increase the collection and recycling rate of waste electronic and electric equipment (WEEE).
- Invest in waste prevention measures to reduce the total amount of waste generated.
- Ensure the achievement of the 2025 waste targets, following the recommendations made by the Commission in the Early Warning Reports where applicable.

Biodiversity and natural capital

Nature protection and restoration – Natura 2000

- Complete the Natura 2000 site designation process.
- Finalise the establishment of site-specific conservation objectives and measures for all Natura 2000 sites (including by adopting their management plans) and ensure their effective implementation.
- Ensure the effective implementation of Natura 2000 management plans and sufficient administrative capacity and financing both for Natura 2000 and the implementation of the Nature Restoration Regulation. Ensure implementation of Prioritised Actions Framework 2021-2027 (PAFs).

The recovery of species

- Strengthen the integration of biodiversity actions into other policies, e.g. energy, agriculture, fisheries, forestry, urban and infrastructure planning and sustainable tourism, and promote communication between stakeholders.
- Reinforce action for habitats and species in unfavourable conservation status, for example through restoration measures, increased connectivity, better policy coordination and integration, and increased funding.

Recovery of ecosystems

- Implement eco-schemes and agri-environmental measures and practices to address the environmental needs of Spain.

Marine ecosystems

- Report updates on the assessment of the state of Spain's marine waters, its target and its determinations of GES, which are expected to include any threshold values for the descriptors in the MSFD that may have been established in cooperation with other Member States at the EU or regional level.
- Ratify the Protocol for the Protection of the Mediterranean Sea against Pollution Resulting from the Exploration and Exploitation of the Continental Shelf and the Seabed and its Subsoil (Offshore Protocol to the Barcelona Convention).

Prevention and management of invasive alien species

- Step up implementation of the IAS Regulation, including with regard to enforcement and capacity of inspection authorities.

Zero pollution

Clean air

- As part of the NAPCP, take action towards reducing emissions of air pollutants.
- Ensure full compliance with the current AAQD standards, also in light of future stricter requirements under the revised AAQD.

Industrial emissions

- Reduce industrial air pollution damage and intensity.
- Reduce industrial releases to water, and their intensity.
- Engage with industry and environmental NGOs to ensure proper contribution to and implementation of BAT conclusions and ensure timely updates to permits following the publication of BAT conclusions.
- Ensure effective public participation and access to justice in relation to the IED.

Major industrial accidents prevention – Seveso

- Strengthen compliance with requirements on safety measures to prevent major accidents and ensure appropriate preparedness and response for UTEs, in particular as regards review, testing and update of EEPs; at intervals of no longer than three years.
- Ensure access to transparent and clear information towards citizens on risks and behaviour in case of accidents.

Noise

- Complete noise mapping.
- Complete and implement action plans on noise management.

Water quality and management

- Improve river continuity and ecological flows, boosting efforts on nature-based solutions to reduce hydromorphological pressures.
- Ensure periodic reviews of permits for discharges, abstractions and other water uses, including hydropower pressures.
- Reduce pollution from nutrients, chemicals, metals and saline discharges.
- Better justify exemptions to the achievement of good status.
- Improve the classification of water bodies and strengthen monitoring systems.
- Develop more robust programmes of measures, tackle obstacles identified in the implementation of measures and ensure adequate financing for implementation, including through better use of the cost recovery and polluter pays principle.
- FRMPs should provide details on how the FHRMs were used in the choice of measures and how to consider pluvial flooding.
- Consider future climate scenarios in FRMPs.
- Better explain the choice and implementation of flood prevention and protection measures (prioritisation, monitoring, costs of measures).
- Improve public consultation and stakeholder involvement.
- Tackle nutrient pollution, especially nitrates from agriculture, through the implementation of the Nitrates Directive.
- Take the necessary measures to ensure full implementation of the current Urban Wastewater Treatment Directive, taking into account the new requirements of the recast Directive.

Chemicals

- Upgrade the administrative capacities in implementation and enforcement to move towards a policy of zero tolerance of non-compliance.
- Increase involvement in the activities of the Forum for Exchange of Information on Enforcement of the European Chemicals Agency, including in the coordinated enforcement projects, called REF projects.
- Increase customs controls and controls of products sold online with regard to compliance with chemicals legislations.

Climate action

- Implement all polices and measures that are needed to achieve targets laid down in the Effort Sharing Regulation (ESR) and the Land Use, Land Use Change and Forestry (LULUCF) Regulation. More detailed priority actions are set up in the assessment of the final National Energy and Climate Plan (NECP).

Financing

- Use more national funding (for instance, by increasing taxes in favour of the environment and reducing environmentally harmful subsidies), EU funding and private funding to help close the investment gap.

Environmental governance

Information, public participation and access to justice

- Ensure that relevant information on EIA and SEA procedures (including on public participation opportunities and on publication of final decisions) is electronically accessible in a timely manner, through at least a central portal or easily accessible points of access, at the appropriate administrative level.
- Provide information on the average duration of all steps in the EIA process.
- Improve access to courts in national environmental cases by the public concerned and eliminate practical barriers, such as length of proceedings and excessive costs.

Compliance assurance

- Encourage the use of training programmes provided by the Commission (or developed at the national level) covering the ELD and its interaction with the other national liability-related instruments, to ensure more efficient ELD implementation, improve the expertise of the competent authorities and raise awareness among all stakeholder groups.

EU-supported environmental capacity-building

- Improve overall national environmental governance, in particular administrative capacity to support the green transition and coordination at the regional and local levels.