CLIMATE AND ENERGY PLANS: FROM LEGAL OBLIGATION TO OPPORTUNITY

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Energy and climate change plans are no longer a voluntary exercise. Since 2019, two Basque laws—Ley 4/2019, de Sostenibilidad Energética, and Ley 1/2024, de Transición Energética y Cambio Climático—have made local energy and climate planning a legal obligation for a very large share of the municipalities, provincial councils (Diputaciones Forales) and other local entities in the Basque Country.

It is not just a matter of drafting and approving a document. It is about setting a roadmap that reduces energy consumption, cuts greenhouse gas emissions, promotes renewable energy and prepares the municipality for the impacts of climate change, with specific actions and investments up to 2030 and 2050.

Where does the obligation come from?

Ley 4/2019, de Sostenibilidad Energética de la Comunidad Autónoma Vasca, requires all Basque public administrations—including the historical territories and municipalities—to design and approve a multi-year energy action plan (Art. 14). Decree 254/2020 implements this obligation: it specifies deadlines and procedures, clarifies indeterminate legal concepts and regulates the Comisión para la Sostenibilidad Energética del Sector Público.

Five years later, Ley 1/2024, de Transición Energética y Cambio Climático, goes a step further. It requires the historical territories and municipalities with more than 5,000 inhabitants to approve climate and energy plans that expressly incorporate the provisions of Ley 4/2019 and add the climate variable—mitigation and adaptation—(Art. 18). The law itself reorders the terminology: what used to be called an “energy action plan” is now called a “climate and energy plan”.

The two obligations are complementary, not contradictory, and can be met through a single instrument: a municipal climate and energy plan that simultaneously fulfils the energy content required since 2019 and the climate content required since 2024.

Ihobe, the Basque Government’s public environmental management company, has published the reference methodological guide for this instrument: “Planes de Clima y Energía de Euskadi. Guía para la elaboración de planes municipales y comarcales” (Ihobe, January 2026), which updates the 2021 edition in line with Ley 1/2024 and uses the term “Climate and Energy Plan” (PCE) to refer to this instrument. The PCE meets and extends the requirements of the Sustainable Energy and Climate Action Plans (SECAPs) of the Covenant of Mayors, so that a municipality that has joined this European covenant can align both instruments in a single work process.

Which municipalities are under this obligation?

Ley 4/2019 requires all municipalities and historical territories to have an energy action plan; municipalities with fewer than 5,000 inhabitants can comply jointly, through an association of municipalities or at district level. The statutory deadlines for approving this first plan have already passed, so the energy obligation is now fully enforceable for every Basque municipality, whatever its size.

Ley 1/2024 adds a second layer, more demanding in content but narrower in terms of who is obliged: only the historical territories and municipalities with more than 5,000 inhabitants must approve a climate and energy plan with an emissions diagnosis, a vulnerability analysis and adaptation measures. Municipalities with fewer than 5,000 inhabitants may draw up this climate plan individually or at district level, but are not obliged to do so; they do, however, retain their energy obligation under Ley 4/2019.

Type of entity	Population	Plan required
Historical territory (provincial council)	—	Energy action plan + climate and energy plan
Municipality	More than 5,000 inhab.	Energy action plan + climate and energy plan
	Fewer than 5,000 inhab.	Energy action plan (individual or district-level)
Association of municipalities, cuadrilla or district	—	Vehicle for a joint plan

What makes a climate and energy plan genuinely useful?

Approving the plan is only the beginning. Its usefulness depends not only on the quality of the diagnosis or the number of actions included, but on whether it can be built into the day-to-day management of the city council and kept active throughout its period of validity.

Although a good diagnosis is necessary, it is not usually enough to guarantee implementation. The difference between a plan that guides decisions and one that ends up shelved usually lies in its connection with the municipal organisation: clear responsibilities, achievable priorities, funding, coordination between departments and a monitoring system that makes it possible to correct deviations. Six elements are particularly important:

1. Clearly assigned political and technical responsibility

Each action should have a responsible unit, a person in charge of driving it forward and a political body to oversee its implementation. It is not enough to assign a measure generically to a department. Responsibility must be clearly defined and, at the same time, institutionalised, so that the continuity of actions does not depend solely on one person or disappear with changes of staff or of political term.

2. Link with financial planning

Measures should include a cost estimate, possible sources of funding and a timetable for their inclusion in the municipal budget. When an action is not linked early on to the city council's financial planning, its implementation becomes much more uncertain. Priority measures should be reflected from the first budget year following the plan's approval or, at the very least, have an explicit timetable for their funding. Actions that may depend on grants, supra-municipal funding, public–private partnerships or other external sources should also be identified.

3. Realistic prioritisation and scheduling

A plan is not more ambitious because it includes a large number of actions. It is more useful when it distinguishes which measures should be tackled first, which require prior preparation and which have a longer implementation horizon. Prioritisation should take into account, at the very least, the energy and climate impact of each measure, its cost, its technical feasibility, the municipal capacity available and its possible contribution to other local objectives. It is advisable to distinguish between immediate, low-cost actions capable of generating early results, measures that require prior studies or administrative procedures, and long-term structural projects. This avoids presenting dozens of lines of action with the same weight and no clear sequence for implementation.

4. Cross-cutting governance and internal coordination

The energy and climate transition affects areas as diverse as urban planning, mobility, public procurement, building management, public works, social services, finance, the environment and citizen participation. That is why the plan cannot rest solely with the department that promoted its drafting. It needs a stable coordination mechanism between the municipal departments involved and sufficient political backing. This coordination can be organised through a technical committee, an interdepartmental group or any other structure suited to the size and capacity of the municipality. What matters is that it makes it possible to share information, resolve bottlenecks and link climate measures to the city council's ordinary decisions.

5. Results-oriented indicators

Measuring the starting point accurately—consumption, emissions or levels of vulnerability—is not enough without defining how the plan's progress will be checked. Each action should have a baseline, a target, a deadline, a monitoring frequency and a source of verification. As well as checking whether an action has been carried out, it is advisable to measure what results it has produced: energy savings, emissions reductions, increased renewable generation, reduced climate vulnerability or improved social and environmental conditions.

6. Scheduled review and updating

A climate and energy plan must be able to adapt to budgetary, regulatory, technological or climatic changes. It is therefore advisable to schedule a mid-term review every two or three years, rather than waiting only for the mandatory review at the end of its period of validity. This review makes it possible to identify measures that are not progressing, analyse the reasons, strengthen the actions that are working and modify those that are no longer viable or relevant.

In short, a useful plan is not the one that accumulates the most measures, but the one that clearly sets out **what will be done, who will do it, with what resources, within what timeframe and how its results will be checked**. The municipalities that manage to make their plans deliver real transformation are those that resolve these questions before approving the document, not after.

Naider’s work on climate and energy plans

At Naider we support Basque public administrations in drafting and monitoring their energy and climate plans. We drew up the Plan Foral de Actuación Energética of the Provincial Council of Bizkaia (Diputación Foral de Bizkaia), and we monitor its energy and climate plans. We are currently working on the climate and energy plans of the city councils of Mungia, Berango and Agurain. If your city council, association of municipalities or cuadrilla needs to draw up, update or implement its climate and energy plan, at Naider we will support you throughout the process.