

Avosetta Meeting

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“Instruments of Climate Mitigation and Energy Transition”

Report on Cyprus*

1. Political Situation

Is EU climate (and energy transition) policy generally supported or viewed critically in the respective national political context?

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EU climate and energy-transition policy is formally supported at governmental and institutional level in Cyprus. As a Member State, Cyprus is legally bound by the European Climate Law and the wider EU climate acquis, which structure domestic policy through the Governance Regulation and the National Energy and Climate Plan (NECP).¹

Political support, however, is best characterised as compliance-oriented and implementation-sensitive rather than ambitious. Climate policy is framed less as a matter of normative choice and more as a legal and strategic necessity of EU membership. Public and political debate does not generally contest the legitimacy of EU climate objectives; instead, it focuses on the conditions, pace and distributive implications of implementation.

This perception is shaped by structural characteristics of the Cypriot economy. Cyprus operates a non-interconnected electricity system and remains highly dependent on imported fossil fuels. As a result, concerns centre on affordability, competitiveness and social distribution, particularly in light of expanding carbon pricing under the ETS II. Climate policy also has relatively lower salience in public opinion compared to other policy priorities, limiting the political space for accelerated or unilateral ambition.²

How has national climate (and energy transition) policy developed in recent years?

Since 2017, climate and energy-transition policy in Cyprus has developed primarily through alignment with EU governance obligations, rather than through autonomous legislative reform.

A governance system for climate and energy was established to coordinate preparation and implementation of the NECP and later expanded to cover the European Green Deal more

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¹ European Commission, Cyprus – Final Updated NECP 2021–2030 (submitted 19 December 2024, published 20 December 2024) (“Cyprus Final NECP”).

² European Commission, *Special Eurobarometer 538: Climate Change - Republic of Cyprus Factsheet* (2023).

broadly.³ While this framework provides institutional coordination, it remains largely executive and planning-based, rather than grounded in comprehensive legislative entrenchment.⁴

The most consequential development is the final updated NECP (December 2024), which incorporates the Fit-for-55 package and confirms Cyprus's revised ESR target of –32% by 2030 (compared to 2005 levels).⁵ However, the European Commission's 2025 assessment identifies a projected implementation gap of approximately 6 percentage points, shifting the focus from target alignment to delivery.⁶

Climate policy has also increasingly entered the fiscal domain. A significant development was the comprehensive tax reform adopted in December 2025, which, alongside general restructuring of income taxation, introduced income-tested deductions for energy-efficiency upgrades to primary residences and for the purchase of new electric vehicles.⁷ These measures represent the first concrete legislative step in the broader green tax reform envisaged under the Recovery and Resilience Plan.⁸ That reform is designed as a fiscally neutral restructuring, combining a carbon tax on transport fuels in non-ETS sectors with charges on waste disposal and water use, while returning revenues to households through compensatory measures.⁹ However, the core carbon-tax component has not yet been enacted. Its repeated delay reflects both the political sensitivity of introducing a direct carbon price and the complexity of designing effective and socially acceptable compensation mechanisms.¹⁰ The result is a partial and cautious shift towards fiscal climate instruments. While the direction of travel is clear, the absence of an operational carbon-pricing framework means that the distributive dimension of climate policy remains only partially developed at national level.

Against this backdrop the Department of Environment, has confirmed, through direct correspondence, that a draft national comprehensive climate law is currently under internal preparation, including inter-service consultation to ensure alignment with existing and forthcoming instruments, notably the National Energy and Climate Plan (NECP). Completion of the internal phase is expected within 2026, followed by a public consultation subject to the necessary approvals.¹¹

³ Directorate General Growth (Ministry of Finance, Cyprus), 'European Green Deal' (government webpage, referencing Council of Ministers decision of 13 November 2020 establishing the National Governance System for the European Green Deal).

⁴ Republic of Cyprus, *First Biennial Transparency Report under the United Nations Framework Convention on Climate Change and the Paris Agreement* (2025) [https://unfccc.int/sites/default/files/resource/BTR_2024%20\(002\)_final.pdf](https://unfccc.int/sites/default/files/resource/BTR_2024%20(002)_final.pdf).

⁵ Cyprus Final NECP.

⁶ European Commission, Commission Staff Working Document – Assessment of the Final Updated NECP of Cyprus, SWD(2025) 140 final (28 May 2025).

⁷ The Income Tax (Amendment) (No. 4) Law of 2025 (L. 244(I)/2025) (The reform package also includes Amendments to the Special Defence Contribution Law, the Capital Gains Tax Law, and the Stamp Duties Law, enacted by the House of Representatives on 22 December 2025, effective 1 January 2026.) For consolidated analysis, see KPMG, 'The Cyprus Tax Reform' (Feb. 2026); PwC Cyprus, 'The Cyprus Tax Reform – Bills Published' (Issue N-1-2026, 7 January 2026).

⁸ Ibid

⁹ Revised RRP of Cyprus (December 2025), Reform 1 (C2.1R1); Ibid.; Republic of Cyprus, Final Updated NECP 2021–2030 (December 2024), section 3.1.1.

¹⁰ Revised RRP of Cyprus (December 2025), Milestone 19 (C2.1R1)

¹¹ Information provided by the Department of Environment, Ministry of Agriculture, Rural Development and Environment (personal communication, April 2026).

What are the prospects for future political developments?

Future developments are likely to centre on implementation rather than target-setting. The ESR gap will remain a central issue as 2030 approaches, particularly in transport and buildings. The expansion of carbon pricing under ETS II is expected to increase the visibility of climate policy at household level, intensifying political attention to fairness, compensation and distributional effects. The effective deployment of the Social Climate Fund will therefore be critical for maintaining political support.¹²

More broadly, the pace of decarbonisation will be strongly conditioned by infrastructure constraints, including electricity grid capacity, storage and interconnection. As a result, climate policy debates are likely to remain closely linked to energy security, system resilience and economic competitiveness, rather than involving any fundamental reconsideration of EU climate objectives.

What are the key climate (and energy transition) policy controversies in the national political debate?

The principal controversies in Cyprus concern implementation modalities rather than objective-setting.

- **Fossil gas as transitional fuel**

Government policy treats natural gas and LNG infrastructure as transitional tools to enhance energy security and reduce oil dependence.¹³ Critics argue that such investments risk long-term lock-in potentially incompatible with decarbonisation trajectories.¹⁴

- **Energy isolation and renewable scaling**

Cyprus remains the only EU Member State without electricity interconnection. While renewable deployment, particularly solar, has increased, grid constraints and curtailment limit further expansion. Debate focuses on whether infrastructure reform can precede or must accompany renewable growth.¹⁵

- **Socio-economic distribution**

Electricity prices remain comparatively high within the EU. Political debate centres on affordability, competitiveness and employment impacts, especially in the context of ETS II.¹⁶ Distributional concerns are particularly pronounced given the regressive nature of energy expenditure.¹⁷

- **Transport**

Transport remains the most structurally challenging sector, characterised by heavy reliance on road-based mobility, limited public transport and low electrification.¹⁸

¹² Regulation (EU) 2023/955, Art. 6(1).

¹³ NECP - Energy Security section.

¹⁴ NECP, Annex 1 (Public Consultation) – Annex 1

¹⁵ European Commission, Commission Staff Working Document – Assessment of the final updated NECP of Cyprus (2025)

¹⁶ European Commission, *European Semester Country Report – Cyprus* (June 2025).

¹⁷ Θ. Ζαχαριάδης, 'Ερωτήσεις & Απαντήσεις Σχετικά με την Ενεργειακή Κρίση με Βάση Πραγματικά Δεδομένα' (Ινστιτούτο Κύπρου, 6 Απριλίου 2026), Πίνακας 1 and Section 4, based on Household Budget Survey 2023 data (CYSTAT).

¹⁸ EEA Country Profile Cyprus (Sept. 2025), 'The Mobility System' section

- **Adaptation and administrative capacity**

Climate impacts such as drought and wildfire risk have increased the importance of adaptation policy, while persistent implementation challenges raise concerns regarding administrative capacity.

These implementation challenges are also reflected in the pattern of EU infringement proceedings across climate, energy and environmental law. These do not point to systemic rejection of EU objectives, but rather to recurring delays and gaps in transposition and implementation across successive waves of EU climate governance. Recent proceedings concern, inter alia, delayed or incomplete transposition of key elements of the revised Emissions Trading System,¹⁹ Renewable Energy²⁰ and Energy Efficiency Directives,²¹ as well as related instruments under the Fit-for-55 package.²² In parallel, longer-standing procedures persist in the environmental field, particularly in relation to the Habitats Directive and the designation and protection of Natura 2000 sites.²³ Collectively, these cases reflect both legislative timing pressures and structural administrative constraints in a small, capacity-limited administration. While individual proceedings differ in scope and legal basis, their broader significance lies in their cumulative picture: Cyprus's challenge is not conceptual alignment with EU climate and environmental objectives, but consistent and timely implementation across a rapidly expanding and increasingly complex acquis. This reinforces the broader finding that climate and energy transition policy in Cyprus is characterised by compliance orientation, combined with persistent implementation gaps rather than strategic divergence.

What has been the role of the Courts in your national context?

The role of the courts in Cyprus has been significant, though not through landmark climate judgments comparable to those in some other Member States. The central issue has instead been the extent to which environmental actors, especially environmental NGOs, can obtain access to judicial review under Article 146 of the Constitution. In this respect, the case law has remained uneven and, overall, restrictive.

¹⁹ Commission Register of Infringement Decisions, case INFR(2024)0178 (DG CLIMA), decision of 24 July 2024 (letter of formal notice under Articles 258 and 260(3) TFEU).

²⁰ Commission Register of Infringement Decisions, case INFR(2021)0169 (DG ENER), reasoned opinion of 19 May 2022 under Articles 258 and 260(3) TFEU concerning Directive (EU) 2018/2001; Commission Register of Infringement Decisions, case INFR(2024)0213 (DG ENER), reasoned opinion of 12 February 2025; European Commission, 'February infringement package: key decisions on energy', 12 February 2025, available at https://energy.ec.europa.eu/news/february-infringement-package-key-decisions-energy-2025-02-12_en; Commission Register of Infringement Decisions, case INFR(2025)0201 (DG ENER), reasoned opinion of 11 December 2025; European Commission, 'December infringements package: key decisions on energy', 11 December 2025, available at https://energy.ec.europa.eu/news/december-infringements-package-key-decisions-energy-2025-12-11_en.

²¹ Commission Register of Infringement Decisions, case INFR(2025)0302 (DG ENER), letter of formal notice of 20 November 2025 under Articles 258 and 260(3) TFEU, concerning Directive (EU) 2023/1791 on energy efficiency (recast).

²² Commission Register of Infringement Decisions, case INFR(2026)2015 (DG ENER), letter of formal notice of 11 March 2026; European Commission, 'March infringements package: key decisions on energy', 11 March 2026, available at https://energy.ec.europa.eu/news/march-infringements-package-key-decisions-energy-2026-03-11_en

²³ Commission Register of Infringement Decisions, case INFR(2019)2303 (DG ENV), formal notice of 27 November 2019, reasoned opinion of 13 March 2024, concerning Directive 92/43/EEC (Habitats Directive), Article 6(3); Commission Register of Infringement Decisions, case INFR(2018)2058 (DG ENV), formal notice of 17 May 2018, reasoned opinion of 30 October 2020, concerning Directives 92/43/EEC and 2009/147/EC (Habitats and Birds Directives).

An early indication of a potentially broader approach appeared in *Koinotita Pyrgon v Republic*, where the courts linked environmental degradation to constitutional protection of life and accepted the standing of a local authority affected by the impugned activity.²⁴ A further opening appeared in the first-instance judgment in *Filoi tou Akama v Republic*, where a more generous approach to standing for an environmental organisation was adopted in the context of development in the Akamas area.²⁵ That opening, however, was not consolidated. In *Thanos Club Hotels v ETEK*, the plenary Supreme Court reaffirmed a restrictive approach that has largely shaped subsequent case law.²⁶ Standing was effectively confined to natural persons directly and individually affected, typically those residing in the immediate vicinity, and to local authorities representing the collective interests of a particular community. Environmental organisations, by contrast, could not rely on their statutory objectives alone without this being treated as an impermissible *actio popularis*.

That restrictive line was confirmed in *Somateio Syndesmou Apodimon kai Filon tis Archimandritas v Republic*, where the Supreme Court dismissed a recourse brought by a registered community association and individual property owners challenging planning permission for a wind farm in the Oreites Forest.²⁷ The Court held that the applicants had failed to establish the necessary legitimate interest: the alleged environmental harm was considered too general and vague, the individual applicants had not sufficiently substantiated proximity or specific adverse effects, and the association could not derive standing merely from its environmental purposes. The judgment therefore reaffirmed that, under the prevailing interpretation of Article 146, environmental protection as such does not confer standing on NGOs.

Against that background, the 2023 judgment in *Οικολογική Παρέμβαση – Φίλοι του Ακάμα – Οργάνωση Περιβάλλοντος και Πολιτισμού v Republic* is important, but its significance should not be overstated.²⁸ The case does not amount to a general recognition of standing for environmental NGOs under Article 146. Rather, the Court's reasoning was closely linked to the legislative framework governing environmental impact assessment. The opening it creates is therefore limited to cases in which procedural rights derived from that framework are engaged. It does not establish a broader constitutional principle that environmental organisations have autonomous standing to defend environmental interests as such.

The more difficult issue concerns situations falling outside the EIA framework, where there is an alleged violation of environmental law but no explicit procedural gateway in legislation. In

²⁴ *Koinotita Pyrgon v. Kypriaki Dimokratia* (1991) 4 CLR 33498; *Kypriaki Dimokratia v. Koinotita Pyrgon* (1996) 3 CLR 503.

²⁵ *The Akamas Peninsula, located in the north-west of Cyprus, is one of the island's most ecologically significant and relatively undeveloped areas. It includes sites designated under the Natura 2000 network pursuant to the Habitats Directive (92/43/EEC) and the Birds Directive (2009/147/EC), and hosts important protected habitats and species. Notably, it constitutes one of the most important nesting sites in the Mediterranean for the loggerhead sea turtle (Caretta caretta), a species protected under EU and international environmental law. The area has long been at the centre of tensions between environmental protection and development pressures*

²⁶ *Thanos Club Hotels v. ETEK* (2000) 3 CLR 324. See further analysis on this issue: Ioanna Hadjiyianni, 'Multi-Level Governance in Action: Access to Justice in Light of the Aarhus Convention and its Implementation in the EU Legal Order' (2020) 26(4) *European Public Law* 889; Ioanna Hadjiyianni, 'Access to Justice for environmental protection: Legitimate interest in Cyprus in light of the Aarhus Convention and its Implementation in the European Union, *Environment and the Law (Περιβάλλον και Δίκαιο)* 2/2020, 224.

²⁷ Σωματείο Συνδέσμου Αποδήμων και Φίλων της Αρχιμανδρίτας κ.ά. v. Κυπριακής Δημοκρατίας, Ανώτατο Δικαστήριο Κύπρου, Υπόθεση Αρ. 470/2009, 16 Νοεμβρίου 2012 (Νικολάτος Δ.).

²⁸ *Friends of Akamas v. Republic* (Administrative Court, Cases No. 1652/2018), interim decision of Judge Elena Michael (2023); Decision of Appeal Court *Οικολογική Παρέμβαση – Φίλοι του Ακάμα – Οργάνωση Περιβάλλοντος και Πολιτισμού v. Κυπριακής Δημοκρατίας*, (Υπόθεση αρ. 1652/2018), 4 Μαΐου 2023.

such cases, the restrictive interpretation of standing under Article 146 continues to pose a significant obstacle. This is particularly important from an EU environmental law perspective, because it affects the practical enforceability of EU-derived obligations. While the case law of the Court of Justice requires national courts, so far as possible, to interpret domestic procedural rules in a manner consistent with effective judicial protection in environmental matters,²⁹ the extent to which this has altered Cypriot judicial practice remains limited.

Recent constitutional developments add a further layer of complexity. Article 7A of the Constitution, introduced by the Nineteenth Constitutional Amendment in late 2024, expressly recognises a right to a safe, clean, healthy and sustainable environment and includes procedural guarantees relating to information, participation and access to justice.³⁰ This may strengthen the constitutional basis for environmental protection.³¹ At the same time, however, its practical effect remains uncertain, particularly if it is interpreted through the existing restrictive logic of Article 146. For present purposes, it is sufficient to note that Article 7A creates potential for doctrinal development, but has not yet displaced the established standing framework.

These questions are now directly engaged in the pending Kellia litigation, which arises out of the installation of wind turbines within the Kellia State Forest and the Koshi-Pallourokampos Special Protection Area (SPA).³² The proceedings raise broader issues of compliance with environmental assessment and nature protection requirements, but they are also important procedurally because the Republic has challenged the standing of the applicant NGOs. The outcome will therefore be significant not only for the specific project, but also for the broader question whether Cypriot courts will continue to adhere to the restrictive line of *Thanos Club Hotels* or move towards a more functional understanding of standing where environmental organisations seek to challenge alleged breaches of environmental law.

2. Overall Climate Policy Targets

Are the EU's overall climate targets (2035/2040/2050) considered adequate/too ambitious/insufficient in national politics?

In Cyprus, EU climate targets are generally treated as binding legal and political reference points.³³ The prevailing position is one of acceptance: the Union's climate trajectory is understood as part of the obligations and strategic framework of EU membership, not as an optional policy agenda.

The central debate therefore concerns feasibility under national conditions. Cyprus's position is shaped by structural constraints – energy isolation, reliance on imported fossil fuels, and limited short-term alternatives in electricity and transport – which have consistently led it to

²⁹ notably in *Lesoochránárske zoskupenie* (C-240/09) and *Protect Natur* (C-664/15).

³⁰ Constitution of the Republic of Cyprus, art 7A (as amended by the Nineteenth Amendment to the Constitution (Law 171(I)/2024)

³¹ See Constantina Amvrosiou, Alexandros Vryonides, Ioanna Hadjiyianni, 'The Recognition of the Right to the Environment in the Constitution of the Republic of Cyprus: Prospects and Limitations', *Environment and the Law (Περιβάλλον και Δίκαιο)*, 1/2025, 24.

³² *Terra Cypria and BirdLife Cyprus v Republic of Cyprus* through the Director of the Department of Environment, Administrative Court of Cyprus, recourses filed 2025; K. Μιχαήλ (Chapter 12), Section 3.2.

³³ This characterisation is derived from the overall framing of the Final Updated NECP 2021–2030, which presents EU targets as binding obligations to be implemented rather than as policy options to be debated

emphasise flexibility mechanisms, transitional arrangements and differentiated implementation pathways within the EU framework.³⁴

This pattern is reflected both in negotiation practice and domestic policy discourse. Climate policy is typically debated through concrete distributive questions, such as electricity prices, transport costs and the timing of transition impacts at household level, rather than through principled disagreement with climate objectives.³⁵

Accordingly, Cyprus treats EU climate targets as demanding obligations, the fulfilment of which depends on infrastructure development, implementation capacity and effective social-compensation mechanisms.³⁶

Has the Member State set more ambitious national climate targets (“gold plating”)? If so, what additional national targets are being pursued?

Cyprus has not engaged in “gold plating” of EU climate targets. The principal legal and policy challenge is compliance with EU-mandated obligations, rather than the adoption of more ambitious national targets.

This is reflected in the relationship between the final updated NECP (2024) and the Commission’s subsequent assessment. The Commission’s assessment confirmed that Cyprus remains off track to meet its 2030 targets, even under the additional-measures scenario, with a significant reliance on measures that are not yet fully implemented. Cyprus’s current policy trajectory does not exceed EU requirements; on the contrary, the Commission identified a projected shortfall in meeting the binding 2030 ESR target.³⁷ The central issue is therefore implementation sufficiency, not ambition enhancement.

While the Long-Term Strategy includes more ambitious analytical pathways, these function as modelling scenarios rather than binding commitments.³⁸ The operative framework for implementation remains the NECP and EU-derived obligations.

A limited exception exists at the level of civil society. Proposals for a national climate framework law with stronger targets – such as a 2045 climate-neutrality objective – have been advanced, but have not been adopted in binding form.³⁹

Political significance of the 2026 Cyprus Council Presidency (target politics)

In the context of target politics, the 2026 Cyprus Presidency of the Council of the EU confirms Cyprus’s established approach. Climate-related issues are framed primarily in terms of competitiveness, resilience and strategic autonomy, with the green transition integrated into broader economic and energy-security priorities rather than presented as a platform for

³⁴ NECP, *passim* (energy isolation, non-interconnection, and fossil-fuel dependence are recurring framing elements throughout the NECP); EPRS, *Cyprus’s Climate Action Strategy* (2025), pp. 3-4.

³⁵ 2025 European Semester Country Report – Cyprus, Annex 7 (electricity prices above EU average; non-household prices highest in EU in 2024).

³⁶ *ibid.*

³⁷ European Commission, *Commission Staff Working Document – Assessment of the final updated NECP of Cyprus* (2025).

³⁸ Republic of Cyprus, *Long-Term Strategy for Low GHG Emissions Development* (updated 2022)

³⁹ Terra Cypria, “Εκθεση Θέσπισης Εθνικού Κλιματικού Νόμου Κύπρος,” July 2024.

increasing headline climate ambition.⁴⁰ This is consistent with Cyprus's general positioning: acceptance of the EU trajectory combined with emphasis on implementation feasibility, sequencing and transitional support.⁴¹ The Presidency does not therefore indicate any move towards national "gold plating" of EU climate targets. Instead, it reinforces Cyprus's role as a Member State that supports the Union's direction while prioritising implementable policy design under structurally constrained conditions.

3. Emission Trading System I (Industry)

Is ETS I considered appropriate? If not, what reforms are viewed as priorities from the national perspective?

From the national perspective, ETS I is accepted in principle as an appropriate and necessary instrument for decarbonising electricity generation and energy-intensive industry.⁴² Cyprus does not contest emissions trading as the EU's central market-based mechanism for reducing greenhouse-gas emissions.⁴³ The issue, rather, is how the system operates in a small, non-interconnected and fossil-fuel-dependent energy system.

A distinctive feature of Cyprus's experience with ETS I lies in the interaction between persistent structural constraints and their historical recognition in EU law. Cyprus remains a non-interconnected electricity system and continues to rely heavily on imported fossil fuels, historically including heavy fuel oil, with limited short-term alternatives. These conditions continue to shape the operation and domestic impact of ETS I.

Within that context, the electricity sector was treated as structurally exceptional in earlier phases of the system.⁴⁴ For the third trading period, Cyprus benefited from the derogation under Article 10c of Directive 2003/87/EC, available to certain non-interconnected electricity systems.⁴⁵ The Commission approved Cyprus's application in 2012, allowing a limited volume of free allowances for electricity generation, linked to investments in infrastructure upgrading, diversification of the energy mix and security of supply.⁴⁶ This derogation is important not merely as historical background, but because it reflects an explicit recognition at EU level of the constraints facing isolated energy systems such as Cyprus. Its expiry and the transition to full auctioning from Phase IV materially increased the cost exposure of the power sector and, in turn, the domestic salience of ETS I.⁴⁷

⁴⁰ Council of the European Union, Cyprus Presidency, 'Programme of the Cyprus Presidency' (Consilium) <https://cyprus-presidency.consilium.europa.eu/en/programme/programme-of-the-cyprus-presidency/> accessed 17 February 2026.

⁴¹ Cyprus Presidency, Council of the European Union, 'Environment and Climate Ministers: Strengthening Europe's Resilience, Competitiveness and Global Credibility through Coordinated EU Action' (Consilium, 26 February 2026) <https://cyprus-presidency.consilium.europa.eu/en/news/environment-and-climate-ministers-strengthening-europe-s-resilience-competitiveness-and-global-credibility-through-coordinated-eu-action/> accessed 17 February 2026.

⁴² IBF International Consulting Consortium, "D2 Best practices report – green taxation reform in Cyprus" (January 2022), section "Emissions Trading System (EU ETS)".

⁴³ Directive 2003/87/EC establishing a scheme for greenhouse gas emission allowance trading within the Community [2003] OJ L275/32, as amended by Directive (EU) 2023/959 [2023] OJ L130/134.

⁴⁴ NIR 2025, section 4.2.1.1 ("The cap on allowances for the first trading period was set at national level through National Allocation Plans (NAPs)"; "Information regarding CO₂ emissions has been submitted annually since 2005")

⁴⁵ Directive 2003/87/EC, Article 10c(1)(a); Directive 2009/29/EC, Article 10(1).

⁴⁶ Commission Decision C(2012) 3260 of 23 May 2012, recital (4) and (5).

⁴⁷ Directive (EU) 2023/959; the Article 10c derogation was limited to 2013-2019.

The first contemporary feature is the high concentration of ETS exposure. According to the final updated NECP, around 70% of Cyprus's ETS emissions in 2022 came from electricity generation, with most of the remainder deriving from cement production and only a very small share from ceramics.⁴⁸ The 2025 Environmental Implementation Review confirms the same overall pattern. ETS I therefore affects a relatively narrow emissions base, dominated by the power sector and one energy-intensive industrial cluster.⁴⁹

Secondly, the economic effects of ETS I in Cyprus are closely linked to electricity pricing. Because the power sector accounts for the overwhelming majority of ETS emissions, allowance costs are transmitted directly into electricity tariffs and therefore become visible in household and business energy bills. This is particularly significant in Cyprus, where electricity prices remained above the EU average in 2024 and non-household prices were the highest in the EU, while grid constraints, delays in interconnection and limited short-term adjustment capacity continue to restrict the system's flexibility.⁵⁰ The result is not that ETS I is viewed as inappropriate, but that its distributional and competitiveness effects are more acute than in more diversified and interconnected systems.

Thirdly, the projected ETS pathway depends heavily on infrastructure assumptions reflected in national planning. The updated NECP projects a 43% reduction in ETS emissions by 2030 compared to 2005, but this is linked in part to the expected introduction of natural gas in electricity generation.⁵¹ The projected compliance trajectory therefore depends not only on the carbon price itself, but also on the timely delivery of enabling infrastructure.⁵²

The financial scale of ETS I in Cyprus is also considerable. Auctioning revenues have increased significantly in recent years,⁵³ while modelling of the Fit-for-55 package points to substantial cumulative allowance-purchase costs in the electricity sector over the rest of the decade.⁵⁴ These figures represent different sides of the system. Public revenue on the one hand and compliance costs borne primarily by the power sector on the other. But together they underline the fiscal and economic significance of ETS I within the Cypriot energy system.

4. Emission Trading System II (Buildings and Road Transport)

What share of energy consumption is attributable to buildings and road transport?

Buildings and road transport are central to the decarbonisation challenge in Cyprus and will be the main sectors affected by ETS II.

In the buildings sector, final energy consumption is substantial. Residential buildings account for approximately 19.8% of final energy consumption, with commerce, hotels and services

⁴⁸ Republic of Cyprus, Final Updated National Energy and Climate Plan (NECP) 2021–2030 (submitted December 2024).

⁴⁹ European Commission, Environmental Implementation Review 2025 – Country Report: Cyprus (SWD(2025) 304 final).

⁵⁰ European Commission, Country Report — Cyprus (European Semester, 2025).

⁵¹ NECP.

⁵² Ibid

⁵³ European Commission, *Environmental Implementation Review 2025 – Country Report Cyprus* SWD(2025) 304 final, 35.

⁵⁴ Theodoros Zachariadis, Costas Giannakis and Georgios Taliotis, 'A First Assessment of the Economic Impact of the "Fit for 55" Energy and Climate Policy Package in Cyprus' (2022) 16(2) *Cyprus Economic Policy Review* 1.

contributing a further 15.8%, bringing the total share of buildings to around 35–36% of final energy use.⁵⁵

In road transport, the challenge is even more acute. Transport accounts for a large share of national emissions, including around 23% of total emissions and close to half of effort-sharing emissions.⁵⁶ These figures reflect structural characteristics: Cyprus has no railways or inland waterways, freight is entirely road-based, public transport use remains limited, and electric vehicle penetration is still extremely low.⁵⁷ Road transport is therefore both emissions-intensive and difficult to decarbonise, making it particularly sensitive to carbon pricing under ETS II.

Is the postponement of ETS II to 2028 viewed positively?

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In the Cypriot context, the postponement of ETS II to 2028 is viewed positively in practical terms, even if it does not alter the overall direction of decarbonisation policy.

The main benefit lies in implementation capacity. Cyprus is still in the process of aligning its domestic regulatory framework with ETS II requirements, and additional time is valuable for a small administration facing multiple parallel obligations. The delay also allows more time to develop complementary national measures, particularly in relation to pricing, compensation and administrative preparedness.⁵⁸

The postponement is also relevant in light of the incomplete implementation of domestic carbon-pricing measures.⁵⁹ While national planning anticipates a sequencing between a domestic carbon tax and ETS II, the former has not yet been fully enacted.⁶⁰ The delay therefore creates space to better align domestic instruments with the EU system and to prepare accompanying compensatory measures.

Are buildings and road transport already part of a national regulatory framework anticipating ETS II?

Cyprus already has a policy and regulatory framework that anticipates certain functional elements of ETS II, but this does not necessarily mean that it is fully ready to implement ETS II.

In the buildings sector, existing measures include energy-performance requirements, renovation policies and support schemes, as well as widespread use of solar thermal systems in households. These measures affect baseline energy demand and adjustment capacity, but do not eliminate exposure to carbon pricing.⁶¹

In road transport, anticipatory measures include CO₂-based vehicle taxation and early-stage electrification policies.⁶² However, the structural constraints remain significant: transport

⁵⁵ Republic of Cyprus, *First Biennial Transparency Report under the United Nations Framework Convention on Climate Change and the Paris Agreement* (2025) ('Cyprus BTR1'), 3D.1.1.5.

⁵⁶ Ibid 3D.1.2

⁵⁷ EIR 2025 (Cyprus) effort-sharing subsection

⁵⁸ European Commission, 2025 Environmental Implementation Review: Country Report Cyprus SWD(2025) 304 final (EIR)

⁵⁹ NECP Table 35

⁶⁰ See Section 1.2 and related footnotes

⁶¹ Cyprus BTR1 (UNFCCC submission, 2025), residential buildings section.

⁶² Cyprus BTR1 transport section and continuation.

emissions are high, public transport use is limited, and the transition to electric mobility is still at an early stage.⁶³

Cyprus can therefore be characterised as having an ETS II-oriented policy framework under incomplete implementation conditions, rather than a system that is either unprepared or fully ready.

How are the prospects for decarbonizing the national building and transport sectors assessed?

The outlook differs significantly between the two sectors. In the buildings sector, the prospects are moderately favourable in principle, given the existing policy framework and relatively strong baseline in areas such as solar thermal use.⁶⁴ At the same time, progress has been comparatively slow, and emissions reductions lag behind the EU average.⁶⁵ Future progress will depend on implementation speed, investment uptake and the management of distributional impacts.

In road transport, the outlook is considerably more challenging. Emissions remain significantly above historical levels, and the transition to sustainable transport is still at an early stage.⁶⁶ A key structural feature of the transport sector in Cyprus is the strong reliance on private car use. In practice, mobility is overwhelmingly car-based, with very limited modal alternatives. Public transport remains comparatively underdeveloped, both in terms of coverage and reliability. Bus networks do not adequately serve all areas, particularly outside urban centres, and journeys often require multiple connections, making them time-consuming and impractical. In addition, service reliability is perceived as inconsistent, with schedules subject to frequent changes. As a result, a car-dependent mobility culture has developed, in which private vehicles are effectively the default mode of transport for most daily activities. This structural dependence constitutes a significant constraint on the decarbonisation of the transport sector, as it limits the immediate effectiveness of policy measures that assume the availability of viable alternatives to private car use. Given the structural reliance on road-based mobility and the limited availability of alternatives, ETS II alone is unlikely to drive rapid decarbonisation without parallel investments in public transport, infrastructure and fleet renewal.⁶⁷

5. Double regulation?

Is there a discussion about the topic of ‘double’ regulation: e.g. energy efficiency in ETS installations / build environment, National taxes on/pricing of CO2 emissions, Emission Limit Values in environmental permits?

There is no clear debate in terms of double regulation. The more accurate issue is regulatory layering: the coexistence of multiple instruments that pursue related decarbonisation objectives through different legal techniques and at different points in the regulatory chain. This arises most clearly in three contexts.

First, in relation to national carbon taxation and ETS II, the issue remains largely prospective. Cyprus has not yet implemented a fully operational national carbon tax, despite the broader

⁶³ EIR SWD(2025) 304 final.

⁶⁴ European Commission, *2025 Country Report – Cyprus* SWD(2025) 213 final

⁶⁵ EIR SWD(2025) 304 final.

⁶⁶ Cyprus BTR1 transport section and continuation

⁶⁷ EIR SWD(2025) 304 final

green tax reform trajectory and the planning assumptions reflected in the NECP. The relevant question is therefore not current duplication, but how any future domestic carbon-pricing measure will be coordinated with ETS II once both apply to overlapping fuel uses.

Second, ETS I installations are also subject to permitting obligations under the Industrial Emissions framework, including BAT-based conditions and emission limit values for conventional pollutants. This is better understood as the coexistence of instruments serving different legal functions – greenhouse-gas pricing under the ETS and pollution-control regulation under the IED – rather than duplication in any strict sense, even if it increases compliance complexity for operators.

Thirdly, in the buildings sector, energy-performance requirements under the EPBD framework coexist, or will coexist, with carbon pricing on fuels under ETS II. Here again, the relationship is best characterised as one of layered policy instruments – standards, performance obligations and price signals – rather than unlawful or conceptually problematic duplication. The same is true, in functional terms, of transport, where vehicle taxation, electrification planning and future fuel carbon pricing may cumulatively affect the same transition pathway.

6. Effort Sharing

Is the Member State “on track” to meet its national reduction targets under the Effort Sharing Regulation 2018/842?

No. Cyprus is not currently on track to meet its binding 2030 target under the Effort Sharing Regulation. Its target is a 32% reduction compared with 2005 levels, as revised under Regulation (EU) 2023/857.⁶⁸ The most recent Commission assessments indicate a clear gap. In its 2025 assessment of the final updated NECP, the Commission projects that Cyprus would achieve a reduction of 25.9% by 2030 under the “with additional measures” (WAM) scenario, leaving a shortfall of 6.1 percentage points. Under the “with existing measures” (WEM) scenario, projected performance is substantially weaker, at –3.8%.⁶⁹ The 2025 Country Report confirms the same overall picture and notes that effort-sharing emissions in 2023 were still expected to remain above 2005 levels.⁷⁰

Is failure, compliance or over-achievement expected?

On current projections, over-achievement is not expected, and compliance through domestic measures alone appears unlikely.⁷¹ The central question is whether Cyprus can close part of the gap through the rapid implementation of additional domestic measures and, to the extent legally possible, recourse to ESR flexibilities.

The Commission has expressly noted that domestic flexibilities alone will not be sufficient unless accompanied by swift implementation of further measures.⁷² The issue is therefore not

⁶⁸ Regulation (EU) 2018/842 of the European Parliament and of the Council of 30 May 2018 (Effort Sharing Regulation), as amended by Regulation (EU) 2023/857 (19 April 2023); 4th Environmental Implementation Review – Cyprus (European Commission, July 2025), Effort Sharing section

⁶⁹ European Commission, Commission Assessment of the Final Updated National Energy and Climate Plan of Cyprus (SWD(2025) 140

⁷⁰ European Commission, 2025 Country Report – Cyprus (SWD(2025) 213 final, 4 June 2025), Annex 7 (Clean industry and climate mitigation), p. 57

⁷¹ Cyprus Final Updated NECP 2021–2030 (2024).

⁷² European Commission, 2025 Country Report – Cyprus (SWD(2025) 213 final, 4 June 2025), Annex 7 (Clean industry and climate mitigation), p. 57

simply formal compliance planning, but whether projected reductions can be converted into actual delivery within the remaining period to 2030.

What are the main challenges and success factors?

The principal challenge lies in the structure of Cyprus's effort-sharing emissions. Transport remains the largest problem sector, reflecting heavy dependence on road transport, limited public transport and very low EV uptake.⁷³ Buildings also remain a significant challenge, as emissions reductions have been comparatively slow and further progress will depend on both investment and implementation speed.⁷⁴ More generally, the size of the gap between the WEM and WAM scenarios shows that compliance depends heavily on measures that are not yet fully implemented in practice.⁷⁵

The main success factors are rapid implementation of the additional measures already identified in the NECP, especially in transport and buildings, and timely use of available flexibilities where appropriate. In other words, the issue is less whether Cyprus has identified the relevant sectors than whether it can implement the required transition in time.⁷⁶

Does Cyprus intend to sell or purchase emission allocations?

On current projections, Cyprus is more likely to be a purchaser (or user of flexibilities) than a seller. The final updated NECP expressly acknowledges the likely need to rely on flexibility mechanisms, in particular transfers from other Member States.⁷⁷ The report therefore points towards a strategy of combining domestic mitigation efforts with the use of available ESR mechanisms, rather than any expectation of over-compliance.

Information obtained through officials at the Department of Environment indicates that such transfers remain under active consideration, and that preliminary technical-level contacts have already taken place with other Member States, although no binding agreements have yet been concluded.⁷⁸ Bilateral cooperation arrangements and other regulatory flexibilities are being explored in parallel. The government has indicated that priority is being given to accelerating domestic emission reduction measures to limit reliance on external mechanisms.⁷⁹

7. Renewable Energy

What progress has been made in the transition towards a national energy supply based on renewable energy?

Cyprus has made measurable progress in the deployment of renewable energy, but from a relatively low baseline and under structurally difficult conditions. The national framework is based on the Renewable Energy Directive and the Governance Regulation,⁸⁰ while the

⁷³ European Commission, 2025 Environmental Implementation Review – Country Report Cyprus (SWD(2025) 304 final, 7 July 2025), Effort Sharing section

⁷⁴ Ibid

⁷⁵ European Commission, Commission Assessment of the Final Updated National Energy and Climate Plan of Cyprus (SWD(2025) 140

⁷⁶ Cyprus Final Updated NECP, Section 2.1, Snapshot analysis, pp. 20–21

⁷⁷ Cyprus Final Updated NECP 2021–2030

⁷⁸ Correspondence from the Department of Environment, Republic of Cyprus (April 2026)

⁷⁹ Ibid

⁸⁰ Directive (EU) 2023/2413 of the European Parliament and of the Council of 18 October 2023 amending Directive (EU) 2018/2001 (OJ L, 2023/2413, 31.10.2023); Regulation (EU) 2018/1999 of the European

principal domestic legislative basis is the 2022 Law on the Promotion and Encouragement of the Use of Renewable Energy Sources, which provides the legal basis for support schemes, permitting procedures and renewable energy communities.⁸¹

In quantitative terms, Cyprus has already surpassed its earlier binding RES target of 13% of gross final energy consumption, reaching 16.9%,⁸² and by 2023 this had risen to 20.2%.⁸³ In 2024, renewables accounted for 24% of the electricity mix, while total installed RES capacity increased to 895 MW, of which solar PV represented by far the largest share.⁸⁴ The updated NECP sets a national RES contribution of 33.17% by 2030 under the additional-measures scenario.⁸⁵ These figures indicate genuine progress, especially in solar deployment. At the same time, they should not obscure the wider picture: the Cypriot energy system remains overwhelmingly dependent on imported fossil fuels, and renewables are expanding within a system whose structural constraints continue to limit the pace and depth of transition.

What is the current energy mix, and what are the projections up to 2050?

Cyprus remains heavily dependent on imported fossil fuels. In 2023, oil and petroleum products accounted for the overwhelming majority of gross inland consumption, while renewables and biofuels represented a much smaller share.⁸⁶ Almost all indigenous energy production derives from renewables. What distinguishes Cyprus from most other Member States is that this transition takes place in a fully isolated electricity system, without interconnection to the wider European internal electricity market. That structural condition shapes both the pace of RES deployment and the regulatory choices available to the State.⁸⁷

The 2050 Long-Term Strategy projects a much more decarbonised electricity system, driven primarily by solar energy, with natural gas serving a more limited reserve or security-of-supply role.⁸⁸ At the same time, the credibility of medium-term transition pathways remains highly dependent on infrastructure delivery. The Great Sea Interconnector continues to face delays and uncertainty,⁸⁹ while the Vassilikos LNG import terminal has been affected by serious

Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action (OJ L 328, 21.12.2018, pp. 1–77).

⁸¹ Law 107(I)/2022 on the Promotion and Encouragement of the Use of Renewable Energy Sources; see Final Updated NECP 2021–2030, p. 34. For the broader institutional context of Cyprus's energy law framework, see M Tsangas and AA Zorpas, 'Cyprus: Energy Policy' in G Tiess, T Majumder and P Cameron (eds), *Encyclopedia of Mineral and Energy Policy* (Springer 2023) 205–212.

⁸² BTR1 (p. 32) reports 16.88% citing Cyprus Energy Balance 2020; 2025 European Semester Country Report Cyprus, Annex data table (shows 16.9% for 2020 using Eurostat SHARES)

⁸³ 2025 European Semester Country Report Cyprus, Annex 8 (p. 62): "In 2023, 20.2% of gross final energy consumption came from renewable sources."

⁸⁴ 2025 European Semester Country Report Cyprus, Annex 8 (p. 62)

⁸⁵ Cyprus Final Updated NECP, p. 30, Table 2.3 and accompanying text: AFM scenario targets 33.17% RES in gross final energy consumption by 2030.

⁸⁶ 2025 European Semester Country Report Cyprus, section 2.3.9 (reproduced in Terra Cypria Briefing, p. 12)

⁸⁷ On zero interconnection: Cyprus Final Updated NECP, p. 98 (interconnectivity level of 0%). For a comparative analysis of the regulatory implications of energy isolation for small island Member States, see Tsangas and Zorpas (n 81) 205–212.

⁸⁸ Cyprus Final Updated NECP p. 56

⁸⁹ On the €657 million CEF grant: 2025 European Semester Country Report – Cyprus, Annex 8, p. 62. On the revised execution schedule: Nexans statement of 7 January 2026, reported in *To Vima* (7 January 2026). On the Commission's position: Response of Commissioner Jørgensen to Parliamentary Question E-000494/2026, reported in *Cyprus Mail* (19 February 2026). On the successful sea trial at 3,000m depth: *Cyprus Mail* (10 March 2026). On the agreed new cost/viability study: Trilateral Summit Joint Statement (December 2025), reported in *Balkan Green Energy News* (25 December 2025)

contractual, financial and investigative problems.⁹⁰ These difficulties matter because national planning continues to assume infrastructure developments that have not yet materialised in practice.

What differences exist in the transformation of the electricity market versus the broader energy market (including non electric heating, transport and other energy use)?

The transition is highly uneven across sectors. The electricity sector has advanced furthest, with a steadily increasing RES share, driven predominantly by solar PV. Heating and cooling also perform comparatively well, largely because of the widespread use of solar water-heating systems in households.⁹¹ Transport, by contrast, remains the weakest sector by a considerable margin.⁹² Its RES share is still low, and future improvement depends heavily on accelerated electrification.

This asymmetry is not merely policy-related but structural. Cyprus has no rail infrastructure and no meaningful alternatives to road transport, which leaves private and road-based mobility at the centre of the transport system.⁹³ The result is that progress in RES deployment does not translate evenly across the wider energy economy: electricity and household heating have moved further ahead, while transport remains the principal lagging sector.

What are the major national regulatory instruments to support the transition to renewables?

The regulatory architecture rests on three main elements: a legislative basis for RES promotion, support schemes and market rules, and the institutional framework for licensing and market supervision. The principal statute is Law 107(I)/2022,⁹⁴ while the 2021 electricity-market legislation introduced a revised wholesale-market structure and legal categories for storage and aggregators.⁹⁵

Support instruments have evolved over time from feed-in tariffs to net metering, net billing and virtual net metering, alongside grant schemes financed through the RES and Energy Savings Fund.⁹⁶ These instruments have supported the expansion of distributed solar generation, particularly in residential settings. At the same time, some important market instruments remain underdeveloped: no corporate renewable power purchase agreements have yet been registered, and no contracts-for-difference framework is in place.⁹⁷ The NECP itself acknowledges that the functioning of PPAs will require further amendment of electricity-market rules.⁹⁸

⁹⁰ On the contract termination: Final Updated NECP 2021–2030, section 4.4. On the EPPO investigation: *Ports Europe*, <https://www.portseurope.com/cyprus-vasilikos-lng-terminal-project-doomed/> (26 August 2025). On the EU clawback of €67 million and cancellation of remaining €28 million: *MEES* (13 February 2026) *EU Alive* <https://eualive.net/cyprus-faces-e67-million-eu-clawback-as-lng-terminal-woes-deepen/> (2025).

⁹¹ Cyprus Final Updated NECP, p. 29; NECP p. 31, Table 2.3: RES-H/C target of 53.6% by 2030 under AFM. NIR 2025, p. 58

⁹² Cyprus Final Updated NECP, p. 29: "transport at 7.22%" (2022). NECP p. 145, Table (new RED III methodology): RES-Transport target of 17.3% by 2030 under AFM

⁹³ Cyprus Long-Term Strategy 2050, p. 22.

⁹⁴ Law 107(I)/2022, Article 37; Cyprus Final Updated NECP, p. 34.

⁹⁵ Law 130(I)/2021 Regulating the Electricity Market; BTR1, PaMs table, pp. 66–67 (measure 76). See also Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on common rules for the internal market for electricity (OJ L 158, 14.6.2019, pp. 125–199).

⁹⁶ BTR1, p. 32; See also BTR1, pp. 75–78, PaMs table (measures 1–6, 18)

⁹⁷ BTR1, PaMs table, pp. 75–76 (measures 7, 8, 9, 10).

⁹⁸ 2025 European Semester Country Report – Cyprus, Annex 8, p. 63; Final Updated NECP 2021–2030, p. 69.

Institutionally, the Cyprus Energy Regulatory Authority plays the central role in licensing, grid access and market rules.⁹⁹ A digital one-stop-shop for RES permitting has also been introduced, which is a positive administrative development, though it does not by itself resolve the more fundamental structural bottlenecks.¹⁰⁰

What major obstacles hinder a faster transition to renewable energy at the national level?

The principal obstacles are both structural and regulatory. Structurally, the most important barrier is the isolated and capacity-constrained electricity system, which is already leading to renewable curtailment.¹⁰¹ Storage remains underdeveloped in practice, despite the existence of a regulatory framework and licensing activity.¹⁰²

Regulatory and market-design obstacles also remain significant. Permitting delays persist, inter-agency coordination is not always effective, and the electricity market remains only partially liberalised.¹⁰³ Wind deployment has largely stagnated, while the absence of operational PPAs and CfDs limits the maturity of the support framework. More broadly, the transition continues to depend heavily on infrastructure whose implementation is delayed or uncertain.¹⁰⁴

Are adjustments to the EU's regulatory framework considered necessary? If so, which ones?

From the Cypriot perspective, the main issue is that the EU renewable-energy framework does not always sufficiently reflect the realities of small, isolated and non-interconnected systems.¹⁰⁵ National planning documents therefore emphasise the need for EU-level support mechanisms and implementation pathways that take such structural conditions into account.

In that sense, Cyprus's position reflects the need for a framework in which grid constraints, storage deficits, delayed interconnection and market size are treated as legally and financially relevant implementation conditions.

8. Land Use

How exactly are emissions from the land-use sector recorded nationally?

Cyprus reports LULUCF emissions and removals through its annual National Inventory Report submitted under the UNFCCC, using the 2006 IPCC Guidelines.¹⁰⁶ Land areas are currently represented through IPCC Approach 2, which captures net changes between land-use categories and their conversions, but does not yet provide spatially explicit location data.¹⁰⁷ The inventory

⁹⁹ BTR1, PaMs table, pp. 70–71 (measures 75, 89, 93); Ρυθμιστική Αρχή Ενέργειας Κύπρου (PAEK), Έκθεση 12/2022 : Σύνοψη ανασκόπηση διεργασιών για το νέο μοντέλο αγοράς ηλεκτρισμού στην Κύπρο

¹⁰⁰ Cyprus Final Updated NECP, p. 69

¹⁰¹ 2025 European Semester Country Report Cyprus, Annex 8 (p. 62); See also Terra Cypria Briefing, p. 11

¹⁰² Ibid

¹⁰³ 2025 European Semester Country Report Cyprus, Annex 8 (p. 63); See Articles 15–17 of RED II (now Article 16a of RED III) on permit-granting procedures and timeframes.

¹⁰⁴ Ibid

¹⁰⁵ Cyprus Long-Term Strategy 2050, p. 4.

¹⁰⁶ Cyprus National Inventory Report 2025, Ch. 6.1

¹⁰⁷ Ibid §6.1.1

is based on the CORINE Land Cover dataset and classifies land into the six standard IPCC categories: forest land, cropland, grassland, wetlands, settlements and other land.¹⁰⁸

A specific feature of the Cypriot inventory is that it covers only the territory under the effective control of the Republic. Managed land amounts to 601.82 kha, while the northern part of the island is tracked as unmanaged and does not contribute emissions or removals to the national inventory.¹⁰⁹

The NECP envisages a transition to the more spatially explicit IPCC Approach 3, but the Commission has noted that Cyprus has not yet demonstrated clear progress towards higher-tier estimation methods and geographically explicit datasets.¹¹⁰

What trends can be derived from this data?

The LULUCF sector has remained a net greenhouse-gas sink throughout the entire period 1990–2023.¹¹¹ Net removals increased from –153.1 kt CO₂ eq in 1990 to –310.6 kt CO₂ eq in 2023, representing a substantial strengthening of the sink over time.¹¹² Forest land is the principal contributor, while cropland and grassland have also functioned as continuous sinks; wetlands and settlements remain minor sources.¹¹³

That trend is not linear. It is interrupted by significant reversals in years of major wildfires, when forest land temporarily shifts from sink to source.¹¹⁴ Fire risk is therefore a central variable in the stability of the sector's mitigation contribution. The longer-term increase in removals appears to be linked to structural factors such as the prohibition of logging, less intensive agricultural practices and the expansion of forest and woodland conservation areas.¹¹⁵

Although earlier EU-level assessments identified a modest decline in removals after 2017,¹¹⁶ the most recent inventory data indicate a recovery by 2023, with removals exceeding previous levels.¹¹⁷ The overall picture is therefore one of a functioning but environmentally fragile net sink.

What strategies are being pursued at the national level to strengthen the land-use sector's contribution to emission reductions and to comply with the LULUCF Regulation 2018/841?

Under the amended LULUCF Regulation, Cyprus must achieve net removals of –352 kt CO₂ eq by 2030.¹¹⁸ On current projections, the remaining gap is relatively limited, but not

¹⁰⁸ Ibid §6.1.1 and §6.2.3.

¹⁰⁹ Ibid Table 6.2; §6.1 (overview)

¹¹⁰ Cyprus Final Updated NECP (December 2024), LULUCF measures section (Approach 3 transition); Commission Assessment of Cyprus' Final Updated NECP (2025), §2.1.2 (data quality gap).

¹¹¹ Cyprus NIR 2025, §6.1.4

¹¹² Ibid

¹¹³ Ibid

¹¹⁴ Cyprus BTR1, §2B.1.3.5

¹¹⁵ Ibid

¹¹⁶ 2025 European Semester Country Report — Cyprus, p. 68

¹¹⁷ Cyprus NIR 2025, Table 6.3 (2017: –307.03 kt CO₂ eq.; 2023: –310.58 kt CO₂ eq.)

¹¹⁸ Cyprus Final Updated NECP (December 2024), §2.1, citing Regulation (EU) 2018/841 as amended by Regulation (EU) 2023/839.

negligible.¹¹⁹ The Commission has assessed national policies as broadly supportive of the target, while noting the need for additional measures to ensure full compliance.¹²⁰

The main measure under implementation is the “I Plant for Climate” campaign, introduced in 2018, which provides indigenous and non-invasive seedlings free of charge to public bodies, schools, NGOs and private entities that commit to maintaining the planting for at least three years.¹²¹ The programme is intended to scale up further by 2030.

Additional measures are pursued through the CAP Strategic Plan and the NECP.¹²² These include afforestation on agricultural and non-agricultural land, maintenance support for forests, urban green corridors, soil-carbon measures and strengthened forest-fire prevention and monitoring. Inter-ministerial work is also ongoing to identify state-owned land suitable for afforestation.¹²³

Cyprus is also considering the future development of a voluntary carbon market system aligned with the logic of the CRCF Regulation.¹²⁴ At present, however, the central issue is whether the existing policy mix is sufficient to preserve and modestly expand a sink that is already performing relatively well but remains vulnerable to wildfire and data-quality constraints.

9. Special National Strategies, Programmes, and Ideas

What special strategies, regulatory programmes, and ideas—beyond those already mentioned—are being pursued nationally for climate mitigation? How do these national concepts and legal instruments relate to EU climate policy?

A notable development is the Eastern Mediterranean and Middle East Climate Change Initiative (EMME-CCI), launched by the Republic of Cyprus in 2019 and officially endorsed by ten regional states at COP27 in 2022.¹²⁵ The initiative constitutes a multinational effort to coordinate climate action in a region identified as a climate “hotspot”, warming significantly faster than the global average. It is based on an evolving, science-based Regional Action Plan designed to support participating countries in meeting their Paris Agreement obligations through targeted, transboundary mitigation and adaptation projects.¹²⁶

The scientific foundation of the initiative has been developed by 13 thematic task forces comprising over 240 scientists, coordinated by the Cyprus Institute. In particular, the Institute’s Climate and Atmosphere Research Center (CARE-C) provides the core scientific infrastructure, including high-resolution regional climate projections, greenhouse gas monitoring data, and policy toolkits that inform both national strategies and the regional framework.¹²⁷ The EMME-

¹¹⁹ Commission Assessment of Cyprus’s Final Updated NECP (2025), §2.1.2; 4th Environmental Implementation Review - Cyprus (2025), p. 36.

¹²⁰ Ibid.

¹²¹ Cyprus BTR1, §3F.3.4; Cyprus Long-Term Strategy, LULUCF section; <https://www.moa.gov.cy/moa/fd/fd.nsf/All/8275027A410B42A5C2258490003C47F3?OpenDocument>

¹²² Cyprus BTR1, §3F.3.4; Final Updated NECP 2021–2030, LULUCF measures section.

¹²³ Ibid.

¹²⁴ Cyprus Final Updated NECP, LULUCF measures section.

¹²⁵ ‘The EMME Climate Change Initiative’ <https://emme-cci.org/> accessed 18 March 2026.

¹²⁶ Ibid.

¹²⁷ Final Updated NECP 2021–2030 (December 2024), p. 125.

CCI operates as a cooperative policy mechanism rather than a legally binding instrument, facilitating cross-border collaboration, data sharing, and technology transfer.

At the sub-national level, Limassol's participation in the EU Mission on Climate-Neutral and Smart Cities by 2030 represents a distinct development. Limassol is one of 100 EU cities selected under Horizon Europe¹²⁸ and registered its first Climate City Contract with the European Commission on 15 September 2023.¹²⁹ This is significant in the Cypriot context, as it constitutes the only instance in which a municipality has undertaken a discrete, internationally monitored climate neutrality commitment with a defined target date, thereby introducing a form of sub-national climate governance within an otherwise centralised administrative structure. Upon certification with the "Mission Label", the city gains access to targeted EU and European Investment Bank funding for the implementation of climate neutrality measures across sectors including energy, transport, waste management and the built environment.¹³⁰

These initiatives illustrate that, while Cyprus does not rely on standalone national mitigation models, it participates in multi-level and regional governance frameworks that complement EU climate policy. The emphasis remains on coordination, implementation and access to EU-linked funding mechanisms, rather than on the development of independent regulatory approaches.

Does a programme for carbon capture and storage exist?

Cyprus does not have an operational CCS programme. The NECP states that Cyprus participates in European Commission discussions on CCS technologies applied in other Member States and is exploring the possibility of opening its territory or part of its Exclusive Economic Zone for the exploration of geological formations suitable for CO₂ storage, particularly in connection with future offshore hydrocarbon activities.¹³¹ The Commission's assessment of the final updated NECP confirmed that it does not contain a comprehensive CCUS strategy: it identifies neither capturable CO₂ volumes, transport arrangements, nor overall storage capacity or injection volumes available by 2030.¹³² Despite this, the Long-Term Strategy treats CCS/CCU as a material contributor to achieving carbon neutrality by 2050 under the AMB scenario.¹³³

10. Social and Regional Compensation Mechanisms

Are there national mechanisms to provide social or regional compensation for the burdens arising from climate protection measures? Is any form of "climate dividend" or "climate payment" being issued?

Cyprus does not operate a national "climate dividend" or per-capita climate payment, nor has any such mechanism been proposed. Social compensation derives from EU-level instruments

¹²⁸ European Commission, 'Commission announces 100 cities participating in EU Mission for climate-neutral and smart cities by 2030' (Press Release, 28 April 2022) https://cyprus.representation.ec.europa.eu/news/commission-announces-100-cities-participating-eu-mission-climate-neutral-and-smart-cities-2030-2022-04-28_en accessed 18 March 2026.

¹²⁹ Limassol Municipality, *Limassol Climate City Contract 2030* (2024) <https://www.limassol.org.cy/uploads/Missioncities/812e2afbec.pdf> accessed 18 March 2026.

¹³⁰ European Commission, 'Commission awards EU Mission Label to 20 cities' (Press Release, IP/24/1645, 21 March 2024) https://ec.europa.eu/commission/presscorner/detail/en/ip_24_1645 accessed 18 March 2026.

¹³¹ Final Updated NECP, Section on Carbon Capture and Storage/Utilisation page 26

¹³² European Commission, Assessment of Cyprus's Final Updated NECP (2025), Section 2.1.3.

¹³³ Cyprus Long Term Low GHG Emission Development Strategy for 2050 Section 2.1.1

implemented nationally, supplemented by pre-existing energy poverty protections. The two principal prospective instruments, the Social Climate Fund (SCF) and the green taxation reform's revenue-recycling commitment, are addressed in their institutional dimensions above in Section 1.¹³⁴ The critical issue here is operational delivery, which as of April 2026 is largely absent.

Regarding the SCF, Cyprus missed the 30 June 2025 submission deadline under Article 6(1) of Regulation (EU) 2023/955, and the plan remains unsubmitted, a position shared by 22 of the 27 Member States.¹³⁵ A draft containing seven measures across transport, buildings and energy communities was placed under public consultation in October–November 2025, but it has been criticised for its limited scope and the absence of cost estimates, beneficiary targets, and a definition of energy vulnerability; no SCF funding has therefore flowed to Cyprus.¹³⁶ The one-year postponement of ETS2 to 1 January 2028 may further reduce the overall SCF envelope, since ETS2 auction revenues partially financing the Fund will commence one year later; the Commission has not published a revised allocation.¹³⁷

Regarding the green taxation reform, the compensatory architecture through which carbon tax revenues are to be returned to citizens remains inoperative, because the carbon tax itself has not been enacted.¹³⁸ Postponed at least four times since its original November 2023 deadline, the package was reportedly walked back by 50 to 66 per cent following May 2025 negotiations with the Commission, during which Cyprus unsuccessfully sought a full postponement.¹³⁹ As of March 2026, the Finance Minister has stated that the measures have been further delayed but cannot be cancelled.¹⁴⁰

At the regional level, the Territorial Just Transition Plan, approved by the Commission on 8 July 2022, allocates EUR 101.1 million from the Just Transition Fund to territories most affected by the climate transition, with a strategic focus on reducing GHG emissions at the Dhekelia power station and supporting energy-intensive businesses.¹⁴¹ Funded measures include SME clean-technology adoption, workforce retraining, and the Green Technical School in Nicosia.¹⁴² The broader Thalia 2021–2027 programme, which encompasses the JTF, shows strong absorption, with EUR 700 million allocated across over 100 projects by October 2025.¹⁴³ This is the only operational, regionally targeted compensation mechanism currently disbursing funds in connection with climate-related transition burdens. Pre-existing energy poverty protections, including a reduced electricity tariff for vulnerable consumers (approximately 20%

¹³⁴ See Sections 1.2 and 1.3 above.

¹³⁵ European Commission, DG Employment, Social Affairs and Inclusion, 'Social Climate Fund – National Plans' tracker (accessed March 2026) (showing only Sweden's plan approved as of December 2025; Latvia, Lithuania, Malta and the Netherlands under assessment; remaining 22 Member States not yet submitted); Regulation (EU) 2023/955, Art. 6(1) (deadline of 30 June 2025)

¹³⁶ Cyprus Ministry of Finance, Draft Social Climate Plan, public consultation launched 31 October 2025 via e-consultation.gov.cy; REScoop, 'Cyprus – Social Climate Fund' Financing Tracker (2025) (noting absence of cost data, beneficiary numbers, and definition of vulnerability).

¹³⁷ Regulation (EU) 2026/667 amending Regulation (EU) 2021/1119, adopted by Council on 11 March 2026, postponing ETS2 to 1 January 2028; ICAP, 'EU officially adopts the 2040 climate target, postpones ETS 2 by one year' (March 2026). The budgetary implications for the SCF have not been officially quantified by the Commission.

¹³⁸ See Section 1.2 above for the December 2025 tax reform and green investment deductions.

¹³⁹ Cyprus Mail, 'No full postponement for EU's green taxes for Cyprus – reports' (22 May 2025).

¹⁴⁰ Cyprus Mail, 'Now not the time to introduce green taxes' (23 March 2026).

¹⁴¹ European Commission, Press Release IP/22/4326 (8 July 2022); Thalia 2021–2027 Programme, Territorial Just Transition Plan; Regulation (EU) 2021/1056.

¹⁴² Ibid. (Commission press release specifying JTF-funded measures including SME support, energy infrastructure modernisation, and the Green Technical School in Nicosia).

¹⁴³ Cyprus Mail, '€700 million from Thalia 2021–2027 already allocated' (30 October 2025).

below the standard household tariff), rules against grid disconnection during critical periods, and grant schemes for energy efficiency upgrades, provide ongoing relief but predate the current generation of climate instruments and are not formally designed as compensation for climate protection burdens.¹⁴⁴

11. Adaptation

Are there national programmes for climate adaptation? How can these be briefly described?

Cyprus's first National Climate Change Adaptation Strategy (NAS) and accompanying National Action Plan (NAP) were adopted by the Council of Ministers on 18 May 2017 (Decision No 82.555), with the Department of Environment of MARDE as coordinating authority.¹⁴⁵ The 2017 NAS was developed under the LIFE+ CYPADAPT project, in alignment with the 2013 EU Adaptation Strategy.¹⁴⁶ Implementation has been monitored through annual progress reports to the Council of Ministers; five were prepared between 2018 and 2023, although the fifth has not been officially published.¹⁴⁷ A 2024 gap analysis confirmed that the 2017 NAS was no longer aligned with the 2021 EU Strategy on Adaptation, the European Climate Law (Regulation (EU) 2021/1119), or recent sectoral EU policies,¹⁴⁸ and the Commission's 4th Environmental Implementation Review characterised Cyprus's approach as "mostly non-binding" and its measures as insufficient, noting the absence of sectoral adaptation plans.¹⁴⁹ A revision process, supported by the EU Technical Support Instrument, commenced in December 2023.¹⁵⁰ The revised NAS for 2025–2050 expands the original 12 policy areas to 15, adding Cultural Heritage, Economy and Industry, and Spatial Planning, and identifies 118 measures across all sectors and two cross-sectoral areas (governance and education).¹⁵¹ It is underpinned by an updated Climate Risk and Vulnerability Assessment (October 2024), projecting temperature increases of 1.5–4°C by 2100 under RCP4.5 and RCP8.5,¹⁵² and was subject to two public consultation phases (November 2024–February 2025).¹⁵³ The revised NAP provides for the nomination of adaptation focal points, an Intergovernmental Working Group on Adaptation, biennial progress reports, and six-yearly reviews in 2032, 2038, 2044

¹⁴⁴ Cyprus Final NECP, energy poverty measures section; BTR1, PaM No. 78 (Ministerial Orders K.D.P. 307–310/2023); European Semester Country Report Cyprus 2025, Annex 8.

¹⁴⁵ Cyprus Final Updated NECP, Section on Adaptation to Climate Change, p. 23 (Decision No 82.555); National Adaptation Strategy (revised, 2025), Ch. 2.1; Cyprus Long-Term Strategy (2022), Section on Adaptation (adoption date: 18/5/2017).

¹⁴⁶ National Adaptation Strategy (revised, 2025), Ch. 2.1 (LIFE+ CYPADAPT project and alignment with the 2013 EU Adaptation Strategy).

¹⁴⁷ National Adaptation Strategy (revised, 2025), Ch. 2.1 (five annual reports: 1st August 2018, 2nd November 2019, 3rd February 2021, 4th October 2022, 5th issued late 2023 but not yet officially published).

¹⁴⁸ National Adaptation Strategy (revised, 2025), Ch. 2.1 and Table 1 (gap analysis, Trinomics et al., 2024).

¹⁴⁹ 4th Environmental Implementation Review — Cyprus (2025), Adaptation to Climate Change section, p. 36, and Annex 9, p. 66.

¹⁵⁰ Cyprus Final Updated NECP, p. 23 (review process started December 2023); National Adaptation Strategy (revised, 2025), Ch. 1.1 (TSI support from European Commission/SG REFORM).

¹⁵¹ National Adaptation Strategy (revised, 2025), Executive Summary and Table 2

¹⁵² National Adaptation Strategy (revised, 2025), Executive Summary (CRVA findings); Ch. 3 (CRVA methodology completed October 2024, RCP4.5 and RCP8.5 scenarios).

¹⁵³ National Adaptation Strategy (revised, 2025), Ch. 2.2 and Figure 1 (public consultation timeline); Final Updated NECP 2021–2030, p. 23.

and 2050.¹⁵⁴ Financing draws on EU funds (Cohesion Fund, RRF, LIFE), the national budget and private investment, with funding gaps acknowledged.¹⁵⁵

Should the EU, from a national perspective, develop climate adaptation programmes, or should this remain the responsibility of the Member States?

The Cypriot experience supports the existing division of competence. Article 5(4) of the European Climate Law requires Member States to adopt and implement national adaptation strategies,¹⁵⁶ while Article 19 of the Governance Regulation imposes reporting and monitoring obligations without prescribing programme content.¹⁵⁷ This framework reflects the inherently place-specific nature of climate vulnerability: Cyprus's exposure to water scarcity, wildfires and heatwaves differs fundamentally from the risks faced by northern Member States, and adaptation measures must be shaped by national risk assessments and local stakeholder input rather than harmonised EU prescriptions.¹⁵⁸ At the same time, the TSI support that enabled the NAS revision shows the value of EU technical and financial assistance for smaller Member States.¹⁵⁹

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Recent wildfire events have highlighted implementation challenges in relation to adaptation. Severe fires in 2025 resulted in significant environmental damage, destruction of property and evacuations, and have been described as among the most serious in recent years. The response to these events has been subject to public and political scrutiny, particularly in relation to early warning systems, coordination of emergency response and the timing of requests for international assistance. These developments underline that, beyond the existence of national adaptation strategies, the key challenge lies in operational preparedness and implementation capacity, especially in the context of extreme climate events.

Overall, given the geographically differentiated nature of climate impacts and the predominantly local character of adaptive responses, EU competence in the field of adaptation should be exercised in a restrained manner, limited to coordination, guidance, and support. Attempts to impose harmonised or prescriptive obligations risk exceeding the bounds set by subsidiarity and proportionality, and may undermine the effectiveness of adaptation policies by disregarding local specificities.

12. New liability/compensation regime in the Air Quality Directive (2024/2881) and the amended IE Directive (2024/1784)

The new Air Quality Directive 2024/2881, art. 28. and the amended IE Directive (2024/1785) requires Member States to establish a liability/compensation regime regarding persons suffering damage to human health caused by violation of the EU-obligations under the two directives. The new EU-obligation should be seen in light of the CJEU-ruling in C-61/21 in

¹⁵⁴ Revised NAS (2025), Executive Summary (Implementation Milestones, six-yearly reviews 2032/2038/2044/2050); National Climate Change Adaptation Action Plan 2025–2050, Milestones 1, 3 and 4.

¹⁵⁵ Final Updated NECP 2021–2030, pp. 24–25; National Adaptation Strategy (revised, 2025), Executive Summary.

¹⁵⁶ Regulation (EU) 2021/1119 (European Climate Law), Art. 5(4); European Commission, EU Strategy on Adaptation to Climate Change, COM(2021) 82 final.

¹⁵⁷ Regulation (EU) 2018/1999 (Governance Regulation), Art. 19; Regulation (EU) 2021/1119, Art. 5(4) (cross-referring to Art. 19(1) of Regulation (EU) 2018/1999).

¹⁵⁸ National Adaptation Strategy (revised, 2025), Executive Summary (CRVA sector-specific vulnerabilities); 4th Environmental Implementation Review - Cyprus (2025), Annex 9, p. 66.

¹⁵⁹ Regulation (EU) 2018/1999 (Governance Regulation), Art. 19 (reporting on national adaptation actions); EU Strategy on Adaptation to Climate Change, COM(2021) 82 final.

which the CJEU rejected Member State liability for human health damage based on the (old) Air Quality Directive. The new obligations place Member States as the one who should pay compensation for the damage, but the legal implications of the new regimes are not entirely clear. How is the new obligation on liability/compensation in the new Air Quality Directive and the amended IE Directive intended to be implemented in your Member State?

Cyprus intends to implement both compensation regimes through dedicated provisions in two new draft laws currently proceeding through the legislative process.¹⁶⁰ Both closely mirror the text of their respective directive provisions and were published for public consultation on the national e-consultation platform in late 2025.¹⁶¹

The Department of Labour Inspection of the Ministry of Labour and Social Insurance published a draft Ambient Air Quality Law of 202x for public consultation on 1 October 2025 (closing 29 October 2025), transposing Directive 2024/2881.¹⁶² Article 30 of the draft, entitled “Compensation for harm to human health” (Αποζημίωση για βλάβη στην ανθρώπινη υγεία), directly transposes Article 28 of the Directive.¹⁶³ Article 30(1) provides that the Minister shall ensure that natural persons who suffer damage to human health due to a violation of the national rules transposing Articles 24(1)–(5) and 25(1)–(2), including the provisions on air quality plans and short-term action plans, committed intentionally or negligently by the competent authorities, have the right to claim and obtain compensation for that damage.¹⁶⁴ Article 30(2) requires the Minister to ensure that national rules and procedures governing compensation claims are designed and applied so as not to render the exercise of the right to compensation impossible or excessively difficult.¹⁶⁵ Article 30(3) permits the Minister to set limitation periods for compensation claims, provided that these do not begin to run before the cessation of the violation and before the claimant knew, or could reasonably be expected to have known, of the harm.¹⁶⁶

This constitutes a form of state liability: the compensating party is the competent authority responsible for the violation, not a private operator.¹⁶⁷ The provision also contains a fault requirement, since the violation must have been committed intentionally or negligently (εκ προθέσεως ή εξ αμελείας). In that respect, the draft appears to respond directly to Case C-61/21, JP v Ministre de la Transition écologique, in which the Court held that the predecessor directive did not confer on individuals a right to compensation capable of triggering Francovich state liability.¹⁶⁸ The draft remains listed as “under processing” (υπό επεξεργασία) and received no comments during consultation.¹⁶⁹

The Department of Environment published a draft Industrial and Livestock Rearing Emissions (Integrated Pollution Prevention and Control) Law of 2026 for public consultation on 3

¹⁶⁰ Draft Ambient Air Quality Law of 202x (dated 23 September 2025), Art. 30, Chapter VII; Draft Industrial and Livestock Rearing Emissions Law of 2026, Art. 97, Part X.

¹⁶¹ Cyprus e-Consultation Platform (e-consultation.gov.cy): [AQD draft published 1 October 2025](#); [IED draft published 3 December 2025](#).

¹⁶² Cyprus e-Consultation Platform, ‘Ο περί της Ποιότητας του Ατμοσφαιρικού Αέρα Νόμος του 202x’.

¹⁶³ Draft AQD Law, Art. 30, Chapter VII (Access to Justice, Compensation and Sanctions); transposing Directive (EU) 2024/2881, Art. 28

¹⁶⁴ [1] Ibid., Art. 30(1); transposing Directive (EU) 2024/2881, Art. 28(1).

¹⁶⁵ Ibid., Art. 30(2); transposing Directive (EU) 2024/2881, Art. 28(3).

¹⁶⁶ Ibid., Art. 30(3); transposing Directive (EU) 2024/2881, Art. 28(4).

¹⁶⁷ Ibid., Art. 30(1): liability of competent authorities (αρμόδιες αρχές).

¹⁶⁸ CJEU, Case C-61/21, JP v Ministre de la Transition écologique, ECLI:EU:C:2022:1015 (22 December 2022), Grand Chamber; Directive (EU) 2024/2881, Recital 41.

¹⁶⁹ Cyprus e-Consultation Platform, ‘Ο περί της Ποιότητας του Ατμοσφαιρικού Αέρα Νόμος του 202x’.

December 2025 (closing 15 January 2026), transposing Directive 2010/75/EU as amended by Directive 2024/1785.¹⁷⁰ Article 97 of the draft, entitled “Compensation” (Αποζημίωση), transposes Article 79a of the Directive.¹⁷¹ Article 97(1) provides that where harm to human health is caused as a result of a violation of the Law’s provisions, affected persons have the right to claim and obtain compensation from the natural or legal persons that caused the harm.¹⁷² Article 97(2) requires the Chief Inspector to make publicly available information concerning compensation claims so as to facilitate the exercise of that right.¹⁷³ Article 97(3) permits the competent authority to set limitation periods, subject to the same safeguard that they do not begin to run before the cessation of the violation and before the claimant knew, or could reasonably be expected to have known, of the harm.¹⁷⁴

Unlike the Ambient Air Quality Directive regime, the IED compensation right is directed against operators, not the state, and it does not contain a fault requirement. It is triggered by the violation itself, irrespective of whether that violation was committed intentionally or negligently.¹⁷⁵ The consultation on this draft received five comments from stakeholders, and the draft law would replace the existing Law 184(I)/2013 in its entirety.¹⁷⁶

¹⁷⁰ Cyprus e-Consultation Platform, ‘Ο περί Βιομηχανικών και Κτηνοτροφικών Εκπομπών (Ολοκληρωμένη Πρόληψη και Έλεγχος της Ρύπανσης) Νόμος του 2026’.

¹⁷¹ Draft IED Law, Art. 97, Part X (Administrative Enforcement), p. 167; transposing Directive (EU) 2024/1785, Art. 79a.

¹⁷² Ibid., Art. 97(1); transposing Directive (EU) 2024/1785, Art. 79a(1).

¹⁷³ Ibid., Art. 97(2); transposing Directive (EU) 2024/1785, Art. 79a(2).

¹⁷⁴ Ibid., Art. 97(3); transposing Directive (EU) 2024/1785, Art. 79a(4).

¹⁷⁵ Ibid., Art. 97(1)

¹⁷⁶ The draft replaces Law 184(I)/2013 as amended by Laws 131(I)/2016 and 127(I)/2021