

Fundamental and social rights in the green transition - energy efficiency and energy poverty

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1. EXECUTIVE SUMMARY

Romania's National Integrated Energy and Climate Plan for 2025-2030 establishes Romania's energy efficiency goals by 2030. These goals are to obtain a 51% reduction in primary energy consumption and a corresponding 47% reduction in final energy consumption.¹

The Plan also deals with the issue of just transition for which it indicates a financial plan focusing on six counties that are most affected by the transition, called the Just Transition Programme. It looks in key areas such as development of renewable energy projects, improvement of energy efficiency in buildings, industry, and transport, creation of green jobs in the renewable energy sector, energy efficiency sector, and other sectors that are helping to reduce greenhouse gas emissions.²

However, Green transition in Romania poses a series of particular challenges.

Data shows that 15.2% of the population in Romania is unable to keep their homes adequately warm, which is higher than the EU 28 average of 9.3%.³ Also in 2022, 21% of households experienced energy poverty if considering the LIHC indicator („Low Income, High Cost”) which shows the impact of energy bills on the household budget, showing that after paying their energy bills these households fall below the monetary poverty line.⁴ Moreover, 11,611 Romanians do not have access to electricity and 87% of the houses without electricity do not have a land register, which makes it difficult for institutions to tackle this problem.⁵

It is in this context that a program which would finance individuals to instal individual photovoltaic systems has a great potential. It can allow individuals living in remote areas, not connected to the grid to get access to electricity, it can also alleviate costs for electricity for the thousands of households experiencing energy poverty and it can provide a source of income to vulnerable communities, who could produce their own electricity and sell the surplus electricity. All of this can also greatly help the energy transition process and help to reach Romania's climate goals.

¹ [Integrated National Energy and Climate Plan of Romania 2025-2030](#), Update October 2024, p. 70.

² [Integrated National Energy and Climate Plan of Romania 2025-2030](#), Update October 2024, p. 45.

³ [Integrated National Energy and Climate Plan of Romania 2025-2030](#), Update October 2024, p. 82.

⁴ According to a [press-release](#) from the Romanian Observatory on Energy Poverty (*Observatorul Român al Sărăciei Energetice*), from 27 November 2023.

⁵ Dumitru Chisalita, Intelligent Energy Association (*Asociația Energia Inteligentă*) National Registry of Houses Without Electricity ([Registrului Național al Caselor Fără Energie Electrică, RNCFEE](#)) April 2024

The Photovoltaic Green House 2023 is a project that holds this potential.⁶ It is a recurring national project that allows individuals and religious establishments to access grants of up to a maximum of RON 20,000 (approx. Euro 40,000) to purchase and install photovoltaic panel systems with a minimum output of 3 kW to produce electricity for their own consumption and with the possibility of delivering the surplus electricity into the national energy system.⁷

The project is managed by the Environmental Fund Administration (*Administrația Fondului pentru Mediu*) and the objective of the programme is to increase the capacity to produce electricity from renewable sources, whilst increasing energy efficiency, improving air quality and reducing greenhouse gas emissions through the use of photovoltaic panel systems.⁸

The project attracted significant national popularity and seems to have contributed substantially in promoting renewable energy and in enabling households to reduce their energy bills, gain energy independence, and contribute to the reduction of CO₂ emissions. It arguably helps more people understand the practical and economic advantages of renewable energy and it supports the growth of businesses related to renewable energy, such as installation companies. This has a positive impact on the national economy and contributes to the development of the renewable energy sector.

However, the project does not meet its potential in terms of securing access to electricity for marginalized groups with no access to electricity or who cannot afford electricity costs. The program failed to target vulnerable groups, such as those affected by energy poverty or households without proper legal documentation.

This failure results from the program's design and implementation which in practice excludes large parts of marginalised groups, including people who do not own property, who do not have updated property documents, who cannot afford the 10% required as their own contribution, those with limited capabilities of using internet tools and understanding and navigating through bureaucratic processes.

⁶ Information available on the [Photovoltaic Green House 2023 project website](#).

⁷ Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid ([Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională](#)).

⁸ Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid ([Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională](#)).

The program lacks a comprehensive human rights impact assessment that could have identified potential vulnerabilities and informed concrete measures needed to make sure the program reaches and benefits those most in need.

2. Reaching climate targets through energy efficiency

In October 2024 Romania submitted the final Updated National Integrated Energy and Climate Plan for 2025-2030, hereinafter NECP.⁹

This latest plan comes after considerable delay and was placed in public consultation for only two weeks, which civil society has warned were not enough for a proper consultation.¹⁰ This consultation comes after a series of previous rounds of consultation, which were also criticised. For example, on 21 of December 2023 the Ministry of Energy published a revised National Integrated Energy and Climate Change Plan and invited all interested parties to send their opinions by 21 January 2024.¹¹ Several environmental organizations criticised the Ministry of Energy, and claimed this was not a proper consultation. They criticised the fact that the consultation process was not properly advertised, and the short deadline set, because of which they asked for an extension of the public consultations.¹² Following these accusations, the Ministry of Energy decided to extend the consultation period and to organize three rounds of public debates between February and March 2024 on the revised National Integrated Energy and Climate Change Plan, the debates were hybrid, online and offline and everyone could sign up to attend.¹³

The consultations included the Romanian Parliament, various national institutions, local and regional authorities and a variety of stakeholders, social partners, and civil society organizations including representative associations of industry actors and energy actors as well as civil society actors such as WWF Romania and Greenpeace Romania.¹⁴

⁹ [Integrated National Energy and Climate Plan of Romania 2025-2030](#), Update October 2024. The plan is available in [Romanian](#) and in [English](#).

¹⁰ According to a [press-release](#) issued by 2Celsius, Bankwatch, Declic and WWF-Romania on 3 October 2024.

¹¹ According to a [press-release](#) issued by the Ministry of Energy on 22 December 2023.

¹² According to a [press-release](#) issued by 2Celsius, Bankwatch, Declic, Greenpeace and WWF-Romania on 19 January 2024.

¹³ As explained in a [press-release](#) issued on 16 February 2024 by the Ministry of Energy.

¹⁴ A list of consulted parties and their input is available in the [Integrated National Energy and Climate Plan of Romania 2025-2030](#), Update October 2024, p. 52-54.

According to desk research it does not seem that vulnerable groups were directly consulted in drafting this plan.

The final version of the NECP is considered to be a progress in relation to its previous versions if considering for example the target for renewable energy sources of 38.4% in 2030 of total national final energy consumption (compared to only 30.7% in the 2021 plan) or the fact that it sets emissions reduction target for sectors governed by the Effort Sharing Regulation of -12.7% by 2030 (compared to the previous target of just -2% set in 2018) and a 96% reduction in emissions by 2040 and net negative emissions by 2050, mainly through natural carbon sinks such as forests.¹⁵

However, civil society organizations have criticised the fact that the document offers very little attention to energy poverty and energy communities; they have asked for the plan to look at reducing the use of fossil gas, improving infrastructure for green mobility and to ensure an efficient allocation of resources and coordination between environmental and social objectives to ensure a just and sustainable energy transition.¹⁶

The Romanian Ministry of Energy (*Ministerul Energiei*) is the national coordinator for the monitoring of the implementation of the NECP of Romania and it is responsible for regular reporting on the state of implementation and updating it in accordance with the provisions of Regulation (EU) 2018/1.999, following the formats set out in Annexes I-XXIII to Regulation (EU) 2022/2.299.¹⁷ The Ministry of Energy also holds general responsibility with developing programmes and plans of actions and measures for the implementation of the Government's policy in the electricity sector, including

¹⁵ According to a [press-release](#) issued by The Energy Policy Group (EPG) on 6 November 2024.

¹⁶ According to a [press-release](#) issued by 2Celsius, Bankwatch, Declic and WWF-Romania on 3 October 2024.

¹⁷ Romania, Emergency Ordinance no. 62 of 30 June 2023 establishing the institutional framework and measures for the implementation of Regulation (EU) 2018/1999 of the European Parliament and of the Council on energy governance and climate action and amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council. [525/2013 of the European Parliament and of the Council and Commission Regulation (EU) 2022/2.299 of 15 November 2022 laying down implementing rules on the structure, format, technical details and procedures for integrated national interim energy and climate reports ([Ordonanța de urgență nr. 62 din 30 iunie 2023 privind stabilirea cadrului instituțional și a măsurilor pentru punerea în aplicare a Regulamentului \(UE\) 2018/1.999 al Parlamentului European și al Consiliului privind guvernarea uniunii energetice și acțiunile climatice și de modificare a Regulamentelor \(CE\) nr. 663/2009 și \(CE\) nr. 715/2009 al Parlamentului European și al Consiliului, Directivele 94/22/CE, 98/70/CE, 2009/31/CE, 2009/73/CE, 2010/31/UE, 2012/27/UE și 2013/30/UE ale Parlamentului European și ale Consiliului, Directivele 2009/119/CE și \(UE\) 2015/652 ale Consiliului și de abrogare a Regulamentului \(UE\) nr. \[privind energia și schimbările climatice\]. 525/2013 al Parlamentului European și al Consiliului, precum și Regulamentul \(UE\) 2022/2.299 al Comisiei din 15 noiembrie 2022 de stabilire a normelor de punere în aplicare privind structura, formatul, detaliile tehnice și procedurile pentru rapoartele naționale intermediare integrate privind energia și clima\), 30 June 2023, Art. 3.](#)

programmes for decarbonisation, energy storage, energy efficiency and the promotion of renewable energy sources, in line with national and European programmes on the Integrated National Energy and Climate Change Plan 2025-2030.¹⁸

An inter-institutional working group was set up to assess the state of implementation of the measures included in the National Integrated Energy and Climate Change Plan 2025-2030, the preparation of the National Integrated Interim Report and the update of the NECP.¹⁹

The working group is made up of 66 members who are representatives of the following institutions:²⁰

- Ministry of Energy (*Ministerul Energiei*) – 16 representatives;
- Ministry of Environment, Water and Forests (*Ministerul Mediului, Apelor și Pădurilor*) - 4 representatives;
- Ministry of Transport (*Ministerul Transporturilor și Infrastructurii*) - 4 representatives;

¹⁸ Romania, Law no. 123/ 2012 on electric energy and natural gas ([Legea nr. 123 din 10 iulie 2012 energiei electrice și a gazelor naturale](#)), 10 July 2012, Art. 6 letter c).

¹⁹ Romania, Order no. 910/2.021/2023 issued by the Ministry of Energy and Ministry of Environment, on the establishment of the inter-institutional working group to assess the state of implementation of the measures set out in the Integrated National Energy and Climate Change Plan 2021-2030 (INECCP) and the update of the INECCP in accordance with the provisions of Regulation (EU) 2018/1.999 of the European Parliament and of the Council of 11 December 2018, its technical secretariat, as well as the appointment of rapporteurs for the activities within their remit, in accordance with the provisions of Commission Implementing Regulation (EU) 2022/2.299 of 15 November 2022 ([Ordin nr. 910/2.021/2023 privind constituirea grupului de lucru interinstituțional pentru evaluarea stadiului implementării măsurilor prevăzute în Planul național integrat în domeniul energiei și schimbărilor climatice 2021-2030 \(PNIESC\) și a actualizării PNIESC în conformitate cu prevederile Regulamentului \(UE\) 2018/1.999 al Parlamentului European și al Consiliului din 11 decembrie 2018, a secretariatului tehnic al acestuia, precum și pentru nominalizarea raportorilor pentru activitățile aflate în aria de competență a acestora, în conformitate cu prevederile Regulamentului de punere în aplicare \(UE\) 2022/2.299 al Comisiei din 15 noiembrie 2022](#)), 29 January 2024, Art. 1.

²⁰ Romania, Order no. 910/2.021/2023 issued by the Ministry of Energy and Ministry of Environment, on the establishment of the inter-institutional working group to assess the state of implementation of the measures set out in the Integrated National Energy and Climate Change Plan 2021-2030 (INECCP) and the update of the INECCP in accordance with the provisions of Regulation (EU) 2018/1.999 of the European Parliament and of the Council of 11 December 2018, its technical secretariat, as well as the appointment of rapporteurs for the activities within their remit, in accordance with the provisions of Commission Implementing Regulation (EU) 2022/2.299 of 15 November 2022 ([Ordin nr. 910/2.021/2023 privind constituirea grupului de lucru interinstituțional pentru evaluarea stadiului implementării măsurilor prevăzute în Planul național integrat în domeniul energiei și schimbărilor climatice 2021-2030 \(PNIESC\) și a actualizării PNIESC în conformitate cu prevederile Regulamentului \(UE\) 2018/1.999 al Parlamentului European și al Consiliului din 11 decembrie 2018, a secretariatului tehnic al acestuia, precum și pentru nominalizarea raportorilor pentru activitățile aflate în aria de competență a acestora, în conformitate cu prevederile Regulamentului de punere în aplicare \(UE\) 2022/2.299 al Comisiei din 15 noiembrie 2022](#)), 29 January 2024, Annex 1.

- Ministry of Regional Development and Public Administration (*Ministerul Lucrărilor Publice, Dezvoltării și Administrației*) - 4 representatives;
- Ministry of Agriculture and Rural Development (*Ministerul Agriculturii și Dezvoltării Rural*) - 3 representatives;
- Ministry of Economy, Entrepreneurship and Tourism (*Ministerul Economiei, Antreprenoriatului și Turismului*) - 2 representatives;
- Ministry of Research, Innovation and Digitization (*Ministerul Cercetării, Inovării și Digitalizării*) - 2 representatives;
- Ministry of Labour and Social Solidarity (*Ministerul Muncii și Solidarității Sociale*) - 2 representatives;
- Ministry of Investments and European Projects (*Ministerul Investițiilor și Proiectelor Europene*) - 2 representatives;
- Ministry of Finances (*Ministerul Finanțelor*) - 2 representatives;
- Association of Romanian Municipalities (*Asociația Municipiilor din România*) - 2 representatives;
- Association of Romanian Cities (*Asociația Orașelor din România*) - 2 representatives;
- Association of Romanian Communes (*Asociația Comunelor din România*) - 3 representatives;
- National Energy Regulatory Authority (*Autoritatea Națională de Reglementare în Domeniul Energiei*) - 2 representatives;
- National Institute of Statistics (*Institutul Național de Statistică*) - 2 representatives;
- National Strategy and Forecasting Commission (*Comisia Națională de Strategie și Prognoză*) - 2 representatives;
- National Power Transmission Company "Transelectrica" - S.A. (*Compania Națională de Transport al Energiei Electrice "Transelectrica" - S.A.*) - 6 representatives;
- National Natural Gas Transport Company "Transgaz" - S.A. (*Societatea Națională de Transport Gaze Naturale "Transgaz" - S.A.*) - 3 representatives;
- Association of Energy Cities in Romania (*Asociația Orașe Energie în România*) - 3 representatives;

The working group does not include any civil society organisations and organisations representing vulnerable groups.

The public authorities, institutions and economic operators listed from the working group are designated as reporters and data providers for the transmission of data and information required for the completion of the national integrated interim energy and climate report, and for each reporting component, a rapporteur is designated and is

responsible for the complete and timely reporting of the data and information submitted, these authorities also send, on demand, reports to the Ministry of Energy on the state of implementation of their specific objectives.²¹

Specifically, on just transition, existing legislation provides that persons whose individual employment contracts have been terminated as a result of the closure of lignite- and hard coal-fired power generation capacities and related mining operations should benefit of social protection measures as well as active measures to combat unemployment, of vocational training courses, of courses aimed at retraining and upgrading the workforce.²²

The NECP also covers just transition, indicating as the main measures on just transition to be the Just Transition Programme, which is a financial plan focusing on six counties that are most affected by the transition, in key areas such as development of renewable energy projects, improvement of energy efficiency in buildings, industry, and transport; creation of green jobs in the renewable energy sector, energy efficiency sector, and other sectors that are helping to reduce greenhouse gas emissions.²³ Based on this program Romania developed Territorial Just Transition Plans for six Romanian counties: Dolj, Galați, Gorj, Hunedoara, Mureș and Prahova which will be financially supported, with the objective to phase out coal by 2032.²⁴

The NECP refers to vulnerable energy consumers which are defined in specific legislation as single people or families who, due to illness, age, insufficient income or isolation from

²¹ Romania, Emergency Ordinance no. 62 of 30 June 2023 establishing the institutional framework and measures for the implementation of Regulation (EU) 2018/1999 of the European Parliament and of the Council on energy governance and climate action and amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council. [525/2013 of the European Parliament and of the Council and Commission Regulation (EU) 2022/2.299 of 15 November 2022 laying down implementing rules on the structure, format, technical details and procedures for integrated national interim energy and climate reports ([Ordonanța de urgență nr. 62 din 30 iunie 2023 privind stabilirea cadrului instituțional și a măsurilor pentru punerea în aplicare a Regulamentului \(UE\) 2018/1.999 al Parlamentului European și al Consiliului privind guvernarea uniunii energetice și acțiunile climatice și de modificare a Regulamentelor \(CE\) nr. 663/2009 și \(CE\) nr. 715/2009 al Parlamentului European și al Consiliului, Directivele 94/22/CE, 98/70/CE, 2009/31/CE, 2009/73/CE, 2010/31/UE, 2012/27/UE și 2013/30/UE ale Parlamentului European și ale Consiliului, Directivele 2009/119/CE și \(UE\) 2015/652 ale Consiliului și de abrogare a Regulamentului \(UE\) nr. \[privind energia și schimbările climatice\]. 525/2013 al Parlamentului European și al Consiliului, precum și Regulamentul \(UE\) 2022/2.299 al Comisiei din 15 noiembrie 2022 de stabilire a normelor de punere în aplicare privind structura, formatul, detaliile tehnice și procedurile pentru rapoartele naționale intermediare integrate privind energia și clima\), 30 June 2023, Art.s 5 to 8.](#)

²² Romania, Emergency Ordinance no. 108 of 30 June 2022 on the decarbonisation of the energy sector ([Ordonanță de Urgență nr. 108 din 30 iunie 2022 privind decarbonizarea sectorului energetic](#)) adopted on 1 July 2022, Art.s 12-15.

²³ [Integrated National Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p. 45.

²⁴ [Integrated National Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p. 45.

energy sources, would benefit from social protection measures and additional services ensuring their minimum energy needs.²⁵ The NECP does not address specific vulnerable groups.

2.1. Energy efficiency

Romania's energy mix is made up of 71% fossil fuel, 20.1% renewables and 8.9% nuclear, whilst the electricity mix is made up of 42.4% renewables and 37.6% fossil fuels and 19.9% nuclear energy.²⁶

The Integrated National Energy and Climate Plan of Romania 2025-2030 establishes Romania's energy efficiency goals by 2030 which are to achieve a 51% reduction in primary energy consumption and a corresponding 47% reduction in final energy consumption, with no negative impact on the productivity.²⁷ Also, by 2050, Romania aims to lower its primary energy consumption by 25%, while the final energy consumption is projected to decrease further by 28% compared to the 2022 level of consumption.²⁸

The general objectives of the Romanian national energy efficiency policy look to²⁹:

- remove barriers to the promotion of energy efficiency;
- promote energy efficiency mechanisms and financial instruments for energy saving;
- educate and raise awareness among end consumers on the importance and benefits of implementing energy efficiency improvement measures;
- cooperation between final consumers, producers, suppliers, energy distributors and public bodies in order to achieve the objectives set by the national energy efficiency policy;
- promote basic and applied research in the field of energy efficiency;
- the introduction of high energy efficiency technologies, modern measurement and control systems and energy management systems for monitoring,

²⁵ Romania, Law no. 226 of 16 September 2021 on establishing social protection measures for vulnerable energy consumers ([Lege nr. 226 din 16 septembrie 2021 privind stabilirea măsurilor de protecție socială pentru consumatorul vulnerabil de energie](#)) Art. 3, para. 1, letter a).

²⁶ European Commission, State of the energy union report 2024 - [Romania](#).

²⁷ [Integrated National Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p.70.

²⁸ [Integrated National Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p. 70.

²⁹ Romania, Law no. 121 of 18 July 2014 on energy efficiency ([Lege nr. 121 din 18 iulie 2014 privind eficiența energetică](#)), Art. 2 paras. 2 and 3.

continuous assessment of energy efficiency and forecasting of energy consumption;

- promoting the use of energy-efficient equipment and appliances and renewable energy sources by final consumers;
- reducing the environmental impact of industrial activities and the production, transport, distribution and consumption of all forms of energy;
- application of modern energy management principles;
- granting financial and fiscal incentives, in accordance with the law;
- developing the market for energy services.

Some of the specific measures which are being undertaken in order to increase energy efficiency, according to existing legislation, are:

- Each year, at least 3% of central government buildings or buildings occupied by central government should be renovated in order to uphold energy efficiency standards;³⁰
- Central government authorities should only procure goods services, or buildings with high energy efficiency performance, insofar as they meet the requirements of cost-effectiveness, economic feasibility, increased viability and technical compliance;³¹
- Economic operators consuming per year more than 1,000 tonnes of energy in oil are required to have an energy audit every 4 years and a plan to increase energy efficiency;³²
- Household consumers should receive individual meters, to which they should have digitised access, accurately reflected the actual energy consumption of end-users and providing information on the level and profile of consumption, actual time of use.³³

In order to increase the energy efficiency of both public and private housing, Romania developed a specific strategy enhancing the energy efficiency and decarbonization of residential buildings, which looks at:³⁴

³⁰ Romania, Law no. 121 of 18 July 2014 on energy efficiency ([Lege nr. 121 din 18 iulie 2014 privind eficiența energetică](#)), Art. 6 para. 1.

³¹ Romania, Law no. 121 of 18 July 2014 on energy efficiency ([Lege nr. 121 din 18 iulie 2014 privind eficiența energetică](#)), Art. 7 para. 1.

³² Romania, Law no. 121 of 18 July 2014 on energy efficiency ([Lege nr. 121 din 18 iulie 2014 privind eficiența energetică](#)), Art. 9 para. 1.

³³ Romania, Law no. 121 of 18 July 2014 on energy efficiency ([Lege nr. 121 din 18 iulie 2014 privind eficiența energetică](#)), Art. 10 para. 1.

³⁴ Romania, The National Long-Term Renovation Strategy of 27 November 2020 to support the renovation of the national stock of residential and non-residential buildings, both public and private, and its gradual transformation into a highly energy-efficient and decarbonised building stock by 2050

- improving the energy performance of the existing stock of buildings by reducing energy consumption, carbon emissions and expanding the use of renewable energy sources in buildings;
- improving the quality of life for all users by improving thermal comfort, hygiene, safety and air quality;
- reducing energy poverty and ensuring affordable heating for low-income families;
- developing financing mechanisms to make the renovation of the built stock more efficient;
- developing professional skills on energy efficiency in buildings and supporting innovation;
- increasing the quality of the built stock by improving the safety of buildings and ensuring the architectural quality and urban integration of renovation interventions.

Some of the specific features for Romania include the fact that the population has „*lower disposable incomes than the EU average, an old and inefficient housing stock formed largely from panel type building blocks – a legacy of the communist past, inefficient energy consumption behaviours together with (...) a large share of the population living in rural areas, in thermally inefficient houses without financial resources to insulate them and trapped in using inefficient fuels for heating, for example, around 80% of the rural Romanian households use wood for heating that is procured often through irregular practices*”.³⁵

In terms of energy efficiency of buildings, some of the main obstacles consist of outdated and insufficiently maintained building stock, mostly in private ownership, inefficient heating systems, the establishment of owners' associations and the low solvency of house or building owners.³⁶

[\(Strategia Națională din 27 noiembrie 2020 de renovare pe termen lung pentru sprijinirea renovării parcului național de clădiri rezidențiale și nerezidențiale, atât publice, cât și private, și transformarea sa treptată într-un parc imobiliar cu un nivel ridicat de eficiență energetică și decarbonat până în 2050\)](#) adopted through Government Decision no. 1.034 of 27 November 2020 ([Hotărâre nr. 1.034 din 27 noiembrie 2020](#)).

³⁵ Andreea Vornicu-Chira, Piotr Gutowski, Krzysztof Głowacki, Iryna Holovko [Policy Brief 3: Identifying Vulnerability to the ETS 2 In The CEE Region Based on the Example of Romania and Poland](#), December 2023.

³⁶ Romania, The National Long-Term Renovation Strategy of 27 November 2020 to support the renovation of the national stock of residential and non-residential buildings, both public and private, and its gradual transformation into a highly energy-efficient and decarbonised building stock by 2050 ([Strategia Națională din 27 noiembrie 2020 de renovare pe termen lung pentru sprijinirea renovării parcului național de clădiri rezidențiale și nerezidențiale, atât publice, cât și private, și transformarea sa treptată într-un parc imobiliar cu un nivel ridicat de eficiență energetică și decarbonat până în 2050\)](#) adopted through Government Decision no. 1.034 of 27 November 2020 ([Hotărâre nr. 1.034 din 27 noiembrie 2020](#)).

There are some signs of this improving, as data shows that in 2022 the final energy consumption in the residential sector experienced a reduction of 9.9% compared to 2021, with heating and cooling accounting for around 76% of the energy consumption.³⁷

2.2. Just transition

Just transition in Romania focuses on supporting communities and workers affected by the shift to a climate-neutral economy by increasing the level of employment through investment measures in upskilling, developing skills for green jobs and the circular economy, and/or providing support and active measures to aid job seekers. The main instrument used is the Just Transition Programme, which is a financial plan focusing on six counties that are most affected by the transition in key areas such as development of renewable energy projects, improvement of energy efficiency in buildings, industry, and transport; creation of green jobs in the renewable energy sector, energy efficiency sector, and other sectors that are helping to reduce greenhouse gas emissions.³⁸ Based on this program Romania developed Territorial Just Transition Plans for six Romanian counties: Dolj, Galați, Gorj, Hunedoara, Mureș and Prahova which will be financially supported, with the objective to phase out coal by 2032.³⁹

The Just Transition Programme is structured around 6 priorities dedicated to mitigating the socio-economic impacts of the transition to climate neutrality in each of the six counties and a technical assistance priority with a separate financial allocation.⁴⁰

The priorities are:

- Priority: 1. Mitigating the socio-economic impact of the transition to climate neutrality in Gorj County, with a total budget: €537,205,843 of which: €456,624,966 is the contribution from the Just Transition Fund and €80,580,877 is the national contribution.
- Priority: 2. Mitigating the socio-economic impact of the transition to climate neutrality in Hunedoara County, with a total budget: €525,733,831 of which €446.873.756 is the contribution from the Just Transition Fund and €78,860,075 is the national contribution.
- Priority: 3. Mitigating the socio-economic impact of the transition to climate neutrality in Dolj County, with a total budget: €412,029,766 of which:

³⁷ European Commission, State of the energy union report 2024 - [Romania](#).

³⁸ [National Integrated Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p. 45.

³⁹ [Integrated National Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p. 45.

⁴⁰ As explained on the website of the Ministry of European Investment and Projects ([Ministerul Investițiilor și Proiectelor Europene](#)).

€350,225,301 is the contribution from the Just Transition Fund and €61,804,465 is the national contribution.

- Priority: 4. Mitigating the socio-economic impact of the transition to climate neutrality in Galati County, with a total budget: €38,585,139 of which €329,447,368 is the contribution from the Just Transition Fund and €58,137,771 is the national contribution.
- Priority: 5. Mitigating the socio-economic impact of the transition to climate neutrality in Prahova County, with a total budget: €277,032,659 of which €235,477,760 is the contribution from the Just Transition Fund and €41,554,899 is the national contribution.
- Priority: 6. Mitigating the socio-economic impact of the transition to climate neutrality in Mures County with a total budget: €277,032,659 of which €235,477,760 is the contribution from the Just Transition Fund and €41,554,899 is the national contribution.

The people targeted for investment are those directly affected by the transition process through job loss or those indirectly affected by the transition due to skills unsuitable or insufficiently matched to demand, including those who have been in employment with a basic or medium level of training, young people aged up to 29 years, people aged over 55 years, women, single parents, members of ethnic minorities and people who are disadvantaged workers, severely disadvantaged workers and disabled workers.⁴¹

Civil society groups have argued that the plans have no comprehensive strategies for youth involvement and no comprehensive gender strategy, no comprehensive strategy for vulnerable groups such as Roma, as albeit being pointed as a target group for activities, there is no mention of special measures aimed at alleviating the impact on the relatively large Roma minority living in these regions.⁴²

Research indicates that women are a group which is particularly affected by just transition plans and that their needs are overlooked by existing legislation and that the lack of access to services and professional opportunities lead many women to emigrate which in turn affects other groups left behind, such as older persons or children.⁴³

The concept of "*leave no one behind*" is not enshrined in existing legislation or the NECP.⁴⁴

⁴¹ [Romanian Just Transition plan](#), as approved by Commission Decision C(2022) 9125/02.12.2022, p. 23.

⁴² CEE Bankwatch Network, [Planning for social justice in Territorial Just Transition Plans in central and eastern Europe](#), September 2023, p. 11.

⁴³ Mădălina Muscă and Elena Trifan, Women's participation in the just transition process. Analysis of social and working conditions of women in the Jiu Valle ([Participarea femeilor în procesul de tranziție justă. Analiza condițiilor sociale și de muncă ale femeilor din Valea Jiului](#)) Bankwatch România, 2022, p. 85.

⁴⁴ As confirmed through desk research.

However, the principles of non-discrimination, equal opportunities and gender equality are stated and included in the process of evaluation, selection, contracting, implementation and payment of just transition projects. For investments in infrastructure and equipment the Plan promotes measures to ensure access to people with disabilities (access ramps, lifts, special parking places, adapted toilets, adapted software/computer/websites including for the visually impaired, etc.) and on gender equality (mother and child facilities, promotion of specialised measures/services). The programme also promotes the employment of disadvantaged workers (including those close to retirement age or Roma), of extremely disadvantaged and disabled workers. It also aims to stimulate women's participation in working life, avoiding discrimination, including on the basis of gender, in the labour market and in vocational training.⁴⁵

2.3. Energy poverty

Romanian legislation defines energy poverty as the inability of the vulnerable consumers to ensure their minimum energy needs.⁴⁶ Whilst vulnerable consumers are defined as a single persons/family who, for reasons of health, age, insufficient income or isolation from energy sources, require social protection measures and additional services to ensure at least their minimum energy needs.⁴⁷

Romanian legislation also defines the minimum energy needs as the minimum energy consumption of the single person/family for lighting, optimal cooling and heating of the home, support of cooking facilities and provision of hot water in the home, use of energy-intensive means of communication or powering of medical devices to support life or improve health.⁴⁸

The general criteria used to determine whether someone is experiencing energy poverty are: health, age, income or isolation from energy sources.⁴⁹ The indicator used to monitor the development of energy poverty is the LIHC indicator („Low Income, High

⁴⁵ [Romanian Just Transition plan](#), as approved by Commission Decision C(2022) 9125/02.12.2022 p. 24.

⁴⁶ Romania, Law no. 226 of 16 September 2021 on establishing social protection measures for vulnerable energy consumers ([Lege nr. 226 din 16 septembrie 2021 privind stabilirea măsurilor de protecție socială pentru consumatorul vulnerabil de energie](#)) Art. 3, para. 1, letter o).

⁴⁷ Romania, Law no. 226 of 16 September 2021 on establishing social protection measures for vulnerable energy consumers ([Lege nr. 226 din 16 septembrie 2021 privind stabilirea măsurilor de protecție socială pentru consumatorul vulnerabil de energie](#)) Art. 3, para. 1, letter a).

⁴⁸ Romania, Law no. 226 of 16 September 2021 on establishing social protection measures for vulnerable energy consumers ([Lege nr. 226 din 16 septembrie 2021 privind stabilirea măsurilor de protecție socială pentru consumatorul vulnerabil de energie](#)) Art. 3, para. 1, letter p).

⁴⁹ Romania, Law no. 226 of 16 September 2021 on establishing social protection measures for vulnerable energy consumers ([Lege nr. 226 din 16 septembrie 2021 privind stabilirea măsurilor de protecție socială pentru consumatorul vulnerabil de energie](#)) Art. 3, para. 1, letter a).

Cost”) which shows the impact of energy bills on the household budget, showing that after paying their energy bills these households fall below the monetary poverty line.⁵⁰

Another indicator used is „Population unable to keep home adequately warm by poverty status”, according to which in 2022, 15.2% of the population in Romania was unable to keep their homes adequately warm, which is higher than the EU 28 average of 9.3%.⁵¹

One recent analysis from November 2023 shows that in 2022, 21% of households experienced energy poverty, double the 2021 level of 10.5%; if considering the LIHC indicator („Low Income, High Cost”) which shows the impact of energy bills on the household budget, showing that after paying their energy bills these households fall below the monetary poverty line.⁵²

Other data shows that: *„in 2023, 13.6% of the total population was experiencing difficulties on paying their utility bills while 12.5% was not able to keep their home adequately warm over the cold periods of the year (growing from 2021, when such figures were, respectively, 7.3% and 10.1%)”.*⁵³

The Romanian national objective is to reduce the energy poverty rate and to ensure the protection of the vulnerable consumer, as specified in the NECP which prescribes the following measures:⁵⁴

- updating the regulations on vulnerable consumers and means for their financing;
- drafting a national action plan on energy poverty;
- providing for non-financial support for vulnerable low-income consumers through payment rescheduling;
- implementing a National Social Assistance Computer System;
- providing aid to vulnerable consumers to heat their homes.

One objective is to reduce the percentage of population which is unable to keep their homes adequately warm to 9.8% by 2030 *„by ensuring the access of energy consumers to diversified, sustainable and accessible sources of energy for lighting, heating and cooling corroborated with the establishment of targeted measures to decrease the energy poverty level and protect the vulnerable consumers, as well as by consolidating*

⁵⁰ According to a [press-release](#) from the Romanian Observatory on Energy Poverty (*Observatorul Român al Sărăciei Energetice*), from 27 November 2023.

⁵¹ [Integrated National Energy and Climate Plan of Romania 2025-2030](#), Update October 2024, p. 82.

⁵² According to a [press-release](#) from the Romanian Observatory on Energy Poverty (*Observatorul Român al Sărăciei Energetice*), from 27 November 2023.

⁵³ European Commission, State of the energy union report 2024 - [Romania](#).

⁵⁴ [Integrated National Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p. 47.

an energy poverty governance system to measure, monitor and update the energy poverty objectives periodically.”⁵⁵

Civil society actors have however called for a clear correlation between the Social Climate Fund and the NECP on how the fund will concretely support the energy transition and the fight against energy poverty as well as the need to set clear reduction targets for the other indicators of energy poverty as well, not only for the Eurostat indicator on ‘Inability to keep home adequately warm.’⁵⁶

Existing legislation does not define transport poverty.⁵⁷

No data on transport poverty was identified through desk research, although existing legislation does recognize the possibility for central and local authorities to allow for subsidies or fare waivers for students, pupils and other groups which are disadvantaged.⁵⁸ In 2024 school pupils criticised the fact that in approximately 19 counties school children do not have access to free public transport which can affect the access to educational services, particularly for children coming from vulnerable backgrounds who cannot afford to pay for transport services to get to school.⁵⁹

2.4. Fundamental rights impact assessment

In Romania, by law it is mandatory to have preliminary impact assessment of draft laws, legislative proposals and other draft legislation, before the legislation is adopted and the assessment involves identifying and analysing the economic, social, environmental, legislative and budgetary effects of proposed regulations as well the impact of the new regulations on fundamental human rights and freedoms.⁶⁰

In March 2024 the Romanian Government published a ‘*Guide on the assessment of the impact of regulations on human rights*’ drafted by members of the Technical Secretariat

⁵⁵ [Integrated National Energy and Climate Plan Of Romania 2025-2030](#), Update October 2024, p. 82.

⁵⁶ According to a [press-release](#) issued by 2Celsius, Bankwatch, Declic and WWF-Romania on 3 October 2024.

⁵⁷ As confirmed through desk research. Researchers also sent a request on this topic to the Romanian Ministry of Energy which did not indicate any definition on energy poverty as provided in response no. 30990/CPN/30.05.2024.

⁵⁸ Romania, Law no. 92 of 10 April 2007 public passenger transport services in administrative-territorial units ([Legea nr. 92 din 10 aprilie 2007 serviciilor publice de transport persoane în unitățile administrativ-teritoriale](#)) Art. 19[^]1.

⁵⁹ As explained in a [news article](#), from Edupedu publication from 10 January 2024.

⁶⁰ Romania, Law no. 24 of 27 March 2000 on the rules of legislative technique for the drafting of normative acts ([Lege nr. 24 din 27 martie 2000 privind normele de tehnică legislativă pentru elaborarea actelor normative](#)).

of the Advisory Council for the Assessment of the Impact of Regulatory Acts (*Secretariatului tehnic al Consiliul Consultativ pentru Evaluarea Impactului Actelor Normative*), representatives of the NGOs and experts from the Romanian Institute for Human Rights (IRDO).⁶¹ The guide presents types of human rights impact assessments, the main legal instruments for conducting human rights impact assessments, human rights indicators and proposes a questionnaire to determine the impact on fundamental rights. While drafting the guide, the experts involved also found that albeit it is mandatory to have an impact assessment for human rights, in some cases, this section was not filled in or the initiator considered that "*the normative act does not refer to this subject*", although some of the normative acts in question had a clear component relating to fundamental rights and freedoms.⁶²

One example of how impact assessments are done in practice is the explanatory memorandum to the Law no. 226/2021 on establishing social protection measures for the vulnerable energy consumers which includes an assessment of energy poverty in Romania, its impact and looks at the impact the proposed legislation would have over the living conditions of the beneficiaries of this law.⁶³ Specifically on the expected impact the explanatory memorandum only mentions that it is expected to prevent and fight against energy poverty, to improve living conditions for vulnerable consumers and to increase from 4 to 6% the percentage of households which can benefit from a form of social protection.

The law has however been criticised by civil society groups that have argued that it is necessary to rethink the way in which heating aid is granted in a way that takes into account, in addition to income, the structure of the household and the characteristics of the building and to ensure that the right to have access to energy is guaranteed and a minimum of energy needs is covered, suggesting even to set up an energy ombuds to ensure effective access in practice.⁶⁴

⁶¹ Romanian Government, Human rights impact assessment ([Evaluarea impactului asupra drepturilor omului](#)), p. 4.

⁶² Romanian Government, Human rights impact assessment ([Evaluarea impactului asupra drepturilor omului](#)), p. 4.

⁶³ Romania, Explanatory memorandum ([expunere de motive](#)) to the Law no. 226/2021 on establishing social protection measures for the vulnerable energy consumers ([Lege nr. 226 din 16 septembrie 2021 privind stabilirea măsurilor de protecție socială pentru consumatorul vulnerabil de energie](#)).

⁶⁴ Centre for the study of democracy, George Jigla, Anca Sinea, Social protection measures for vulnerable consumers ([Măsuri de protecție socială pentru consumatorul vulnerabil](#)) January 2021.

3. Addressing different aspects of energy efficiency and energy poverty: Photovoltaic Green House 2023 / Casa Verde Fotovoltaice 2023

Photovoltaic Green House 2023 is a recurring national project that allows individuals and religious establishments to access grants of up to a maximum of RON 20,000 (approx. Euro 40,000) to purchase and install photovoltaic panel systems with a minimum output of 3 kW to produce electricity for their own consumption and with the possibility of delivering the surplus electricity into the national energy system.⁶⁵

The total budget is RON 1,750,000,000 approximately Euro 351,666,901. The project is managed by the Environmental Fund Administration (*Administrația Fondului pentru Mediu*).⁶⁶ The objective of the programme is to increase the capacity to produce electricity from renewable sources, whilst increasing energy efficiency, improving air quality and reducing greenhouse gas emissions through the use of photovoltaic panel systems.⁶⁷

Albeit the manager of the program could not provide data on how the program relates to overall climate targets of Romania, it estimates that given the large number of funding recipients the program is an important element in moving towards green energy.⁶⁸

The 3 kW minimum electricity output have, however, been described as very little, as one interviewee put it:

⁶⁵ Information available on the [Photovoltaic Green House 2023 project website](#).

⁶⁶ As explained in a [press-release](#) issued by the Romanian Ministry of Environment, Water and Forests on 3 May 2023.

⁶⁷ Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid (*Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională*).

⁶⁸ As explained in a response to a freedom of information request, response no. 48651/22.10.2024 from Environmental Fund Administration (*Administrația Fondului pentru Mediu*).

It's a drop in the ocean in terms of functionality for a photovoltaic system for a house. What I mean is that 3 kW, in the equation of a household, is nothing. Or almost nothing. I wouldn't say nothing, but it's very close to nothing.

E o picătură într-un pahar cu apă din punct de vedere al funcționalității și al unui sistem fotovoltaic pentru o casă. În sensul că, ce vreau să vă spun, că 3 kW în ecuația unei gospodării este nimic. Adică aproape nimic. Nu aș zice nimic. E foarte aproape de nimic.

Although, according to desk research, there is no official data on this, one expert who was interviewed estimates that most beneficiaries have upgraded their systems to between 4 kW and 8 kW using their own funds, as the expert explains:

So, this power is okay for a very small household or for relatively small needs. But fortunately, Romanians have understood that this system needs to be boosted, it needs to be increased to a different size in order to truly benefit from photovoltaic energy as it should be. And so, using their own resources, they boosted these systems from 3 kW, I would say, to at least 5 kW. I rarely believe, I don't think more than 7%-10% of the Romanian population that benefited from this program has kept the initial 3 kW. The majority have increased the capacity to 5, 6, 7, or 8 kW.

Deci, această putere este ok pentru o gospodărie foarte mică sau pentru nevoi relativ mici. Dar, din fericire, românii au înțeles că acest sistem trebuie boostat, trebuie cumva să ajungă la alte dimensiuni pentru a te bucura efectiv de energie fotovoltaică, așa cum trebuie. Și atunci, prin resurse proprii, au boostat aceste sisteme de la 3 kW, zic eu, la minim 5 KW. Deci, rar cred că, eu nu cred că mai mult de 7%-10% din populația României care a beneficiat de acest program, are acești 3 kW inițiali. Majoritatea au mărit capacitatea la 5, la 6, la 7, la 8 KW.

The project has the potential to afford people in marginalized, rural communities to gain access to electricity and it can also secure a source of income for people who may produce surplus green energy which they could sell. These have the potential to be very effective tools to alleviate energy poverty in marginalized groups.

3.1. Leaving no one behind – target groups, eligibility, accessibility, equality

The program is addressed to individuals and religious establishments.

For religious establishments funding is open for any place of worship, for a building intended for the living quarters of clergy or a building intended for the space in which religious services are celebrated and religious activities are carried out, for all of the 18 nationally recognized religious denominations.⁶⁹

The inclusion of religious establishments among the beneficiaries is seen as controversial by some of the experts interviewed, as one of them explains:

What I don't understand, and will never be able to understand, is why in the 2023 and 2024 budget they introduced something new for places of worship. Places of worship are mostly illuminated by candles, they don't pay taxes, they don't pay anything, but on the contrary, they receive. (...) For me, it is a mystery that part of this money is not given to the population but instead to places of worship. They should have created a separate program specifying which religious denominations and religions are eligible (...).

Ce nu înțeleg și nu voi putea să înțeleg niciodată este de ce în bugetul 2023 și 2024 au venit cu noutate pentru lăcașurile de cult. Lăcașurile de cult se iluminează mai mult cu lumânări, lăcașurile de cult nu plătesc nici impozite, nu plătesc nimic, dar din contră, primesc. (...) Pentru mine este un mister că parte din acești bani se dau nu populației, ci împreună cu lăcașurile de cult. Trebuia să le facă un program separat în care să spună cultele, religiile care sunt, să zic, eligibile.

For individuals who want to apply, they need to reside in Romania, at the address mentioned in their ID, have no debts to the state and they must be the owner of the building where the photovoltaic panel system would be installed.⁷⁰

⁶⁹ Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid ([Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională](#)) Art. 5 from the Guide.

⁷⁰ Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for

The manager of the program indicated that it offers equal and non-discriminatory access to everyone applying.⁷¹ However, the program does not provide for any special measures for certain vulnerable groups at risk.

Experts interviewed agreed that indeed, the program does not present clear exclusion or direct discrimination criteria but from the way the program is set up it indirectly discriminates against several groups, particularly the most vulnerable and marginalized groups, as the majority of the interviewees have argued.

For example, the program is only targeted at people who own a house (buildings with common properties and individual properties, in the form of a block/condominium, with more than two apartments are excluded) for which they apply, people who have all the necessary documents to prove the ownership and who have paid all of their taxes to local or national level authorities, who can cover a personal contribution of RON2,000 (approximately 400 Euro).⁷² This obviously excludes people who do not own houses, who face problems with property documents, who are living in informal settlements conditions or who have been unable to pay their local taxes or cover the contribution to the program.

According to Eurostat data for 2023 Romania has the highest shares of house ownership in the EU with 95% of the population living in a household owning their home and 65% of the population lives in a house whilst 34.9% lives in a flat.⁷³ Consequently at least 34.9% of people are excluded from the program because they live in a flat and buildings with common properties and individual properties, in the form of a block/condominium, with more than two apartments are excluded from the program.

In respect to the housing situation in Romania, it holds several particular characteristics. Data from 2021 shows that only 2.6% of the population lives in municipal housing and the private rental sector is negligible, with only 1.3% of the population living in privately rented accommodation – the reliability of data for the private rented sector is however questionable, as the number of informal renting arrangements may be significant for tax

the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid ([Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională](#)).

⁷¹ As explained in a response to a freedom of information request, response no. 48651/22.10.2024 from Environmental Fund Administration (*Administrația Fondului pentru Mediu*).

⁷² Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid ([Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională](#)) Art. 16 from the Guide.

⁷³ Eurostat, Housing in Europe, [2023 edition](#).

reasons.⁷⁴ Other data estimates that the stock of rented housing represents 3% of the total market in Romania, while unofficially the range is estimated at 7-15% at national level, whilst another approximately 72,000 inhabitants live in informal settlements on the outskirts of villages and towns and 5,528 are homeless.⁷⁵ Older data also shows that in Romania only 2.5% of the population lives with subsidized rent and public owned dwellings are only 1.4% of all dwellings and not all of these are necessarily social housing.⁷⁶

In terms of accessibility, the program's application process is conducted only online, requiring applicants to gather documents, create an account, and upload their forms within a very limited timeframe. This process inherently favours individuals with digital skills and rapid internet access, which poses an indirect barrier for certain groups, especially older individuals, those less familiar with technology people with disabilities or those with slower internet connection, particularly in rural regions of the country.

These measures disproportionately affect certain groups which can be discriminatory, as one interviewee explains:

To use a metaphor, we put the hippo and the monkey to climb the tree, saying we're giving everyone the same chances. Sure, logically, a hippo could climb a tree, I'm not saying it couldn't. But imagine what kind of tree it would take to hold it up. It's very complex. So, I can't say they were restricted by criteria. No. But through the practical implementation of the methodology and everything that happened, those who succeeded are more likely exceptions that prove they weren't really the target.

Ca să mă folosesc de metaforă, noi am pus hipopotamul și maimuța să urce în copac. Zic că le dăm la toți aceleași șanse. Băi, logic că hipopotamul, săracul, s-o urca și un hipopotam în copac, nu zic nu. Dar îți dai seama ce copac trebuie să fie ăla ca să-l țină. Adică, e foarte complex. Deci nu pot să zic că ei au fost restricționați prin criterii. Nu. Însă prin punerea în practică a metodologiei și prin tot ceea ce s-a întâmplat, cei care au reușit pot fi mai degrabă excepții care confirmă faptul că, de fapt, nu ei erau ținta.

⁷⁴ Tamás Kiss, József Hegedüs (2023) [Housing of Ukrainian Refugees in Europe Options for Long-Term Solutions Country case study Romania](#), commissioned by Habitat for Humanity International, January 2023, page 6.

⁷⁵ Romanian, National Housing Strategy for the period 2022-2050 ([Strategia Națională a Locuirii pentru perioada 2022-2050](#)) 29 June 2022.

⁷⁶ Cristina Alpopi, Cristina Iacoboaea, Andrei Stănescu, [Analysis of the Current Housing Situation in Romania in the European Context](#), Transylvanian Review of Administrative Sciences, October 2014, page 20.

From a perspective on equality, the measures are fair. Everyone's treated the same, right? But by doing that, you're ignoring the very vision you need to put into practice. You can't do that, because your citizens are not equal. You can't compare someone from a vulnerable, illiterate community with someone in central Bucharest who owns a villa, has a higher education, and a monthly income of 5,000 euros.

Adică din punctul meu de vedere al egalității, măsurile noastre sunt corecte. Bă, toți la fel, bă. Dar când ai făcut chestia asta, tu omiți fix viziunea pe care trebuie să o pui în practică. Dar n-ai cum, mă, că cetățenii tăi nu sunt egali. Păi nu compari cu acela din comunitate vulnerabilă, analfabet, nu știi ce, cu acela din mijlocul Bucureștiului, deținător de vilă și cu studii superioare. Și cu venit de 5.000 de euro pe lună.

The experts interviewed have flagged the following general issues that affect the accessibility of the program:

- The program has a very complex and inflexible application process, which has excluded many potential beneficiaries, particularly those who are less educated or lack access to the internet or are not very tech savvy.
- The eligibility criteria, requiring formal property ownership of houses, have excluded many groups, including those living in apartment blocks because they don't own the roof, those living in informal settlements, and rural areas without proper documentation.
- The program did not include targeted measures to ensure the inclusion of marginalized groups, such as the Roma or low-income families. By not actively addressing the needs of these groups, the program failed to provide them with opportunities to benefit from renewable energy initiatives, thereby missing a chance to improve social equity.
- The "first come, first served" criteria of selection created a competitive and often unfair environment where only those who were quick enough to submit their applications could benefit from the program;
- The program is online and it disadvantaged individuals who were not as familiar with digital processes and those with limited digital access, as funds were exhausted after 2 minutes or less since the applications were opened;
- There are no social or energy poverty criteria in the selection process;
- The program requires the beneficiary to also have their own contribution of about 10% which excludes those who cannot afford this contribution.

Because of these reasons, many of the interviewees described the program as one targeting the middle class and not the most vulnerable communities. One expert who analyses energy poverty across the country argued:

[...] we started to look at the Casa Verde program under these conditions and say, "wait a second, this has no social criteria, no energy poverty criteria, nothing, nothing". And we started to say that, nah, it's a program for the rich aimed at the rich. Obviously here, unfortunately, we don't really have data to show that, we can only somehow approximate who has Internet access, who has high-speed Internet access, the program becoming this competition of fast fingers, in 15 seconds they have to write the application. Not to mention the very basic things, namely who has property deeds, who has, well, all these things in order, zero debts to all budgets and so on, zero tax records, etc. So clearly, it is a program that is aimed at the middle class and somehow those above the middle class.

[...] am început să ne uităm la Casa Verde în condițiile astea și să zicem, omule stai așa, că ăsta nu are niciun criteriu social, niciun criteriu de sărăcie energetică, nimic, nimic. Și am început să spunem că, na, e un program pentru bogați care se adresează bogaților. Evident că aici, din păcate, nu prea avem date care să arate chestia asta, doar cumva putem să aproximăm cine are acces la internet, cine are acces la internet de mare viteză, programul devenind acest concurs al degetelor iuți, de în 15 secunde trebuie să-ți scrie aplicația. Ca să nu mai spun chestiile foarte de bază, respectiv cine are acte de proprietate, cine are, mă rog, toate chestiile astea în regulă, zero datorii la toate bugetele și așa mai, caziere fiscale pe zero etc. Deci clar, e un program care se adresează clasei de mijloc și cumva deasupra clasei de mijloc.

This leads another interviewee to state that:

I don't think this program is about poverty reduction or something like that, because if it was, it would have had filters... it's a random program. Whoever gets it, gets it. If they had wanted to create a component for, let's say, poorer people or those more in need, there would have been filters stating how many square meters your house has or how much you earn per capita, or things like that. Or even the location of the house, because someone impoverished can't live in central Bucharest in a villa built in, I don't know, 1992.

Eu nu cred că acest program se referă la o componentă de eliminare a sărăciei sau ceva de genul ăsta, pentru că dacă ar fi fost așa, ar fi avut filtre... este un program random. Îl ia cine apucă. Dacă ar fi vrut să facă o componentă pentru oamenii, să zic, mai sărmani sau oamenii mai în nevoie, ar fi avut niște filtre în care să spună câți metri pătrați are casa aia a ta sau câți câștigați per capita sau chestii de genul. Sau chiar poziția casei, că un prăpădit nu poate să locuiască în centrul Bucureștiului, într-o vilă construită în, nu știu, 1992.

Given these considerations one expert concluded that:

The program is not for everybody.

Programul nu e pentru toată lumea.

The National Council for Combating Discrimination (CNCD), which is the equality body was also petitioned in regards to the selection criteria by an applicant whose official address which is written on their ID is not the same at the one where the applicant wanted to install the photovoltaic panels and where they in fact live and because of this the applicant was eliminated. The applicant considered this to be discriminatory and the equality body agreed, stating that there is no reasonable justification to exclude such applicants and to differentiate between those living at the address written on their ID and those living at another address.⁷⁷

Another issue that is not addressed by the program is that of houses with no access to electricity which is a very serious problem in Romania. The National Registry of Houses Without Electricity (RNCFEE) which is an analysis of the current state of houses which do not have access to electricity shows that:⁷⁸

- 11,611 Romanians do not have access to electricity, the majority of adults are between 50 and 96 years old and there are 4,777 children who live in these homes without electricity,
- 87% of the houses without electricity do not have a land register, which makes it difficult for institutions to tackle this problem,
- 64% of people living in houses without electricity have incomes estimated to be below the minimum income per person and household in Romania,
- only 23% of cases have strategies, projects, plans for household electrification within the next 3 years,
- most of the houses are not accessible, in 53% of cases access to buildings without electricity is difficult and in 10% there are no access roads.

For the above reasons the program would have been extremely useful to address this problem, to offer access to electricity to the thousands of homes with no access.

⁷⁷ Romania, National Council for Combating Discrimination ([Consiliul Național pentru Combaterea Discriminării](#)) Decision no. 498 from 13 August 2023.

⁷⁸ Dumitru Chisalita, Intelligent Energy Association ([Asociația Energia Inteligentă](#)) National Registry of Houses Without Electricity ([Registrului Național al Caselor Fără Energie Electrică, RNCFEE](#)) April 2024.

Unfortunately, the program misses to address this issue, as one interviewee argues:

Perhaps the unfair aspect is that we didn't first address the issue of citizens who have no energy access at all. This is something that, in principle, or from any perspective, personally bothers me. A very small portion of AFM's budget would have been enough to solve this. But we didn't do it, and now there are all kinds of citizens who installed panels through AFM, whether they have ten RON in their account or millions—we didn't necessarily make a distinction. There are still 15,000 or 17,000 citizens living in unelectrified buildings.

Poate lucrul incorect este faptul că nu am rezolvat întâi problema cetățenilor care nu au deloc energie. Asta e o chestiune care principial sau din toate punctele de vedere, pe mine personal mă deranjează. E că ar fi fost necesar o porțiune foarte mică din bugetul AFM-ului să rezolvăm acest lucru. Ori nu am făcut-o și sunt cetățeni de toate tipurile care și-au pus panouri prin AFM că au zece lei în cont sau milioane, n-am făcut neapărat o distincție. Și aici un lucru care poate că ar fi trebuit să fie făcut altfel, sunt încă 15.000 sau 17.000 de cetățeni care locuiesc în clădiri neelectrificate.

This leads one expert to state that

That part of the population that really needs such programs continues to face high energy bills or has no access at all to energy sources. We are also talking about households that are not connected to electrical grids at all, not to mention gas networks and so on. And we are practically abandoning them, leaving them to fend for themselves, and yes, it's a shame.

Acea parte a populației care chiar are nevoie de astfel de programe continuă să aibă facturi crescute la energie, să nu aibă acces deloc la surse de energie. Pentru că vorbim și de gospodării care nu sunt conectate absolut deloc la rețele electrice, nu mai vorbim la rețele de gaz și așa mai departe. Și practic îi lăsăm de izbeliște cum ar veni, să se descurce cum pot și da, e păcat.

Another issue is that of houses which although have access to electricity, cannot afford the electricity bills.

As shown in Romania 21% of households experienced energy poverty, double the 2021 level of 10.5%; if considering the LIHC indicator („Low Income, High Cost”) which shows

the impact of energy bills on the household budget, showing that after paying their energy bills these households fall below the monetary poverty line.⁷⁹

The program failed to address this specific group, as one expert who was interviewed argued:

The negative consequence of exclusion, first and foremost (...) is that those who can generally afford their energy bills will still be advantaged by this program. Meanwhile, those who experience energy poverty (...) will continue to struggle to pay their bills, will still use insufficient energy, and will still face high costs without protection. These solar panels provide a safeguard against price fluctuations in the market, especially now when electricity is four times more expensive than gas.

Consecința negativă a excluderii, în primul și în primul rând, este că (...) că cei care își permit facturile la energie în general, ei vor fi avantajați oricum de programul ăsta. În schimb, cei care se află în sărăcie din perspectiva energetică (...) în continuare vor avea probleme să își plătească facturile, să utilizeze îndeajuns de multă energie și în continuare va fi scump și nu sunt protejați. Panourile solare astea te protejează de fluctuațiile de preț ale pieței, mai ales acum, în condițiile în care energia electrică este de 4 ori mai scumpă decât gazul.

That, to me, is the primary issue. You're creating even wider gaps in the canyon of inequality that already exists because there are very, very large differences in this country between people with medium to high incomes and those living in poverty.

Asta mi se pare în primul și în primul rând. Creezi niște breșe și mai mari în canionul inegalității care s-a creat oricum, pentru că ai niște diferențe foarte, foarte mari în țara asta între persoanele cu un venit mediu spre mare și persoanele care se află în sărăcie.

One particular group that is at risk of poverty is that of Roma people and one interviewee that works with vulnerable Roma communities across the country argues:

I don't know of any. And I do see quite a lot in my work with communities, but I don't know a single vulnerable person who has panels through the program.

Eu nu cunosc. Și am totuși, văd totuși destul de mult în viața mea, la comunități, dar nu știu o persoană vulnerabilă care să aibă panouri prin program.

⁷⁹ According to a [press-release](#) from the Romanian Observatory on Energy Poverty (*Observatorul Român al Sărăciei Energetice*), from 27 November 2023.

Experts interviewed argued that many Roma families do not have proper legal documentation for their homes, often lacking up-to-date land titles, which makes them ineligible for the program. Additionally, their homes' electrical systems or the rooftop are often not up to standard, which in practice constitute structural barriers that exclude them from participation in the program.

One measure that seems to have helped afford wider access is the fact that there were different funding calls in the same year for various geographical areas of Romania, by which the funds were divided for the 8 regions of Romania, with 8 calls in which applicants from each region had 3 days in which to apply. One interviewee argues that this measure allowed for funding not to be absorbed solely by the more developed areas in Romania. By allocating budgets based on regions, the program gave a slightly bigger chance to residents in less technologically advanced or economically developed areas to benefit from the initiative. This regional allocation prevented wealthier, more tech-savvy areas from monopolizing the funds:

I think they tried to balance things a bit by allocating budgets by regions. You know? They didn't distribute it across the entire country, because I think if they had done that, Ilfov (wealthy county near Bucharest) would have been flooded with solar panels, period. And this whole highly educated, technologically savvy area would have taken over. (...)

Cred că ei au încercat să echilibreze un pic lucrurile, în sensul în care au dat bugete pe regiuni. Știi ? Adică n-au dat complet pe toată țara, pentru că, cred că dacă ar fi dat așa, Ilfovul s-ar fi umplut de panouri, punct. Și toată zona asta hipereducată, tehnologically savvy, nu știu ce.

However, another expert interviewed considers that the decision to allocate funds by regions was not driven by the desire to allocate funds evenly across the country but because in previous editions when there was just one call for the whole country the system would crash because of the large number of simultaneous applications, as the expert explains:

Initially, if I remember correctly, 3-4 years ago, they wanted to have the registration done in a single day, but the servers crashed, everything crashed, and then they realized they had to do it by regions, and that's how it still works today.

Inițial, dacă mi-aduc amintea, cu 3-4 ani au vrut să fie înscrierea într-o singură zi și s-au blocat naiba serverele, s-a blocat tot, după care și-au dat seama că trebuie să le facă pe regiuni și așa este și astăzi.

3.2. Impact

The interviewees' overall assessment of the program was mixed.

On the positive side of the program, according to experts interviewed, is that it significantly increased the number of prosumers and raised awareness about renewable energy among the general population and this is seen as a crucial step towards broader acceptance of green energy solutions and aligns with broader decarbonization goals.

According to one interviewee

The most important effect I see personally—and this is a subjective opinion, if you will—is that the citizen has become involved in the energy sector.

Cel mai important efect pe care îl văd eu personal, e o părere subiectivă, dacă vreți, este faptul că cetățeanul a fost implicat în sectorul energetic.

According to a press-release issued by the program coordinator on 3 May 2023 the program sought to assist 87,500 households in their efforts to cut their energy bills, on top of the 55,000 households approved in the two previous funding rounds.⁸⁰ The 2024 edition of the program sought to provide photovoltaic panel systems to another 67,000 more households, seeking to reach a total of about 200,000 households with this program throughout all of its editions.⁸¹

Experts interviewed agreed that these figures are indeed good, however, they paint only a limited picture of the program. If success is measured solely by these indicators the program seems successful, as one expert explained:

We're doing fine, basically, because from this perspective, if success is measured by whether the program was accessed and the funds were disbursed, then I'm sure it's considered a success by the ministry. Now, if you define success purely by the fact that the funds were accessed without caring about by whom, how, who was left out, etc., then I wouldn't say it's a success without an evaluation. If we're only focusing on sales, then I imagine it's a successful program. And for the companies involved in this—selling photovoltaic panels, installation, and all the related services—it's certainly a success.

⁸⁰ According to a [press-release](#) from the Administration of the Environment Fund (*Administrația Fondului pentru Mediu*) published on 3 May 2023.

⁸¹ According to a [press-release](#) from the Administration of the Environment Fund (*Administrația Fondului pentru Mediu*) published on 29 August 2024.

Suntem bine, practic, că din punctul ăsta de vedere, dacă evaluează din perspectiva dacă a fost accesat programul și au fost dați banii ăia, sunt sigur că este un program de succes din perspectiva ministerului. Acum, pentru faptul că definești succesul ca pe faptul că au fost accesați banii și nu te interesează de către cine, cum, pe cine a lăsat pe tine afară, etc., atunci aici nu aș fi să spun, fără o evaluare, dacă este un program de succes. Adică dacă ne focusăm doar pe vânzări, imaginez că este un program de succes.

However, one of the general problems raised by experts interviewed is the lack of data to show concrete impact. The program operator or experts interviewed could not provide any data on specific impact. This seems to be a general problem, as one interviewee showed:

[...] unfortunately, at the moment we have a big data problem and we don't know exactly how much prosumers are injecting into the grid, but also we don't know how much they are consuming. What we see is that electricity consumption is unusually low, it is decreasing in the long term. We're not talking now about heat waves and so on. Which means that self-consumption has started to play a very important role.

[...] din păcate, în momentul de față noi avem o mare problemă cu datele și noi nu știm exact cât injectează prosumatorii în rețea, dar nu știm cât consumă. Noi ce vedem este că consumurile de electricitate sunt neobișnuit de mici, sunt în scădere la nivel de termen lung. Nu vorbim acum de valurile de căldură și așa. Ceea ce înseamnă că autoconsumurile au început să joace un rol foarte important.

In terms of shortcoming that limited its impact the experts interviewed argued that the program faced several challenges, including bureaucratic hurdles, exclusion of marginalized groups, a lack of strategic planning and coherent legal framework. The program struggled with processing a high volume of applications and also faced legal challenges, with numerous lawsuits arising from procedural delays which lead to some documents to expire after they were submitted and which in turn resulted in the applications being refused. These issues limited the program's effectiveness and equity, leading to a call for substantial improvements.

The limited consideration for social aspects and human rights issues seems to be a structural problem with energy projects, as one interviewee argues:

the vast majority of those who design energy policies have no social sensitivity and no concern for vulnerable groups, social protection, etc. And for a long time, there wasn't even any thematic connection made between the two dimensions.

marea majoritate a celor care gândesc politice energetice nu au nicio sensibilitate socială și vis-a-vis de grupuri vulnerabile, protecție socială, etc., etc. Adică nici... Și cumva o foarte bună perioadă de timp nici nu s-a făcut vreo asociere tematică între cele două dimensiuni.

A 2022 report issued by Bankwatch which also looks at the performance of the Casa Verde Fotovoltaice program together with other programs managed by the Environmental Fund Administration (AFM) shows that the AFM managed to distribute to the population only 25% of the funds it had available for the promotion of renewable energy and energy efficiency in the period 2009-2021, the administration spent only RON 563 million of the total allocated sum of RON 3.3 billion in the period 2009-2022 and out of 140,000 applicants, only 46,000-60,000 had their files approved by May 2022.⁸² The report shows that if all the citizens who applied had received funding, then 5.5% of polluting energy would have been replaced, with a reduction of 477,000 tons of CO₂.

3.3. Information, communication and social acceptability

Information on the program was shared on the website of the implementing institution, which included relevant documents arranged in chronological order and video instructions on how to create an account and how to submit the application.⁸³ The implementing institution considers these measures to have had a positive outcome, given the number of accepted applications.⁸⁴

Interviewees have indeed confirmed that the program enjoys a high level of visibility and public interest. They have argued that due to the program's significance and widespread appeal, mainstream media outlets closely monitor and cover developments related to it. As a result, the program coordinator does not need to put in significant effort to disseminate information, a simple press release is sufficient to trigger

⁸² Laura Nazare, Bankwatch Romania (2022) AFM programs for renewable energy and energy efficiency: from implementation to failure ([Programele AFM pentru energie regenerabilă și eficientă energetică: de la implementare la eșec](#)).

⁸³ Environmental Fund Administration (*Administrația Fondului pentru Mediu*) [website](#) which includes relevant documents arranged in chronological order and [video](#).

⁸⁴ As explained in a response to a freedom of information request, response no. 48651/22.10.2024 from Environmental Fund Administration (*Administrația Fondului pentru Mediu*).

widespread coverage across social media and traditional press, as argued by one interviewee:

Well, since this is a very popular initiative where the state is giving rather than taking, I think it's very well publicized. I mean, the entire media is focused on the Casa Verde Fotovoltaice program, and articles are constantly being published about it. AFM doesn't even need to do much—just issue a press release, and then it instantly spreads through social media and the press.

Păi, aici, fiind o acțiune așa foarte populară, că statul îți dă, finalmente nu-ți mai ia, mie mi se pare că e foarte bine mediatizată. Adică, cumva, toată presa e cu ochii pe Casa Verde Fotovoltaice și se tot publică articole despre, că AFM-ul nici nu trebuie să dea decât câte un comunicat și nici măcar, câte o chestie, că după aia se propagă instant în social media, în presă.

Nonetheless, experts who were interviewed argued that the information is often presented in a technical and complex manner, which can make it difficult for non-specialists, particularly less-educated citizens, to fully understand.

Experts also argued that the information does not really reach marginalized communities who have not benefitted of a tailored communication campaign, as one interviewee that works with Roma communities explains:

Information wasn't an issue for those who understand where and how to look for it. It was available. But for that, the person searching needed to understand that the information was meant for them. And that they could be included in this. I guarantee that many people in these vulnerable communities we're talking about didn't look for any information, because, first, they thought it wasn't for them; second, they're on different communication channels; and third, it needs to be addressed differently. They need a different type of assistance—both at the application stage and in managing it, and so on.

Informația nu cred că a fost o problemă pentru cine înțelege unde trebuie să o caute, cum trebuie să o caute. A fost disponibilă. Dar pentru asta omul ăla care o caută trebuia să înțeleagă că informația e pentru el. Și pentru el. Și că el poate fi vizat de chestia asta. Îți garantez că foarte mulți din comunitățile astea vulnerabile despre care vorbim noi nu au căutat niciun tip de informație, pentru că unu au zis că nu e pentru ei, apoi ei stau pe alte canale de comunicare, trei trebuie adresat altfel. Au nevoie de un alt tip de asistență - și în momentul aplicării și în momentul gestionării și așa mai departe.

Experts suggest that communication could be more effective if it included outreach measures specifically targeting vulnerable populations. Good practices could include

hiring consultants or representatives in local communities to provide personalized guidance, translating key information into simplified or colloquial language, and holding informational sessions to raise awareness in less accessible regions.

Some experts who were interviewed have stated that it was difficult to communicate with the program coordinator and obtain clarifications. One of the interviewees who represents beneficiaries of the program stated:

I submitted a request that I sent to three recipients, three individuals within AFM, and I was unpleasantly surprised because... for example, if I ask a question to the European Commission, I receive a response in one or two days, and so on, as an NGO working in energy in Romania, and so forth. These people at AFM responded after about 45 or 50 days. And it was a question, exactly what I mentioned earlier, it was a clarification. (...) The response was given after 50 days, which seems quite long to me.

Am făcut o adresă pe care am trimis-o la trei recipienti, la trei destinatari în cadrul AFM-ului și am rămas neplăcut surprins că... adică, de exemplu, dacă eu fac o întrebare către Comisia Europeană, mi se răspunde într-o zi, două și așa mai departe, ca ONG pe energie în România și așa mai departe. Oamenii ăștia la AFM mi-au răspuns după vreo 45 de zile, 50. Și era o întrebare, exact ce v-am spus mai înainte, era o clarificare. (...) Într-adevăr, a fost dat răspunsul după 50 de zile, mi se pare destul de mult.

The installers were also complaining that they have terrible communication with these people in the program, that they don't respond, and that you have no one to talk to. It's like a black hole that, from time to time, someone comes down from it and looks at us.

Asta se plâneau și instalatorii că au o comunicare îngrozitoare cu acești oameni în program și că nu răspund și că n-ai cu cine. Adică e ca și cum ar fi o gaură neagră pe care, din când în când, mai coboară așa de undeva și se mai uită la noi.

In terms of the public perception over the program and controversies attached to it several experts interviewed mentioned that there are significant concerns about the fairness and accessibility of the program, connected to suspicions of frauds committed in the application process. This has led to frustration and scepticism among the public, particularly among those who feel that the program's design inherently disadvantages them. One expert who followed the program from the beginning, including the early editions, noted:

The first one was this one where the computer application crashed and they started investigating because one installer had applied with 3,000 people yes,

with a software and the online platform of the program crashed for a couple months. In the meantime, the documents expired. When they expired, they said "sir, documents are expired, you're out of discussion." And that was a scandal. Let's say the second one [...] the application simply blocked again, but it was not the same problem. The application simply crashed because it didn't work. But people were super suspicious after the first one, after the first year, that nah, it didn't work out [...] And the third one was, I think it was with the company that was not accepted as a validated company, they sued, so the whole program was blocked, because the court ordered, "sir, you can't run the program until the court case with that company is clarified" and eventually a compromise was reached with that company.

Primul a fost ăsta în care s-a blocat aplicația informatică și au început să investigheze pentru că acel instalator a aplicat cu 3000 de oameni da, print-un software, ce a băgat că s-a blocat câteva luni. Între timp, documentele au expirat. Când au expirat, i-au zis domnule, documente sunt expirate, sunteți out of discussion. Și ăla a fost un scandal. Să zicem al 2-lea fost când e [...] s-a blocat pur și simplu aplicația din nou, dar n-a mai fost aceeași problemă. Pur și simplu s-a blocat aplicația că n-a ținut. Și aia am fost, știi. Dar oamenii erau super suspicioși după prima, după primul an, că na, n-a ieșit bine. [...] Și al 3-a a fost, cred asta cu firma care n-a fost acceptată ca firmă validată, a dat în judecată, așa că s-a blocat tot programul, că na, așa a dispus instanța domnule, nu mai puteți să derulați programul până nu se clarifică judecata cu firma respectivă și până la urmă s-a ajuns la un un compromis cu firma aia.

Even the 2024 edition of the program was controversial, as media reported that all of the funds were exhausted after 1 minute and 5 seconds from the moment when the applications started and that many people used specialised digital tools, including artificial intelligence tools to fill out the forms in record number; these specialised services being advertised by various service provides months before the application was opened.⁸⁵ Media reports show that there are service provides who for a fee of around Euro 100 can fill in the application for interested parties in under a minute, guaranteeing the applicant's success.⁸⁶

Additionally, a significant controversy arose around allegations that certain installers had unauthorized access to databases of citizens who submitted applications in a previous phase.⁸⁷ These installers reportedly used this information to send unsolicited offers, which raised concerns over privacy and the improper use of applicants' personal

⁸⁵ According to a [news article](#), published by Hotnew.ro on 4 October 2024.

⁸⁶ According to a [news article](#), published by Hotnew.ro on 28 September 2024.

⁸⁷ According to a [news article](#), published by Hotnew.ro on 13 September 2023.

data. This scandal, although unresolved, further impacted the program's reputation, casting doubt on data security and fairness.

In order to address these claims, the minister of environment declared in a press interview that the ministry will have to develop some differentiating criteria to ensure that access is granted to all applicants not just the ones who apply fastest.⁸⁸

There were also good practice examples.

For example, Greenpeace Romania developed a website for people interested in accessing the program, informing them about the benefits of producing their own energy needs and how to navigate existing legislative and bureaucratic requirements.⁸⁹

At the local level, the mayor from a Romanian village got involved and together with their team implemented awareness-raising activities to help residents understand the program and apply successfully. This included organizing meetings, providing personalized consultancy, and simplifying the process by offering assistance in collecting documents and completing applications. These actions were critical in reaching groups who might otherwise have been unaware of the program (for example older people, but not only) as they helped 119 households to apply to the program of which 107 were admitted.⁹⁰

The mayor explained in an interview that:

I honestly believe that if we hadn't gotten involved, I don't know if there would have been 10 or 15 families. Maybe 10 families, but as you know, there's a significant lack of information. I would also mention education.

Cred că, vă spun sincer, dacă nu eram noi să ne implicăm, eu nu știu dacă erau 10, 15 familii. 10 familii poate erau, dar știți cum e lipsa informației destul de mare. Aș mai spune și educația.

The example shows how proactive involvement from the public administration of the local authority can make the program more accessible, by offering consultancy services and assisting families in completing their applications, explaining the benefits of photovoltaic systems, and helping with the technical aspects of the application.

⁸⁸ According to a [news article](https://www.digi24.ro/), published by <https://www.digi24.ro/> on 9 September 2024.

⁸⁹ Greenpeace Romania website for prosumers: <https://fiiprosumator.ro/>.

⁹⁰ As explained in an [interview](#) with the mayor published by Greenpeace Romania on 13 April 2023.

3.4. Stakeholder engagement and participation

General legislation provides that whenever preparing draft legislation all public administration authorities are required to publish a notice of this action on their website at least 30 working days before submitting it for approval and should set a period of at least 10 days to receive written proposals, suggestions or opinions on the draft legislative act, opinions which must be recorded in a register. Also, whenever anyone requests so in writing, the public authority has to organize a meeting for public discussion of the draft normative act.⁹¹

The implementing institution stated that it observed existing legislation on public consultations, that there has been an ongoing dialogue with all relevant stakeholders, indicating that the draft of the program was placed under public consultation.⁹²

Indeed, the order approving the program and the guide were published on the website of the Romanian Ministry of Environment, Water and Forests (*Ministerul Mediului, Apelor și Pădurilor*) and interested persons had 10 days in which they could indicate any recommendations or opinions to an indicated e-mail address.⁹³

However, the interviews show that the consultation process was deficient and albeit the authorities followed the formal requirements prescribed by law they failed to truly engage stakeholders, and particularly to engage with vulnerable groups. The consultation process was described as being more of a formality than a genuine effort to engage with stakeholders and address their concerns. Experts interviewed argued that the consultations were not meaningful or impactful, they failed to incorporate feedback from civil society or vulnerable groups in a way that could influence the action's outcomes. This has steadily fuelled distrust on behalf of civil society experts who were interviewed.

Beyond the initial consultation phase, the interviewees also pointed out the absence of ongoing consultations during the program's implementation.

Continuing consultations are crucial for adapting the program to emerging challenges and ensuring that it remains responsive to the needs of its participants. However, the

⁹¹ Romania, Law no. 52 of January 21, 2003 on decisional transparency in public administration ([Lege nr. 52 din 21 ianuarie 2003 privind transparența decizională în administrația publică](#)) Art. 7.

⁹² As explained in a response to a freedom of information request, response no. 48651/22.10.2024 from Environmental Fund Administration (*Administrația Fondului pentru Mediu*).

⁹³ Public consultation notice from 21 December 2023, available on the website of the Romanian Ministry of Environment, Water and Forests ([Ministerul Mediului, Apelor și Pădurilor](#)).

interviewees noted that there was no sustained dialogue between the authorities and stakeholders once the program was launched. This lack of ongoing engagement meant that problems that arose during implementation were not adequately addressed, and the opportunity to make improvements based on feedback was missed.

Interviewees suggested that the main groups which were consulted are industry actors and electricity grid installers, as one interviewee explains:

I think the only stakeholder that was truly considered in this whole program, especially in its latest edition, were the installers—in other words, the business sector. Because they were the ones who had to verify the files, they needed to be clear on what they had to do, they had to register on a certain platform, be validated as installers, etc. They had to meet certain requirements regarding the equipment and so on. I believe there was significant consultation with them, and I think they had a substantial influence on the writing of the program and the guidelines.

Cred că singurul stakeholder care a fost băgat în seamă, cu adevărat, în tot programul ăsta, mai ales în ultima lui ediție, au fost instalatorii. Adică au fost mediul de business. Pentru că ei trebuiau să verifice dosare, lor trebuia să le fie clar ce au de făcut, ei trebuiau să se înscrie într-o anumită platformă, să fie validați ca instalatori, etc. Să aibă anumite cerințe vis-a-vis de echipamente și așa mai departe. Cred că cu ei a avut loc o mare consultare și cred că ei au avut o influență pe scrierea programului și a ghidului.

One local official explained that at the criteria and operational framework were set at the national level without input from the local administration and that local authorities were not formally consulted during the design phase, as the expert explained:

It's really hard for me to say if any consultations were made. With civil society or with installers—at least no one ever informed us, not even the prefecture, let's say, who are the government's representatives in the area. Everything we did was through our own initiative and from information we gathered from the internet or maybe through discussions with certain collaborators in this field. I mean, we called companies to ask for specific details that we didn't know or when we had some unclear areas where we weren't sure how to proceed.

Nu știu să vă spun. Mi-e tare greu să vă spun dacă s-au făcut consultări. Cu societatea civilă sau cu instalatorii (...) cel puțin pe noi nu ne-a înștiințat nimeni niciodată, nici măcar prefectura, să zicem, care sunt oamenii guvernului în teritoriu. Tot ce am făcut a fost din inițiativa proprie și din informațiile care le-am luat de pe internet sau poate chiar discuții cu anumiți colaboratori în zona

aceasta. Adică am mai sunat să întrebăm anumite detaliile pe care nu le-am știut sau unde am avut câteva zone așa negre unde n-am știut cum să procedăm.

3.5. Governance and accountability, data and monitoring

The project coordinator does not have any information on existing ex-ante impact assessment carried out, or any impacts on fundamental rights of the project, or data on specific vulnerable groups.⁹⁴

In terms of monitoring, the project guide just mentions that the program coordinator monitors how the beneficiaries of the program respect the guidelines, for up to one year after receiving the approval to join the electricity grid.⁹⁵

However, the evaluation processes appear to focus solely on the technical output of the program—mainly installed capacity—and there is little to no follow-up on the actual benefits or challenges faced by beneficiaries. One expert who was interviewed explains how this works in practice:

I know there have been visits; they came to count the panels on the house to confirm that the correct number was installed, that it's the right inverter, and so on. How much they actually verify, I don't know. How internal verification is done, again, I don't know very well.

Știu că s-au făcut și vizite, au venit să numere panourile de pe casă, chiar s-au pus atâtea, chiar e inverterul ăla, chiar nu e ăla. Cât la sută verifică, nu știu. Cum se verifică intern, iarăși nu știu foarte bine.

This is confirmed by another expert interviewed who claims that:

They told me at one point (e.g. AFM) that for the program, they go and do monitoring like this: they choose one project out of, say, 100, go see if the panels

⁹⁴ As explained in a response to a freedom of information request, response no. 48651/22.10.2024 from Environmental Fund Administration (*Administrația Fondului pentru Mediu*).

⁹⁵ Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid ([Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională](#)) Art. 29.

are on the house, check their capacity, and that's it. Wonderful, we've evaluated and monitored, basically.

Ei mi-au zis la un moment dat (AFM) că pe Casa Verde se duc și fac monitorizare așa: aleg un proiect din cele 100 să zicem, să duc, văd dacă panourile sunt pe casa, verifică capacitatea lor și gata. Minunat, am evaluat, am și monitorizat practic.

The project guidelines prescribe a complaint mechanism by which applicants who are refused can file a complaint within 30 days to the governing board of the project.⁹⁶

This complaint mechanism seems to be used in practice, as one expert shows:

I saw that there are individuals who have filed appeals, and we had one as well. (...) There are appeals, and I saw on the AFM website that quite a few appeals have been approved, meaning they were won by individuals.

Persoane fizice am văzut că sunt care au făcut contestații și noi am avut și noi am avut un dosar respins și am făcut. (...) Deci da, sunt contestații, am văzut și pe site-ul AFM că sunt destul de multe contestații aprobate, adică câștigate de persoane fizice.

4. Conclusions and key recommendations

The program analysed had a significant potential to allow individuals living in remote areas, not connected to the grid to get access to electricity, to alleviate costs for electricity for the thousands of households experiencing energy poverty and to provide a source of income to vulnerable communities, who could produce their own electricity

⁹⁶ Romania, Ministry of Environment, Water and Forests, Order No 1.063 of 26 April 2023 for the approval of the Financing Guidelines of the Programme for the Installation of Photovoltaic Panel Systems for the Production of Electricity to Cover Consumption Needs and Surplus Supply to the National Grid ([Ordin nr. 1.063 din 26 aprilie 2023 pentru aprobarea Ghidului de finanțare a Programului privind instalarea sistemelor de panouri fotovoltaice pentru producerea de energie electrică, în vederea acoperirii necesarului de consum și livrării surplusului în rețeaua națională](#)) Art. 23.

and sell the surplus electricity. The program could have achieved these objectives whilst leading the energy transition process and helping to achieve national climate goals.

However, the project so far failed to achieve this potential of securing access to electricity for marginalized groups with no access to electricity or who cannot afford electricity costs. The program failed to target vulnerable groups, such as those in energy poverty or households without access to electricity or proper legal documentation.

This results from the program's design and implementation which in practice excludes large parts of marginalised groups, including people who do not own property, who do not have updated property documents, who cannot afford the 10% own contribution, those with limited capabilities of using internet tools and limited understanding and capacity of navigating through bureaucratic processes.

The program shows the necessity of comprehensive human rights impact assessments which could identify potential vulnerabilities and could have informed concrete measures needed to make sure the program reaches and benefits those most in need.

4.1. Main effects

The overall assessment of the Casa Verde Photovoltaic program is mixed. While the program has successfully increased the adoption of photovoltaic systems and contributed to Romania's decarbonization efforts, it also suffers from significant shortcomings, particularly in terms of accessibility, inclusivity and governance.

The program has been effective in increasing the number of prosumers (individuals who both produce and consume their own energy) in Romania, which aligns with the broader goals of decarbonization and energy independence.

However, the program has not really benefitted vulnerable groups. The program could have been designed to provide access to energy to those communities that most need it, those who do not have access to energy or who cannot afford it. But because the way the project was designed and implemented it practically excluded the most vulnerable groups.

Because of these reasons, one interviewee concludes that:

We missed an opportunity. (...) It is not the first and not the last. We missed another opportunity. To reduce some divides, to provide other resources to some children—we missed a chance.

Bă, am pierdut o șansă (...) nu e nici primul și nici măcar nu o să fie ultimul. Am mai pierdut o șansă. Să reducem niște clivaje, să oferim alte resurse unor copii, am pierdut o șansă, sigur.

4.2. Challenges and gaps

The program's design and implementation were criticized by experts interviewed for not adequately addressing the needs of vulnerable groups, which were largely excluded due to the program's reliance on property ownership and digital applications. The digital nature of the application process, combined with the need for property documents, creates significant accessibility barriers, particularly for those who are not digitally literate or do not have the necessary legal documentation.

Another gap refers to the limited evaluation of the program's overall impact, particularly its social outcomes.

There is no comprehensive evaluation of whether the program is truly benefiting all socio-economic groups or contributing to broader social equity or environmental goals. This gap in monitoring hinders the ability to make meaningful improvements. The experts interviewed suggested that by broadening the evaluation scope, additional improvements could be introduced to better align the program with its long-term sustainability and social equity goals.

Experts interviewed argued that the program faces significant accessibility barriers due to its design and implementation. The main barriers include:

- Complex application process: The program requires applicants to navigate a bureaucratic process involving ownership documentation and co-financing, which presents a challenge for those unfamiliar with government procedures or without digital access.
- Competitive nature of the "first come, first served" principle resulted in a selection process that only took into account speed of application and advantaged people with good digital skills.
- Financial co-financing requirement: The mandatory 10% contribution excludes many low-income households, even those who may meet other criteria.
- Digital divide: Information about the program is mainly available online, limiting access for vulnerable groups who may lack digital literacy or internet access.
- Lack of proactive outreach: There are no significant measures in place to actively engage or assist marginalized groups (e.g., rural populations, the elderly, or ethnic minorities), exacerbating the accessibility gap.

4.3. Lessons learned and good practices

The program shows that there is a real interest in green energy and energy independence on behalf of the general population. There is also great potential for green energy policies to have a positive impact in vulnerable communities and alleviate energy poverty and poverty in general.

In order to reach this potential, it is however important to have a proper project design that allows it to reach those most in need.

One of the most significant promising practices resulting from the research is the example of the proactive role of local municipality in helping citizens navigate the application process. A mayor from a Romanian village got involved and together with their team implemented awareness-raising activities to help residents understand the program and apply successfully. This included organizing meetings, providing personalized consultancy, and simplifying the process by offering assistance in collecting documents and completing applications. These actions were critical in reaching groups who might otherwise have been unaware of the program (for example elders, but not only) as they helped 119 households to apply to the program, out of which 107 were admitted.⁹⁷

Under Romania's National Recovery and Resilience Plan, the RePowerEU component, there is a call for funding on energy efficiency projects, including the installation of solar panels, open only for energy poor households and vulnerable energy consumers.⁹⁸ Under this program local authorities would work closely with economic operators who can apply on behalf of vulnerable consumers to receive vouchers for energy efficiency projects including: thermal insulation of external walls and facade, including finishing works, replacement of existing exterior woodwork with insulated woodwork, including windows and doors, thermal insulation of roof and/or floor, installation of photovoltaic electricity generation systems, with a net capacity of at least 3kW, for own consumption, which are connected to the national grid and energy audit report. This grant seems to address several shortcomings presented in the Cassa Verde Fotovoltaice program as it addresses specifically vulnerable consumers who with the assistance of local municipality can chose an economic operator who would handle the application process on their behalf. It is however still addressed to home owners but, those who cannot

⁹⁷ As explained in an [interview](#) with the mayor published by Greenpeace Romania on 13 April 2023.

⁹⁸ The call for funding is available on the Ministry of European Investment and Projects (*Ministerul Investițiilor și Proiectelor Europene*) [website](#).

provide a land register statement, can prove ownership with any other document issued by the local public authority.

4.4. Recommendations

The experts interviewed emphasized the need for a robust governance framework, greater inclusivity, and accessibility enhancements. These suggestions are aimed at ensuring a more transparent and socially equitable implementation.

- **Institutional Framework:** Establish a formal governance and oversight structure to ensure consistent monitoring, evaluation, and accountability.
- **Inclusivity:** Incorporate social criteria into the program to prioritize vulnerable groups, such as those experiencing energy poverty, the elderly, and marginalized communities, to make the program more equitable.
- **Process Accessibility:** Simplify the application process, particularly for individuals who lack digital literacy or easy access to necessary documentation.

One expert suggests prioritizing disadvantaged communities by setting specific criteria to address underserved parts of Romania, advocating for a “priority intervention map” that the Romanian state commits to as part of a broader equity strategy. This map would identify regions most in need, ensuring that vulnerable communities have structured support to access the program and benefit from renewable energy solutions:

From my point of view, they should say, 'this is the priority intervention map. You can also start from the map of disadvantaged communities. There are some foundations there to build on. (...) Then, based on that, you need to think about a comprehensive development plan. I mean, fine, so you've installed panels, but then what? What actually happens? What are the cascading effects you're creating? Because that's what sustainability means.

Adică, din punctul meu de vedere, trebuie creată o hartă de intervenție prioritară pe niște criterii pe care statul român să-și le asume. Să zică « asta e harta de intervenție prioritară ». Culmea, se poate porni și de la harta comunităților dezavantajate. Se poate porni, sunt niște embrioni acolo, de la care se poate porni. (...) După care tu trebuie să gândești, pornind de la chestia asta, o dezvoltare comprehensivă. Adică, bun, și dacă ai pus panouri, ce? Ce se întâmplă efectiv? Care sunt efectele cascada pe care tu le provoci ? Pentru că asta înseamnă sustenabilitatea.

Annexes

Annex I. Design of the action

Information about the action	
<p>Objective</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Objective • Area of contribution • Explicit focus 	<ul style="list-style-type: none"> • The object of the program is to finance the acquisition and installation of photovoltaic panel systems that use renewable, non-polluting energy sources for the production of electrical energy and its use by consumers connected to the national electricity distribution network. • The aim of the program is to increase energy efficiency, improve air quality, and reduce greenhouse gas emissions through the use of photovoltaic panel systems with a minimum power of 3 kW, for the production of electrical energy needed for own consumption and the delivery of surplus into the national energy system. • The objective of the program is to increase the capacities for producing electrical energy from renewable sources. • The performance indicator of the program (I) is the total amount of reduced greenhouse gases (kg CO₂) through the installation of photovoltaic panel systems, calculated over the entire monitoring period of the project, as follows: $I = \sum_{i=1}^n E_i \times f$, where: f = CO₂ emission factor (0.21337 kg CO₂/kWh according to ANRE report/2020); n = number of installed photovoltaic panel systems; E = electrical energy produced by a photovoltaic panel system (kWh).
<p>Background</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Starting date • Origin and development • Rationale • Stakeholders involved 	<ul style="list-style-type: none"> • Starting date: the program has started in 2019 and continues, with the latest edition in 2023 • The program was developed in the framework of changing and adapting the legal basis for the existence of prosumers • The rationale was to support the development of a new market of prosumers in order to increase the individual capacities for producing electrical energy from renewable sources • Stakeholders involved: Ministry of the Environment, AFM-Environmental Fund Administration, prosumer associations
<p>Timeline</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Timeline and duration • Milestones, reviews, amendments planned 	<p>The program started in 2019 and was continued as a recurrent program until now. In the legal documents it is foreseen as a multiannual program but, due to constant problems and blockages, it only had 3 editions until 2024. There is no information on future editions but according to press interviews the ministry is looking to continue it, to allocate more funds and to set more criteria for who receives the funds, renouncing the first come, first serve criteria used so far.</p>

	<p>The Ministry of European Investment and Projects is going to launch the RePower program (https://mfe.gov.ro/wp-content/uploads/2023/06/Of3f1374ef12ed29a38a89151f812434.pdf) that is a going to be implemented until 2026 and has similar objectives but more social criteria in the selection process than Casa Verde Fotovoltaice program.</p>
<p>Scope and development</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Activities included • Planned developments, phases, repetitions or other • Project continuation in the future 	<p>Through the Casa Verde Fotovoltaice, the Environmental Fund Administration (AFM) offers non-reimbursable funding for the installation of photovoltaic panel systems, helping one save money and protect the environment. They offer support in the acquisition and installation of photovoltaic panel systems, thereby contributing to the increase in energy production from renewable sources and the reduction of the carbon footprint.</p> <p>The program will be continued also in 2024.</p>
<p>Internal governance</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Legal basis • Bodies/units responsible for management, implementation, monitoring • Organigram (please attach if available) • Persons working on the action 	<p>The legal basis for the program is composed of multiple ministerial orders and governmental emergency ordinances, as stated in the guide for the program here. The main and most important one is the ministerial order from 2018: Ordinul viceprim-ministrului, ministrul mediului, nr.1.287/2018. The organigram can be found here.</p>
<p>External governance</p> <p><i>Please include:</i></p> <ul style="list-style-type: none"> • Reporting obligations • Accountability • Partnerships • Collaborations 	<p>The activity of the AFM is supervised by the Ministry of Environment. They also have, according to the organigram, an internal evaluation process. They have established in 2006, according to the official website, a collaboration with ARCE (Romanian Association for Energy Conservation) in order to finance projects concerning renewable energy.</p>
<p>Funds</p>	<p>The funds for this program have varied from year to year. For the 2023 editions the budget was RON 1,750,000,000, approximately Euro 351,666,901. The financing for the beneficiaries of the program</p>

<p><i>Please include:</i></p> <ul style="list-style-type: none"> • Budget available for the action • Funding sources, (including administrative level) • Information on fundamental rights conditionalities if any 	<p>is granted up to a maximum amount of 20,000 RON for each project, on the condition that the beneficiary contributes 2,000 RON (10%). The total number of beneficiaries for 2023 is: 49,311.</p> <p>For the 2024 edition the budget was RON 1,999,980,000, approximately Euro 401,852,559 which is meant for approximately 67,000 beneficiaries who can receive a maximum amount of RON 30,000 for the purchase and installation of a photovoltaic panel system and a storage installation for electricity produced from renewable energy sources, provided that the beneficiary pays a contribution of RON 3,000. The total number of beneficiaries for 2024 is of: 66,666.</p> <p>The financing of the program is carried out from the revenues of the Environmental Fund, within the limits of the commitment and budgetary credits allocated for this purpose through the annual budget of the Environmental Fund, approved in accordance with the law.</p>
<p>Other aspects to be considered</p>	<p>Constant scandals and blockages of the program, due to internal problems and lack of foresight from the governing body of the program</p>