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Methodology for the selection of a representative sample of SECAPs and a feedback procedure for cities

European Covenant of Mayors Initiative

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Abstract

The Covenant of Mayors for Climate and Energy – Europe (CoM EU) supports local authorities in developing and implementing Sustainable Energy and Climate Action Plans (SECAPs). The Joint Research Centre (JRC) is responsible, among other, for the evaluation of SECAPs and the provision of feedback to CoM signatories. Under the previous Administrative Arrangements (from 2010 to 2024), JRC was giving feedback on all SECAPs after analysing them either individually or, when applicable, under a grouped evaluation approach with the involvement of Covenant Territorial Coordinators (CTCs). The current Administrative Arrangement (AA), which started on 9 July 2025, foresees that JRC will analyse on a one-to-one basis a selected sample of SECAPs, while continuing to apply the CTC-grouped approach whenever relevant. The aim is to provide constructive recommendations to municipalities, identify good practices, and support continuous learning and improvement within the CoM EU, while ensuring efficiency, transparency and scalability.

This document represents deliverable 1.6 of the AA and describes the methodology to select the sample of SECAPs for individual analysis and the feedback procedure. It also outlines an approach to provide automated feedback to the municipalities whose SECAP will not be reviewed by JRC.

Acknowledgements

This work has been developed by the European Commission's Joint Research Centre in the context of the Administrative Arrangement Technical and scientific assistance, analysis and support to the Covenant of Mayors for Climate and Energy in coordination with DG ENER and DG CLIMA.

We would like to thank DG ENER and DG CLIMA for their strategic vision and guidance on the Covenant of Mayors initiative, and for their valuable exchanges and feedback during the definition and finalisation of the methodology described in this document.

We also thank our colleagues at the Covenant of Mayors Europe Office (CoMO) team for their continuous support and constructive contributions throughout the development and finalisation of this work.

Additionally, we are grateful to our colleagues at the JRC, in particular Joana Bastos, Gema Hernandez Moral, Corentin Kuster, and Davide Marinella, who have provided continuous support and constructive contributions throughout the development and finalisation of this work.

Authors

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1. Introduction

The Covenant of Mayors for Climate and Energy – Europe (CoM EU) has, since its inception, supported European small- and medium-sized municipalities, cities and towns in developing and implementing Sustainable Energy and Climate Action Plans (SECAPs). Up to 30 June 2025, the Joint Research Centre (JRC) was responsible for the assessment and acceptance (or rejection) of all SECAPs submitted by signatories. From 1 July 2025 onwards, the assessment of SECAPs shifts from a full review of all submitted plans to a sample-based evaluation approach. Under this approach, all submitted plans continue to undergo first-level automated validation through the MyCovenant platform, while an in-depth expert assessment and feedback by the JRC is carried out only for a representative sample of plans. From 2026 onwards, this approach is implemented as a regular operational process on a quarterly basis.

Since 2020, more than 2,000 SECAPs have been submitted under the CoM EU framework (see the Annex for detailed information). Approximately 55% of these were developed under the Covenant Territorial Coordinator (CTC) approach[1] and are assessed collectively for acceptance by the JRC under a dedicated procedure[2] not covered by this document. The remaining plans submitted individually or through joint approaches (options 1 and 2) were assessed by the JRC on a one-to-one basis. Following the peak submission campaigns of 2020 and 2023, the number of individual plans has stabilised at around 150 per year, reaching about 200 per year when joint plans (options 1 and 2) are also considered (see also the Annex). This steady inflow of SECAPs demonstrates the need for a more efficient and scalable assessment approach, while preserving quality and comparability.

The CoM assessment is organised into two complementary levels. The first level consists of an automated verification through the MyCovenant reporting platform, which checks the completeness of mandatory data reported in the platform and awards “badges” to municipalities, according to criteria defined in the context of the Global Covenant of Mayors (GCoM). The second level involves an expert-based assessment carried out by the JRC. Under the previous approach, this review was conducted on all submitted plans on a one-to-one basis, based on qualitative criteria applied across three pillars (mitigation and adaptation, and energy poverty from 2025 onwards) and including consistency checks of reported data.

Considering the increasing number of submitted plans, this document introduces an updated methodology for the second level evaluation of SECAPs. It explains the methodology for selecting a representative sample of SECAPs, including joint plans; and outlines the feedback procedure for municipalities whose plans are reviewed.

The methodology builds on the fitness-check and feedback system developed under the GCoM, while being adapted to the specific needs and operational context of the European initiative (Melica et al., 2024). It is guided by the principles of transparency and independence, balanced representativeness (by city size, geographical distribution and plan type), and added value through constructive feedback and learning.

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1 through which groups of municipalities receive technical support.

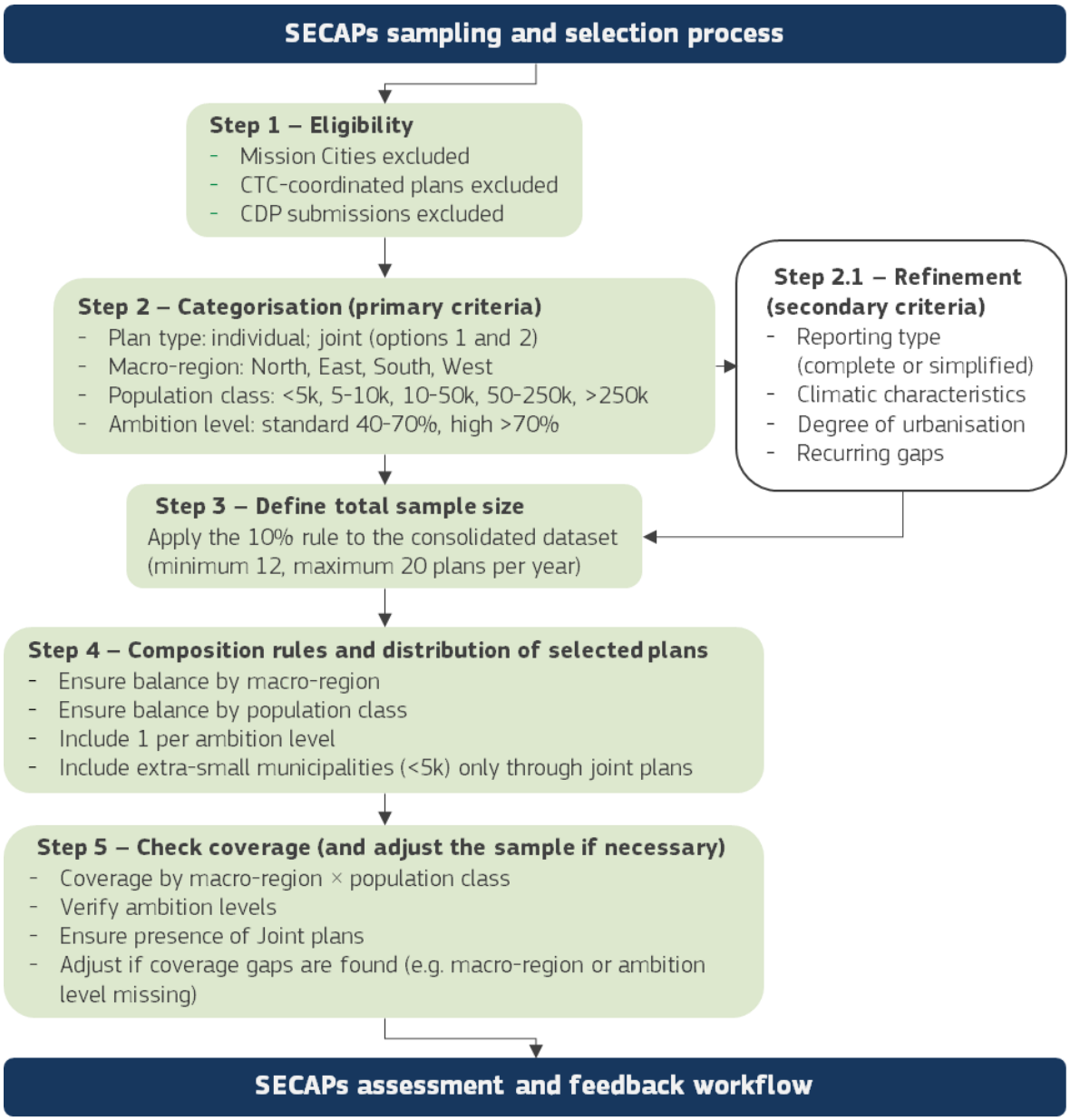
2 https://eu-mayors.ec.europa.eu/en/resources/library/reference-guide-regional-secaps-assessment-framework

2. Methodology for the selection of SECAPs

The new assessment approach is based on the analysis of a representative sample of SECAPs, rather than on a review of all submitted plans. Figure 1 provides an overview of the sampling process, while the following sections describe in detail its objectives, statistical basis, criteria and application over time.

The methodology applies to SECAPs submitted under the CoM EU initiative, including both individual and joint plans. The approach is designed to ensure an inclusive and balanced sample that reflects the diversity of municipalities across the EU, while remaining feasible in terms of workload.

Figure 1. Methodology for SECAP sample selection: general structure and application to a sample.



Source: JRC analysis

2.1. Objectives and guiding principles

The methodology defines how a representative and purpose-driven subset of SECAPs is identified on a regular basis, ensuring transparency, consistency and comparability over time.

The sampling methodology pursues three main objectives:

— Inclusiveness. To ensure that the SECAPs analysed by the JRC reflect the diversity of municipalities across the EU, in terms of geographical coverage, population size, plan typology (individual or joint), and ambition level. The sampling aims for balanced diversity rather than strict statistical representativeness of the overall CoM community.

— Efficiency. To optimise the use of available resources while maintaining analytical depth and quality standards, by reviewing only a selected sample of plans instead of the entire set of submissions.

— Learning and comparability. To generate evidence on strengths, weaknesses and emerging practices that can inform guidance, capacity building and methodological updates within the initiative.

The approach is guided by a set of shared principles:

— Transparency and traceability. The criteria for inclusion in the sample are clearly defined and documented.

— Independence. Selection and assessment are performed by the JRC as an independent evaluator, following objective criteria and avoiding potential conflicts of interest.

— Inclusiveness and balance. The sample ensures balanced coverage across regions, population size classes and plan types, rather than a strictly proportional representation. It reflects the diversity of the CoM community across the three SECAP pillars (mitigation, adaptation and energy poverty) and different submission modalities (individual and joint plans).

— Flexibility and adaptability. The primary and secondary criteria are applied dynamically at different stages of the sampling process, depending on the characteristics of the reference pool. On a quarterly basis, the JRC may adjust the balance among selection parameters to ensure adequate coverage across key dimensions such as geography, population size, plan typology, and ambition level. In parallel, an annual overview is used to verify that the cumulative coverage across quarterly samples remains balanced over time.

— No additional burden for cities. The process relies exclusively on information already submitted through SECAPs and, where relevant, existing monitoring reports (MRs). Cities are not requested to provide further documentation or information.

— Complementarity with other assessment streams. The methodology applies only to directly assessed plans, excluding those submitted under the CTC approach, which follow a distinct evaluation process, and Mission Cities, which are reviewed under the EU Cities Mission framework.

The scope of the methodology covers SECAPs addressing the three mandatory pillars of the CoM EU: mitigation, adaptation and energy poverty. Since 2025, energy poverty has become a mandatory pillar for all new SECAP submissions. Cities that submitted a SECAP prior to this requirement may integrate the energy poverty pillar through MRs, where relevant indicators and actions are reported. Accordingly, the methodology applies both to SECAPs covering all three pillars

and to cases where mitigation and adaptation are addressed in the SECAP, while energy poverty is reported through an MR submitted from 2025 onwards.

The approach covers all SECAP typologies recognised under the CoM framework:

— Individual SECAPs, developed and submitted by a single municipality.

— Joint SECAPs "Option 1 - individual GHG reduction commitment", where each signatory commits individually to a common target (e.g. climate neutrality by 2050) and is required to develop its own SECAP, which may include both individual and shared measures. The impacts of joint actions are allocated among the municipalities involved, and each city uploads its SECAP to its profile with approval from its Municipal Council.

— Joint SECAPs "Option 2 - shared GHG reduction commitment", where the group of signatories commits collectively to a common target (e.g. carbon neutrality by 2050) and fills in a single joint SECAP, including both individual and at least one shared measure. A common document covering all members is uploaded and approved by each Municipal Council.

2.2. Application of the sampling methodology over time

For SECAPs submitted between 1 July and 31 December 2025, all plans falling under the direct-assessment stream are considered within a single reference pool, from which a representative sample is selected.

From 1 January 2026 onwards, the methodology is applied on a quarterly basis, with representative samples selected from plans submitted during each reference period. Quarterly sample selection is complemented by an annual balancing exercise to ensure that, over the course of the year, the overall coverage remains representative of the diversity of the CoM EU signatory base in terms of geographical distribution, population size, plan typology and ambition level.

2.3. Statistical basis and definition of sampling parameters

The definition of sampling criteria builds on the statistical analysis of SECAP submissions between 2020 and 2025, which provides the empirical basis for the selection parameters used in the methodology (Bezerra et al., 2025). This analysis identifies the main compositional features and trends within the CoM community, including:

— A predominance of individual SECAPs, with around 800 individual submissions recorded between 2020 and 2024, in addition to approximately 900 CTC-coordinated plans submitted individually by municipalities. Joint approaches remain comparatively limited, with roughly 80 municipalities grouped under Joint option 1 (across fewer than 20 groups) and around 50 Joint option 2 submissions covering nearly 500 municipalities (see Annex);

— A persistent geographical imbalance, with a higher concentration of submissions from Southern Europe;

— The prevalence of small municipalities (<10,000 inhabitants), accounting for over half of individual submissions between 2020 and 2024 (approx. 52%), followed by medium-sized and large cities;

— A concentration of plans within a standard ambition range (40–69% GHG reduction by 2030), with fewer cases at very low or very high ambition levels; and

Increasing integration of the energy poverty pillar from 2025 onwards, with varying levels of maturity.

2.4. Sampling logic, criteria and frequency

The selection of SECAPs follows a flexible, multi-criteria approach designed to ensure a representative and balanced sample over time. For each reference period, the JRC builds a sampling frame including all eligible plans submitted under the direct-assessment stream (excluding SECAPs coordinated through CTCs and Mission Cities).

The composition of the sample is primarily guided by a set of core criteria, which ensure structural representativeness across the CoM EU signatory base. These core criteria include:

— Geographical distribution, ensuring coverage across EU macro-regions and giving priority to under-represented countries or regions;

— Population size class (<5k, 5–10k, 10–50k, 50–250k, >250k inhabitants), reflecting the distribution of municipalities within the CoM. The population size class is applied in combination with the plan typology (see below): individual SECAPs are considered for all population size classes except extra-small municipalities (<5,000 inhabitants), for which only joint SECAPs are included in the sample;

— Plan typology, including individual SECAPs and joint SECAPs (options 1 and 2), applied in combination with the population size class as described above;

— GHG ambition level, focusing on plans with standard and high 2030 reduction targets.

In addition to these core criteria (primary), a limited set of secondary criteria may be applied on a case-by-case basis to further refine the composition of the sample. These criteria are used flexibly and do not alter the overall sampling logic. Complementary criteria may include:

— Reporting type (complete vs simplified templates) on MyCovenant platform (where relevant) to ensure balanced coverage of different reporting modalities;

— Climatic characteristics (e.g. climate zone or climatic class), to ensure coverage of different environmental contexts;

— Degree of urbanisation, to capture the diversity of local contexts (cities, towns and suburbs, rural areas);

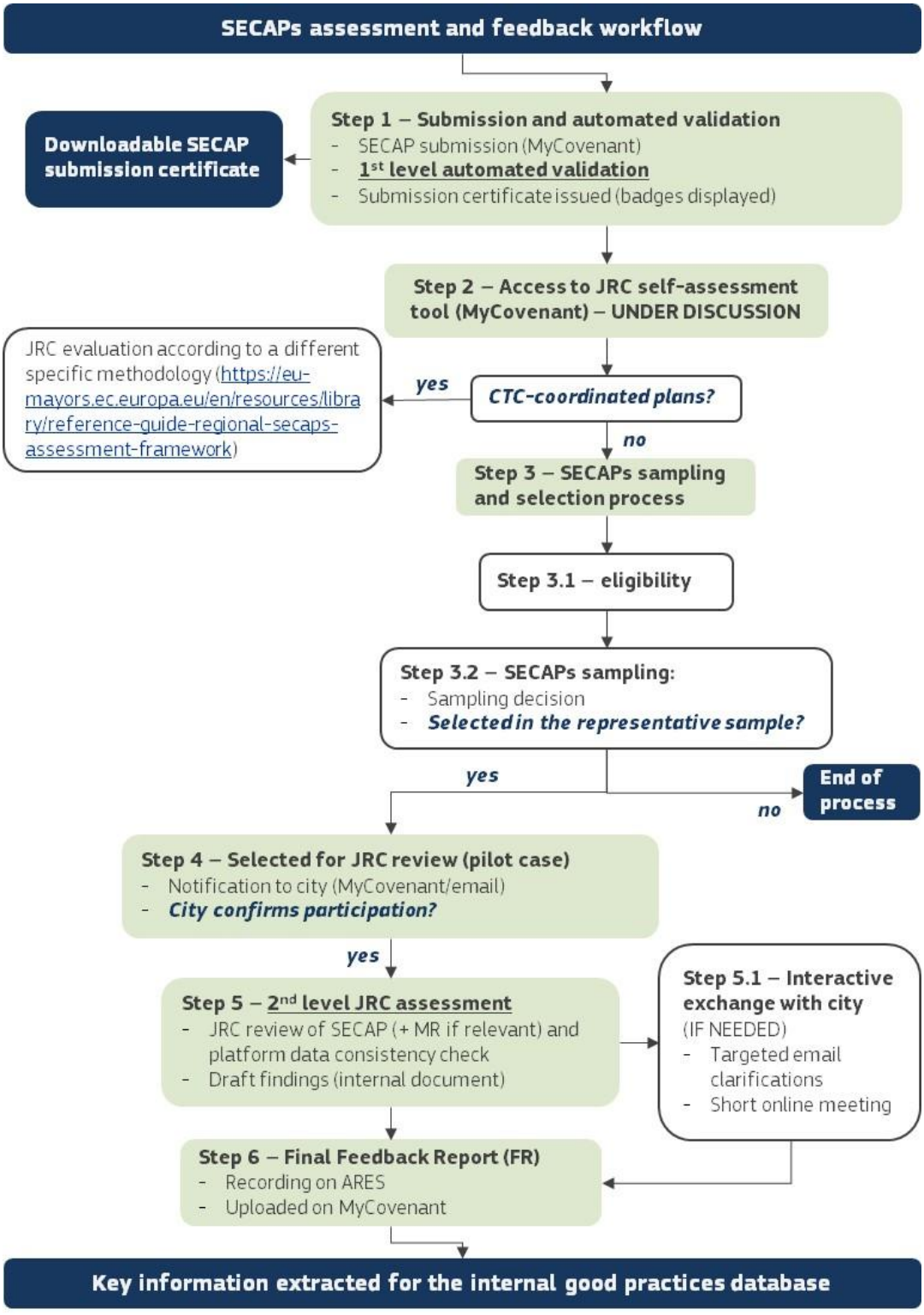
— Recurring analytical gaps or weaknesses observed across submitted plans (e.g. based on findings from the JRC open validation tool), to support targeted learning and methodological improvement.

The annual sample size is calculated as 10% of the total number of SECAPs submitted each year. The resulting number of plans selected for the JRC assessment is set with a minimum of 12 and a maximum of 20 plans per year. At the quarterly level, the number of plans assessed may vary depending on the volume and characteristics of submissions received in each period. The minimum coverage rule applies at the annual level, where a broader balancing exercise is carried out to ensure that, across the four quarters, the cumulative sample remains representative in terms of geographical distribution, population size, plan typology and ambition level.

3. Methodology for the feedback procedure

The feedback procedure complements the sampling-based assessment described in section 2 by translating the outcomes of the expert-based review into actionable recommendations for cities and structured evidence for learning across the CoM community.

Figure 2. Workflow of the SECAP assessment and feedback process.



Source: JRC analysis

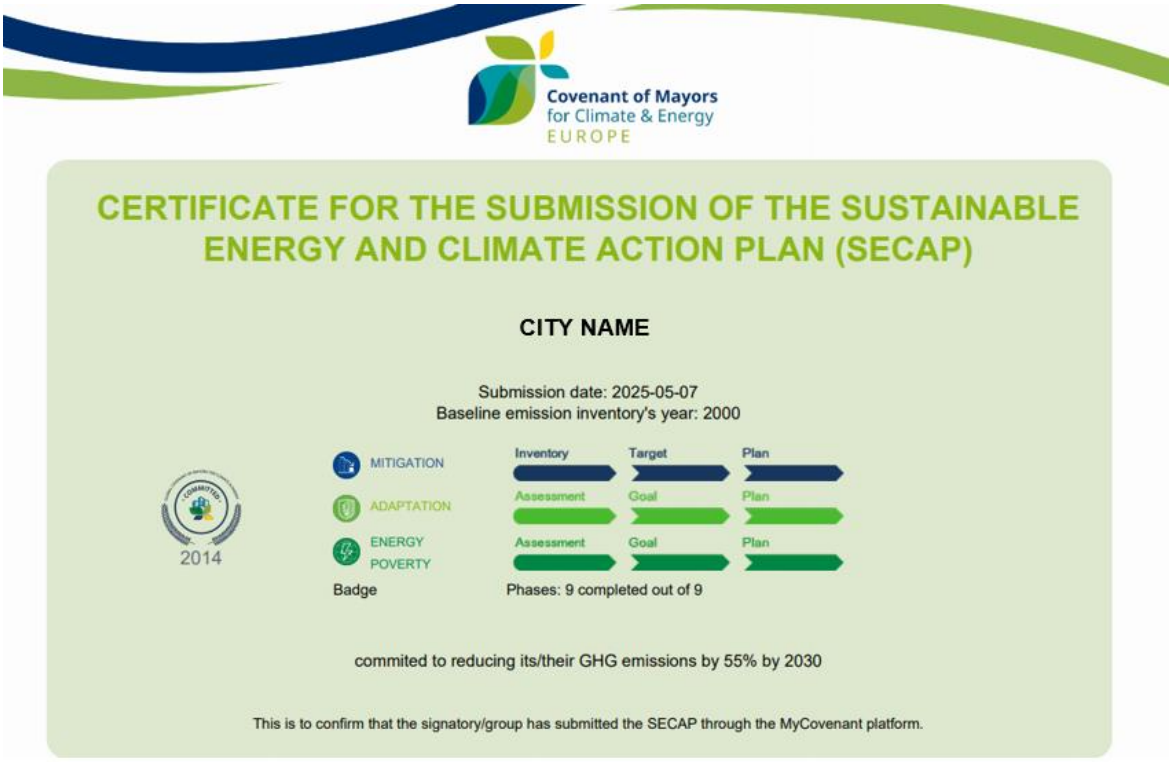
Its purpose is to provide targeted, city-specific guidance aimed at strengthening the quality, robustness and internal coherence of SECAPs; and to generate consolidated insights on recurring strengths, gaps and emerging practices that can inform the continuous development of the initiative. The overall SECAP assessment and feedback workflow is illustrated in Figure 2.

The feedback procedure is embedded within a broader assessment architecture that combines automated platform-based validation and expert-based review. All SECAPs submitted through the MyCovenant platform continue to undergo first-level automated validation, which verifies the formal completeness of mandatory reporting elements and results in the issuance of a submission certificate. In parallel, the representative sample of plans selected for second-level assessment by the JRC will receive a feedback report.

3.1. Assessment and feedback approach

The feedback procedure is based on three main components: automated validation, JRC review and learning-oriented support tools. This approach is designed to ensure clarity for cities, proportionality in the assessment effort and added value in terms of guidance and learning, while maintaining transparency and consistency across the CoM framework. All SECAPs submitted through the MyCovenant platform are subject to a first-level, automated validation. This validation verifies the formal completeness of mandatory reporting elements across the three pillars (mitigation, adaptation and energy poverty) and awards "badges" to signatories according to harmonised criteria defined in the GCoM context. Based on the reporting progress made by cities under each pillar, badges are displayed automatically in the signatory profile. Upon submission of the SECAP, cities can download through MyCovenant a submission certificate which shows the pillar badges they have obtained (Figure 3).

Figure 3. Example of the SECAP submission certificate generated through the MyCovenant platform, displaying the pillar badges awarded following first-level automated validation.



Source: JRC analysis

This certificate formally acknowledges the successful completion of first-level validation for all signatories, independently of selection for second-level expert review. The submission certificate could be also promoted among CTCs (notably those who did not opt for the regional SECAP assessment framework[3]) as a way to acknowledge the accomplishment of a major step of the city climate action journey, possibly also in the context of grants given to cities by CTCs (e.g. vouchers from Apulia Region).

In addition to this automated validation, a second-level, expert-based assessment is carried out by the JRC on a representative sample of SECAPs, selected according to the sampling methodology described in section 2. This assessment focuses on the quality, robustness and internal coherence of the plans and constitutes the analytical basis for the structured feedback procedure. It is designed as a constructive and learning-oriented process, providing city-specific recommendations and enabling the identification of good practices for wider dissemination. Checks performed by JRC include verification of the consistency between the information reported through the MyCovenant platform and the content of the submitted SECAP document (PDF file), as well as an integrated review of the Covenant pillars. The feedback may focus on specific pillars or cross-cutting aspects where improvements are most relevant or impactful.

Alongside the two assessment components described above, the revised framework foresees two parallel feedback pathways.

1. For SECAPs selected within the representative sample, cities receive structured, expert-based Feedback Report (FR) from the JRC, as detailed in section 3.2.
2. For SECAPs not included in the sample, they will be able to use an automated self-assessment tool that will be made available through the MyCovenant platform. This tool, building on the JRC validation system used internally for SECAP analysis, is designed to support municipalities in reviewing the quality and internal coherence of their submitted SECAP template data in a structured and user-friendly manner. The tool will generate downloadable outputs highlighting potential issues, gaps and recommendations linked to key reporting elements (e.g. GHG emissions data, targets, actions and monitoring aspects). It is complementary to both the automated first-level validation and the JRC second-level assessment, and aims to provide immediate and actionable feedback to cities on their submitted SECAP.

3.2. Objectives and rationale of the feedback procedure

The feedback procedure aims to strengthen the effectiveness and added value by establishing a structured and timely dialogue between the JRC and the cities whose SECAPs are selected for review. It supports a more practical and responsive interaction, aligned with the operational needs of municipalities.

The feedback is provided through direct exchanges between the JRC and cities, replacing purely static communication. These exchanges may include short written clarifications via email (using the dedicated JRC functional mailbox) or brief online meetings initiated by the JRC, depending on the

[3] https://eu-mayors.ec.europa.eu/en/resources/library/reference-guide-regional-secaps-assessment-framework

complexity of the issues identified. This allows cities to clarify key aspects of their plans promptly and supports a smoother assessment process.

Feedback is delivered in concise, focused cycles, addressing the most relevant issues affecting the quality, robustness and internal coherence of the SECAP. The feedback provision timeline is being streamlined to enable a more interactive exchange, including the possibility of dedicated meetings with cities, where appropriate. The final Feedback Report (FR) is uploaded to the MyCovenant platform. Any detailed exchanges with the city, replacing the former pre-contact letters, are conducted through direct interaction. The final feedback report is recorded internally (ARES) to ensure transparency and traceability.

In addition, the procedure systematically identifies strengths and good practices, in alignment with the GCoM approach, emerging from the reviewed SECAPs. These are consolidated to support cross-city learning, inform capacity-building activities and promote the dissemination of replicable solutions across the CoM community.

3.3. Timeline and process

The feedback procedure is aligned with the timing of the assessment framework and operates on a regular cycle. Reviews are carried out on a quarterly basis, and the final FR is provided within six months[4] from the submission of a SECAP or from its inclusion in the representative sample, ensuring predictable timelines and regular communication with cities.

This timeline ensures both stability and continuous learning: the initial implementation allows the procedure to be applied and refined, while subsequent cycles consolidate it into a standard operational routine.

Each feedback cycle consists of the following steps:

— Submission and automated validation. Following submission through the MyCovenant platform, all SECAPs undergo first-level automated validation. Signatories may download the submission certificate.

— Selection into the representative sample. A subset of SECAPs is selected for second-level, JRC assessment in accordance with the sampling methodology described in section 2.

— Trigger of the feedback process. The feedback process starts once a SECAP has been selected for JRC assessment. Cities are informed accordingly through the MyCovenant platform or via email.

— Desk review. JRC experts review the SECAP and, where relevant, associated MRs, assessing the completeness of the Covenant pillars, the internal coherence between inventories or assessments, targets and actions, as well as horizontal aspects (e.g. the soundness of the financial information provided at action level). Consistency is verified between the information reported through the MyCovenant platform and the content of the submitted SECAP document (PDF file).

[4] JRC will strive to further reduce this timeline, once the new approach is up and running.

— Synthesis of findings. Reviewers prepare structured observations and recommendations using a standard feedback template.

— Interactive exchange with cities. Communication takes the form of concise, iterative exchanges, such as brief meetings or targeted messages through the platform or via email, to clarify key issues and support mutual understanding of the proposed recommendations.

— Feedback report (FR) and communication. The final FR is delivered through the MyCovenant platform and by email, summarising the main findings and recommendations. Where appropriate, cities may request a short follow-up exchange to discuss specific aspects of the assessment.

— Information gathering. From the analysis of each SECAP JRC experts collect relevant information such as good practices or gaps in a dedicated table for future reference.

Along this process, the JRC ensures that exchanges with cities remain efficient and proportionate to the complexity of the plan, prioritising clarity, consistency and timely support.

3.4. Feedback structure and template

The FR is provided through a structured report that follows the format established within the CoM framework. The template ensures consistency across cities while allowing for the integration of elements introduced under the updated methodology. The FR includes the following sections:

— Foreword, outlining the purpose of the feedback, the scope of the assessment and the evaluation criteria applied;

— General criteria, verifying formal approval of the SECAP and completeness of mandatory information reported through MyCovenant;

— Mitigation criteria, covering the overall GHG reduction target, the completeness of the baseline emission inventory (BEI) -according to the complete or simplified reporting approach- and the presence of key mitigation actions;

— Adaptation criteria, addressing adaptation objectives, the completeness of the climate risk and vulnerability assessment and the presence of key adaptation actions;

— Energy poverty criteria, verifying the presence of an energy poverty or access assessment, related targets and key actions;

— Overall evaluation, summarising the main findings and the level of alignment with the assessment criteria;

— Detailed comments, providing specific observations and recommendations by pillar;

Disclaimer, clarifying the scope and limits of the feedback and the responsibilities of the signatory city.

3.5. Tracking, aggregation and learning

All FRs and recommendations are recorded in a central repository managed by the JRC. This system supports both city-level follow-up and cross-city analysis.

— City-level tracking: recommendations are linked to the respective SECAP and can be monitored in subsequent submissions, allowing progress to be assessed over time.

— Aggregation of findings: the repository enables analysis of recurrent strengths and weaknesses across cities, disaggregated by geographical area, population size class and plan typology.

— Cross-city learning: good practices identified during the feedback process are consolidated into knowledge products such as synthesis reports, collections of good practices and training resources, supporting peer learning within the Covenant of Mayors community.

— Informing the evolution of the initiative: recurrent patterns emerging from the aggregated analysis inform methodological refinements and targeted capacity-building.

This tracking and aggregation function strengthens the credibility of the initiative, supports evidence-based learning and contributes to the continuous evolution of the Covenant of Mayors framework.

3.6. Next steps

Information on the assessment approach and the associated feedback procedure is communicated to cities through the MyCovenant platform and accompanying communication materials, in coordination with the Covenant of Mayors Office (CoMO).

Signatories will be informed that, while all SECAPs continue to undergo first-level automated validation and receive a submission certificate, only a representative subset of plans is selected for in-depth expert-based assessment and structured feedback by the JRC, in line with the sampling methodology described in this document. Further details on timing and communication modalities will be clarified in coordination with the CoMO.

The progressive implementation of the revised framework will also enable the consolidation of cross-city insights and methodological refinements over time.

4. Conclusions

This document outlines the methodology for the sampling-based assessment and feedback procedure applied to SECAPs under the CoM EU. The approach combines automated validation, expert-based assessment and structured feedback, ensuring proportionality, transparency and added value while responding to the growing number and diversity of SECAP submissions.

By introducing a representative sampling strategy and a structured feedback procedure, the methodology enables the JRC to provide targeted, actionable recommendations to cities, while generating consolidated evidence on recurring strengths, gaps and emerging practices across the CoM community. This supports both city-level improvement and cross-city learning, without introducing additional reporting burdens for signatories.

The methodology is designed to operate on a regular and predictable basis, with clear timelines and communication processes, and to evolve over time through iterative learning. Further refinements may include the progressive enhancement of communication modalities and validation tools, in coordination with the Covenant of Mayors Office and relevant Commission services.

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Melica, G., Treville, A., Franco De Los Rios, C., Todeschi, V., Baldi, M. G., Bezerra, P., Davide, M., Hernandez Moral, G., Palermo, V., Pittalis, M., Bastos, J., Monforti-Ferrario, F., Barbosa, P., & Bertoldi, P. (2024). *Covenant of Mayors: 2023 assessment* (Issue KJ-NA-31-954-EN-N (online)). Publications Office of the European Union. https://doi.org/10.2760/835080 (online)

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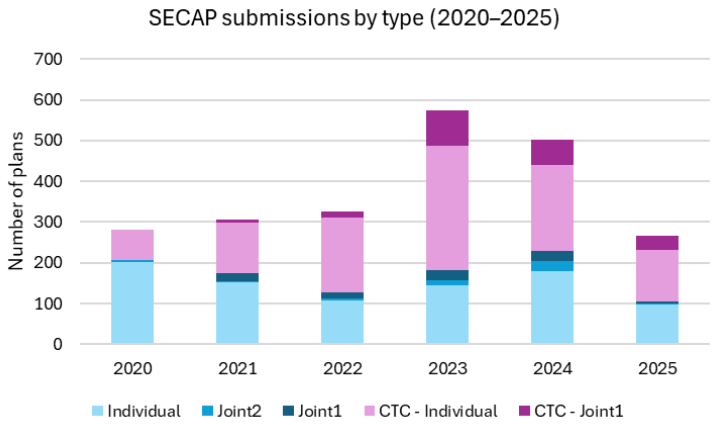
Annex. Statistical analysis of SECAP submissions

This section presents a statistical overview of SECAP submissions from 2020 to 2025, considering only action plans aligned with the 2030 or 2050 commitment frameworks. The analysis is structured in two parts: (i) consolidated results for 2020–2024, covering five full years of data; and (ii) preliminary results for 2025, which are still partial and will be further complemented by monitoring reports.

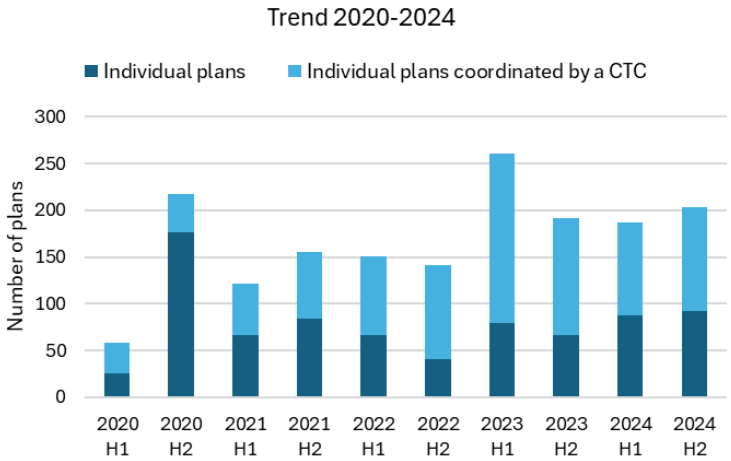


Submissions 2020-2024

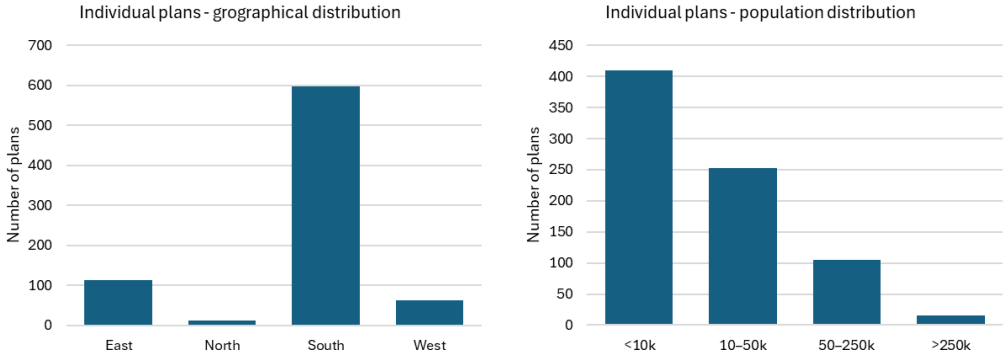
Individual plans

From 2020 to 2024, a total of 784 individual SECAP submissions were recorded, plus an additional 901 plans coordinated by a Covenant Territorial Coordinator (CTC) but submitted individually by each municipality, outside the grouped approaches (Joint option 1 and Joint option 2).

Temporal distribution shows a very sharp peak in 2020 H2 (176 individual submissions), followed by a stabilisation between 50 and 90 per semester (roughly 150 plans per year). By contrast, the CTC approach gained momentum especially from 2022 onwards, with a remarkable peak in 2023 H1 (182 submissions). This spike is largely explained by coordinated submission campaigns led by Diputació de València and the Region of Sicily, which together account for 79% of the semester's CTC-coordinated submissions. The year 2024 again shows relatively high figures (92 individual and 111 CTC plans in H2), confirming a renewed momentum in both tracks.

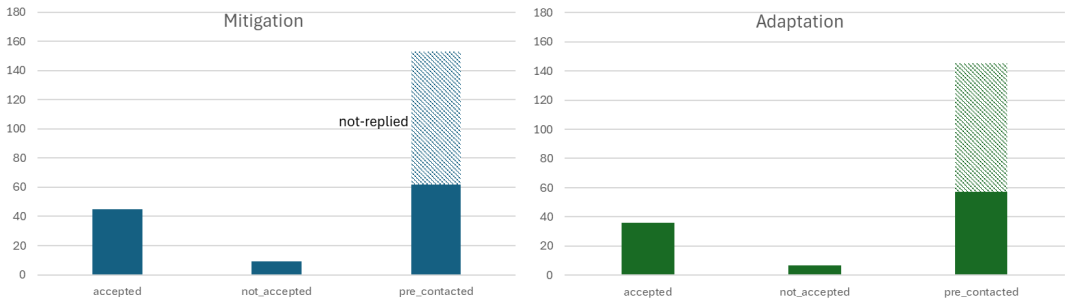


Regional distribution (according to the UN M49 geo-scheme for Europe, https://unstats.un.org/unsd/methodology/m49/) highlights a strong prevalence of submissions from the South, followed by East, West and North. Regarding population size, most plans come from small municipalities (<10k inhabitants), followed by medium-size and large cities.



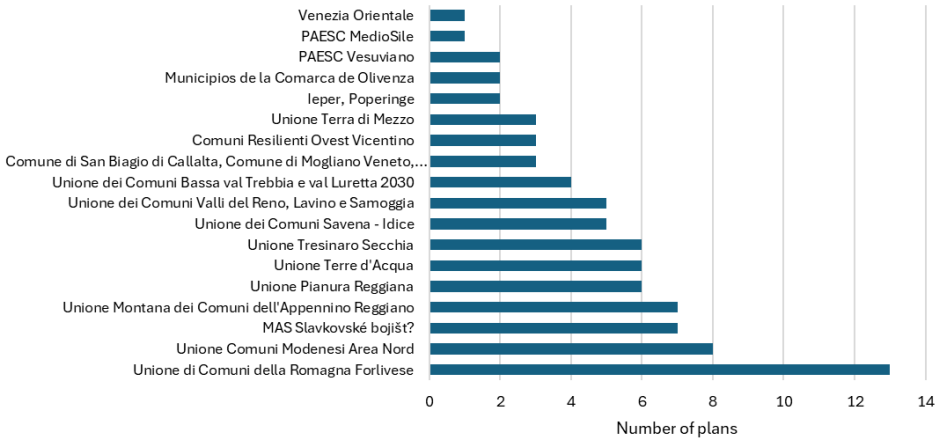
As part of the individual plans analysis, an additional assessment was carried out on the engagement of cities during the plan evaluation phase (2023–2024), excluding those supported by a CTC.

In this process, submitted plans can be (i) directly accepted, (ii) pre-contacted for revision and resubmission, or (iii) not accepted. The pre-contacted category refers to cities invited to update their SECAP following the initial review, before a final acceptance. The dataset includes 207 cases under the mitigation pillar and 188 under adaptation. Among these, 153 and 145 cities respectively were pre-contacted (including both those who replied and those who did not). Specifically, 62 mitigation and 57 adaptation cases replied to the invitation, while 91 and 88 did not provide any follow-up. This shows that a large share (60%) of cities invited to revise their plan did not complete the process, indicating a critical point in the current communication and follow-up mechanism. Most pre-contacted cities are small municipalities from Southern Europe, but responsiveness remains low across all groups. These findings will inform the refinement of the forthcoming Feedback to Cities procedure, suggesting a move towards more direct and timely communication with cities to improve response rates and ensure the completion of the evaluation process.



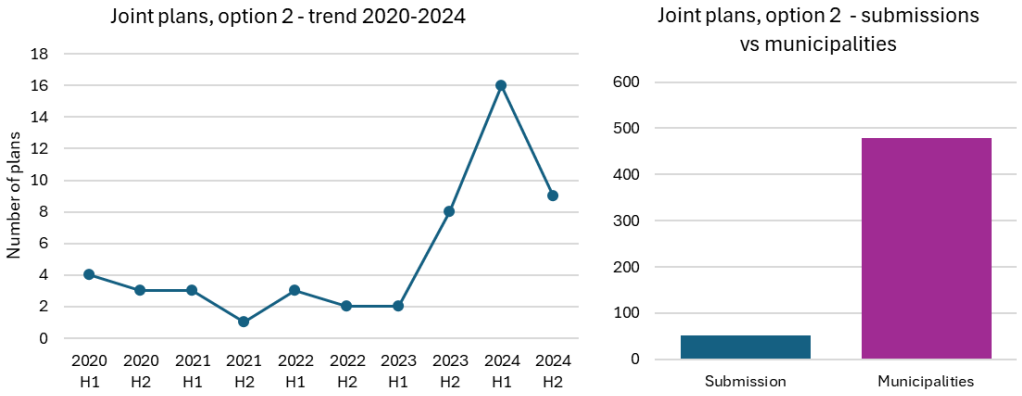
Joint plans – option 1

In the Joint option 1 category, each municipality submits its individual action plan, while at least one measure is jointly implemented with the other members of the group. By 2024, 84 municipalities were grouped into 18 joint groups. The largest groups are the Unione di Comuni della Romagna Forlivese (13 members) and the Unione Comuni Modenesi Area Nord (8 members), followed by several medium-sized groups.



Joint plans – option 2

The Joint option 2 category, where a single action plan is shared among all group members, recorded 51 submissions covering 479 municipalities up to 2024. The distribution over time indicates increasing uptake after 2021, with a notable concentration in 2024 H1 and 2024 H2.



Key findings

- Individual plans dominate the dataset, representing most submissions.
- Submissions grew steadily until 2024, showing the momentum of the initiative.
- The geographical imbalance shows a strong dominance of Southern municipalities.
- Small municipalities (<10k inhabitants) represent the bulk of signatories. This size class will be further disaggregated in the 2025 analysis (e.g. <5k and 5-10k) to support the development of the sampling methodology.
- Joint option 1 groups illustrate collaborative approaches, though concentrated in specific regions.
- Joint option 2 plans are relatively few but cover a significant number of municipalities.
- The evaluation process shows a high share of pre-contacted cities, yet many did not provide follow-up after the initial invitation, suggesting the need to streamline communication and improve response rates in the forthcoming Feedback to Cities procedure.

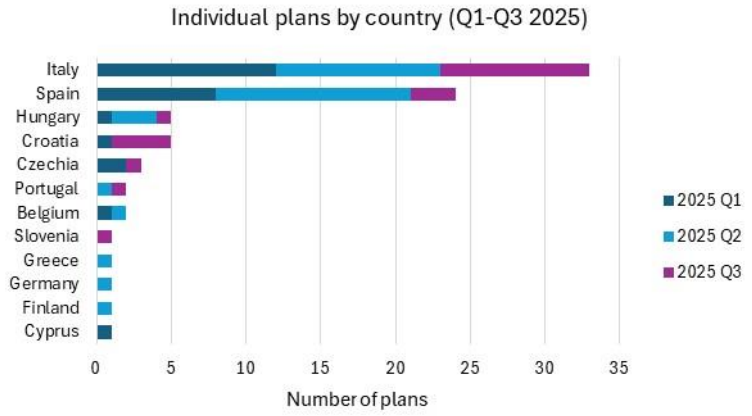
Preliminary results 2025

Data for 2025 are still partial, covering the first semester and a very limited number of submissions in the second semester (data download updated to 30 September 2025). These preliminary results serve to test and refine the new sampling and feedback methodology, which will be applied to SECAPs and Monitoring Reports (MRs) on a quarterly basis (we analyse MRs in relation to the energy poverty pillar, if not submitted in the action plan template.).

A total of 83 new plan submissions (SECAPs and MRs) were recorded in 2025, distributed as follows: 79 individual, 1 joint option 1, and 3 joint option 2 plans. Plans developed under the coordination of CTC are not included in this analysis, as they are subject to the CTC-grouped approach of analysis. In 2025, 162 such CTC-coordinated plans were submitted. The assessment covers SECAPs addressing the three mandatory pillars: mitigation, adaptation and, since 2025, energy poverty. Because the energy poverty pillar became compulsory only recently, several cities have included it in their MRs rather than in their original SECAPs. According to the first_energy_poverty_badge information, 96% of the cities have already addressed the pillar in their SECAP and 4% through MR. This transitional situation will be carefully monitored to ensure the completeness of future submissions and to inform the design of the forthcoming feedback cycle.

Individual plans

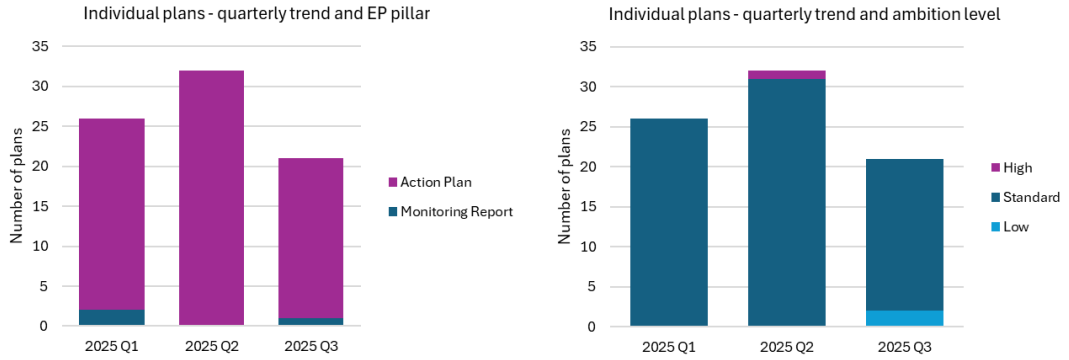
Out of the 83 submissions recorded in 2025, 79 are individual plans. According to the first_energy_poverty_badge information, 76 cities have integrated the energy poverty pillar in the SECAP and 3 in the MR.



The distribution of individual SECAPs shows a clear geographical imbalance, with a strong predominance of Southern municipalities (around 77% of all submissions), followed by the East. Northern and Western regions remain marginal, with only a few new plans submitted in 2025. The quarterly pattern for 2025 is consistent with the 2020–2024 trend (excluding the exceptional peak of Q4 2020), confirming the dominance of Southern municipalities and limited participation from Northern and Western regions.

In terms of population size, small and medium municipalities (<50k inhabitants) continue to dominate, reflecting the historical composition of the Covenant community. The smallest signatories (<10k inhabitants) alone account for more than one-third of the 2025 submissions, while large cities (>250k) remain underrepresented.

The figure below shows the quarterly distribution of individual SECAP submissions in 2025, disaggregated by the integration of the energy poverty pillar (SECAP and MR). The data indicate relatively stable submission rates across the first three quarters, with a slight decrease in Q3. Most plans already include the energy poverty dimension directly within their SECAP, while a smaller share rely on MRs. To complement this overview, the ambition of mid-term GHG reduction targets (2030) was also assessed. Results show that the large majority of plans fall under the standard ambition range (40–69 % reduction), typically aligned with EU and national benchmarks, while only 1 display high ambition (≥ 70 %) and 2 low ambition (< 40 %) targets.



These patterns confirm the overall alignment of cities with the new reporting requirements and suggest a steady submission pace throughout the year, supporting the quarterly approach to sample selection.

Joint plans

In 2025, 1 new Joint option 1 and 3 Joint option 2 plans were recorded. Joint option 1 plan corresponds to PAESC Comuni Pasubio. Joint option 2 submissions consist of 3 inter-municipal plans (Terra del Sole e del Mare, Unione dei Comuni Alta Val d'Arda, and Unione Montana Appennino Parma Est), collectively covering a total of 14 municipalities.

These numbers confirm that joint planning approaches remain marginal compared with individual submissions, but they represent interesting governance models. To ensure representation of collaborative approaches, one plan from each joint option (1 and 2) will be included in the review sample.

Key findings

The preliminary analysis of 2025 submissions provides several insights relevant to the design of the sampling and feedback methodology.

Composition of the 2025 dataset

— Individual SECAPs represent the majority of submissions (84%), while joint plans (options 1 and 2) account for a smaller share.

— The geographical and demographic balance remains uneven, with a clear predominance of small municipalities from Southern Europe.

Implications for the sampling design

To ensure representativeness and balanced coverage, the sample of SECAPs to be reviewed each quarter will correspond to approximately 10% of all plans submitted during the period.

The selection criteria are applied flexibly, depending on the composition of each quarterly dataset, with the aim of ensuring that all main categories are adequately represented (e.g. population size, geographical area, ambition level, and plan type). Within this general framework, the following aspects are considered with different degrees of priority according to the needs of each sample:

- Expression of interest – Cities that have explicitly requested to be selected for feedback.
- Geographical coverage – Priority given to underrepresented countries or regions with a low number of submissions.
- Population size – Larger municipalities may be prioritised to balance the predominance of small signatories.

Treatment of joint plans

— Given the limited number of Joint option 1 and Joint option 2 submissions in 2025, these plans will be considered with priority for inclusion in the review process, but not automatically all selected.

— For Joint option 1, inclusion will depend on the diversity of the member municipalities, ensuring that selected groups represent different population classes or governance settings. Where groups are homogeneous (e.g. similar size and location), only one representative plan will be retained for review.

— For Joint option 2, 3 inter-municipal plans were submitted in 2025. One of these plans will be analysed to ensure coverage of collaborative approaches, while also considering internal diversity in terms of population size and governance structure.

— As all 2025 joint SECAPs originate from Italy, the geographical coverage criterion will not be applied in this phase. Instead, the selection will focus on ensuring a balanced representation of group characteristics within the available sample.

Overall considerations

These findings will guide the operational sampling and feedback methodology, ensuring that future assessments are both representative and flexible. The approach is designed to adapt dynamically to the composition of each quarterly dataset, adjusting the selection logic to reflect the characteristics of the available submissions.

For instance, the treatment applied to Joint plans (options 1 and 2) in Q1–Q3 2025 exemplifies this flexibility, whereby inclusion criteria are refined according to group size, diversity and the overall composition of the observed sample.

Refinement of the Feedback to Cities process

— The analysis of 2023–2024 evaluation cases revealed that a significant share of pre-contacted cities did not reply or complete the revision of their plan.

— Under the current approach, the JRC provides feedback to accepted plans and pre-contacts cities whose plans cannot yet be accepted, sharing a list of required improvements before final approval.

— Within the revised methodology, this pre-contact phase will evolve into a more direct and interactive exchange with cities. Instead of sending a static set of written recommendations, JRC experts will reach out to municipalities to jointly identify the necessary adjustments and ensure that plans can be accepted following the dialogue.

This change aims to make the feedback process more effective, reduce non-responses, and support cities more proactively in achieving acceptance of their plans.

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