



Strengthening Democratic Governance
for Climate Transitions

D5.3 – Participation and deliberation in EU climate governance

WP5 – Institutions for deliberative participation

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EC Summary Requirements

1. Changes with respect to the DoA

The methodology section of the DoA states that this task will include ten semi-structured interviews with participants and observers of participatory and deliberative processes. Given the complexity of the EU system that was studied and the desire to explore connections between different mechanisms in that landscape, we opted to instead organize a feedback and co-creation workshop with 19 stakeholders and policymakers to discuss a draft version of the analysis and incorporate their feedback. Details of this workshop can be found in Section 2.5 (Methods).

2. Dissemination and uptake

This deliverable will be disseminated to the public and will also be used within the project consortium for, e.g. synthesis and policy recommendations.

3. Short summary of results (<250 words)

Public participation and deliberation can play a key role in the creation of more effective, legitimate, and socially acceptable climate policy. In this report, we map and assess the EU's landscape for participation and deliberation related to climate change. Our analysis focuses on 15 key participatory and deliberative mechanisms at the EU and national levels. Drawing on the academic literature, human rights law, and the 1998 Aarhus Convention, we analyse these mechanisms along nine key dimensions: the governance level where they operate (EU and/or Member States), how they are initiated (top-down or bottom-up), which stage of the policy cycle they address (agenda setting, decision-making, evaluation), who can participate (citizens, other stakeholders), the mode of participation (input, discussion, deliberation), the level of transparency, the accountability of decision-makers, the impact of participation on decision-making, and the legal institutionalisation of the mechanisms. We find that the EU is home to a wide array of participatory and deliberative mechanisms for climate governance, but that the uneven quality of these mechanisms leaves significant room for improvement. Five key challenges are identified: imbalanced representation, implementation gaps, limited impact and transparency, low public visibility, and a lack of deliberation in Member States and across governance levels. To address these challenges, we propose an agenda for action, including setting robust EU-wide participation standards, fostering national deliberative mechanisms, empowering civil society participation, mainstreaming participation in national climate governance, improving existing EU mechanisms, increasing public awareness, and encouraging wider debate on participation and deliberation.

4. Evidence of accomplishment

This report.

Preface

The overall goal of the RETOOL project is to advance our understanding of how to address the twin challenges of responding to the climate imperative while strengthening and reinvigorating democratic governance. The project has four overarching objectives: (i) To deepen our understanding of the relationship between democratic governance and the climate imperative by developing a novel analytical framework and creating new empirical underpinnings, including important new open-access datasets; (ii) To understand how a variety of democratic institutions across Europe are responding to the climate challenge, including learning lessons from history and studying new and innovative democratic practices; (iii) To contribute to reinvigorating democratic governance in Europe by developing and synthesising new knowledge and insights on climate democracy, and presenting them in a range of high-impact formats; and (iv) To serve as a bridge between academic research on climate democracy innovations and policymakers and practitioners, as well as civil society and the wider public. RETOOL brings together an international and interdisciplinary consortium, with partners from Western Europe (Ireland, UK, Belgium, Austria), Northern Europe (Finland), Eastern Europe (Estonia), and Southern Europe (Italy, Greece), combining expertise in political science, political sociology, deliberative democracy, environmental law, European studies, and public administration. The consortium includes a democracy practitioner foundation (Praxis), and all partners are closely associated with practitioner and civil society networks and involved in hands-on activities. RETOOL will be undertaken by a mature, settled consortium that has significant experience of working together, with six of our nine partners core members of the EU-funded Jean Monnet Network GreenDeal-NET.

Consortium Partner	Acronym	Country	Logo
Dublin City University	DCU	IR	
Vrije Universiteit Brussel	VUB	BE	
Università degli studi di Trento	UNITN	IT	
Universiteit Gent	UGent	BE	
Universität für Bodenkultur Wien	BOKU	AT	
University of Eastern Finland	UEF	FI	
HOLISTIC S.A.	HOL	EL	
Praxis Think Tank	PRAXIS	EE	
London School of Economics and Political Science	LSE	UK	

Executive Summary

Overview

Public participation and deliberation are crucial tools for better climate governance and constitute cornerstones of European democracy. Research has demonstrated that meaningfully engaging citizens and stakeholders in the policymaking process leads to more effective climate action, increasing public trust and buy-in. Participation and deliberation also have the potential to help overcome political polarisation and rebuild faith in democratic institutions. In other words, strengthening these key institutions of democracy can prepare the ground for ambitious, legitimate, and enduring climate policies.

In this report, we provide **an assessment of the quality of public participation and deliberation mechanisms for European Union (EU) climate change governance**. We analyse **15 EU participatory/deliberative mechanisms**, including **general cross-sectoral mechanisms** (e.g. the European Citizens' Initiative, public consultations on EU legislation, Strategic Dialogues, and European Citizens' Panels) and **climate-specific mechanisms** (e.g. the European Climate Pact). The analysis includes mechanisms at the EU level and those at the national level that are anchored in EU governance.

Drawing on the academic literature, human rights law, and the 1998 Aarhus Convention, **we analyse these mechanisms along nine key dimensions**: the governance level where they operate (EU and/or Member States), how they are initiated (top-down or bottom-up), which stage of the policy cycle they address (agenda setting, decision-making, evaluation), who can participate (citizens, other stakeholders), the mode of participation (input, discussion, deliberation), the level of transparency, the accountability of decision-makers, the impact of participation on decision-making, and the legal institutionalisation of the mechanisms.

We use our analysis of these dimensions to assess strengths and weaknesses of the participatory/deliberative landscape. Public participation mechanisms should be as inclusive, transparent, accountable, impactful, deliberative, institutionalised and comprehensive as possible to ensure high-quality participation. Taken together, they should therefore ensure full coverage of the policy cycle, including decision-making on policy design and on implementation. In addition, policymakers should be aware of important contextual factors, aiming for a balance of top-down and bottom-up initiation, a diverse mix of input/discussion/deliberation, and the involvement of both citizens and stakeholders.

Achievements and challenges

Our analysis shows that the EU is home to a wide array of participation and deliberation mechanisms for climate governance. Participation opportunities exist at both EU and national levels, with general participation mechanisms concentrated at the EU level, whereas climate-specific ones are largely national. The existing mechanisms provide stakeholders and, to a lesser extent, citizens with a variety of channels to engage throughout the policy cycle. As such, the existing system provides a valuable basis and starting point for meaningful public participation and deliberation in EU climate governance.

However, the uneven quality of public participation and deliberation mechanisms leaves significant room for improvement. For example, several mechanisms fall short of the requirements of the 1998 Aarhus Convention and related best-practice standards. This report identifies five key challenges for the EU framework of public participation and deliberation:

- **Imbalanced representation:** Existing mechanisms tend to favour private economic interests, leaving public-interest civil society organisations and individual citizens underrepresented.
- **Implementation gaps:** Putting participatory standards into practice remains a major challenge, particularly at the Member State level and when embedding participatory/deliberative processes in established institutions.
- **Limited impact and transparency:** Many mechanisms struggle to meaningfully shape decision-making and often lack transparency and accountability, especially newer ones with weak institutionalisation (e.g. the Strategic Dialogues).
- **Low public visibility:** Most participatory tools remain poorly known to the public, limiting broader engagement.
- **Lack of deliberation in Member States and across governance levels:** Opportunities for joint problem-solving are scarce. Crucially, the EU has yet to effectively promote deliberative formats like citizens' assemblies in Member States.

Addressing these challenges is essential if the EU wishes to ensure that climate governance is not only effective but also legitimate and inclusive. As the EU implements new climate policies that directly affect people's lives, meaningful participation becomes more critical than ever. Therefore, EU institutions must make public engagement a strategic priority and invest in advancing inclusive approaches to participation across all levels of governance – in line with the strategic priorities of the European Commission for 2024–2029 under President Ursula von der Leyen.

An agenda for action

To this end, we propose seven key actions that the European Union can implement to foster meaningful engagement of citizens, civil society and stakeholders. By enhancing the design, delivery, and accessibility of public participation and deliberation, these actions lay the foundation for a more inclusive, transparent, and democratic policymaking process.

1. **Set robust EU-wide participation standards:** Establish robust best-practice standards for emerging EU participation mechanisms (e.g. Strategic Dialogues, European Citizens' Panels) to ensure balanced, transparent, and impactful engagement. Embed such standards within the Better Regulation framework and climate legislation including the Governance Regulation and the European Climate Law.
2. **Foster national deliberative mechanisms:** Introduce best-practice standards for national/sub-national deliberative processes, such as mini-publics/citizens' assemblies, into the revised Governance Regulation. These standards should be accompanied by Commission support for implementation and capacity building to enhance public engagement in climate policymaking.
3. **Empower and support civil society participation:** Ensure balanced representation and participation by civil society in EU participation and deliberation mechanisms. Foster adequate resources for public-interest and marginalised groups to engage effectively with these mechanisms.
4. **Mainstream participation in national climate governance:** Facilitate Member State efforts to integrate meaningful public participation into national climate governance. To this end, define best-practice standards in the Governance Regulation, in line with the Aarhus Convention, including for National Energy and Climate Plans, Long-Term Strategies, and

Multilevel Energy and Climate Dialogues. Support best practices and capacity building to increase the ownership of meaningful public participation and its outcomes by public authorities.

5. **Improve existing EU participation mechanisms:** Improve established EU participation mechanisms by strengthening transparency, supporting balanced participation, and increasing integration in decision-making. Key priorities would include reinforced public consultations of the Commission, more balanced composition of Commission expert groups, broader use of the European Citizens' Initiative, and strengthened roles for the European Ombudsman, the European Economic and Social Committee, the Committee of the Regions, and the petitions to the European Parliament.
6. **Increase visibility and public awareness:** Develop a dedicated communication strategy to raise visibility and awareness of participation and deliberation opportunities, complemented by a multilingual central website for easy access to all public participation channels.
7. **Foster debate on public participation and deliberation:** Support wider public debate on how to improve participation/deliberation by mobilising existing EU mechanisms such as public consultations and European Citizens' Panels. Initiate regular reviews of EU participation processes at least every five years.

This action agenda aligns with the strategic priorities of the current European Commission and its broader push to strengthen democracy in an increasingly turbulent political landscape. In line with the Commission's commitment to regulatory efficiency, implementing the proposed actions does not require additional legislation and offers a path to streamlined and more coherent participation arrangements. The agenda can be pursued through existing initiatives, including the European Democracy Shield (European Commission and High Representative for Foreign Affairs, 2025), the EU Strategy for Civil Society (European Commission, 2025c), the planned revision of the Governance Regulation (2026), and the next Multiannual Financial Framework (beginning in 2025). Overall, this action agenda can serve to update EU public participation and deliberation arrangements to simultaneously support effective climate protection and a vibrant EU democracy.

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1. Introduction

To meet the goals of the Paris Agreement, it is crucial that democratic governance and climate governance mutually reinforce each other, both in the European Union (EU) and beyond (Pickering et al., 2022). Public participation and deliberation have an especially important role to play in this context (Reed, 2008; Jager et al., 2020). We define public participation as any process that involves the public (citizens and stakeholders such as civil society) in decision-making. Participation can occur throughout the policy cycle, including during policy formulation, implementation, and evaluation. It can also play many roles by providing one-way input to policymakers, fostering two-way discussions on policy topics, and creating spaces for in-depth deliberation. Deliberation is a process of “respectful and reasonable dialogue” (Lindberg et al., 2014, p. 160), bringing citizens and stakeholders together with equal status to discuss and feed into policy, or in some cases to make policy decisions.

Well-designed public participation has been shown to contribute to more effective and broadly accepted climate policy, thereby countering the short-term bias of traditional democratic decision-making, supporting cross-sectoral, integrated policies, and reducing the risk of polarisation and societal contestation (e.g. Dryzek & Niemeyer, 2019; Eckersley, 2020; Kiss et al., 2022; Willis et al., 2022). In addition, climate governance can be an important testing ground for participatory and deliberative methods and can therefore help to address the broader crisis of modern democracy (e.g. Della Porta, 2013; Alemanno & Organ, 2020; Oleart & Theuns, 2023; Valgarðsson et al., 2025) and the EU’s “democratic deficit” (Follesdal & Hix, 2006; Fung, 2006; Smith, 2009; Kohler-Koch & Quittkat, 2013).

Therefore, strengthening public participation and deliberation in EU climate governance holds the promise of a double dividend: more effective, socially acceptable climate policy alongside a contribution to strengthening European democracy at a time of increasing internal and external pressures. Externally, the 2nd Trump Administration is the most visible, but far from the only, serious challenge to democratic and climate governance. Within the EU, the strengthening of right-wing populist political movements has reinforced similar challenges (Armeni & Lee, 2021; Lindvall, 2024). Climate policy has also been under strain due to “climate backlash” that has grown in the 2020s (Patterson, 2023; Bocquillon, 2024). The European elections in 2024 also signalled a political shift from the European Green Deal’s emphasis on climate change and sustainability in the early 2020s to an increased emphasis on competitiveness and industrial development. Consequently, an EU Clean Industrial Deal has become a new flagship initiative of the European Commission (European Commission, 2025f).

Against this backdrop, we contribute to the academic and policy debates on public participation and deliberation mechanisms for EU climate governance in two ways. First, we go beyond existing approaches by examining both climate-specific mechanisms (such as the Multilevel Climate and Energy Dialogues) and general EU governance mechanisms that can be used to advance climate policy, such as the European Citizens’ Initiative (ECI), the European Ombudsman, and European Citizens’ Panels (see, in general, Magnette, 2003; Kohler-Koch & Quittkat, 2013; Alemanno, 2020). Second, we go beyond the existing literature’s focus on individual mechanisms (e.g. Smith, 2009, 2024; Oberthür et al., 2025) by providing an integrated, system-wide analysis that considers the full spectrum of participatory and deliberative mechanisms available for EU climate governance. Taking this system-wide view allows us to systematically assess the broad landscape while also considering the extent to which multiple mechanisms interact and build on each other.

The need for a broader, integrated analysis is especially relevant given the introduction of several new participatory mechanisms in EU governance since 2024. For example, the 2nd von der Leyen

Commission has organised an increasing number of so-called “Strategic Dialogues” that focus on discussion of the EU’s broad strategic orientation toward topics such as automobiles and agriculture (see Section 3.1). Von der Leyen’s Political Guidelines for 2024–2029, and the mission letters to the Commissioners, also foresee a continuation of European Citizens’ Panels, further Strategic Dialogues, the organisation of annual youth policy dialogues, implementation dialogues with stakeholders, and the establishment of a youth advisory board (von der Leyen, 2024).

Our analysis proceeds in five steps. Section 2 discusses the benefits of public participation and deliberation. It then introduces a set of dimensions for the mapping and assessment of participatory and deliberative mechanisms in EU governance. Based on an in-depth review of available scholarly literature and expert studies, it defines benchmarks for assessing the participatory ecosystem for EU climate governance and discusses the methods of analysis. Section 3 applies the dimensions and criteria identified in Section 2 to map and assess existing mechanisms of public participation in general EU governance (as relevant for climate governance). Section 4 applies the same criteria to mechanisms specific to EU climate governance. Section 5 synthesises the major findings and identifies existing shortcomings and room for improvement. On this basis, Section 6 identifies policy options for enhancing participatory and deliberative governance mechanisms and the overall system of public participation for EU climate governance.

2. Analytical framework

2.1 The benefits of public participation

Existing scholarship emphasises three key rationales for public participation: normative, instrumental, and substantive (Daley, 2013; Glucker et al., 2013). The normative rationale is rooted in the democratic principle that people have a right to shape decisions impacting their lives. Participation can enhance the legitimacy of policies by making them more transparent and accountable. This is a critical factor in climate action, where decisions often involve complex trade-offs and long-term impacts (Pickering et al., 2020; Pickering, 2023). More broadly, it can help to foster a democratic culture and public trust in institutions, an especially important goal amid growing concerns over democratic backsliding in the EU (Lindvall, 2024).

The instrumental rationale for participation highlights the practical benefits of participation. When citizens are involved in policymaking, they are more likely to understand, accept, and support policies. This is particularly relevant in climate governance, where measures like carbon pricing or energy reforms can face public resistance. More generally, participation can improve institutional responsiveness by highlighting concerns early and helping shape more widely acceptable solutions (Cattino & Reckien, 2021).

Finally, the substantive rationale focuses on improving the quality of decisions by including diverse forms of knowledge, such as local insights and lived experiences that may often be overlooked by policymakers (Fung, 2006). In climate policymaking, this can lead to more grounded and socially robust solutions (Drazkiewicz et al., 2015). For EU democracy more broadly, participation can help ensure that decision-making reflects a wider range of perspectives and better responds to complex challenges.

Public participation also constitutes a key channel for addressing climate justice and advancing a just transition. Climate change and related policies affect people unequally across regions, social groups, and generations. Inclusive participation can help ensure that those groups disproportionately impacted can voice their concerns (Armeni & Lee, 2021). It can do so by strengthening procedural justice (by including a broad range of stakeholders in decision-making)

and recognitional justice (by reflecting the historical or cultural identity of specific groups in policy decisions) (Zimm et al., 2024, p. 23). It can also help to address intersectional injustice, where people are subject to further marginalisation due to the intersection of multiple aspects, such as gender, class, and race (Mikulewicz et al., 2023; Marty et al., 2024). Addressing these issues is also important because of their increasingly salient role in EU strategy and policymaking (see, e.g. Debusscher & Maes, 2025; Kantola & Gaweda, 2026).

Taken together, this review demonstrates the multiple potential benefits of public participation for both EU climate governance and democracy. However, whether these benefits are realised depends not only on whether participation happens, but also on the quality of the participation process, including its impact on policymaking (Sprain, 2016; Bobbio, 2019). We hence turn to important dimensions that can be used to assess the quality of public participation.

2.2 Key dimensions

The relevant literature has highlighted several important dimensions of public participation (Reed, 2008; Dryzek & Niemeyer, 2019; Kiss et al., 2022; Willis et al., 2022). The importance of these dimensions is also reflected in the relevant provisions of the 1998 Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (hereafter, the Aarhus Convention). Human rights law has also established the right to political/public participation (directly or through representatives) (Steiner, 1988; Liston, 2017; Human Rights Council, 2018). From these sources, we have derived a list of nine dimensions of public participation which we will use to examine participation and deliberation in the European Union.

Initiation: This dimension refers to the actor or actors who initiate participatory/deliberative processes. Much of the literature is focused on top-down initiatives organised by policymakers to include the public in decision-making (e.g. Fung, 2006). However, participation mechanisms can also be initiated bottom up by citizens and stakeholders themselves, either as an independent body or as part of the overall decision-making system (Della Porta & Felicetti, 2026).

Policy stage: This dimension refers to the stage of the policy cycle to which a mechanism provides input (e.g. agenda-setting, decision-making, and evaluation). Participation/deliberation processes should generally take place early in the policymaking process when policy options are still open (Human Rights Council, 2018, para. 70; Aarhus Convention, Articles 6.4 and 8). Relating this to the policy cycle (Jann & Wegrich, 2017), we also argue that the overall system of public participation and deliberation should cover the full range of the policy cycle. We define three stages: agenda setting, decision-making (including on policy formulation, adoption and, implementation) and evaluation (as a preparation for further decision-making).

Governance level: This dimension refers to the governance level at which participatory/deliberative mechanisms are implemented (e.g. international, national, regional, local). In the EU context, it is important to explore how these mechanisms map on to multiple governance levels. Here we focus on the EU level and the Member State level (Newig & Fritsch, 2009). Mechanisms at the international and sub-national level are beyond the scope of this study.

Participants: This dimension refers to who can participate in participatory/deliberative processes. We distinguish between citizens, civil society organisations (CSOs) and other stakeholders (such as business organisations, social partners and policymakers). While overall participation should be as representative of the general public as possible (see Lafont, 2015), citizens, CSOs and marginalised groups face particular barriers to participation (e.g. Fung, 2006; Human Rights Council, 2018, para. 20; Bobbio, 2019; Debusscher & Maes, 2025).

Mode of participation: This dimension refers to the depth and quality of participatory/deliberative processes. We can distinguish three principal modes of participation according to the intensity and quality of communication involved. First, participants may provide *input* without a real exchange with each other or with decision-makers. Second, *discussion* may take place via two-way exchanges between participants and/or with policymakers. Third, participation processes may amount to *deliberation* when they foster joint reflection and problem solving (e.g. Bobbio, 2019; Dryzek & Niemeyer, 2019; MacKenzie & Caluwaerts, 2021).

Institutionalisation: This dimension refers to the extent to which a mechanism is institutionalised in the overall policy landscape. Previous research has emphasised the widely varying levels of institutionalisation in the EU (e.g. Cardwell, 2015; Knodt et al., 2020), as well as the importance of building durable policies and institutions to address climate change (e.g. Jordan & Moore, 2020). A high level of legal institutionalisation through proper anchoring in EU treaties and law can ensure that participatory mechanisms become stable elements of the overall landscape and should impede attempts at ignoring them and their results, especially if they include grievance/redress mechanisms.

Transparency: This dimension refers to the overall transparency of a mechanism. Transparency entails the public availability and accessibility of relevant information, including draft plans and policies, the proceedings, input to, and output of the public participation process (e.g. Rowe & Frewer, 2000; Quick & Bryson, 2016). Transparency also plays an important role in creating and supporting trust as a key condition of successful public participation.

Accountability: This dimension refers to the level of accountability that decision-makers show to the participants and outcomes of participatory/deliberative processes. A key aspect of public participation relates to its link to decision-making. Important aspects of accountability include a commitment of decision-makers to engage with participation outcomes and provide feedback to participants on how the outcomes have been considered (e.g. Glucker et al., 2013; Bobbio, 2019).

Impact: This dimension refers to the observed impact that participation has on policymaking. Beyond feedback on how the results of public participation have been taken into account, it may be important for those engaging in public participation to see an actual impact on decision-making (Jacquet et al., 2023). In other words, accountability may not be enough, especially where it leads to a regular failure to transform participation's results into substantive policy decisions (Glucker et al., 2013; Bobbio, 2019). To better support policy impact, participation should enable input early in the decision-making process before options have been narrowed down (see above).

2.3 Assessment criteria

For the assessment of the overall EU participatory and deliberative landscape in Section 5, all nine dimensions serve as benchmarks for high-quality public participation and deliberation. High-quality processes aim to maximise the normative, instrumental and substantive benefits of participation/deliberation, thereby supporting transformational outcomes (cf. Hausknost & Hammond, 2020).

The overall participatory/deliberative system should therefore strive to:

- Facilitate broad participation by citizens and relevant stakeholders, including CSOs, indigenous people, and marginalised groups;
- Use a diverse range of participation modes (input, discussion, deliberation);

- Cover all phases of policymaking (including agenda-setting, decision-making, and evaluation);
- Ensure a balance of both top-down and bottom-up initiation, including by citizens and CSOs, especially regarding agenda-setting and evaluation;
- Foster relevant participatory mechanisms at both EU and Member-State levels (also at local level), including their complementarity and reinforcement; and
- Attain high levels of transparency, accountability, impact and institutionalisation for each mechanism and across the participatory landscape.

However, the dimensions play varying roles in the assessment of individual participatory mechanisms and the resulting overall participatory landscape for EU climate governance, given the need to tailor each mechanism to its specific purpose and place in the overall system:

- For a first group of three dimensions (*Initiation, Policy Stage, Governance Level*), there are good reasons for broad coverage in the overall landscape, but not its individual mechanisms. They hence constitute useful criteria for assessing the overall landscape rather than individual mechanisms.
- Second, *Participants* and *Mode of Participation* are also useful criteria for assessing the overall landscape, since this landscape should ensure (a) broad and balanced participation by all those concerned by a decision and (b) the best use of a variety of modes. However, they may also constitute criteria for the assessment of individual mechanisms. Individual mechanisms focused on stakeholder participation should ensure a balanced representation of stakeholders, including all those concerned and facing the greatest barriers (*participants* – see above). Mechanisms designed to include exchanges (i.e. going beyond inputs) should best incentivise discussion and deliberation (*mode of participation*).
- Third, the last four criteria (*Institutionalisation, Transparency, Accountability, Impact*) apply both to each individual mechanism and to the overall landscape because higher levels generally (i.e. for each mechanism and across the landscape) support higher quality of participation. Shortcomings in these areas in individual mechanisms will also weaken the overall landscape.

This threefold distinction has repercussions for the structure of our analysis. For each mechanism discussed in Sections 3 and 4 below, we will cover all nine dimensions (see also Table 1 in Section 5). However, the first three (*Initiation, Policy Stage, Governance Level*) will primarily be mapped to generate a basis for the assessment of the overall landscape in Section 5. In contrast, the last four dimensions (*Transparency, Accountability, Impact, Institutionalisation*) will serve as criteria for the assessment of each individual mechanism. The two remaining aspects (*Participants, Mode of Participation*) will also be mapped and will become part of the assessment in cases where stakeholder participation and/or exchanges are part of the mechanism design.

2.4 Contextual conditions

The EU's mechanisms for participation and deliberation form part of a wider system of democratic governance, and in turn affect this system's proper functioning and effectiveness. Within the EU's wider democratic landscape, there are several key elements that do not directly relate to public participation and deliberation but that facilitate, enable and/or complement it, including:

The rule of law, which is fundamental to any democratic governance system based on a division of powers. The rule of law is enshrined in Article 2 of the Treaty on European Union (TEU).

Right to peaceful assembly and protest, which is a fundamental human right (Article 12 of the EU Charter of Fundamental Rights). It is fundamental to the participation of citizens in public discussion and decision-making in general.

Because participatory/deliberative mechanisms form part of a broader political system, they complement established decision-making (by parliaments and governments). Accordingly, human rights law addresses two main elements of political participation, namely a right to take part in public affairs (directly or through representatives) and a more specific right to vote and to be elected at periodic elections (Ebbesson, 1998). The overall characteristics of the relevant political system also play a role in assessing room for improvement. In the multilevel EU context, for example, possibilities for effective citizen participation may be more constrained at the EU level due to its complexity and high level of aggregation.

Two further elements of EU climate governance underpin the participation of citizens and stakeholders in the climate and energy transition, but do not themselves constitute arrangements for public participation or deliberation in decision-making (and are not assessed in detail in this report). These are the other two pillars of the Aarhus Convention in addition to participation:

Access to information is an important precondition for fully informed public participation and deliberation. Beyond fostering informed debate on climate policy, this access is essential for monitoring the actions of public officials, ensuring accountability, and enabling timely public engagement with legislative, regulatory, and administrative processes. As a fundamental aspect of the rule of law, access to information is enshrined in the Aarhus Convention (and the EU's Aarhus Regulation, which implements the provisions of the Convention in EU law) and various other EU and international legal frameworks, including the Treaty on the Functioning of the European Union (TFEU), the Treaty on European Union (TEU), the Access to Documents Regulation, and various human rights instruments (Etemire, 2020; on access to information on climate change and human rights, see United Nations, 2024). Various weaknesses related to access to information have been identified at different stages of the EU lawmaking and policy process, for example, regarding the lack of transparency in dialogues and restrictions on access to related documents (e.g. Leino-Sandberg, 2023).

Access to justice is a fundamental pillar of democracy and the rule of law. It promotes meaningful public participation by enabling individuals and groups to hold policymakers accountable for violations of participatory and procedural rights, as well as for failures to comply with substantive environmental obligations. The amended Aarhus Regulation has strengthened access to justice at the EU level, even though limitations remain (Robert, 2023). In addition, the Aarhus Convention requires all EU Member States (all of which are parties) to provide for access to justice in environmental matters. Moreover, the EU Treaties, the EU Charter of Fundamental Rights, and the European Convention on Human Rights all recognise the right to access to justice (European Court of Human Rights, 2024, paras 501–502). Although access to justice has been increasingly used to legally challenge EU and Member State decisions on environmental matters (Grantham Institute, 2022; e.g. Setzer & Higham, 2023), introducing specific and tailored access to justice requirements under EU climate law could help address uneven and frequently deficient access to justice among EU Member States (see discussion in Oberthür et al., 2024, pp. 17–19).

Also, we wish to point out that the paper does not analyse in any detail mechanisms for bottom-up engagement of citizens in the climate and energy transition short of involvement in political decision-making, as provided for in EU governance, such as energy communities and renewable energy communities.

Finally, **knowledge and expertise** are fundamental preconditions for the effective operation of participatory and deliberative mechanisms. To enable participation and deliberation to identify effective solutions, it is important to ensure that participants engage with and receive a solid and broad knowledge base, including expert and other types of knowledge (such as local and indigenous knowledge, as appropriate). As research has identified a risk of tensions between “experts” and “the public” (Armeni & Lee, 2021; Araos, 2023; Dietz et al., 2023), knowledge and expertise should ideally facilitate participation and deliberation by allowing participants to truly acquire and interpret relevant knowledge (Averchenkova, 2024, p. 24). However, a systematic inclusion of mechanisms related to **knowledge and expertise** (e.g. the European Scientific Advisory Board on Climate Change) is beyond the scope of this study (but see Christensen & Gornitzka, 2022; Seibicke, 2025).

2.5 Methods

Our mapping and assessment of the EU participatory/deliberative landscape for climate governance is based on an in-depth review and evaluation of existing scholarly literature, expert studies and ongoing research. We focused on studies related to public participation in decision-making in general and public participation in environmental/climate decision-making in particular. Our assessment also relied on the analysis of primary documents related to each of the participatory mechanisms included in this report. Unless otherwise noted, we analyse the evolution of these mechanisms up to and including January 2026.

We also presented a draft of the report at a hybrid workshop convened in Brussels and online on 30 January 2025. Participants attended from non-governmental organisations (9), the European Commission (2), EU Member State governments (2), the European political groups (1), academic institutions (3), think tanks (1), and climate-related advisory bodies (1). Participants were asked to imagine ideal forms of public participation, contribute to the mapping of the existing landscape, identify gaps, propose ways to address those gaps, and suggest key entry points for these changes in the EU policymaking process. This workshop also considered a draft of the analysis in Sections 3, 4, and 5 and the resulting conclusions. Inputs from this workshop, as well as further communication with stakeholders, were incorporated into our mapping of participatory and deliberative governance in this report. We also wish to acknowledge input from several experts who reviewed a draft of this report in early 2025.

3. Participation & deliberation in general EU governance

In this section, we investigate 11 mechanisms of general EU governance that facilitate public participation and deliberation, including for EU climate governance. In identifying these mechanisms, we have followed a broad understanding of public participation and deliberation that includes mechanisms that allow citizens and/or stakeholders to directly or indirectly affect political decision-making. For each mechanism, we (a) provide a general background (including its relevance for EU climate governance) and map relevant dimensions, and (b) assess it using the criteria established in Section 2. Where available, we also discuss suggestions for improvement.

We have organised our analysis according to the level of institutionalisation of participatory mechanisms. We proceed from the most recent, least institutionalised mechanisms to those that have a soft legal basis (such as Commission guidelines). After this are mechanisms with a basis in EU legislation. These are followed by mechanisms that have a firm legal basis in the EU Treaties.

Several new mechanisms that have been announced by the Commission (e.g. the Youth Advisory Board) have not become operational in time to be included in the analysis.

3.1 EU Strategic Dialogues

Background and mapping

The EU Strategic Dialogues are a new format initiated by the European Commission under President von der Leyen to address salient societal and political challenges (as defined by the Commission), engaging stakeholders in structured high-level conversations at the EU level.

We assess four Strategic Dialogues that have been conducted by the Commission that are relevant for EU climate policy:

- The *Strategic Dialogue on Agriculture*, held in Spring 2024, aimed to build a shared vision for Europe's agricultural sector, in a context of a perceived conflict between economic and environmental objectives.
- The *Clean Transition Dialogues*, held between October 2023 and April 2024, focused on understanding industry concerns about competitiveness and how to shape business models fit for a decarbonised economy. Nine Clean Transition Dialogues were conducted on hydrogen, energy-intensive industries, clean-tech industry, critical raw materials, energy infrastructure, forest-based bioeconomy, cities, steel industry, and clean mobility.
- The *Strategic Dialogue on the Future of the Automotive Industry (the "Cars Dialogue")*, held in February 2025, discussed the challenges faced by the European automotive sector to identify measures to ensure the sector's economic competitiveness.
- The *Strategic Dialogue on Steel*, held in March 2025, aimed to develop a common vision on the future of the European steel industry with a view to developing a Steel and Metals Action Plan.

These Strategic Dialogues have contributed to agenda setting and decision-making.

Assessment

Although they may be partially related to the Commission mandate to facilitate sectoral dialogue under Article 10 of the European Climate Law (see also Section 4.1), the Dialogues do not have a legal basis and therefore have a **low level of institutionalisation**. Furthermore, there are large differences between individual dialogues related to **participants, mode of participation, transparency, accountability** and **impact**. For example, the Strategic Dialogue on Agriculture and the Clean Transition Dialogues stand at opposite ends of the spectrum on these criteria. The Agriculture Dialogue convened a broadly representative selection of stakeholders and fostered transparency (with information on proceedings freely accessible on the internet). It was carefully structured, facilitating an informed dialogue and even deliberation at several meetings, and was complemented with an external consultation. It also produced a largely well-received final report (European Commission, 2024d) that fed into the Commission's Vision for Agriculture and Food, even if this Vision only took up parts of the package presented in the Dialogue's final report (European Commission, 2025b).

In contrast, the Clean Transition Dialogues were ad-hoc consultations that did not live up to high standards of public participation. They were organised as one-off events primarily and selectively convened industry representatives. Proceedings lacked transparency (with very limited publicly available information), and there was little room for deliberation. They did not have concrete outcomes beyond a summary report released by the Commission (European Commission, 2024e),

and there is no clarity about how they informed subsequent action and decision-making (e.g. on the Clean Industrial Deal).

The Strategic Dialogues on cars and steel seem to sit somewhere in the middle. They were more structured and transparent than the Clean Transition Dialogues but also convened relatively ad-hoc and with very selective participation (both only including one environmental NGO). They did not result in any concrete outcomes such as a report or recommendations. While designed to feed into subsequent Commission Action Plans for the Automotive Industry, and for Steel and Metals (European Commission, 2025a, 2025d), it is not clear how, if at all, the Strategic Dialogues affected these plans. In this case, the lack of accountability makes it impossible to gauge actual impact.

Overall, the Strategic Dialogues have been characterised by a low level of institutionalisation (including inconsistent formats), transparency, and accountability, as well as an imbalanced selection of participants (biased in favour of industry). The Commission has announced that it plans to continue to convene Strategic Dialogues until at least 2029. Planned topics include fisheries and oceans, the post-2030 climate policy framework, and chemicals (the last of which was carried out in May 2025). It is also possible that additional dialogues will be announced at relatively short notice in the future.

3.2 Conference on the Future of Europe

Background and mapping

Strengthening EU democracy formed a key part of the first-term agenda of the von der Leyen Commission (von der Leyen, 2019). It was hence no surprise that she took up French President Macron's idea for an EU-wide citizens' assembly to give citizens a say on the future policy direction of the Union, a concept which became the Conference on the Future of Europe (CoFE) (Fabbrini, 2020; Oleart, 2023). Originally envisioned as a two-year exercise, the CoFE was shortened to one year due to the COVID-19 crisis and disagreements between the EU institutions on the Conference's structure. It was launched by a joint declaration made by the Commission, the Council, and the Parliament in March 2021 and took place from April 2021 to May 2022.

The overall objective of the CoFE was to allow citizens to debate the challenges facing the EU, discuss its overall priorities, and create a closer relationship between EU citizens and EU decision-making structures (Oleart, 2023). In doing so, it aimed at strengthening EU democratic legitimacy and European values and goals. The Conference focused on nine core topics: (1) climate change and the environment; (2) health; (3) a stronger and fairer economy, social justice and jobs; (4) the EU in the world; (5) values and rights, rule of law, security; (6) digital transformation; (7) European democracy; (8) migration; and (9) education, culture, youth and sport.

The CoFE consisted of four main platforms for interaction:

- (1) the Multilingual Digital Platform;
- (2) European Citizens' Panels;
- (3) decentralised events at the national, regional and local level; and
- (4) the Conference Plenary.

First, the Multilingual Digital Platform (MDP) was an interactive online platform in which European citizens could exchange ideas in their own language and was envisioned as "the hub of the Conference" (Kantar Public, 2022). MDP contributions were collected and used as input for the European Citizens' Panels, the national events, and the Conference Plenary. Additionally, the Platform hosted online events organised by civil society and citizens themselves on the CoFE's nine

core topics. Citizens could also upload contributions outside these topics in an “Other Ideas” category.

The MDP was an open forum where European citizens could submit their ideas on the future of the EU and relied on self-selection to do so. In total, around 50,000 people registered on the Platform, resulting in 19,000 contributions, and 7,000 events (Kantar Public, 2022). However, participants were not evenly distributed across the Member States and socio-economic groups. Concerns were also raised about accessibility for, e.g. people with disabilities (Arpio et al., 2023; REAL DEAL, 2023).

Second, four European Citizens’ Panels were organised covering four themes: (1) stronger economy, social justice, jobs, education, culture, sport, and digital transformation; (2) EU democracy, values, rights, rule of law, security; (3) climate change, environment and health; and (4) the EU in the world and migration. Each panel consisted of 200 randomly selected citizens, including at least one female and one male citizen per Member State. A third of participants were between the ages of 16 and 25. Each panel met three times: once online and twice in person. These meetings were moderated by external facilitators, and the participants themselves came up with the questions that were debated in each panel. To support meaningful discussions and ensure that participants had a sufficient understanding of the topics at hand, experts provided information at the start of the sessions, during the discussions, and at the recommendation stage. EU citizens were randomly selected to form a part of the European Citizens’ Panels. The use of several selection criteria such as nationality, urban/rural residence, socio-economic background, gender, and age aimed at ensuring diversity. Nevertheless, concerns regarding the inclusion of minority groups and LGBTIQ+ people remained (REAL DEAL, 2023) as did critiques related to the lack of gender mainstreaming and attention to intersectionality (Oleart, 2025).

Third, EU Member States and local/regional governments were encouraged to organise events including national citizens’ panels, for which citizens were randomly selected, or other thematic events. These events were required to adhere to a set of criteria defined by the Conference and to reflect European values. While only six Member States – Belgium, Germany, France, Italy, Lithuania, and the Netherlands – organised national citizens’ panels, all Member States organised a wide range of events and initiatives.

Fourth, input from the MDP, citizens’ panels, and national events were discussed in the Conference Plenary, a body composed of a wide variety of actors, including representatives from the European Parliament, the Council of the European Union and the European Commission, members of national parliaments, representatives from the citizens’ panels, civil society, and regional and local authorities (European Union, 2022; Oleart, 2023). The plenary met a total of seven times between June 2021 and April 2022. It was organized into nine working groups, each consisting of members of the different groups of actors and focused on one of the topics of the MDP. These working groups then delivered recommendations for the entire Plenary to decide on. The four policymaking institutions involved in the Plenary—the European Commission, the European Parliament, the Council, and the national parliaments—needed to reach a consensus on the final recommendations. Citizens also had to give their support, but this was not formally binding. In the case of citizen disagreement with the consensus, their opinion was noted in the final report (Arpio et al., 2023). A feedback event was also held to give participants an update on the progress of the implementation of their proposals.

The final report contained 49 proposals and 326 individual measures. These recommendations were grouped according to the nine defined themes. The climate-related recommendations were organised around six broad proposals covering (1) agriculture and food production, (2) biodiversity

and ecosystems; (3) climate change and energy; (4) transport; (5) sustainable consumption, packaging and production; and (6) information, awareness, dialogue and lifestyle (European Union, 2022). The report included recommendations to redirect subsidies toward organic farming; improve protected areas, strengthen the EU's climate leadership, support a just transition, address climate-related loss and damage on the global level; and invest in high-speed rail and night trains.

The Commission grouped the measures into different categories depending on the level of response that was required (European Commission, 2022a). These categories included measures that were already addressed by existing legislation proposals, those where the Parliament and Council should act, and new initiatives or areas of work inspired by the proposals falling within the remit of the Commission. After the end of the CoFE, the Commission has launched several proposals related to Conference recommendations, including a revision of the framework to reduce waste, including food waste, and the environmental impact of waste management (European Commission, 2022b).

Assessment

Because it was a one-off event, the CoFE had a **low level of institutionalisation**. However, the Commission continued organising European Citizens' Panels on certain key proposals as part of its policymaking (see Section 3.3). Additionally, the Commission created an online Citizens' Engagement Platform where EU citizens can submit their ideas on EU issues. Like the role of the Multilingual Digital Platform within the CoFE, contributions from the Citizens' Engagement Platform serve as input for the post-CoFE EU Citizens' Panels. So, while the CoFE was not institutionalised as a whole, it led to the continuation of the Citizens' Engagement Platform and European Citizens' Panels. Overall, the Conference showed **high levels of transparency**, publishing reports from the MDP, the panels, and the Plenary. It also showed a **medium level of accountability**, in that the Commission considered the recommendations of the Conference in detail but the actual implementation of those recommendations in policy proposals has been uneven.

The dominant **mode of participation** differed in the CoFE's various components. The MDP was mostly organised as one-way communication (**input**) with limited dialogue between participants themselves. Citizens could post contributions that they could discuss on the platform. While these were eventually submitted to other CoFE processes, there was no direct line of communication between MDP contributors and policymakers or participants in the other parts of the process.

A higher level of dialogue—including **deliberation**—was reached in the national and European citizens' panels, which were explicitly designed as deliberative forums. In four European panels and six national panels, selected citizens debated various topics with the objective of reaching concrete recommendations that could be submitted to the Conference Plenary. The level of dialogue was diminished somewhat by organisational aspects. The high complexity of the topics and the participants' unfamiliarity with them made for at times shallow discussions (Conference on the Future of Europe Observatory, 2022). Timing issues further worsened this issue as the short timeframes constrained citizens in their understanding and deliberation. Moreover, the technical nature of many of the discussions on complex topics often created barriers to participation and the presence of and reliance on experts created distance with the wider public.

The Plenary also incorporated discussion and deliberation, in part due to the inclusion of policymakers in the deliberation process and the explicit goal to formulate strong, concrete recommendations at the end. The Plenary was first organised in a parliament-like setting in which participants signed up in advance for speaking slots (Arpio et al., 2023). This hampered discussion in the Plenary and privileged policymakers familiar with the system who ended up dominating the early Plenary sessions (Arpio et al., 2023; REAL DEAL, 2023). After criticism from citizens, this

system was changed to allow more spontaneous interaction and stronger engagement between the various Plenary participants.

Regarding **impact**, the different components of the CoFE can be seen as building on each other, with the goal of eventually bringing citizens' ideas into the policymaking process. A broad collection of ideas and contributions started in the MDP. These were collected and served as material to base discussions on in the European Citizens' Panels. The recommendations coming out of the European and the national panels were fed into the Conference Plenary where policymakers, citizens and civil society further debated them and made them into actionable proposals for legislative initiatives. As such, the link to the policy process of most of the CoFE components was indirect. Moreover, the Conference Plenary seemed to be mostly aimed at the legislative proposal stage of the policy process rather than impacting or evaluating legislation at later stages. The CoFE recommendations were also not immediately translated into policy initiatives but required follow-up in EU legislative initiatives to be put into action.

3.3 European Citizens' Panels

Background and mapping

The European Citizens' Panels trace their origins to the Conference on the Future of Europe (CoFE) that took place from April 2021 to May 2022 (see Section 3.2). During the CoFE, the EU organised four European Citizens' Panels, each consisting of around 200 citizens and focusing on four wide-ranging topics: (1) stronger economy, social justice, jobs, education, culture, sport, and digital transformation; (2) EU democracy, values, rights, rule of law, security; (3) climate change, environment and health; and (4) the EU in the world and migration (Oleart, 2023; Galende-Sánchez, 2025).

Since the conclusion of the Conference, the Commission has organised several European Citizens' Panels on "key topics" to provide citizens' input for Commission proposals (Demidov et al., 2023). The panels are designed to provide input to the Commission at the early stages of the policy cycle, to set the agenda and identify and select promising policy options. Panels enable discussion and aim to foster deliberation. By February 2026, seven panels had been carried out on Tackling Hatred in Society, Energy Efficiency, Learning Mobility, Virtual Worlds, Food Waste, the EU Budget, and Intergenerational Fairness. All EU citizens can contribute to the Panels beforehand on the dedicated Citizens' Engagement Platform. The Commission plans to continue to organise Citizens' Panels each year during the 2024–2029 legislative term on topics where citizen input is seen as most valuable (von der Leyen, 2024). In a related initiative, the European Commission has also convened a Young Citizens' Assembly on Pollinators.

Assessment

The European Citizens' Panels hold potential to integrate citizens' perspectives into policymaking, bring EU policymaking closer to EU citizens, and improve the quality of EU legislation by introducing more bottom-up perspectives, including on climate change. Their proceedings have generally been **transparent**, with recordings of the Panels, input documents, and outcomes (including summaries and recommendations) available on a dedicated Commission website.

However, Citizens' Panels have a **low level of institutionalisation and have displayed shortcomings regarding accountability and impact**. The Commission has considerable discretion in deciding the topics for the panels, how it considers their recommendations, and whether it provides related feedback. Past "key topics" have not always been situated in the centre of public debate (e.g. virtual worlds) (Gjaldbæk-Sverdrup et al., 2023). Additionally, the Citizens'

Panels have been criticised for being overly depoliticised and doing little to connect their deliberations to the wider public spheres in which they operate (Oleart, 2023; Petit & Oleart, 2025). By failing to bring them into national and EU public discourses, the Panels’ **impact** has remained limited.

3.4 European Commission public consultations

Background and mapping

The Commission’s use of public consultations during the legislative process has significantly expanded since the beginning of the 21st century as part of the Better Regulation agenda. These consultation processes are reflected in an inter-institutional agreement and internal Commission guidelines. As a result, the Commission regularly initiates public consultations to gather feedback from citizens and stakeholders on legislative proposals, as well as for policy evaluation purposes. Generally, the Commission’s public consultations provide an opportunity to gather diverse perspectives and help all stakeholders better understand the range of views on specific matters. These consultations can take various forms, ranging from broad, internet-based public consultations to targeted in-person consultations (Alemanno, 2020, p. 117). Some consultations involve in-person or online meetings, which allow for a level of exchange and discussion. However, many consist of online surveys that are primarily aimed at collecting input from citizens and stakeholders. On average, 100 public consultations were conducted per year between 2015 and 2018 (European Court of Auditors, 2019, p. 12). As of March 2026, the Commission consultation website lists 208 consultations related to climate action since 2011.

Assessment

While Commission guidelines and the Better Regulation agenda provide for some level of **institutionalisation**, the rules are not binding and are difficult to enforce in the courts. As a result, the Commission has significant flexibility when carrying out consultations. Legislation considered urgent has at times been prepared and adopted without public consultations, including the recently proposed softening of European Green Deal legislation. There are not clear rules about when such deviations from the standard procedure are acceptable. Several NGOs have launched complaints with the Ombudsman on recent environmental cases where public consultations were not properly conducted (ClientEarth, 2025; European Ombudsman, n.d.).

While the **transparency** of EU public consultations is generally high and related information is generally available online, they have displayed considerable weaknesses related to **accountability** and **impact**. Participation levels have remained low and geographically skewed (with most contributors coming from Northern and Western Europe). Consultations have low visibility beyond expert stakeholders and the range of interests represented have remained limited (Alemanno, 2020, p. 122). In 2019, the Court of Auditors (2019, p. 36) recommended more systematic advertising of upcoming consultation opportunities. Whereas the Commission does regularly report on the outcomes of public consultations and how these have been considered in legislative proposals, the Court of Auditors has recommended more detailed and more timely reporting by the Commission on the use of public consultation outcomes (European Court of Auditors, 2019, p. 96). This ties in with criticism that public consultations are mainly symbolic activities with limited impact on decision-making (Binderkrantz et al., 2023).

3.5 European Commission expert groups

Background and mapping

European Commission expert groups are consultative bodies created to **provide advice on specific policy proposals and implementation of existing legislation** (European Commission, 2016b). The Commission’s public expert group register lists 24 active groups that address climate change, ten of which are run by DG Climate Action (European Commission, 2025e). This includes general groups which address climate change as one of many issues (e.g. the Group of Chief Scientific Advisors) and climate-specific groups (e.g. the Expert Group on Climate Change Policy). Expert groups differ significantly in how long they operate: those related to the Fuel Quality Directive and CO₂ from cars are nearly a decade old, whereas the group on carbon removals was set up in 2022. Others are set up temporarily, such as the High-level Expert Group on Sustainable Finance, which met between 2016 and 2018 (High-Level Expert Group on Sustainable Finance, 2018).

Expert groups are generally made up of **representatives of the EU institutions, Member State governments, and stakeholders that include business, NGOs, and academia**. Members may also be appointed in a personal capacity. The groups on climate policy, carbon removal, and the Innovation Fund include representatives from all three of these stakeholder groups. In contrast, the group on CO₂ from road vehicles includes only business and NGO representatives. Some groups or individual meetings are limited to the Commission and Member States. The groups allow for discussion and deliberation (within the confines of their mandate).

Assessment

Expert groups are considered **impactful** both on policy proposals and implementation (European Ombudsman, 2015; Blomeyer et al., 2018). Commission **accountability** to expert group members is relatively high; the groups serve as a continuing forum to discuss chosen issues. However, public **transparency** and **accountability** are more problematic. While many expert groups provide agendas and minutes, meetings are rarely open to the public or streamed (Blomeyer et al., 2018, p. 53). For example, none of the 41 meetings of the Expert Group on Climate Change Policy in 2024 were open to the public. Furthermore, their work is not widely reported beyond the groups themselves.

Expert groups have also been criticised for an **over-representation of business interests** when compared with NGOs, research institutions, and trade unions (Blomeyer et al., 2018, p. 44). For example, approximately 80% of the members of the Expert Group on Climate Change Policy represent economic or business interests.

3.6 Commission complaint procedure

Background and mapping

Complementing the Ombudsman and the right to petition, **any citizen or stakeholders**, including CSOs, “may file a complaint with the Commission free of charge against a Member State about any measure (law, regulation or administrative action) or the absence of a measure or practice” (European Commission, 2016a). This is related to the Commission’s responsibility to monitor the application of EU law in the Member States and initiate infringement procedures when a Member State has failed to fulfil its obligations under the Treaties. Complaints to the Commission play a “crucial role” in “detecting infringements of EU law” (European Commission, 2016a). They provide an important **input** into the Commission’s **evaluation** of implementation by Member States and decision-making on the initiation of infringements.

Climate policy (and environmental policy in general) makes up a significant share of the Commission’s overall activities monitoring the application of EU law. To a significant extent, these

activities are triggered through the complaint procedure (European Commission, 2024b). Recent high-profile complaints include NGOs raising Member State non-compliance with their obligations under the Governance Regulation, in particular the quality of submitted National Energy and Climate Plans, including the proper conduct of public consultations in the preparation of these Plans (CAN Europe, 2025).

Assessment

The complaint procedure is **softly institutionalised**; it does not have a firm legal basis but results from a commitment by the Commission to a procedure laid out in a Commission Communication (European Commission, 2016a). This procedure—which the Commission has generally followed—entails **high transparency and accountability**. Complaints are registered through an online form. Complainants receive a confirmation. Furthermore, the complainant is informed in writing of the action the Commission takes in response to the complaint (including a decision to close the case). As a rule, the Commission has one year to issue a formal notice or close a case following official registration of a complaint. The Commission must inform the applicant in writing if this time limit is exceeded. If the case is closed, the Commission informs the complainant in writing about its reasons for doing so. If the Commission receives further comments from the complainant within four weeks, it must state whether the investigation will continue or be closed indefinitely (European Commission, 2016a).

Given Commission’s discretion on pursuing infringements under the Treaties, the **impact** of complaints has been considerable. In particular, the Commission will not follow up on issues that it concludes apply only to individual situations and do not amount to a general situation where a Member State is failing to uphold its obligations under the Treaties. Other situations that do not qualify for follow-up include cases in which national courts have already brought forward the issue to the Court of Justice of the EU; and complaints about problems already known to the Commission or already addressed through a legislative proposal (European Commission, n.d.). In 2022 and 2023, the Commission pursued between 4 and 5 per cent of complaints, either through informal dialogue or by launching an infringement procedure. These complaints accounted for between 10 and 20 per cent of overall cases that the Commission pursued (European Commission, 2023, 2024b).

3.7 Bilateral meetings with the EU institutions

Background and mapping

Ad-hoc consultations and meetings occur regularly between stakeholders and **EU officials working at the Commission, Parliament and Council**, including on climate policy files (Gullberg, 2008; De Bruycker & Colli, 2023; Dinan et al., 2025). Points of access include Commissioners, members of their cabinets, other Commission officials, Members of the European Parliament, the Council secretariat, Member State officials in the Council working groups, and the Committee of Permanent Representatives. Stakeholder representation is encouraged by EU officials as a prerogative of democracy and because stakeholders possess specific, useful expert knowledge (Gullberg, 2008; Dinan et al., 2025; see also Rosamond & Dupont, 2025). For example, the Commission may encourage dialogue with stakeholders **across the policy cycle** to strengthen input legitimacy at the proposal stage and to assess the reception and effectiveness of policies in various sectors at the evaluation stage (Gullberg, 2008).

Little is known about the **mode** of exchange in these informal meetings, but it may be safe to assume that they can include input, discussion, or deliberation depending on the purpose of the meeting and the participants.

Assessment

Previous research has shown a sizable imbalance in access to bilateral meetings between business interests and public-interest organisations. Private sector actors tend to enjoy more privileged access to EU policymakers (De Bruycker & Colli, 2023; Dinan et al., 2025). According to Dinan et al. (2025, p. 2), the lobbying capacity of the oil and gas industry “dwarfs” that of environmental NGOs so that they “have routine access to senior decision makers and regulators in the EU and are deeply embedded in related policy networks”. Disproportionate financial and staff resources mean that private sector actors are often more successful in arranging for meetings with officials than NGOs and CSOs, who must rely more heavily on outside lobbying tactics like protests and social media campaigns to have their voices heard (De Bruycker & Beyers, 2019).

Some rudimentary **institutional** arrangements governing bilateral meetings have existed since 2005 but provide only a moderate level of **transparency**. The Transparency Register lays out a code of conduct for non-profit, civil society, and private sector actors representing their interests in meetings with EU officials, while also requiring signatories to publicise information such as operating budgets and personnel resources. It was created in 2005 as part of the European Transparency Initiative in response to accountability concerns raised by some Members of the European Parliament, the Ombudsman, civil society groups, and the media (Dinan, 2021). The Register “helps to keep track of which interests are being represented to the institutions, who is representing them and on whose behalf, what legislative files are targeted and what resources are devoted to the related activities” (Transparency Register Management Board, 2024, p. 3).

Yet several gaps can be identified in the overall transparency system (Greenwood & Dreger, 2013; Dinan et al., 2025). For example, it is not mandatory to register to gain access to policymakers in several settings, there is no system of stakeholder verification, and the register requires limited financial reporting (Dinan et al., 2025). Furthermore, while some EU institutions require registration on the Transparency Register as a prerequisite for meetings, and these meeting times are sometimes published, there is little to no record of the outcome of such meetings. In summary, the Transparency Register provides a limited degree of **transparency**, while doing little to ensure **accountability** and trace the **impact** of bilateral meetings.

3.8 European Citizens’ Initiative

Background and mapping

The European Citizens’ Initiative (ECI) enables citizens to propose EU legal acts in areas where the EU has legislative competences. Introduced by the Treaty of Lisbon and governed by the ECI Regulation, the ECI requires at least one million signatures from citizens across at least seven Member States within one year for an initiative to qualify. If the threshold is reached, the Commission must consider the initiative and justify whether it makes a legislative proposal on that basis. **The ECI allows citizens, on their own initiative, to put an issue on the EU’s policy agenda.** It is **input-oriented**, without itself providing for discussion and deliberation.

As of April 2026, 129 initiatives had been registered, of which 12 had been addressed by the European Commission since 2011 (with two additional initiatives awaiting a response after being validated). Grassroots organisations and citizens have used the ECI to advance environment-related topics such as a proposal for a Right To Water (2014) and to ban glyphosate (2017). Other relevant initiatives failed to receive the required number of signatures (including End Ecocide in Europe, 2013; People4Soil, 2017; Stop Global Warming, 2022; Ban Fossil Fuel Advertising and Sponsorships, 2023) (Ilia, 2024).

Assessment

The ECI displays **high levels of institutionalisation, transparency and accountability**. The specific legal anchoring in the EU Treaties and the further elaboration in a Regulation provide for a high degree of legal stability and certainty. The Commission is obliged to justify whether or not it acts on a successful ECI by making a legislative proposal. The pledge and the signature process are transparently reported on the [website of the ECI](#).

The existing literature highlights **important shortcomings especially regarding impact**. The Commission rarely makes proposals based on successful citizens' initiatives, potentially frustrating initiators and leading to the instrument being underutilised (e.g. Ilia, 2024; see also: Cuesta-López, 2012; Vogiatzis, 2013; Greenwood, 2019). Moreover, ECI proposals face significant barriers (including regarding resource requirements and lengthy procedures). At the same time, the literature has also pointed to **significant positive potential and impact of the ECI**. In particular, ECI proposals have, irrespective of their success, had indirect positive effects, including fostering European collaboration, debate and awareness of proposed topics, contributing to the development of an EU-wide public space (e.g. Stop Global Warming, 2022). Even unsuccessful initiatives have at times had a certain impact on the EU political agenda (Weisskircher, 2020).

Several **proposals for improvement** of the ECI process exist. First, accountability could be enhanced by strengthening the Commission's obligations to provide justification in case of inaction within defined timelines. Second, the administrative effort required for registration and signature verification could be further addressed (beyond the improvements of the 2019 Regulation), ensuring enhanced accessibility by a wider audience (including smaller organisations). Finally, the scope of the ECI could be expanded beyond areas of established EU competence to better reflect citizens' priorities (Greenwood, 2019) and to enable citizens to engage with the complex challenges that the EU is facing irrespective of competence (Ilia, 2024).

3.9 European Ombudsman

Background and mapping

The European Ombudsman is an independent EU institution that investigates **complaints by citizens and stakeholders** about maladministration by **EU institutions**. It can also launch **own-initiative investigations** into broader systemic issues affecting **EU institutions** and decision-making processes. While citizens can trigger an investigation (if their complaint is found admissible), they are not involved in any further discussion or deliberation (**mode**). Most of the Ombudsman's inquiries relate to the transparency and accountability of the EU institutions, as well as fundamental rights and general ethical issues. In focus are issues across the **policy cycle** (including agenda setting, decision-making and evaluation), such as the conduct of public and stakeholder consultations, preparation of legislative proposals, access to documents, or procedural obligations of EU institutions.

Albeit Ombudsman inquiries focus exclusively on administrative matters, they regularly relate to EU climate policy. This has included, for example, inquiries related to the lack of stakeholder consultation and impact assessments related to an "urgent" legislative amendment to the Common Agricultural Policy, with the Ombudsman finding maladministration by the Commission (European Ombudsman, 2025). Furthermore, in April 2025 a coalition of several NGOs submitted a complaint to the Ombudsman about the lack of adequate impact assessments and broad public participation concerning the recent Commission "Omnibus" simplification packages (ClientEarth, 2025).

Assessment

The Ombudsman enjoys **high levels of institutionalisation, transparency and accountability**. Its legal anchoring in the EU Treaties and the further elaboration in a Regulation (see above) provide for legal stability and certainty. Complainants are informed about the admissibility and the outcome of the complaint. Relevant documents are transparently published on the website of the Ombudsman.

The Ombudsman has also proven **impactful** in safeguarding the rights of EU citizens and improving administrative practices in the EU, although it does not possess enforcement powers. If the Ombudsman concludes that maladministration has taken place, it can only issue non-binding recommendations to the relevant institutions. Implementation of its recommendations depends on the cooperation of other EU institutions and public 'naming and shaming'. Because its strong investigative powers have allowed the Ombudsman to release well-founded recommendations, EU institutions have tended to adapt their practices accordingly (Kostadinova, 2015; Wille & Bovens, 2022).

3.10 Petitions to the European Parliament

Background and mapping

EU **citizens and legal persons** (stakeholders) can petition the European Parliament on any matter within the EU's fields of activity and affecting the petitioner directly. A petition can hence relate to the full **policy cycle** (agenda setting, decision-making, evaluation) and address any relevant issue vis-à-vis **EU institutions and Member States**, for example a proposal for policy change, an implementation issue at EU or Member State level, or a complaint against the EU administration (Vogiatzis, 2022; European Parliament, 2024). As a key EU instrument of public participation (de Waele, 2023), the right to petition is focused on **input, rather than discussion and deliberation** with citizens.

The European Parliament's Committee on Petitions (PETI) is responsible for dealing with submitted petitions. PETI coordinates with other Committees, national parliaments and authorities, and EU institutions (notably the Commission and the Ombudsman) under the Petitions Network (European Parliament, 2024). During the 9th legislative term (2019–2024), the Committee oversaw 6,991 petitions. **Climate change issues have, along with other environmental issues, featured among the top subject matters of petitions** (Committee on Petitions (PETI), 2024; see also Vogiatzis, 2022).

Assessment

The petition system operated by the PETI committee has seen **high levels of institutionalisation, transparency and accountability**. The legal anchoring in the EU Treaties provides for a solid legal basis. Petitions and related documents are published on a web portal once they are deemed admissible. PETI must also communicate the outcome of the petition to the initiator.

Although petitions have not been without follow-up and consequence, in general their impact has been low. PETI can take several follow-up actions, such as referral to the relevant EU institution or Member State for follow-up, own-initiative reports, fact-finding missions, public hearings, workshops or studies. Some degree of discussion may hence follow from a petition (although not involving the petitioner). Several petitions have led to legislative or political action, EU pilot cases, and preliminary rulings or infringement proceedings (PETI, 2024). Petitions on **environmental issues** that led to concrete follow-up addressed issues such as illegal logging, deterioration of ecosystems, EU green prosecutors, plastics, mining, climate change denial, health, and the protection of species and habitats (PETI, 2024, pp. 6–7). Having said that, effective follow-up

depends on third parties other than PETI. Overall, most admissible petitions do not lead to any tangible follow-up (Alemanno, 2021; Vogiatzis, 2022).

Other issues that have hindered the petition system from realising its full potential include low political visibility (e.g. in comparison with the ECI and the Ombudsman) and insufficient resources. Proposals to enhance the system relate to a stronger PETI focus on broader EU policy debates and implementation at Member State level, a clearer distinction from and coordination with ECI and Ombudsman, and increased resources for PETI (Alemanno, 2021; Vogiatzis, 2022).

3.11 European Economic & Social Committee/Committee of the Regions

Background and mapping

The European Economic and Social Committee (EESC) is composed of 329 members appointed from **labour and civil society** (social, occupational, economic or cultural organisations). It is an **advisory body to the European Commission, the Parliament and the Council**. Its four roles include (1) providing advisory opinions, (2) supporting representatives of CSOs in navigating EU affairs and institutions, (3) strengthening and establishing CSOs and (4) informing citizens and organisations about the EU's role and functions (Lironi & Peta, 2017, p. 33). Most prominently, the EESC publishes opinions on policy proposals and proposed legislation on its **own initiative, at the request of the legislative EU institutions or as required under the EU's ordinary legislative procedure**. On average, the EESC delivers 170 opinions a year, of which about 15% are issued on its own initiative (EESC, 2025).

The Committee of the Regions (CoR) mirrors the EESC, **representing the regions and cities across the EU**. It is composed of 329 elected members, grouped by political party, and aims to enhance the cooperation between the different governance levels of the EU. Like the EESC, the CoR formulates **advisory opinions on legislative proposals**, and both institutions often collaborate with each other.

Both the EESC and the CoR act on **climate policy** through their formal advisory role in the legislative process and through their own-initiative advisory opinions and related activities. In so doing, the EESC has been a strong advocate of a Just Transition (EESC, 2023) and both committees have worked towards the integration of regional and local perspectives into EU climate strategies.

Assessment

On one side, the Treaty base ensures a **high level of institutionalisation** and Committee proceedings and activities are **generally public and transparently communicated**. On the other side, there is a **lack of accountability and impact**. The main EU legislative institutions have tended to neglect the advice by the EESC and the CoR and have failed to provide substantive feedback on how they have taken the advice into account (Hönnige & Panke, 2016). This may have contributed to relevant stakeholders at times neglecting the Committees as a main avenue for influencing EU climate decision-making. Uptake in policy debates seems to be somewhat better when advisory opinions are provided early in the policy process (for the EESC, see Hönnige & Panke, 2013). In addition, more active promotion and engagement in the political process beyond formal channels may enhance visibility and effectiveness in shaping EU policies.

3.12 Synthesis: General EU participatory and deliberative mechanisms

Participatory mechanisms in general EU governance can and have been meaningful for climate decision-making. The newest mechanisms (Strategic Dialogues and European Citizens' Panels) add value by enabling stakeholders and citizens to shape the agenda and decision-making. They also

are suitable for deliberation. However, they suffer from limited transparency. Strategic Dialogues seem particularly problematic as they have not consistently provided for balanced participation by stakeholders and have lacked transparency and accountability.

Several other mechanisms (including public consultations, Commission expert groups, complaints to the Commission, and, to a lesser extent, bilateral meetings) are (partially) guided by soft rules. To the extent they can be utilised by citizens, they are primarily input-oriented (complaints, public consultations). Those that can primarily be utilised by stakeholders fail to provide for balanced stakeholder representation in favour of business interests (expert groups, bilateral meetings) and also lack transparency and accountability.

The most institutionalised mechanisms (ECI, Ombudsman, right to petition, EESC/CoR) possess a strong focus on input (without discussion or deliberation). Their proper functioning depends on the continued or increased availability of resources and is at times handicapped by limited visibility to citizens and stakeholders and could benefit from enhanced accountability and/or impact.

4. Public participation in EU climate governance

In this section, we investigate four participatory mechanisms specific to EU climate governance. These are anchored in the European Climate Law, the Governance Regulation, the Social Climate Fund Regulation, and the Environmental Impact Assessment and Strategic Environmental Assessment Directives. Most of these mechanisms operate at the Member-State level. As laid out in Section 2, for each mechanism we (a) provide general background and map relevant dimensions, and (b) assess its quality along the criteria established in Section 2. Where available, we also discuss suggestions for improvement.

4.1 EU sectoral roadmaps and dialogues

Background and mapping

The European Climate Law requires **the Commission to engage with stakeholders** to prepare voluntary indicative sectoral roadmaps, including the facilitation of dialogue and the sharing of best practice (Art. 10). The Strategic Dialogues on agriculture and on clean industry, as well as further planned sectoral dialogues, can be considered a manifestation of this mandate (see Section 3.1), along with the Commission's *EU transition pathways*¹ regarding certain industrial sectors (European Commission, 2024c, pp. 6–7).

Assessment

Guidance and systematic information on the implementation of the Climate Law mandate on sectoral roadmaps and dialogues is lacking (see also Section 3.1). The legal basis in the Climate Law is vague, indicating a low level of **institutionalisation**. It is hence not possible to assess **transparency, accountability** and **impact**.

4.2 EU-mandated national plans and strategies

Background and mapping

1 https://single-market-economy.ec.europa.eu/industry/transition-pathways_en

Like EU-mandated participatory planning in environmental governance (Newig & Koontz, 2014), the main EU arrangements for public participation in climate policymaking require Member States to undertake public participation in national planning processes, including:

- **National Energy and Climate Plans (NECPs) and Long-term Strategies (LTSs).** The Governance Regulation requires **Member States** to conduct public consultations in the preparation of NECPs and LTSs (Art. 10) and to report on these public consultations in these documents.
- **Multilevel climate and energy dialogues.** Article 11 of the Governance Regulation requires **Member States** to create such multilevel dialogues to discuss different scenarios for national climate and energy policy with a broad set of stakeholders and to report on these dialogues in the biennial progress reports under the Governance Regulation.
- **Social Climate Plans.** Regulation (EU) 2023/955 establishing a Social Climate Fund requires **Member States** to conduct public consultations for the elaboration of Social Climate Plans and to report on these consultations in the plans submitted (Art. 5).

Under the requirements of the Governance Regulation, public consultations for NECPs and LTSs should be open to **both citizens (the general public) and stakeholders**, while the Social Climate Plan rules only require consultations with **stakeholders**. Furthermore, such national consultation processes are principally subject to the requirements of the 1998 Aarhus Convention to which all EU Member States and the EU itself are parties.

Assessment

While participation requirements related to climate planning are principally **legally mandated** under EU law, related requirements have for the most part remained vague/general and have been found to be in non-compliance with the requirements of the Aarhus Convention (Robert, 2023). Accordingly, national implementation of these public consultations has diverged significantly, leaving considerable room for improvement on **inclusiveness, mode, transparency, accountability and impact** (Faber et al., 2024; Oberthür et al., 2025). Improvements may be achieved through specification of the EU requirements and enhanced follow-up of their implementation, including capacity building for public authorities to meaningfully embed public participation in their procedures and decision-making.

4.3 Environmental Impact Assessments and Strategic Environmental Assessments

Background and mapping

The Environmental Impact Assessment (EIA) Directive (first adopted in 1985 and last amended in 2014) and the Strategic Environmental Assessment (SEA) Directive (adopted in 2001) require **Member States** to provide for public participation in EIAs for large industrial and infrastructure projects (such as power stations, roads, etc.) and SEAs for related sectoral development plans and programmes. The public includes affected and interested **citizens and stakeholders**. Public participation is to be undertaken early to feed into the **decision-making** related to relevant projects, plans and programmes. The more detailed implementation, including aspects that will determine the extent to which **discussion** and **deliberation** will be possible in addition to **input**, is left to the Member States (on the Directives, see Arabadjieva, 2016; Bottero & Mondini, 2020; Jiricka-Pürner & Fischer, 2022).

The EIA and SEA Directives apply to climate-related projects, plans and programmes. EIAs and SEAs ought to pay particular attention to climate change aspects, as explicitly mentioned in the EIA Directive (as revised in 2014) and further clarified in relevant Commission guidance for both Directives (Jiricka-Pürner & Fischer, 2022; Mayembe et al., 2023, p. 4). At the same time, the Directives' narrow scope also limits their relevance for climate governance. In particular, their focus on projects and sectoral development plans and programmes, respectively, necessarily limits their utility, as it does not extend to large areas of policymaking (such as legislation and budgetary allocation). In this regard, it is questionable whether the SEA Directive would also apply to plans such as NECPs, since the SEA Directive states that it specifically applies to sectoral development plans (Art. 3.2). It is doubtful that NECPs and LTSs qualify as such. Article 10 of the Governance Regulation clarifies that, in so far as the SEA Directive is applicable, undertaking public consultations on NECPs and LTSs in accordance with the SEA Directive is considered to fulfil the requirements.

Assessment

Because it is anchored in the applicable EU Directives, public participation in EIAs and SEAs is clearly **institutionalised**. Their rules are complemented by Article 7 of the Aarhus Convention on public participation concerning plans, programmes and policies. Overall, these rules provide for a high level of **transparency** and **accountability**, for example by requiring that decisions should explain how the public's opinions have been considered and provide reasons for the eventual decision (see SEA Directive, Art. 9.1). As regards **impact**, the Directives determine that the decision should "take into account" the results of the public participation. There is no requirement to refrain from any projects or plans and programmes that cross a threshold of environmental damage or harm (Arabadjieva, 2016; Bottero & Mondini, 2020; Jiricka-Pürner & Fischer, 2022).

There is very limited knowledge on the actual implementation of public participation under both Directives in the Member States. Both Directives leave the specifications of relevant arrangements to the Member States. The knowledge that is available suggests considerable variation in the quality of public participation in EIAs and SEAs across the Member States (Nesbit et al., 2019).

4.4 European Climate Pact

Background and mapping

The European Climate Pact (ECP) is a European Commission initiative that aims to increase bottom-up climate action and participation in climate governance across the EU. It was launched in December 2020 and is still active. In its Communication on the ECP, the European Commission explicitly frames the European Green Deal as a response to the demand for stronger climate action coming from citizens (European Commission, 2020). Arguing that everyone needs to be involved in the climate transition for it to be a success, the ECP seeks to enable bottom-up action by connecting people and organisations and by sharing knowledge on the climate crisis and climate solutions. In its early stages, it focused on the topics of green areas, green transport, green buildings and green skills.

Five core values shape the ECP's activities: (1) Science, responsibility and commitment; (2) Transparency; (3) Ambition and urgency; (4) Local action and impact; and (5) Diversity and inclusiveness (European Commission, 2020). People and organisations signing up to be involved in the ECP must pledge to adhere to these values. In doing so, the Commission tries to ensure that the programme remains open, inclusive, and ambitious.

People and organisations can get involved in the ECP in several ways. Individuals can sign up to become Pact Ambassadors. Ambassadors form the core of the initiative and are tasked with

informing, inspiring and supporting climate policy and action, leading by example and connecting with other individuals or organisations (European Union, n.d.-a; REAL DEAL, 2023). They are expected to both organise concrete actions and to participate in other ECP events.

The criteria to become an Ambassador have changed over time. Initially, anyone could sign up, but this was later changed to only those that could be seen as community leaders (Tosun et al., 2023). The Commission defines these as leaders of both formal and informal groups, policymakers, representatives of cultural, educational or research institutions, and influencers and other opinion leaders (European Union, n.d.-a). Until July 2022, people from outside the EU could also sign up (Tosun et al., 2023). This was restricted afterwards and now only EU citizens can become Ambassadors.

Organisations can also sign up to become Partners of the Pact. By signing up, they show their commitment to climate action, and pledge to inspire and connect with others (European Union, n.d.-b). Moreover, by becoming a partner, organisations can increase the visibility of their climate actions, engage in policy discussions, and have access to the Climate Pact’s resources. They are also expected to take concrete climate actions and to participate in events. Only non-profit, educational, cultural, scientific and public sector organisations can become Partners. Ambassadors and Partners are supported by the ECP Secretariat and country coordinators for each EU Member State.

The ECP has an online EU Climate Action Academy that bundles resources to support climate initiatives and offers online webinars and training sessions. Previous courses include seminars on how to foster behavioural change and improve climate communication. Resources are provided by the Commission as well as partners such as UNESCO, the Global Covenant of Mayors for Climate and Energy, and the Climate Pact Ambassadors themselves. These include documents on topics of climate disinformation, greening teaching, and climate adaptation. Many of these resources are publicly available.

As a final component of the ECP, the Commission works together with the Committee of the Regions to organise Going Local Talks, which are local events on climate policy, adaptation, preparedness and resilience, and the social aspects of the climate transition. These events aim to bring the ECP to the local level, empower communities, and increase support for (and solicit feedback on) the EU’s climate transition.

As of 11 March 2026, the ECP website lists 1,293 ambassadors, up from 876 in 2023 (Tosun et al., 2023). Participants are unevenly geographically distributed across the EU Member States. The seven countries with the most ambassadors make up 52% of the total (Italy, Spain, Germany, France, Greece, Poland, and Portugal). Italy has the most listed ambassadors (115) while Cyprus has the least (8). There are also wide variations in the number of ambassadors per capita; both France (1.3 ambassadors per million inhabitants [2024]) and Greece (8.8 per million) have 92 ambassadors listed. Research on individual motivations for being an ambassador has found that a sense of moral obligation is the most common, followed by personal interest, and the value of training/networking (Tosun et al., 2023; Tosun & Heinz-Fischer, 2026). The 113 organisations that are Partners of the ECP are more evenly distributed.² Every Member State has at least one registered organisation (the mean was approximately 4 per Member State). Nine countries had an above-average number of Partners; Belgium had the highest number at 11 organisations. 770 events have so far been organised either online or in the Member States.

² As of 12 March 2026.

The level of dialogue (both among participants as well as participants and policymakers) depends on the types of activities organised. There are some centralised means of communication between participants such as an online platform and email lists. The European Commission invites national and subnational governments to organise discussion meetings with their constituents to develop and support the climate transition together, but it is not clear how many of these have taken place so far (European Commission, 2020). Much of the dialogue seems to take place at the annual European Climate Pact event organised by the European Commission. During the event, Pact Ambassadors, Partners of the Pact, country coordinators and representatives from the Commission meet for one day in Brussels or online to discuss climate action and climate solutions. As such, these events provide opportunities to connect with Commission policymakers, and for Ambassadors and Partners to learn from each other and to connect.

Assessment

The ECP exhibits low levels of **institutionalisation**; it is underpinned by a Commission communication rather than EU legislation and has instead been created and funded directly by the Commission. As such, its continued operation and the level of financial/personnel support it receives is dependent on the Commission's own priorities. However, it exhibits **high levels of transparency**: information on ambassadors, partners, and events is publicly available, and the Commission engages directly with participants through an annual event that is open to the public.

Measuring the ECP's **impact** is challenging given that it does not have concrete objectives but rather aims at increasing societal acceptance. As a result, its outcomes are not easily defined, nor is its success readily measurable. There is no direct link between the ECP and the policy process. Survey evidence suggests that political action around climate policy is widespread amongst Ambassadors and Partners (e.g. Tosun & Heinz-Fischer, 2026, pp. 106–107). But it is unclear which jurisdictions this activity is aimed at (local, national, EU) and—especially in the case of partner organisations—whether the ECP has been the catalyst for this engagement. Nevertheless, Tosun (2022) has identified several ways the ECP could more effectively feed into policymaking. For instance, the ECP could facilitate citizens' initiatives during agenda-setting, deliberative formats during policy formulation, and they could assist implementation by providing information (Tosun, 2022). The resources provided in the EU Climate Action Academy can also support other forms of participation that can in turn have an impact on the decision-making process. For instance, it provides resources on how to host a "Peer Parliament": small deliberation settings with 5-10 participants that discuss issues such as transport, just and clean energy, or sustainable consumption (European Commission, 2024a). The results of these discussions can be shared with European policymakers and stakeholders, and in doing so, inform policy formulation. These are nonetheless not formally established roles. As such, the ECP's decision-making influence is at best indirect.

Given that the ECP is fundamentally an externally facing programme that is not designed as a tool to feed into the EU policy process, the definition of **accountability** in this case is challenging. In principle the annual ECP event and participant-organised events provide opportunities to share lessons learned and opinions on EU climate policy. Overall, we argue that the ECP has a low level of accountability, which is likely to vary significantly between issue areas and events.

4.5 Synthesis: EU climate-related participation

Public participation arrangements in EU climate governance have remained insufficient. Relevant minimum requirements for national planning processes are not in compliance with the Aarhus Convention. They are also not aligned with best practice and lack clarity. The EU-level

provisions that exist are ambiguous and have remained limited to sectoral roadmaps and dialogues. The EIA and SEA Directives provide for a relatively high standard of public participation but are limited in their reach to specific projects and sectoral development plans and programmes – and hence of limited relevance for broader climate policymaking.

It is striking that **EU climate governance has so far placed relatively little focus on innovative mechanisms of inclusive public participation and deliberation** that have flourished over the past decades in EU Member States, including and prominently addressing climate policy (Farrell et al., 2019; Elstub et al., 2021; McBride, 2022; Smith, 2024). These innovative mechanisms include mini-publics such as citizens' assemblies, citizens' panels, citizens' councils or else (including "participatory budgeting"). They have been initiated by different actors, including governments/public institutions and CSOs, have involved (a cross-section of) citizens, and have aimed at deliberation. One key issue for these mini-publics has been to ensure that policymakers pay attention to the results of deliberation, provide feedback on how the mini-publics have informed decision-making, and seriously consider their recommendations. In some local/regional cases, such mini-publics have therefore been institutionalised, linking them to the established representative decision-making institutions (Smith, 2024). In addition, the European Citizens' Panels can provide a deliberative space to provide recommendations to policymakers and this can also occur at national level, e.g. through well-designed public consultation surrounding the NECPs and LTSs.

Similarly, platforms and initiatives that aim at facilitating input and engagement from citizens in the climate and energy transition, such as the Real Deal, have so far not been acknowledged or fostered in EU climate law and governance.

5. Key findings: achievements and shortcomings

Our analysis of participatory mechanisms for EU climate governance in Sections 3 and 4 leads to several general findings. The results of our analysis are reflected in Figure 1 and Tables 1 and 2. We present our findings in two steps. First, we characterise the overall participatory system across the EU and its Member States that emerges from our analysis of the nine key dimensions guiding our inquiry (Section 2). Second, from this synthesis we derive five key challenges and priorities for enhancing public participation for climate governance in the EU.

Table 1 Key characteristics of EU participatory and deliberative mechanisms

#	Mechanism	Type	Level	Policy stage			Initiation					Participants		Mode		
				Agenda	Decision	Eval.	COM	Citizens	Stakehld.	MS	Other	Citizens	Stakehld.	Input	Discuss.	Delib.
3.1	Strategic Dialogues	GEN	EU	✓	✓		✓						✓	Varies		
3.2	Conf. on Future Europe	GEN	EU	✓			✓					✓	✓	✓	✓	✓
3.3	EU Citizens' Panels	GEN	EU	✓	✓		✓					✓			✓	✓
3.4	EU public consultations	GEN	EU		✓	✓	✓					✓	✓	✓	✓	
3.5	Expert groups	GEN	EU	✓	✓	✓	✓						✓	✓	✓	
3.6	Commission complaints	GEN	EU			✓		✓	✓			✓	✓	✓		
3.7	Bilateral meetings	GEN	EU	✓	✓	✓	✓	✓	✓		✓		✓	Varies		
3.8	European Citizens' Initiative	GEN	EU	✓				✓	✓			✓		✓		
3.9	European Ombudsman	GEN	EU	✓	✓	✓		✓	✓		✓	✓	✓	✓		
3.10	Petitions to Parliament	GEN	EU/MS	✓	✓	✓		✓	✓			✓	✓	✓		
3.11	EESC (& CoR)	GEN	EU		✓						✓		✓	✓		
4.1	Roadmaps & dialogues	GEN	EU		✓		✓					✓			✓	✓
4.2	NECPs & LTSs	CLI	MS		✓					✓		✓	✓	Varies		
4.2	Multilevel Dialogues	CLI	MS		✓					✓		✓	✓	Varies		
4.2	Social Climate Plans	CLI	MS		✓					✓		✓		Varies		
4.3	EIA & SEA Directives	CLI	MS		✓					✓		✓	✓		✓	✓
4.4	European Climate Pact	CLI	EU	✓			✓					✓	✓	Varies		

Governance level: The mechanisms we assessed address both the EU and the Member-State level. Participatory mechanisms at the EU level tend to be of a general nature but can also be created specifically to contribute to climate governance (e.g. the European Climate Pact). In contrast, mechanisms specifically addressing climate governance focus on the Member-State level. Having said that, our analysis only covers mechanisms anchored in EU governance and does not cover further national and local mechanisms that exist independently of EU arrangements.

Policy stage: Overall, existing mechanisms put a strong emphasis on the decision-making stage of policymaking (see Figure 1 and Table 1). Only the ECI enables independent, bottom-up input into agenda setting by citizens and CSOs. Citizens’ Panels and Strategic Dialogues permit participants to contribute to agenda setting, but only to the extent that the framing of the initiating European Commission provides room for it. Evaluation is also not a strong focus. Some mechanisms allow citizens and CSOs to complain about implementation deficits by European institutions and Member States (complaints to the Commission, Ombudsman, petitions). To some extent, these actors can also contribute when public consultations and expert groups directly address evaluations (to the extent they are represented).

Initiation: Few of the mechanisms can be initiated bottom-up by citizens/stakeholders. Those that do are focused on a cluster of mechanisms at the EU level that provide input (but do not involve discussion or deliberation): the European Citizens’ Initiative, the right to petition, the Ombudsman, and complaints to the Commission. In addition, citizens and interest groups can initiate bilateral contacts for exchange and lobbying.

Participants and mode of participation: Public participation in climate governance at the Member State level is in principle open to both citizens and stakeholders (NECPs & LTSs, Multilevel Dialogues, EIA & SEA Directives, but not the Social Climate Plans). However, actual implementation varies considerably between Member States and seems to have privileged, as a rule, stakeholders over citizens. In principle, these mechanisms also provide room for discussion and deliberation, but actual implementation rarely exploits this opportunity. General EU-level participation mechanisms that also involve citizens have a strong emphasis on providing input (as opposed to engaging in discussion or deliberation), including the Commission complaint procedure, the ECI, the Ombudsman and petitions. EU-level mechanisms facilitating discussion and, to a lesser extent, deliberation are largely focused on engaging stakeholders (and cannot be initiated bottom up), including public consultations, expert groups, Strategic Dialogues and roadmaps, and bilateral contacts. Citizens’ Panels form the only exception where (a selection of) citizens engage in discussion and deliberation. Deliberative mechanisms at both levels focus on decision-making. An imbalance of stakeholder participation in favour of economic interests has been found with respect to several mechanisms, including bilateral contacts, expert groups, Strategic Dialogues, roadmaps, and public consultations.

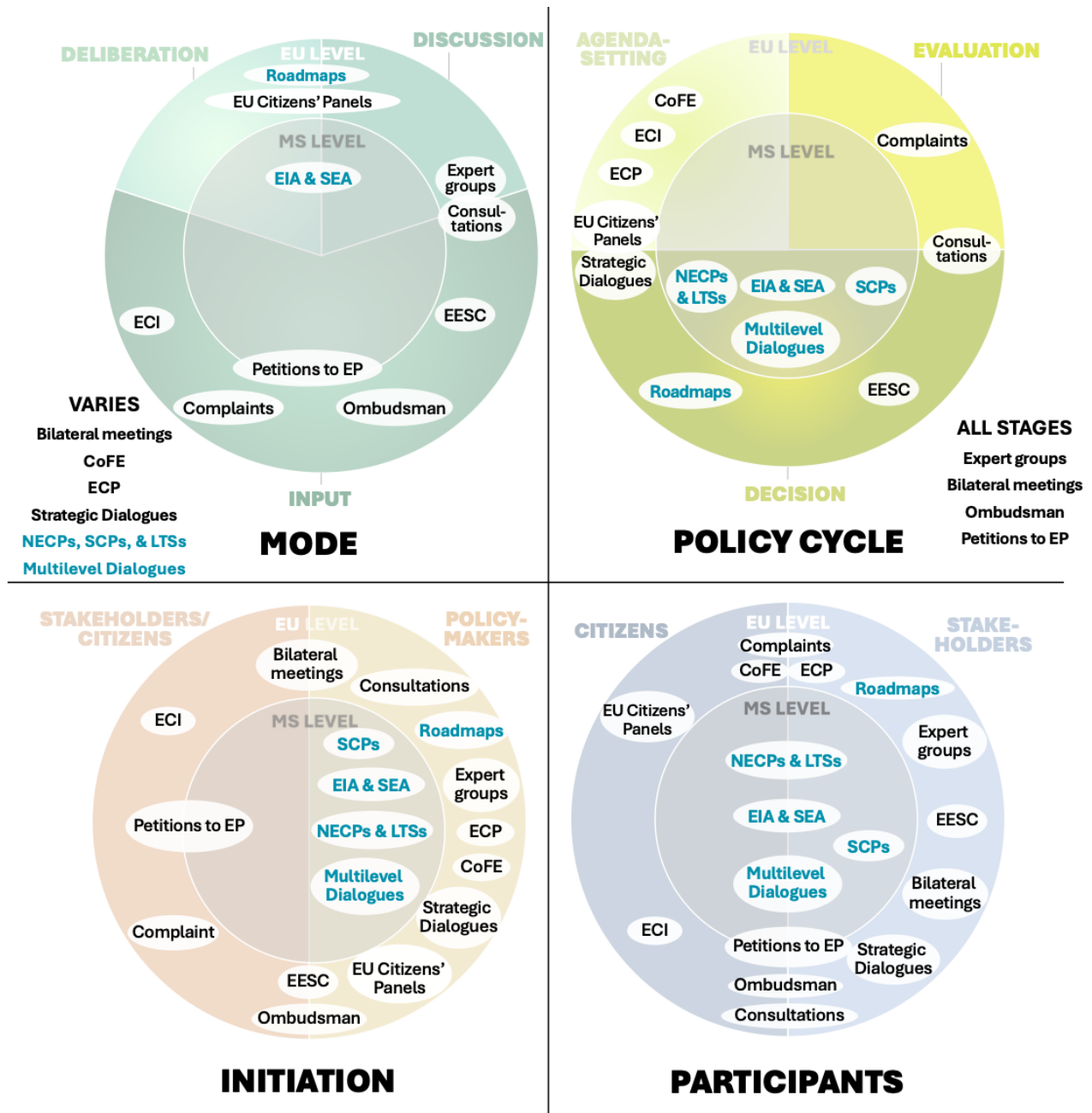


Figure 1 Mapping of EU public participation mechanisms across four dimensions

Based on the analysis in Sections 3 and 4 (see also Table 1); mechanisms of climate governance in blue font.

Table 2 Levels of institutionalisation, transparency, accountability, and impact.

#	Mechanism	Institutionalisation	Transparency	Accountability	Impact
3.1	Strategic Dialogues	Low	Low	Low	Low
3.2	Conf. on Future of Europe	Low	High	Medium	Medium
3.3	EU Citizens' Panels	Low	High	Medium	Medium
3.4	EU public consultations	Medium	Medium	Medium	Medium
3.5	Expert groups	Medium	Low	Low	High
3.6	Commission complaints	Medium	High	High	Medium
3.7	Bilateral meetings	Low	Medium	Low	Unclear
3.8	European Citizens' Initiative	High	High	High	Low
3.9	European Ombudsman	High	High	High	High
3.10	Petitions to Parliament	High	High	High	Low
3.11	EESC (& CoR)	High	High	Low	Low
4.1	Roadmaps & dialogues	Low	Low	Low	Low
4.2	Multilevel Dialogues	Medium	Varies by MS	Varies by MS	Varies by MS
4.2	NECPs & LTSs	Medium	Varies by MS	Varies by MS	Varies by MS
4.2	Social Climate Plans	Medium	Varies by MS	Varies by MS	Varies by MS
4.3	EIA & SEA Directives	Medium	Varies by MS	Varies by MS	Varies by MS
4.4	European Climate Pact	Low	High	Low	Unclear

Institutionalisation: There is significant variation in the institutionalisation of the existing participation mechanisms. Some mechanisms are established by the EU Treaties, which provide a strong legal foundation and protection, including the ECI, the Ombudsman, the European Parliament petitions, and the EESC. Many Member State-level mechanisms are specifically mandated by EU secondary law (and required to comply with the standards of the international Aarhus Convention), including public participation for NECPs and LTSs, for Social Climate Plans, for EIAs and SEAs, and in multilevel dialogues. While both the Treaties and secondary law may in principle make the standards judiciable, secondary-law mandates on plans and dialogues lack specificity and coherence. Several other mechanisms are vague (roadmaps & dialogues), primarily have a basis in Commission acts or guidelines (public consultations, expert groups, complaints to the Commission) or lack a basis in rules altogether (European Citizens' Panels, Strategic Dialogues). It is noteworthy that more institutionalised mechanisms at the EU level appear to score higher on transparency, accountability and impact, with the most problematic Strategic Dialogues/roadmaps lacking a sound institutional basis.

Transparency: Member State-level mechanisms display wide variation in transparency from country to country. EU-level mechanisms achieve relatively high scores on transparency, with important exceptions. Hence, Strategic Dialogues/roadmaps and expert groups suffer from a lack of transparency, and there is room for improvement regarding public consultations and bilateral contacts.

Accountability: Member State-level mechanisms also display wide variation on accountability, with more problems than regarding transparency. EU-level mechanisms also achieve somewhat lower scores on accountability than on transparency. In addition to Strategic Dialogues/roadmaps, expert groups, bilateral contacts and public consultations, shortcomings in this regard are also apparent for Citizens' Panels and the EESC.

Impact: Impact remains a particular problem area across levels and mechanisms. Whereas variation across Member States exists also in this respect, Member State-level mechanisms on average score low on impact. At the EU level, even mechanisms scoring relatively high on

transparency and accountability display shortcomings regarding impact, including the ECI, petitions and the Commission complaint procedure. Only the Ombudsman and expert groups score relatively high on impact (with the latter lacking transparency and accountability). Knowledge of the impact of bilateral contacts is cursory at best. Overall, the lack of impact may indicate a need to build public agencies' capacity and motivation to incorporate public participation outcomes into decision-making.

Our findings point to **five key challenges and priorities for enhancing public participation for climate governance in the EU**. Addressing these challenges promises to significantly upgrade the system of public participation and enhance the double dividend for climate and democratic governance:

1. **Imbalanced representation:** Existing mechanisms tend to favour private economic interests, leaving public-interest civil society organisations and individual citizens underrepresented.
2. **Implementation gaps:** Putting participatory standards into practice remains a major challenge, particularly at the Member State level and when embedding participatory/deliberative processes in established institutions.
3. **Limited impact and transparency:** Many mechanisms have limited influence on decision-making and often lack transparency and accountability, especially newer ones with weak institutionalisation (e.g. the Strategic Dialogues).
4. **Low public visibility:** Most participatory tools remain poorly known to the public, limiting broader engagement.
5. **Lack of deliberation in Member States and across governance levels:** Opportunities for joint problem-solving are scarce. Crucially, the EU has yet to effectively promote deliberative formats like citizens' assemblies in Member States.

6. An agenda for enhancing participation & deliberation in EU climate governance

To align the system of public participation for EU climate governance with high-quality standards, we identify an action agenda comprising seven key items. The European Commission could initiate and pursue this agenda in cooperation with other European institutions, as appropriate. The EU is already pursuing several related initiatives. In November 2025, the European Commission and the EU High Representative for Foreign Affairs issued a joint communication on a European Democracy Shield (European Commission & EU High Representative for Foreign Affairs, 2025). The communication included proposals to increase citizen engagement, including through a multilingual online resource hub and an annual award for democratic innovation (see pp. 25–26). In parallel, the Commission released an EU Strategy for Civil Society, where it pledged to create a Civil Society Platform for engagement, an online Knowledge Hub for Civil Society, and a proposal for increased funding in the next Multiannual Financial Framework (European Commission, 2025c). In addition, the revision of the Governance Regulation is expected to be initiated in 2026 (which could also consider public participation in EU climate governance as addressed in the European Climate Law). While several of the suggested key actions focus on public participation in EU governance in general, they would specifically benefit climate governance, including the development of the Clean Industrial Deal, as a prime area of EU governance in need of meaningful public participation.

Before discussing the key actions in the following, it should be noted that their implementation generally does not require additional legislation. Instead, the proposed agenda can be pursued through the elaboration of non-legislative instruments such as best-practice guidance and capacity building, planned legislative revisions, and concrete implementation.

6.1 Create robust EU-wide participation standards

The introduction of new mechanisms of public participation at the EU level constitutes an opportunity to enhance decision-making and democratic legitimacy. To strengthen these mechanisms, best-practice standards should be defined to safeguard balanced participation, promote discussion and deliberation, and ensure transparency, accountability and impact. This will enable these mechanisms to effectively contribute to better and more legitimate decision-making (see Section 2).

Such best-practice standards are absent from the most recently introduced mechanisms, the **Strategic Dialogues** and **European Citizens' Panels**. They are also not on the horizon for other, just emerging, new mechanisms as announced by the Commission, including the annual Youth Policy Dialogues, the Youth Advisory Board to the Commission President, and the organisation of implementation dialogues with stakeholders by Commissioners.

Relevant best practice standards could be defined (in consultations with the public) in a **Commission communication** and could be incorporated into the **Better Regulation Agenda** (guidelines and toolbox). Specifically with respect to climate governance, best-practice standards could also usefully be included in a revised **Governance Regulation**, possibly in combination with related changes to public participation arrangements under the European Climate Law (see Oberthür et al., 2024).

6.2 Foster national deliberative mechanisms

To further mobilise the underexploited potential of deliberative participatory mechanisms across Member States, the revised **Governance Regulation** should promote the diffusion and use of mini-publics (such as citizens' assemblies) by elaborating best-practice standards for their implementation and institutionalisation. The Commission could usefully complement such standards by elaborating, facilitating and sharing best practices as well as by fostering capacity building and increased understanding of deliberative mechanisms amongst public agencies. The mobilisation of financial support for the organisation of mini-publics in line with best-practice standards would be helpful. Furthermore, devising arrangements for channelling the outcomes of national and sub-national mini-publics to EU decision-making could usefully complement EU-level public participation and enrich EU policy discussions.

6.3 Enable and empower civil society

One of the crosscutting shortcomings of existing participation mechanisms is the structural favouring of private interests and the underrepresentation of civil society, marginalised groups, and less-organised interests. Private interests face fewer challenges when organising themselves and possess ample resources. Other interests, especially public-interest groups, face higher hurdles to effectively organise and have far fewer resources at their disposal. At the same time, private economic interests have been found to enjoy privileged access to policymakers (see Section 3.6).

Under these circumstances, ensuring a balance of represented views and interests requires particular and persistent attention. Such balance supports the effectiveness and legitimacy of decision-making. To provide a level playing field, the following two action points would prove useful:

- Ensuring balanced representation and participation opportunities across participatory mechanisms, including Strategic Dialogues, Commission expert groups, and bilateral meetings.
- Facilitating the provision of sufficient resources for public-interest and marginalised actors to enable them to fully participate and contribute.

This constitutes an issue that cuts across the action agenda presented here and should hence be addressed throughout, especially where serious imbalances have been identified (Strategic Dialogues, Commission Expert Groups). In particular, it is crucial to better incorporate the voices of marginalised groups in climate-related participation, given the significant barriers they face to inclusion and impact (Debusscher and Maes, 2025; Oleart, 2025).

6.4 Mainstream public participation in national climate governance

To enhance public participation in national climate planning and policymaking, related guidance could be further developed and strengthened through the forthcoming revision of the **Governance Regulation**, including:

- Clarifying effective participatory best-practice standards, in line with the Aarhus Convention and drawing on existing experience and state-of-the-art knowledge, for the development and discussion of **national plans and strategies**, including NECPs, LTSSs, and Social Climate Plans.
- Further specifying and clarifying the design and mandate of **multilevel energy and climate dialogues** under Article 11 of the Governance Regulation as a central element of public participation in climate governance (see also Faber et al., 2024).

Enhanced guidance in the Governance Regulation provides the opportunity to align EU legislation with the Aarhus Convention and resolve the ongoing compliance proceedings against the EU under this Convention (Robert, 2023). It would also be an opportunity to streamline and clarify ambiguous legal requirements, as well as to develop a more systematic and coherent approach to public consultations/participation in Member States on climate governance (in line with principles of Better Regulation). Such enhanced legislative arrangements should facilitate better implementation at national level. They should be complemented by the Commission elaborating best-practice guidance and facilitating sharing of best practices as well as supporting capacity building on public participation. Capacity building should also encourage public agencies to embrace the benefits of participation for political decision-making (Oberthür et al., 2024, pp. 15–16).

6.5 Improve existing EU participation mechanisms

Beyond the strengthening of new mechanisms, existing participation mechanisms have an important role to play and have room for improvement to enhance their quality and use. An **action plan for enhancing existing EU participation mechanisms could** further develop the individual mechanisms and their complementarity through the following main elements:

- **Public consultations:** a renewed and reinforced commitment by the European Commission to transparent and broad public consultations with balanced participation, including a commitment to providing meaningful information on how these consultations have been taken into account in decision-making.
- **Expert Groups:** a reform of participation arrangements to increase transparency and ensure more balanced involvement of civil society, research institutions, and trade unions;

this could be addressed through a review of the Commission's approach to the expert groups.

- **European Citizens' Initiative:** a review of the ECI to further facilitate its use by civil society, including consideration of an expanded substantive scope.
- **Ombudsman, petitions, and EESC/CoR:** ensuring appropriate resourcing and a timely focus on key issues; enhancing consideration and feedback by the co-legislating institutions to the EESC/CoR.

6.6 Increase visibility and public awareness

The Commission, the Council, the European Parliament, the Ombudsman and the EESC/CoR could significantly facilitate and promote the targeted use of existing participation mechanisms (both in general EU governance and in climate governance) by enhancing the public visibility and awareness of these mechanisms. This could build on the following interlinked elements:

- Developing and implementing a **dedicated communication strategy** towards stakeholders and citizens to raise awareness of the existing participation mechanisms.
- Creating a **central website resource** with information on all public participation possibilities in EU (climate) governance, accessible in all European languages.

Such a website could enhance accessibility and thereby facilitate wider and more effective use of participation mechanisms by citizens and civil society. It could, over time, be developed into an interactive online platform gathering all EU and Member State participation opportunities and could even be extended to include sub-national mechanisms and initiatives.

6.7 Foster debate on public participation

It seems appropriate to proactively involve the public when identifying promising actions that can be taken to enhance public participation in EU (climate) governance. This debate could be pursued by mobilising existing EU participation mechanisms. The results could also feed into the other items of our suggested agenda.

In particular, the European Commission could launch broad **public consultations on best practices of public participation in EU governance**. A carefully prepared European Citizens' Panel could also be considered to provide input on how to advance public participation in EU governance.

Given the dynamic development of the field, it should also be advisable to conduct similar reviews of evolving best practice at regular intervals (e.g. at least every five years, at the beginning of a new Commission mandate). This could be accompanied by regular reviews, e.g. by the Court of Auditors, which could also help ensure effective implementation of applicable rules and guidelines.

This action agenda provides a means for aligning public participation for EU climate governance with international standards (Aarhus Convention) and with best practice. The state of the art of knowledge on public participation has evolved significantly over the past several years, not least in the field of climate governance. It is time to update EU public participation arrangements accordingly and fully realise the double dividend for effective climate protection and a vibrant EU democracy.

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