



Strengthening Democratic Governance
for Climate Transitions

D3.3 – PUBLIC PARTICIPATION IN EU CLIMATE GOVERNANCE: EXAMINING THE NATIONAL ENERGY AND CLIMATE PLANS & NATIONAL LONG-TERM STRATEGIES

WP3 – Representative Democratic Institutions



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EC Summary Requirements

1. Changes with respect to the DoA

No changes with respect to the work described in the DoA.

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)

Well-designed public participation plays a crucial role in creating effective, widely accepted climate governance. In this report, we analyse the quality of public participation carried out during the formulation of the EU National Energy and Climate Plans (NECP) and National Long-term Strategies (LTS). First, we analyse the consultations carried out related to 106 NECPs and 26 LTSs according to 4 dimensions of participation quality: inclusiveness, deliberative quality, policy impact, and transparency. Our analysis shows large variations in the participatory quality of consultations across Member States and over time. Only a few Member States reach the levels of absolute quality, relative quality, and consistency over time necessary to be close to the standard for high-quality participation. Second, we carry out case studies of consultation practices in four Member States: Germany, France, Sweden, and Slovenia. We focus special attention on the role that the institutionalisation of participatory practices, institutions, and discourses plays in these consultation practices. We find that the NECPs are often not treated as a high priority in climate policy making and that consultation practices within each case differ over time. In three of the cases (Germany, France and Sweden) we find evidence of substitutive institutionalisation, where existing participatory institutions stand in for NECP requirements with little or no new NECP-specific institutionalisation. Only in Slovenia, which possessed less existing participatory infrastructure when the NECP/LTS process began in 2018, do we find evidence for substantive institutionalisation: the creation of practices, institutions, and discourses that are specifically focused on the NECPs. We contribute to the existing literature by designing and utilising a novel assessment framework for participation quality, further developing the conceptual approach to the study of institutionalisation in participatory processes, and significantly expanding the empirical scope of analysis in this area.

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

Introduction and background

Climate change presents numerous challenges for policymaking because it requires cross-sectoral, long-term decisions, while impacting existing power dynamics and affecting some groups more than others. These challenges highlight the need for well-informed, well-designed, and, perhaps most importantly, legitimate climate policy to support an effective, just climate transition. Incorporating meaningful public participation into climate policymaking is a key requirement to make this type of policy a reality. From a normative perspective, public participation can fulfil three different roles: enhancing policy decisions, enhancing legitimacy, and reducing contestation.

In EU climate and energy policymaking, public participation requirements are growing, not least in the 2018 Governance Regulation. This foundational procedural regulation created two climate and energy policy planning instruments: the National Energy and Climate Plans (NECPs), a 10-year horizon policy planning document; and the Long-term Strategies (LTs) with the same scope but with a time horizon towards 2050. EU law requires that these complementary instruments are informed by regular, early, and meaningful public consultations, as described in the Aarhus Convention (1998).

Existing studies have shown that these consultations related to the NECPs/LTs are unevenly implemented across Member States and over time (Oberthür et al. 2025; Righettini & Vincentini, 2023). However, comparative assessments of public participation mechanisms are rare because they face challenges related to the availability and comparability of data, as well as the design and implementation of consistent quality criteria across a broad number of diverse cases. Furthermore, the level to which EU-mandated public participation is an efficient instrument is unclear (Newig & Koontz, 2014) because of the variety of national contexts in the European Union (Börzel, 2002).

Objectives and scope

This report's aims are two-fold. First, we provide a comparative assessment of the quality of public consultations for the NECPs and LTs across all Member States between 2018 and 2024. We rely on NECP and LT data because they provide an unprecedented source for comparable public participation mechanisms implemented in different contextual settings. We also develop a robustness testing framework to ensure that our findings hold up across different assessment metrics. Second, we carry out case studies of consultation practices in four Member States: Germany, France, Sweden and Slovenia. We focus special attention on the role that the institutionalisation of participatory practices, institutions, and discourses plays in these consultation practices and whether the Governance Regulation has led to new, meaningful participation related to the NECPs and LTs.

Methods

First, we collected and coded the data available on public consultations in the NECPs (106 documents) and LTs (26 documents). We developed an assessment framework based on 12 criteria stemming from legal/international requirements and the academic literature. We then developed a robustness testing framework that categorised each Member State's NECP consultations according to three different metrics: the normative quality of the participation process, the relative quality of the process (vis-à-vis other Member States) and its consistency over time.

Second, we selected four case studies—Germany, France, Sweden and Slovenia—for an in-depth analysis of how EU requirements on NECP-related public consultations were institutionalised. To assess this topic, we developed an analytical framework based on two different possible institutionalisation pathways. The first pathway, *substantive institutionalisation*, refers to a process where EU requirements on public participation have led to the creation of new participation processes. The second pathway, *substitutive institutionalisation*, refers to a process where pre-existing national participatory processes have impeded the creation of an NECP-specific process. In the latter cases, Member States argue that they have existing processes that are equivalent to the consultations required by the Governance Regulation. We distinguished between two sub-types of substitutive institutionalisation: declaratory and operational. In the case of *declaratory institutionalisation*,

countries claim that their existing processes are equivalent to Governance Regulation requirements but do not take action to substantiate this claim. In *operational institutionalisation*, the government modifies the existing process, ensuring that EU requirements are met.

Key findings

In our assessment of participation quality in the NECPs and LTSs, we find that the implementation of public consultations is uneven across EU Member States and over time. During the period studied, we observe a stagnation of the average quality of consultations when we include Member States that did not carry out NECP consultations in that year. If we focus only on consultations that did take place, there is a modest increase in participation quality between the first NECP phase in 2018–2019 and the second phase in 2023–2024. Greece is the only Member State that can be considered a champion in implementing meaningful public participation, followed closely by Latvia and Slovenia. On the other hand, there are many Central and Eastern European countries that we classify as laggards due to a combination of low normative and relative participation quality and inconsistency in carrying out consultation processes over time. Long-standing EU Member States with large administrative capacity (e.g., France, Germany) or strong pre-existing democratic practices (e.g., Sweden) vary in how well they perform, meaning that there is significant room for them to improve their implementation of public consultations. The median LTS quality score is similar to the NECP quality in the 2023–2024 phase, although at the level of individual Member States there is very little similarity between performance on the NECPs compared to the LTSs.

In our four national case studies, we find that pre-existing public participation processes compete with, and in some cases impede, the institutionalisation of an NECP-specific participatory process. Slovenia shows a clear uptake and improvement of both their participation process and their climate and energy planning governance. However, Germany, France and Sweden were more reluctant to take over such a process, arguing that their national processes are sufficient to meet the requirements. To that end, we also make a distinction between countries like Slovenia which treat the NECP as a planning document, where others, like Germany, France and Sweden, appear to perceive the process as a reporting exercise to the European Commission.

Finally, reflecting on the conditions that enabled or hindered such institutionalisation of NECP participation, our cases point towards the effects of multiple enabling/impeding conditions that reinforce each other. Among them, the stability of the administration, the role of individual change agents, and the time, knowledge, and human capacity of both national administrations and NGOs.

Recommendations

Our findings highlight shortcomings that should be addressed in the upcoming revision of the Governance Regulation. First, the revised regulation should include clearer guidelines about the definition and requirements for meaningful public participation in the NECP and LTS drafting processes. If the Governance Regulation provides more details about the process and outcomes of these consultations, then it would constrain Member State's ability to substitute pre-existing consultations for the EU requirements without making substantive changes to those processes (the declaratory sub-type of substitutive institutionalisation). Similarly, it would be useful to outline to what extent Member States can avoid creating new participation processes by referring to excessive administrative burdens. Finally, one important shortcoming of these consultations is the difficulty of tracing back how the input of the public is transferred into policymaking because of a lack of transparency from government reporting. A revised Governance Regulation could aim to overcome that challenge by providing a more specific template for reporting on how consultation input influenced the drafting of the NECP/LTS. Finally, it would be useful to combine public participation processes for LTS and NECPs to avoid duplication of consultations which are cost- and time-intensive.

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Contribution Statement

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1. Introduction

Climate change is one of the most important policy issues facing the European Union and poses several crucial challenges for policymakers (Dupont et al., 2024; European Commission, 2019g). As a long-term issue, climate change requires policy responses that consider long time horizons out to 2050 and beyond. At the same time, the need for stronger policy responses is also increasingly urgent, in that reductions in greenhouse gas (GHG) emissions and effective adaptation to climate impacts must be implemented at an historically rapid pace. In addition, the sectors that must undergo the largest changes to reduce GHG emissions are also deeply embedded in everyday life (for example energy production and agriculture). Because of these and other challenges, there has been increasing evidence of political backlash to climate policy among policymakers, stakeholders, and the general public (Bocquillon, 2024; Patterson, 2023).

These challenges highlight the need for well-informed, well-designed, and, perhaps most importantly, legitimate climate policy to support an effective, just climate transition. Incorporating meaningful public participation into climate policymaking is a key requirement to make this type of policy a reality. By public participation, we mean any process that involves the public in decision-making (the 'public' in this case includes citizens and other stakeholders such as civil society organisations). Participation plays three key roles in policymaking: normative, substantive and instrumental (Glucker et al., 2013). From a *normative perspective*, participation can increase three types of democratic legitimacy: input legitimacy (by enabling contributions from the public), *throughput legitimacy* (by making complex processes accountable), and *output legitimacy* (by ensuring policies reflect societal rather than merely expert positions) (Schmidt, 2013). From a *substantive perspective*, participation can enhance policy effectiveness through, for example, the integration of diverse types of knowledge into decision-making (Armeni & Lee, 2021; Bächtiger et al., 2018; Smith, 2009). Finally, from an *instrumental perspective*, participation can create forums to discuss contested issues and increase societal support for climate action (Glucker et al., 2013; Willis et al., 2022). For climate policies specifically, participation offers spaces to discuss issues encountered by diverse publics related to climate change and find acceptable solutions for a fair climate transition.

1.1 Public participation in EU climate planning

Public participation in EU environmental policymaking is in part based on the requirements in the 1998 Aarhus Convention, which focuses on access to information, public participation, and access to justice. This international treaty requires parties (which includes the EU and its 27 Member States) to ensure the right to public participation in environmental matters. This covers the right to be informed, to participate early and meaningfully in environmental decision-making, and the requirement that authorities genuinely consider participants' input in decision-making. The EU has transposed these requirements into EU law through the 2003 Public Participation Directive (Directive 2003/35/EC) and the 2006 Aarhus Regulation (including revisions in 2021). The EU Regulation on the Governance of the Energy Union and Climate Action (the "Governance Regulation"), adopted in 2018, builds on the Aarhus Convention to embed public participation in the EU's climate governance architecture. Two key complementary instruments form the cornerstone of such governance: the National Energy and Climate Plans (NECPs) and the National Long-term Strategies (LTSS).

1.1.1 National Energy and Climate Plans

The EU National Energy and Climate Plans (NECPs) are documents prepared by each EU Member State that use a unified framework to consolidate previously fragmented EU-mandated planning, reporting, and monitoring obligations relating to climate and energy policy. Each NECP focuses on five key dimensions: decarbonisation, energy efficiency, energy security, the internal energy market, and research/innovation/competitiveness. The NECPs are decadal planning documents that are updated every five years through a two-step process. Member States first submit draft plans to the European Commission, which reviews them and provides recommendations. Following this feedback, Member States finalise their NECPs, which the Commission then evaluates for adequacy against EU objectives.

Public participation is embedded within this planning cycle. Member States are required to consult the public at both the draft and final stages of the NECP process. More specifically, Article 10 of the Governance Regulation requires Member States to ensure that the public is given "early and effective opportunities to

participate in the preparation of draft NECPs and, for the 2021–2030 period, in the preparation of final plans prior to their adoption”.

1.1.2 National Long-term Strategies

The EU National Long-term Strategies have their origins in international climate negotiations. Under the 2015 Paris Agreement, parties are invited to submit long-term low-emissions development strategies (Buylova et al., 2024; Cruanyes et al., 2024). In its 2016 proposal for the Governance Regulation, the Commission explicitly referred to these Paris Agreement strategies when discussing the requirement for long-term strategies within the EU (European Commission, 2016, p. 16). Indeed, many EU Member States have published essentially identical reports on both the EU LTS website and the UNFCCC website (compare Swedish Ministry of the Environment, 2019, 2020). Therefore, the LTSs followed a distinct path to inclusion in the Governance Regulation when compared to the NECPs. The NECPs were conceived as integrated ten-year national plans that were intended to streamline existing Member State reporting and planning requirements under EU legislation (as discussed in Section 1.1.1). In contrast, the LTS process in the Governance Regulation can be understood primarily as the incorporation of an existing international commitment into EU legislation.

The LTSs have several core components, including a description of the country’s 2050 target for GHG reductions, modelling of emissions pathways up to 2050 (at minimum), and discussion of other topics including renewable energy, energy efficiency, and climate adaptation. In addition, Article 10 of the Governance Regulation sets the same requirements for early, effective, and timely public participation for the LTSs as it does for the NECPs. While the Commission releases guidelines on the LTS process, they are not embedded in a formal review and recommendation process with the Commission. As a result, it has less leverage on Member State outputs, since it does not examine drafts and issue individual recommendations to national governments. This is reflected in the fact that many LTSs were missing at least one major component required under Commission guidelines and were subject to significant submission delays (Oberthür et al., 2023, p. 14). Poland has still not submitted an LTS as of June 2026.

1.2 Research questions & contributions

This report seeks to answer two related research questions. In the first part of the study, we assess the quality of NECP and LTS public consultations across four time periods and all EU Member States. We aim to explain which EU Member States can be considered high and low performers in conducting these consultations. In the second part of the study, we use these findings to select four NECP participation case studies and examine the conditions under which NECP public participation requirements become institutionalised as enduring participatory mechanisms within domestic climate and energy governance. In doing so, we make two distinct contributions. First, we introduce and implement a novel methodology to assess participation quality and compare countries using a robustness framework. Second, we provide an analytical framework to analyse the institutionalisation pathways of EU-mandated public participation in climate and energy governance.

Our report provides important policy-relevant findings. First, our analysis highlights uneven participation quality across EU Member States and over time. Public participation quality improves over the selected period (2018–2024), but many countries still do not report consultations in recent years. Secondly, in terms of robustness, we observe that Greece is a particularly robust champion in terms of participation quality, while a set of Central and Eastern European countries can be considered laggards. Surprisingly, countries with the highest participation scores were small- to medium-sized countries, such as Greece, Latvia and Slovenia. In contrast, Scandinavian countries and long-standing EU Member States with high levels of economic development were only able to reach the level of leaders or mixed performers.

For the second part of our study, we select four country case studies: Germany, France, Sweden and Slovenia. Our analytical framework distinguishes between substantive institutionalisation (where the EU-mandated process has been integrated by the country) and substitutive institutionalisation (where countries build on pre-existing national procedures of public participation to fulfil the output (reports) and outcomes (climate and energy policy planning)). Our analysis demonstrates how Slovenia fits the substantive model of institutionalisation, while Germany, France and Sweden rather correspond to a substitutive type of institutionalisation. Finally, reflecting on the conditions that enabled or hinder such institutionalisation of the NECP participation process, our analysis shows that the way the NECP process is perceived, whether it is seen

as a planning or a review process, impacts the degree and depth of the institutionalisation. Furthermore, our cases point towards the effects of multiple enabling conditions that reinforce each other. Among them, the stability of the administration, the time, knowledge and human capacity of both national administration and NGO, as well as the role of individual change agents.

1.3 Structure of the report

The rest of the report is structured as follows. In Section 2, we present our large-scale analysis of the quality of participation as reported by Member States in their NECPs and LTSs since 2018. Using an assessment framework based on existing academic literature and previous work we have conducted on this topic, we analyse participation quality across 106 NECP reports and 26 LTS reports. This research includes participation processes across two NECP cycles: the first cycle (drafts in 2018 and final plans in 2019) and the second cycle (draft updates in 2023 and final updates in 2024). In Section 3, we draw on the findings from the quantitative analysis to select four Member States for an in-depth analysis: France, Germany, Slovenia, and Sweden. This qualitative analysis focuses on the relationship between participation quality and the degree of institutionalisation of participatory processes between 2018 and 2024. Section 4 synthesises the findings from the two approaches, discusses overarching patterns, and addresses remaining open questions. It then concludes by situating the combined quantitative and qualitative analysis within the existing literature on NECPs, LTSs, and EU-mandated planning processes in the environmental policy domain more broadly. It also identifies unresolved issues and outlines directions for future research.

2. Participation quality in the NECPs and LTSs

2.1 Introduction

Given the importance of high-quality public participation for the creation of effective, socially acceptable climate policy, it is important to systematically measure the quality of those participation processes between countries and over time. In this respect, the NECPs and LTSs provide a unique opportunity to assess and compare participation quality across a large number of planning processes that are subject to the same participation requirements. Indeed, NECP participation processes have received prior attention in the literature. Righettini and Vicentini (2023) assessed participation in the first round of NECPs, which stretched between 2018 and 2019 and included all of the 54 reports published during that time period. Oberthur et al. (2025) extended this type of analysis to the initial draft NECPs of 2023, utilising a framework organised around three analytical dimensions: inclusiveness, robustness, and integration in the policymaking process. Our research builds on these studies, designing an updated analytical approach and extending the empirical coverage of our analysis to two full NECP cycles and the LTSs.

2.2 Measuring participation quality

The existing literature on assessing public participation quality is extensive and contains a diversity of assessment approaches (Bherer & Breux, 2012; Bobbio, 2019; Fung, 2006; Reed, 2008). Within that literature, a key distinction exists between evaluations of participation processes (i.e., process design and implementation) and participation outcomes (e.g., whether the process has reached specific goals such as reducing contestation, finding a consensus, etc.) (Chess & Purcell, 1999).

Within the evaluations of participatory processes, a substantial body of work analyses participation quality using three analytical dimensions: inclusiveness (who participates), deliberative quality (how participants interact), and policy impact (whether their input shapes policy) (Fung, 2006; Jager & Newig, 2024). This approach has the advantage of covering key themes from the literature on deliberative and participatory democracy, especially the need for a large, diverse participation process and the creation of sufficient space for high-quality deliberation. However, it pays less attention to another key principle of good governance, namely transparency (Addink, 2019). Transparency relates to the accessibility of information about the participatory process. It is a key indicator of participation quality, especially for non-participants, researchers, and other external actors.

Due to its importance, several scholars have suggested that transparency be included as a fourth dimension of participation (Font & Galais, 2011; Rowe & Frewer, 2000). Greater transparency can support the democratic legitimacy of public participation mechanisms, as well as making it possible to examine the limits of certain discussions (e.g., whether there is a process of stakeholder capture or missing aspects of the discussion). A further argument in favour of this addition is the empirical observation that transparency varies independently from the other dimensions: a participatory process can be highly inclusive, deliberative, and influential yet remain poorly documented and inaccessible to external scrutiny.

Therefore, we distinguish **four dimensions of participation quality: inclusiveness, deliberative quality, policy impact, and transparency**. For each dimension, we assess three criteria on a scale from 0 (not fulfilled) to 1 (fulfilled). The final score represents the unweighted sum of the 12 criteria, yielding a maximum possible score of 12. Equal weighting was used because, in the case of the NECPs and LTSs, high-quality public consultations require the fulfilment of multiple dimensions simultaneously (Oberthür et al., 2025; Aarhus Convention, 1998).

Inclusiveness: This dimension describes who can participate in the participation process and which mechanisms they can use to do so (accessibility). First, we assessed whether participants needed an invitation to access the consultation. On one hand, consultations relying only on invitations for selected participants may not adequately represent diverse viewpoints. On the other hand, fully open consultations risk representing only the most engaged citizens and stakeholders without reaching marginalised populations. We therefore examined whether the consultation process combined open participation with targeted invitations. Second, we assessed the number of participants engaged in the consultation process as a quantitative measure of participation diversity. Third, we assessed which groups participated, distinguishing between 1. citizens, 2. stakeholder organisations (including civil society, private interest groups and academics), and 3. local authorities. For the stakeholder group, at least two of the three sub-groups needed to participate for this group to be counted as represented. We included local authorities as a mandatory group because, in climate planning processes, they are well positioned to represent citizens' interests in what are often technocratic procedures (Wiehler & Stumm, 1995).

Deliberative quality: This dimension describes the quality of the interaction within a participation process, both between the participants themselves and between participants and organisers/government representatives. Participation can involve a request to receive input (one-way exchange) or a request to discuss a topic (two-way exchange). A high-quality process is also one that enables participants access to relevant information in a timely manner that gives them sufficient time to reflect on the issue. For this dimension, we assessed the quality of the deliberation process through three criteria. First, we examined whether participants had access to a draft of an NECP/LTS before or during the consultation process. Second, we assessed consultation length, examining whether the time provided was sufficient for participants to provide considered responses. Third, we evaluated the consultation method, distinguishing between one-way consultations (where participants submit input) and two-way consultations (enabling discussion amongst participants and with government about objectives and policy options before submitting input).

Policy Impact: This dimension describes the extent to which the participation process is given the means to impact decision-making. This can be measured through the extent to which the government has engaged with the output of the participation process, e.g., whether they explained why they agreed to incorporate certain recommendations and not others. This is important both for participants, to better understand how they contributed to the discussion, and for non-participants, to understand the scope of the discussion that has taken place, as well as its impact on the policy process. First, we assessed whether the public was involved early in the process, enabling genuine influence on decisions rather than providing input after decisions had been taken. Second, we examined whether the government included a summary of outputs of the consultation process in their NECP/LTS. Third, we assessed whether the government engaged with participants' input by explaining how it would or would not incorporate suggestions.

Transparency: This dimension describes the extent to which the participation process is communicated to the broader public. First, we examined whether information about participants was released. Second, we assessed whether a dedicated webpage had been established for the consultation process to explain its scope and objectives. Finally, we evaluated whether the public consultation was widely advertised to raise awareness and encourage participation.

Table 1: Dimensions and criteria to assess participation quality

See Annex A for a summary of the codebook used to assess these criteria and assign scores.

Dimension	Criterion	Description
Inclusiveness	Access	Whether the consultation was invitation-only or open to the public.
	Participation size	Measured the number of participants in the consultation process. ¹
	Participant diversity	Whether the consultation included participation by citizens, stakeholders and/or subnational authorities.
Deliberative Quality	Availability of draft	Whether a draft of the NECP/LTS was made available for the public consultation process.
	Consultation length	Measured the length of the consultation process. ²
	Diversity of participation methods	Whether the consultation was a one-way exchange (input seeking) or a two-way exchange (exchange of information).
Policy Impact	Consultation summary	Whether the NECP/LTS featured a summary of the input gathered during the consultation.
	Early involvement	Whether the consultation closed at least 3 months before submission of the NECP/LTS to the European Commission.
	Government reaction to comments	Whether the government included a discussion of how it planned to integrate the participation input into the NECP/LTS.
Transparency	Information about group participants	Whether the NECP/LTS disclosed the names and/or types of organised groups participating in the consultations.
	Website	Whether the government created a specific webpage about the NECP/LTS for the public to access information about the process.
	Awareness generation	Whether the process was advertised to the general public or not.

¹ Three categories were drawn empirically from the data: (1) below or equal to 50 participants; (2) between 51 and 200 participants; (3) above or equal to 201 participants.

² Three categories were drawn empirically from the data: (1) Between 1 and 20 days; (2) between 21 and 45 days; (3) above 45 days.

2.3 Methods

Our analysis of participation quality focused on the NECP and LTS reports. As noted in Section 1, the NECP process required Member States to submit a draft and final NECP to the Commission in 2018 and 2019, and a draft and final NECP Update in 2023 and 2024. As a result, each Member State submitted four reports over the period studied, resulting in 106 documents.³ During the same period, only one LTS was submitted per Member State, and our analysis was based on the 26 submitted documents (as of June 2026, Poland had not yet submitted its LTS). In cases where the reports were not written in English and a courtesy translation was not available on the European Commission website, we translated the document with Google Translate, using DeepL to check shorter amounts of text.

Both the NECPs and the LTSs are extensive documents that often run to hundreds of pages. As a first step, our analysis therefore focused on the relevant section of each NECP/LTS that addressed public consultation (Section 1.3). In addition, we also examined the broader documents through keyword searches and analysed any annexes and directly referenced summary documents.

Each report was coded independently by two researchers using the criteria presented in Table 1.⁴ Codes were then converted into scores for each criterion (between a minimum of 0 and a maximum of 1). The detailed codes and corresponding scores for each criterion can be found in the codebook in Annex A. Initial inter-coder agreement was 75% for the NECPs and 73% for the LTSs. The coders met iteratively throughout the process to discuss differences, clarify the codebook, and arrive at finalised, shared coding and scoring for each report.

2.3.1 Robustness framework

We developed an assessment of participation quality combining three different but related assessment metrics. We designed this novel threefold assessment to provide a sense of how ‘robust’ a country performance is. For example, it allows us to distinguish countries that simultaneously fulfil normative criteria, are ahead of other Member States and conduct high-quality participation over several time periods, from countries that fulfil only one of these criteria. In other words, while a high performance on each of these metrics is necessary to conclude that a country is conducting high-quality participation, none of these metrics alone is sufficient.

The assessment is therefore based on a two-step analytical process. First, for each metric, we categorise countries according to four different performance levels, namely ‘champions’, ‘leaders’, ‘mixed performers’ and ‘laggards’ (see Table 2). Second, we assess how countries fared overall. For example, if, for each metric, France consistently stays in the leader category, then we can say that France is a robust leader on public participation quality in NECPs. Obviously, not all countries are consistently associated with one category, which is why we apply a “two-out-of-three rule” meaning that for a country to be associated with a specific category, it must meet that category’s threshold for at least two of the three metrics. We call this a robust finding.

However, in cases where countries are in three different categories across the three metrics, we associate them to the intermediate category (e.g., a country that is associated with the leader, mixed performer and laggard category, will be associated with the mixed performer category because it sits between leader and laggard). We call this a weak finding, as the robustness of the result is limited, meaning that the country is not very consistent and that specific aspect(s) of participation quality can be identified as lagging.

The three metrics are:

Metric 1: Normative quality: We assessed this metric by calculating the mean participation quality score obtained by each country, including only years where countries conducted public consultations. We do this for two reasons. First, including country-year pairs in which no consultation has happened would systematically distort the scores negatively, while the objective is to assess the quality of those that effectively took place. Second, we capture the frequency of consultations separately by the third quality perspective ‘consistency’, in which countries that conduct high-quality participation but in a selective manner are sanctioned.

³ The 2024 Final Updated NECPs from Belgium and Poland are not integrated in the assessment since they were not published during the period of the data collection.

⁴ The NECP reports were coded by Lea Schewe and Miles Weemes. The LTS reports were coded by Brendan Moore and Miles Weemes.

We set the following threshold to measure the normative quality: countries that have an average score between 10 and 12 are classified as “champions”. “Leaders” score from 8 up to but not including 10; and the “mixed performers” reach scores from 6 up to but not including 8. An average score of 6 or below serves as the upper boundary of the laggard category. Below this point, it means that over the observed period, a country fails more criteria than it meets, and that further classification of participation quality becomes analytically unwarranted because it reflects systematic non-compliance with the minimum substantive requirements of the framework.

Metric 2: Relative performance: This metric is assessed by calculating the number of years in which a country's participation quality score fell within the top quartile of performers. The top quartile represents the top 25% of a ranked data set. Therefore, it allows us to capture the relative standing of a country within the group: a country may score well in absolute terms yet perform modestly relative to its peers or conversely achieve a high rank in a year of generally low performance. We considered the top quartile as a proxy for the yearly relative performance rather than a fixed cutoff, as the threshold adjusts to the overall dataset and considers outliers (e.g., a year with many countries not conducting public consultations).

For this perspective, we define champions as the countries whose participation quality score fell within the top quartile of performers 3 or 4 times. We include countries that did so 3 times to mitigate the low overall participation rates observed in 2018, due to the short time between adoption of the Governance Regulation and the due date of the draft NECP. Countries that were in the top quartile two times are considered leaders, where countries that make it once are considered mixed performers. Countries that, overall, did not reach the top quartile of performers at any time are labelled as laggards.

Metric 3: Consistency over time: this metric is assessed by calculating the number of times that a public consultation was conducted, out of four observed periods. We consider champions as those that reported public consultations four times, leaders those that reported three times, mixed performers those that reported twice and laggards those that reported only once.

Concretely, we develop a table in which, for each metric, we associate four country categories that correspond to different performance levels (e.g., champions, leaders, mixed performers and laggards). Table 2 outlines these four categories and the corresponding measure for each metric.

2.3.2 Limitations

Given the large number of cases studied and the need for a consistent analytical approach, our analysis relies on the information reported by EU Member States in the NECPs and LTSs. In other words, the dataset used for this assessment only represents the governmental view of the participation process, and there can therefore be incomplete or missing information. Our analysis does not directly incorporate the views of participants such as NGOs, business stakeholders, or citizens. Furthermore, we chose to focus our analysis on the largest number of cases possible, translating into an assessment that focused on a standardised comparative setting. Therefore, this analysis provides only a limited amount of detailed information about the participation process and its implementation.

Table 2: Categorisation of country performance on participation quality.

Country category	Normative quality Mean quality scores in years with participation, out of 12 points.	Relative performance Frequency of scores within the top 25% of countries.	Consistency over time Frequency of public consultations.	Robustness
Champions Countries that reach the normative definition of high-quality participation.	10–12	3 or 4 times	4 consultations	Robust finding: countries that reach the champion category at least two times
Leaders Countries that demonstrate good practices of high-quality participation but can still improve.	8–10	2 times	3 consultations	Robust finding: countries that reach the leader category at least two times Weak finding: countries that fall within three different categories (champion, leader, and mixed performer; or: champion, leader, and laggard)
Mixed Performers Countries that occasionally meet quality thresholds but do not sustain them.	6–8	1 time	2 consultations	Robust finding: countries that reach the mixed performer category at least two times Weak finding: countries that fall within three different categories (leader, mixed performer, and laggard; or: champion, mixed performer, and laggard)
Laggards Countries that fall below minimum thresholds on average.	0–6	0 times	1 consultation	Robust finding: countries that fall within the laggard category at least two times

2.4 Assessment of National Energy and Climate Plans

Table 4 presents the participation quality scores for the NECPs of each EU Member State. A score marked as 0 means that a Member State did not conduct a public consultation for an NECP.

2.4.1 Temporal patterns

Table 4 outlines the distribution of scores over time. 2019 is the only year where all countries conducted public consultations for the NECPs. It is also the year with the highest median score (7.3). In contrast, in 2018 countries had the lowest scores for participation quality with a median of 3.7 and 5.7 excluding countries that did not conduct a consultation in that year. The latter can be explained by the fact that the Governance Regulation entered into force on 24 December 2018, while Member States were required to submit their draft NECPs 7 days later, on 31 December 2018. This left little time for countries to conduct public consultations. Those that did report consultations mostly discussed consultations they had previously conducted on national climate and energy policy (i.e., not on the NECPs per se). In both 2023 and 2024, countries recorded median participation scores of 5.8, slightly below the score (6) that leads to classifying countries as laggards. If we focus the assessment only on the consultations that took place, the median scores rise to 6.3 (2023) and 7.2 (2024), above average and signalling a clear difference between draft and final NECP updates. In both 2018 and 2024, at least a quarter of Member States did not conduct public consultations (Table 3). At the same time, the highest scores were attained in the first cycle (2018–2019) with 10.7 (Greece) and 10.3 (Malta).

From these two NECP cycles, when comparing draft and final consultations (2018–2019 and 2023–2024), participation quality improved between the draft and final phases for the first NECP but stagnated for the updated NECP considering the whole pool of countries. When excluding countries that did no consultations, then the final updated NECP consultations were of better quality than for the draft updated NECPs. This stagnation when looking at all countries together is puzzling, given that countries had more time to prepare the consultations and had already developed experience with NECP-related public consultations. This is not only reflected in the quality, but also in the number of countries that carried out public consultations. As said above, a quarter of countries did not do consultations for the 2024 final updated NECP. In other words, the progression of participation quality over time is limited: it only concerns countries that did participation, while overall the number of countries bypassing this requirement increased.

Table 3: Distribution of scores for NECP consultations

Years	2018	2019	2023	2024
Minimum	0	2	0	0
Quartile 1	0	5.7	1	0
Mean	3.5	6.9	4.5	5.0
Q2/Median	3.7	7.3	5.8	5.8
Quartile 3	6.0	8.4	6.6	8.3
Maximum	10.7	10.3	9.4	10.0
Range	10.7	8.3	9.4	10.0

Table 4: Performance of EU Member States on NECP consultations

Reported as score out of 12.

Member State	2018	2019	2023	2024
Austria	6.0	5.7	6.5	0.0
Belgium	6.5	8.3	6.0	0.0
Bulgaria	0.0	4.7	4.8	0.0
Croatia	3.0	5.7	4.7	0.0
Cyprus	0.0	8.9	5.8	6.8
Czechia	5.3	3.8	6.2	7.5
Denmark	0.0	7.3	6.8	5.8
Estonia	7.8	3.7	6.5	4.7
Finland	8.2	6.8	6.8	7.2
France	9.0	6.8	8.0	0.0
Germany	0.0	8.4	0.0	8.3
Greece	10.7	6.7	6.9	8.5
Hungary	3.7	4.0	5.2	0.0
Ireland	6.0	4.8	0.0	9.7
Italy	0.0	9.5	6.2	5.4
Latvia	7.2	8.7	0.0	10.0
Lithuania	0.0	7.3	4.8	5.3
Luxembourg	0.0	8.7	8.9	0.0
Malta	4.3	10.3	0.0	4.8
Netherlands	0.0	8.0	2.0	9.7
Poland	0.0	7.0	0.0	0.0
Portugal	4.5	8.4	6.7	8.2
Romania	5.2	7.3	0.0	6.7
Slovakia	2.0	2.0	2.0	2.0
Slovenia	0.0	8.5	9.4	9.3
Spain	0.0	7.0	6.5	6.8
Sweden	3.8	8.3	0.0	9.0
# Consultations	16 (59%)	27 (100%)	20 (74%)	19 (70%)
Median (incl. 0)	3.7	7.3	5.8	5.8
Median (excl. 0)⁵	5.7	7.3	6.3	7.2

⁵ Excluding countries that did not carry out consultations (those with a score of 0) focuses the assessment on the participation quality of the consultations that did take place.

2.4.2 Country performance patterns

For an overview of performance by country, see Table 5 (next page).

Champions

Greece

Greece is the only Member State that reaches the highest performance threshold of public consultations in the NECPs. Greece was a top performer three times (2018, 2023, 2024) and conducted consultations for all four NECP rounds. It achieves one of the highest participation quality scores in 2018 (10.7). However, the average quality of public participation of Greece is 8.2, meaning that it falls below the limit set to be considered a champion in terms of the quality of the participatory process.

Leaders

France, Finland, Germany, Ireland, Latvia, Luxembourg, Portugal & Slovenia.

The leader category includes 8 countries, among which a few countries are wealthier, Western European countries (France, Finland, Germany, Ireland, Luxembourg). We also find two Eastern European countries, Latvia and Slovenia, as well as Portugal as a Southern European country.

France, Germany, Ireland, Latvia, Luxembourg and Slovenia can be considered leaders (robust finding), since they reach the leader category on at least two out of three metrics. Latvia and Slovenia even reach the champions threshold for their relative performance (Slovenia: 2019, 2023, 2024; and Latvia: 2018, 2019, 2024). On the other hand, Germany and Luxembourg only reach the mixed performer group in terms of time consistency given that they reported only two consultations out of the required four. France and Ireland only reach the mixed performer threshold for the normative quality of the participatory process since their normative quality score is respectively 7.9 and 6.8.

On the other hand, Finland and Portugal are rather weak leaders because their performance across the metrics is divided between the champion, leader and mixed-performer categories.

Mixed performers

Austria, Belgium, Cyprus, Denmark, Estonia, Italy, Malta, Netherlands, Romania, Spain & Sweden

The mixed performer category includes 11 countries that are very diverse in terms of economic development and geographical position. Overall, in terms of population size, these countries are mostly small to middle-sized countries, except Italy and Spain.

Belgium, Cyprus, Denmark, Italy, Malta, Netherlands and Sweden can be considered robust mixed performers. Additionally, they score once among the leader category as they reported three consultations out of the four necessary ones.

On the other hand, Austria, Romania and Spain can be considered weak mixed performers, because while they are mixed performers in terms of normative quality, they are considered laggards in the relative performance, but report three consultations out of the four necessary ones. Estonia is a unique case, because it reports on four consultations (ranking therefore as champion in terms of consistency), while reaching the mixed performer threshold in terms of relative performance but at the same time, the average quality of the participation process is below 6.

Laggards

Bulgaria, Croatia, Czechia, Estonia, Hungary, Lithuania, Poland, and Slovakia.

The countries identified as laggards in our assessment are 8 post-Communist countries. Interestingly, here as well two groups can be distinguished. First, a majority of countries are laggards on normative quality and relative performance but champions or leaders on consistency. On the other hand, Bulgaria and Poland were laggards across almost all categories (Bulgaria reporting only two consultations out of four, and Poland only one).

Table 5: Results of countries performance along the robustness framework.

Country category	Normative quality (Mean quality score in years with participation)	Relative performance (frequency of scores within top quarter)	Consistency over time (frequency of public consultations)	Robustness
Champions Countries that reach the normative definition of high-quality participation	-	Latvia, Slovenia, Greece	Czechia, Estonia, Finland, Greece, Portugal, Slovakia	Robust finding: Greece
Leaders Countries that demonstrate good practices of high-quality participation but can still improve	Germany, Greece, Latvia, Luxembourg, Slovenia	Finland, France, Germany, Ireland, Luxembourg, Portugal	Austria, Belgium, Croatia, Cyprus, Denmark, France, Hungary, Ireland, Italy, Latvia, Lithuania, Malta, Netherlands, Romania, Slovenia, Spain, Sweden.	Robust finding: France, Germany, Ireland, Latvia, Luxembourg, Slovenia Weak finding: Finland, Portugal
Mixed performers Countries that occasionally meet quality thresholds but do not sustain them.	Austria, Belgium, Cyprus, Denmark, Finland, France, Ireland, Italy, Malta, Netherlands, Poland, Portugal, Romania, Spain, Sweden	Belgium, Cyprus, Denmark, Estonia, Italy, Malta, Netherlands, Sweden	Bulgaria, Germany, Luxembourg	Robust finding: Belgium, Cyprus, Denmark, Italy, Malta, Netherlands, Sweden Weak finding: Austria, Estonia, Romania, Spain
Laggards Countries that fall below minimum thresholds on average.	Bulgaria, Croatia, Czechia, Estonia, Hungary, Lithuania, Slovakia	Austria, Bulgaria, Croatia, Czechia, Hungary, Lithuania, Poland, Romania, Slovakia, Spain	Poland	Robust finding: Bulgaria, Czechia, Croatia, Hungary, Lithuania, Poland, Slovakia

2.5 Assessment of National Long-term Strategies

Twenty Member States reported public consultations related to the Long-term Strategies (Table 6). Six submitted strategies but did not report consultations, while Poland has not yet submitted its LTS as of June 2026. The median quality score across all Member States was 5.84 and the mean was 5.11. The median score was lower than the score for the 2019 Final NECPs but similar to the 2023/2024 updated NECPs. If we look only at the Member States that performed LTS consultations, the median score was 6.58, also within the range of the updated NECPs.

Sweden had the highest overall LTS participation quality score at 10. Of the countries that carried out a consultation, Finland had the lowest score at 3.66. Among implemented consultations, inclusiveness and deliberation quality were the highest scoring dimensions on average (mean: 2.1 out of 3). The policy impact dimension was slightly lower at 1.8, and transparency was lowest at only 1.2 out of 3.

2.6 Overview and comparison

Regarding the NECPs, there was no steady improvement in participation quality over time and there were still a substantial number of countries that did not carry out consultations in the second round of updated NECPs. On the other hand, when looking at each combined NECP cycle (draft and final), every country carried out at least one consultation related to either the draft or final version.⁶ However, the Governance Regulation requires countries to conduct public participation at each stage of the NECP, and this was not respected.

Our assessment of participation quality showcases that most of the countries are consistent in the way they deliver public consultations, in the sense that they fare relatively similarly across the three-assessment metrics. Six countries showcase very different performance results across the three metrics, reflecting specific strengths and weaknesses. Greece stands out as the country with the highest-quality NECP public participation from the normative, relative, and consistency perspectives. On the other hand, we find a sizeable group of laggards in ex-Communist, Central and Eastern European Member States, which may reflect more structural difficulties with conducting high-quality participation processes. For future policymaking, this may require more specific, focused support from the EU institutions to guarantee better conditions for conducting meaningful participation processes in these countries. However, other countries with the same profile, including Slovenia and Latvia, fared particularly well, doing better than wealthier, Western European countries. The conditions underlying these different trajectories require further investigation.

The relationship between participation quality in the NECPs and the LTSs leads to several puzzling results. The consultations on NECPs and LTSs show little evidence of alignment, meaning that countries that conducted high-quality consultations for NECPs rarely did the same for LTSs, and some laggards for NECPs consulted the public in a meaningful way for LTSs. Average NECP scores for each country have a very weak correlation with that country's LTS scores (-0.10 Pearson Correlation). Several NECP champions/leaders had low LTS quality scores (Latvia, Slovenia) or did not carry out an LTS consultation (Greece). Similarly, Slovakia did poorly on the NECPs but had the second highest score for the LTS.

This could mean that conducting meaningful participation processes is possible in different contexts, but that the multiplication of these processes for different purposes faces capacity barriers. Three consultations were required for the NECPs and the LTS in a short period of time in the 2018–2020 period, which may have created capacity problems (e.g., budget, human resources) but also consultation fatigue from participants. Another potential explanation for the divergence is that these two national climate planning approaches may align better with either NECPs or LTSs (e.g., short/medium term planning or long-term planning), making it easier and more effective to develop a participation process for one of these processes.

⁶ Poland's final updated NECP is yet to be published and has not been integrated in this study.

Table 6: Performance of EU Member States on LTS consultations

Country	Total Score (out of 12)	Inclusiveness (out of 3)	Deliberative Quality (out of 3)	Policy Impact (out of 3)	Transparency (out of 3)
Austria	8.5	3	2	3	0.5
Belgium	0	0	0	0	0
Bulgaria	4.83	1.33	1.5	1	1
Croatia	4.83	1.33	1.5	2	0
Cyprus	5.83	1.33	3	1	0.5
Czech Republic	0	0	0	0	0
Denmark	0	0	0	0	0
Estonia	0	0	0	0	0
Finland	3.66	1.33	0.83	1	0.5
France	9.17	3	1.67	3	1.5
Germany	4.5	1	2	1	0.5
Greece	0	0	0	0	0
Hungary	7	2.67	2.33	1	1
Ireland	8.01	2.34	1.17	3	1.5
Italy	8.01	2.34	1.67	3	1
Latvia	6.66	2.33	2.33	0	2
Lithuania	0	0	0	0	0
Luxembourg	6.5	2.67	2.33	0.5	1
Malta	6.34	2.67	2.67	0.5	0.5
Netherlands	7.84	2.67	1.17	2	2
Poland	0	0	0	0	0
Portugal	5.67	1.67	3	0	1
Romania	5.84	1.34	3	1	0.5
Slovakia	9.83	2.33	2	3	2.5
Slovenia	6.01	2.34	2.67	1	0
Spain	8.84	2.34	2.5	3	1
Sweden	10	2	3	2.5	2.5
Mean (incl. 0)	5.11	1.56	1.57	1.2	0.8
Mean (excl. 0)	6.89	2.1	2.1	1.8	1.2
Median (incl. 0)	5.84	1.67	1.67	1	0.5
Median (excl. 0)	6.58	2.33	2.17	1.5	1

3. Case studies: Participation in the NECPs

3.1 Introduction

In our quantitative assessment of the public participation quality of the NECPs and LTSs, we demonstrated the breadth of participation practices across EU Member States and revealed variation between countries and over time. We also found a stagnation of participation quality in the second NECP cycle and a puzzling divergence between countries' NECP and LTS performance. Given its broad scope, this quantitative assessment could not examine how participation processes were organised in practice, why some Member States invested in NECP-specific public participation measures while others did not, and, most importantly, whether the participation requirements of the Governance Regulation created durable changes in domestic climate and energy governance. This second study therefore complements the quantitative breadth with qualitative depth, asking how public participation has changed through EU intervention and under what conditions high-quality participation becomes embedded in national institutions and practices.

Building on the Aarhus Convention, the Governance Regulation obliges all Member States to ensure “early and effective opportunities” for the public to participate in the preparation of their plans (Article 10) and to establish multilevel climate and energy dialogues in which local authorities, civil society organisations, the business community, investors and the general public can engage (Article 11). In this way, the EU created new, uniform participation requirements for national climate and energy policy planning (Newig & Koontz, 2014). The literature on the Governance Regulation has characterised this arrangement as a form of “harder soft governance” (Bruch et al., 2024; Lindberg & Wettestad, 2024) or experimentalist governance (Bocquillon & Maltby, 2025), in which iterative planning, review, and recommendation cycles are intended to ratchet up both ambition and procedural quality without direct enforcement. Existing assessments of this arrangement have concentrated on the quality of individual consultations (Oberthür et al., 2025; Righettini & Vicentini, 2023; see also Section 2) or on the implementation of specific provisions such as the Article 11 dialogues (Faber et al., 2025). However, there has been little systematic attention to whether the repeated application of these requirements across successive planning cycles produces lasting change in how Member States organise participation.

To help fill this research gap, we examine how NECP-related participation has developed over time in four national case studies. Our central research question is:

Under what conditions do NECP public participation requirements become institutionalised as enduring participatory mechanisms within domestic climate and energy governance?

Answering this question requires distinguishing between two possible outcomes. First, EU-mandated participation may help create durable mechanisms that persist beyond the NECP process and become embedded in wider domestic governance. Second, it may remain a largely procedural exercise, repeated when submission deadlines approach but leaving domestic routines unchanged or justified by referring to participation processes that would have taken place anyway. Only the first outcome would suggest that the Governance Regulation has strengthened the democratic infrastructure of national climate governance, which was among its stated aspirations (Oberthür et al., 2025).

To investigate this question, the study draws on two strands of literature. The first concerns public participation in environmental and climate governance, introduced in Sections 1 and 2 of this report. This literature provides normative benchmarks for high-quality participation and advocates the implementation of early, inclusive, and effective processes (Glucker et al., 2013; Lucas et al., 2024). It also highlights the risk that legally protected participation rights may become shallow, bureaucratic exercises when opportunities to influence decisions remain limited (Lee et al., 2013). The second strand of literature focuses on institutionalisation, understood as the process through which new norms, rules, and practices become embedded in formal and informal institutions and gain stability over time (e.g., Drasko & Fiket, 2026; Elsässer et al., 2026; Fiket et al., 2026; Marquardt et al., 2023). We use institutionalisation as an analytical lens to identify observable change and compare the durability of public participation measures across countries.

Following these literatures, we assess the institutionalisation of NECP-related participation by examining four

observable dimensions:

- *Discursive change*: Whether the NECP requirements for public participation have changed the way relevant actors, both state and non-state, speak about public participation;
- *Legal codification*: Whether participation requirements connected to climate and energy planning have been anchored in national law or binding rules;
- *Organisational change*: Whether standing bodies or platforms have been created (or repurposed) to host participation on the plans, or whether ministries have built dedicated capacities, units, or responsibilities for organising participation;
- *Procedural routinisation*: Whether consultation practices recur across cycles in a predictable, standardised form rather than being improvised.

Beyond this conceptualisation and analytical framework, we also draw on multi-level governance and Europeanisation research. This literature suggests that the domestic effects of a uniform EU obligation are shaped by its fit with pre-existing national institutions (Börzel, 2002; Börzel & Risse, 2003; Wiener et al., 2019). Where dense participatory structures already exist, governments may treat the EU requirement as redundant and fulfil it by referring to existing channels. Where such structures are absent, the same requirement may instead encourage new participatory institution building. This leads us to distinguish between two types of institutionalisation. The first is *substantive institutionalisation*, where observable change across the dimensions outlined above can be plausibly attributed to the NECP process, indicating NECP-specific institutionalisation. The second is *substitutive institutionalisation*, where existing participatory institutions stand in for NECP requirements, but no – or only limited – NECP-specific institutionalisation takes place. Here, substitutive institutionalisation may take either a declaratory or an operational form. *Declaratory institutionalisation* refers to cases in which governments present pre-existing participatory arrangements as sufficient to fulfil the requirements of the Governance Regulation, without demonstrating their equivalence or adapting them to the NECP process. *Operational institutionalisation*, by contrast, occurs when existing arrangements are actively revised, extended, or connected to the NECP process so that the relevant EU requirements are fulfilled in practice.

Beyond the four outcome dimensions, the case studies also examine the conditions that shape institutionalisation, including both conducive and hindering factors. Building on the literatures above, and on the findings of Section 2, we attend to factors including (1) the quality of the NECP participation processes, since well-designed processes are more likely to generate positive feedback among participants; (2) legal-administrative receptivity, i.e., the capacity and disposition of national administrations to absorb new procedural obligations (Guy et al., 2023); (3) societal pressure, i.e., the extent to which civil society organisations and other stakeholders demand, monitor, and litigate participation (Bruch et al., 2024); (4) EU oversight and leverage, i.e., the comprehensiveness and specificity of Commission review, recommendations, and enforcement; and (5) contextual conditions, such as electoral cycles and external shocks, which may have influenced NECP cycles. These conditions are further explored inductively by comparing findings across the examined cases.

The remainder of this section proceeds as follows. Section 3.2 presents the research design, case selection, and methods. Sections 3.3 to 3.6 present the four country case studies of Germany, France, Sweden, and Slovenia, each structured around the participation context, the two NECP cycles, and an overall assessment of NECP-specific institutionalisation of public participation. Section 3.7 discusses the comparative findings and their implications for the role of the EU in inducing participatory change in Member States.

3.2 Research design and methods

We employ a comparative case study design covering four EU Member States: France, Germany, Slovenia, and Sweden. Cases were selected following a diverse-case logic (Seawright & Gerring, 2008) to maximise variation on the dimensions that the literature and the results of Section 2 identify as relevant. First, the cases vary in their performance on NECP participation quality as measured in Section 2. Germany, France, and Slovenia belong to the leader category, albeit with different profiles. Germany is a leader in normative participation quality and in terms of relative performance, but a mixed performer in terms of consistency over

time. France is a mixed performer in terms of normative participation quality but a leader regarding its relative performance and consistency over time. Slovenia is a leader in normative participation quality and consistency over time as well as a champion in relative performance. In addition, we also included Sweden as a mixed performer that skipped consultation on its 2023 draft update entirely and was a mixed performer for the normative participation quality of its consultations and its relative performance. In addition, it was categorised as a leader in terms of consistency over time. We also expected Sweden to fare better overall as a country that is generally described as a leader in climate governance and deliberative democracy (see also Lindberg & Wettestad, 2024).

Second, the cases vary in their prior participatory traditions and existing institutional architecture. Germany combines a neo-corporatist tradition of routinised stakeholder consultation with a more recent use of deliberative consultation formats. Sweden has a long-standing and highly institutionalised process of written stakeholder consultation on legislation. France combines statist planning with a comparatively rich participatory infrastructure, including standing consultation bodies and a permanent national commission on public debate. Slovenia, by contrast, embarked on the NECP process with comparatively limited experience of structured public participation in climate and energy policy. This was partly due to failed earlier attempts to adopt a national climate and energy strategy, leaving no stable planning framework around which participatory routines could develop.

The empirical analysis follows the method of structured, focused comparison (George & Bennett, 2005). Each case study addresses the same four elements: (1) the participation context, covering the country's participatory traditions and the political circumstances of the two NECP cycles; (2) the first NECP cycle (2018–2020); (3) the second NECP cycle (2023–2024); and (4) an overall assessment of institutionalisation along the four dimensions and two types introduced in Section 3.1. The cross-case comparison in Section 3.7 then identifies common mechanisms and patterns of institutionalisation across the four countries.

The analysis draws on three main types of data. First, primary documents include the draft and final NECPs of both cycles (especially their consultation chapters and annexes) as well as the European Commission's assessments, recommendations, and factsheets on each plan. Furthermore, we analysed national legal texts and administrative rules governing consultation. Second, we conducted an in-depth desk study of third-party assessments by civil society organisations and drew on existing studies on public participation in the context of the NECPs (CAN Europe & WWF, 2023; Duwe et al., 2019; Sicaud-Clyet & Didi, 2025). Third, we carried out a series of semi-structured expert interviews conducted between May and July 2026 with government officials responsible for NECP coordination, representatives of national civil society organisations engaged in the NECP processes, and representatives of European civil society networks monitoring NECP implementation (see Table 7). Interviews lasted between 45 and 90 minutes and are cited in pseudonymised form. Non-English documents and interviews were analysed in the original language by the respective country experts in the research team.

The research design has several limitations. First, while four cases provide an in-depth account of public participation processes in the context of the NECPs, our results can only be generalised to the universe of cases (all EU Member States) to a limited extent. Second, we relied on a small number of interviews per country, which means that some actor perspectives, especially from subnational governments and businesses, are under-represented. Where we could not obtain the governmental perspective directly, we triangulated civil society accounts with the government's own reporting in the NECPs and the Commission's assessments. Finally, institutionalisation is a slow-moving outcome, and we observe it here across only two completed planning cycles. Our assessments are therefore necessarily provisional and focus on the direction of change as much as on its current depth.

Table 7: Interview list

#	Affiliation	Country/level	Date
1	Civil society organisation involved in the NECP process	Germany	12 May 2026
2	Civil society organisation involved in the NECP process	Germany	13 May 2026
3	EU-level civil society organisation involved in the NECP process (group interview, two participants)	EU	1 July 2026
4	Civil society organisation involved in the CNTE	France	20 May 2026
5	Civil society organisation involved in the CESE and CNTE	France	18 June 2026
6	Member of public debates organised by the CNDP on topics related to the energy transition.	France	24 June 2026
7	Civil society organisation involved in the NECP process; former government official	Sweden	7 July 2026
8	Government official involved in NECP process	Slovenia	20 May 2026
9	Government official involved in NECP process	Slovenia	29 May 2026
10	Civil society organisation involved in NECP process	Slovenia	12 June 2026

3.3 Germany

3.3.1 Context

Germany's approach to stakeholder involvement in policymaking reflects two distinct traditions. The first is a long-standing neo-corporatist mode, in which organised interests are routinely consulted during policymaking. Federal ministries often draft legislation in close contact with associations representing industry, trade unions, and environmental organisations. This is reinforced through formal association consultation, or "Verbändebeteiligung," which requires ministries to share draft bills with affected associations before cabinet adoption. In climate and energy policy, this model has been both stabilising and limiting. It gives organised environmental interests access to policymaking, but it tends to privilege peak associations over the wider public. The Coal Commission of 2018–2019 is a key example of this, which brought together government, industry, trade unions, environmental organisations, regional representatives, and academics to negotiate Germany's coal phase-out.

The second tradition is a more recent but uneven embrace of broader participatory and deliberative formats. This includes statutory early public participation in infrastructure planning, introduced in 2012 after the Stuttgart 21 protests (2010), participation requirements in electricity grid planning (Schweizer et al., 2016), and citizens' assemblies organised by civil society, including the 2021 "Climate Citizen Assembly" (Bürgerrat Klima). Research on the German energy transition has emphasised both the importance of citizen participation for the acceptance of the Energiewende (Langer et al., 2017; Schroeter et al., 2016), and the persistent gap between this emerging participatory landscape and policymaking at the federal level, which remains strongly shaped by organised interests and corporatist routines (Herberg et al., 2020; Radtke, 2025).

Politically, the German NECP processes spanned three federal election cycles. The first cycle fell under the third and fourth Merkel governments, with the Federal Ministry for Economic Affairs and Energy (BMWi) coordinating the plan. The second cycle was conducted by the Scholz government's renamed Federal Ministry for Economic Affairs and Climate Action (BMWK), which held an explicit mandate for dealing with climate change. Since 2025, responsibility has passed to the Merz government's Federal Ministry for Economic Affairs and Energy (BMWE), under which civil society expect climate-related participation to receive lower priority (Interview 1, German NGO). Germany reported public consultations for the NECPs in two of the four reporting

periods, both for the final plans. In both cases, these consultations performed well on consultation length, summary provision, and early involvement. However, participant diversity and reported participation size declined between the two cycles, while transparency-related criteria, such as the use of a dedicated website and proactive advertisement, improved. Overall, Germany qualifies as a robust leader in participation quality (see also Section 2), but its engagement with the public on NECPs has been inconsistent.

3.3.2 First NECP process (2018–2020)

Germany submitted its draft NECP on 20 December 2018, ahead of the EU deadline. The 143-page document followed the Commission’s template and drew almost entirely on existing legislation and previously agreed measures, since the parallel negotiations on the national “Climate Action Programme 2030” had not concluded by the submission date (Lindberg & Wettestad, 2024). In effect, the consultation chapter of the draft was largely a placeholder. It stated that consultations would be conducted in the course of 2019 and that the ministry would provide information on participation opportunities on its website. The NECP process initially received little public attention in Germany, and both government representatives and stakeholders perceived it as less important than the ongoing national policymaking processes (Interview 2, German NGO; Lindberg & Wettestad, 2024). In fact, the draft emphasised that Germany’s targets were nationally driven and would be pursued “independently”. In its assessment of the draft, the Commission merely observed that the public consultation had “recently started”, and none of its eleven recommendations to Germany addressed participation (European Commission, 2019a, 2019f). A civil-society assessment of all draft NECPs was considerably harsher, ranking Germany 26th out of 28 Member States overall on a composite index that included the quality of the drafting process and stakeholder engagement (Duwe et al., 2019, p. 5).

The consultation itself took place between 14 June and 2 August 2019, after the draft had been submitted, in the form of an online survey structured around the five dimensions of the Energy Union. It attracted 200 responses, of which roughly half came from private individuals (96), followed by companies (28), industry associations (21), NGOs and civil society organisations (18), environmental associations (14), research institutions (10), and eight of the sixteen Länder (BMW, 2020, p. 32). The final NECP, submitted in June 2020, reproduced a summary of the responses “without the addition of any comments” and stated that the extent to which responses had been taken into consideration was “clear from the NECP”, pointing to the far-reaching energy and climate policy decisions taken in the second half of 2019, in particular the Climate Action Programme 2030 and the implementation of the Coal Commission’s recommendations (BMW, 2020, p. 32). The plan also situated the NECP consultation within a broader landscape of “regular exchanges of information with stakeholders” in the ministry’s standing energy transition platforms. In parallel, Germany conducted a comparatively elaborate regional consultation with neighbouring countries and other Member States in April 2019, including a high-level ministerial meeting, an all-day consultation covering all five dimensions of the plan, and a written comment procedure.

The first NECP cycle illustrates a pattern in the German approach to consultation that would repeat itself in 2023–2024. Procedurally, the consultation met several of the quality criteria assessed in Section 2. It was open, reasonably long, drew a diverse set of participants, and its results were summarised in a dedicated annex. Substantively, however, it was conducted on a completed draft whose content had been settled in parallel national processes, and neither the plan itself nor the Commission’s final assessment could establish how the input had shaped the document. The Commission noted explicitly that Germany had submitted a detailed summary of the public’s views but that “the plan does not always make it clear how those views were taken into account” (European Commission, 2020, p. 4). More fundamentally, Germany had only consulted the public on the NECP once, but the Governance Regulation made clear that versions of both the draft and final plans should receive public input. Finally, the German government’s implicit logic—that the NECP should compile existing national measures, each of which underwent consultation in its own legislative process—went largely unchallenged in the first cycle but would become the central point of contention in the second.

3.3.3 Second NECP process (2023–2024)

In the aftermath of the 2022 energy crisis, Germany missed the EU deadline of 30 June 2023 for its draft updated NECP, submitting it more than four months late on 3 November 2023. Civil society mobilised earlier and more visibly than in the first cycle (Interview 1, German NGO). In April 2023, a coalition of five major

environmental organisations publicly criticised the government for having “so far ignored civil society” in the preparation of the updated plan, noting that consultations were already underway in other Member States and that the government’s process lacked transparency and participation (Germanwatch et al., 2023). Similarly, a comparative survey conducted by NGOs reported that no multilevel climate and energy dialogue under Article 11 had been established in Germany (CAN Europe & WWF, 2023). The government’s position was that existing structures such as the Climate Neutral Electricity System Platform (PKNS) and the Alliance for Transformation served the same purpose (Interview 1, German NGO). The surveyed respondents, however, did not expect these structures to feed into the NECP revision at all.

The Commission’s assessment of the draft update was, for the first time, explicitly critical on participation. It found that the draft did “not outline a procedure to ensure early public participation before decisions were taken and throughout the decision-making process” and noted that Germany had not established a multilevel energy and climate dialogue (European Commission, 2023b, p. 8). Its recommendation called on Germany to ensure inclusive public participation within a reasonable timeframe, broad participation of local authorities and civil society, and summaries of both the views expressed and the manner in which the plan integrates them (European Commission, 2023f, p. 9). Particularly the latter recommendation matches the major criticism raised by German NGOs that have been engaged in the NECP process (Interviews 1 & 2, German NGOs).

Partly in response to this pressure, BMWK conducted an online consultation on the draft update between 24 January and 17 March 2024, again after the draft had been submitted. The consultation asked participants to rate the adequacy and weighting of objectives and measures across the five Energy Union dimensions on a five-point scale, complemented by free-text fields and a published e-mail address (Interview 1, German NGO). Participation was initially so limited that the ministry began advertising the consultation in its energy transition newsletter and on social media halfway through the consultation period. In the end, participants were mainly business associations and civil society organisations (BMWK, 2024).

In interviews, civil society described the format of this consultation as poorly suited to substantive input with limited space and an overall rating system akin to satisfaction buttons found at airport toilets (Interview 2, German NGO). They also noted that where coordinated civil society responses raised substantive compliance concerns, the government’s response in the final plan was descriptive rather than responsive (see also BMWK, 2024, pp. 40–44). The plan recorded that the issue had been raised but did not act upon the criticism or change the underlying content.

The final NECP confirms this pattern. Its consultation chapter devotes most of its length to an extensive inventory of ‘action-related’ participation formats conducted independently of the NECP, including the PKNS, the stakeholder meeting accompanying the System Development Strategy, the Energy Efficiency Roadmap dialogue, sectoral summits, and multi-stage consultations in network development planning. It explicitly rejects the criticism that no consultation was carried out before the draft was prepared, arguing that in light of the many action-related participation opportunities such consultation is “not mandatory pursuant to Article 10 of the Governance Regulation” (BMWK, 2024, p. 43). The final updated plan was submitted on 29 August 2024, again after the deadline. In its assessment of the final updated NECP, the Commission stated that Germany had “partially addressed” its public consultation recommendations, noting that the consultation was not specific to the NECPs, that consultation on the draft update happened only after its submission, and that the government had not explained in detail how it integrated inputs into the final plan (European Commission, 2025a, p. 44). In addition, a German NGO filed a formal complaint with the European Commission against the German NECP in November 2024, citing inadequate public participation as one of three legal grounds. The Commission later opened infringement proceedings against several Member States for late submission but did not act on the substantive participation grounds (Interview 3, EU-level NGO; CAN Europe, 2024).

3.3.4 Overall assessment

Assessed against the four dimensions of institutionalisation, the German case shows little evidence that the NECP participation requirements have generated enduring participatory mechanisms. There has been little discursive change in the way relevant actors have perceived or spoken about public participation in the context of the NECPs. Discursive change has been limited. Relevant actors do not appear to have changed how they understand or discuss public participation in the NECP context. If anything, the discursive environment may

have become less favourable, as interviews from civil society pointed to a shrinking space for civil society involvement, growing legitimacy challenges, and weaker public support for NGOs monitoring the federal government's climate policy implementation in the context of rising populist movements (Interview 1, German NGO; Interview 3, EU-level NGO).

There has been no legal codification of NECP-specific public participation measures beyond the direct applicability of the Governance Regulation itself. No organisational fora, dedicated bodies, or funding streams have been created, and administrative embedding remained minimal. The consultations of both cycles were organised ad hoc by the responsible ministry (Interview 1, German NGO). In particular, Germany did not establish an Article 11 Multilevel Climate and Energy Dialogue, and the standing platforms invoked in its place predate the NECP update, were created for other purposes, and are not expected by participants to address the plans (Interview 1, German NGO; CAN Europe & WWF, 2023).

Some procedural routinisation can be observed, in that an online consultation on the draft plan was conducted in both cycles with a published summary of responses, and the final plan states that further forms of participation will be examined in the future. Expectations of continued participation, finally, are held by civil society organisations as a matter of entitlement and advocacy rather than shared with government, and interviewees on both the national and the EU level anticipate that participation in the third cycle, under a government with different priorities and amid a deteriorating discursive environment with regards to climate action, is more likely to regress than to deepen (Interview 1, German NGO; Interview 3, EU-level NGO).

Overall, the German case illustrates a substitutive type of institutionalisation, where the government discharges the EU participation obligation by drawing on a dense, pre-existing landscape of corporatist and sectoral consultation, treating the NECP itself as a reporting rather than a planning instrument. One interviewee reported that ministry officials describe the plan as a "library of climate policies" that compiles decisions taken elsewhere and that the absence of dedicated consultations has been justified by referencing wording in the Governance Regulation which states that participation should not impose disproportionate administrative burden, reasoning that the underlying laws had each been consulted upon in the ordinary corporatist manner (Interview 2, German NGO). This framing is largely consistent with earlier findings that German federal state officials perceived the NECP as less important than national processes (Lindberg & Wettestad, 2024).

Crucially, however, the substitution remains declaratory rather than operational. The problem is not the reference to existing participatory institutions as such. Where prior consultations demonstrably feed into the integrated plan, substitution can be an efficient approach for a state with a well-developed participatory infrastructure. In the German case, however, neither NECP cycle shows how upstream input shaped the plan. The Commission identified this gap in both 2020 and 2023. Moreover, the government's reliance on the administrative-burden clause of the Governance Regulation has turned a qualification intended to make participation workable into a practical ceiling of its participatory ambition.

Several conditions shaped this outcome. First, Germany's entrenched participatory traditions lowered the perceived added value of NECP-specific participation. Second, the framing of the NECP as a reporting exercise reduced the political incentive and will to invest in it. Third, electoral turnover across the two cycles prevented accumulated practice from consolidating. Fourth, sustained societal pressure emerged only in the second cycle and led mainly to procedural concessions rather than substantial structural change. Finally, while the Commission's recommendations became more specific over time, they were not backed by enforcement on the substance of participation. The Commission therefore played a rather arbitrary role, as it criticised Germany's approach in successive assessments but did not challenge the government's claim that further NECP-specific participation would create an excessive administrative burden. And because Commission assessments of final NECPs and updated NECPs did not lead to corrective action, their enforcement effect was limited.

3.4 France

3.4.1 Context

Public participation provisions in France are guaranteed by both general and environment-specific institutions and procedures. From a general perspective, France has established an independent administrative authority, the National Commission for Public Debates (CNDP), that oversees public debates involving organised stakeholder groups (e.g., civil society, private interest groups, etc.), citizens, and local authorities. This specific type of consultation is mandatory for very large projects⁷ and certain national-level plans and programs.⁸ Second, the Economic, Social and Environmental Council (CESE) (or “third parliamentary chamber”), represents organised civil society and advises the government and Parliament on relevant legislation. Third, the National Council for the Ecological Transition (CNTE) is an environment-specific consultative body tasked with informing government strategy on matters relating to the ecological and energy transition. It gathers representatives of the national government, local authorities, trade unions, employers' organisations, environmental NGOs, and elected officials. It is consulted on major draft laws and strategic documents relating to climate and energy. These three bodies issue non-binding but publicly available opinions that are often used in legal cases (Interview 6, CNDP Participant).

Public participation provisions were built in the national climate governance system early on, in accordance with the development of international and EU environmental law. Notably, the key principle of public participation in environmental matters from the Aarhus Convention is elevated to the rank of constitutional principle through the Charter of the Environment (2005). In 2009 and 2010, a nationwide, open, and multi-party public participation process on environmental policy planning, known as “Grenelle de l’Environnement”, was established and led to structural changes for French climate and energy policymaking and planning. These changes included the first climate law establishing a French emission reduction target, as well as specific planning requirements (e.g., local and regional territorial climate and energy plans). Later, ahead of COP21 in Paris, France established its first climate framework law, the Energy Transition for Green Growth Act, that established two planning tools. First, the National Low Carbon Strategy (SNBC), a national roadmap to climate neutrality. Second, the Multiannual Energy Program (PPE), the key planning tool for the energy sector with specific requirements for individual sub-sectors. These two national planning documents became the two main inputs that fed into the writing of the NECPs.

Finally, in 2019, a new Energy and Climate Law (an update of the 2015 framework law) established the target of achieving carbon neutrality by 2050. Importantly, it mandated a five-year “programmatic law on energy and climate” designed to set and regularly update climate and energy objectives. This programmatic law was supposed to be adopted in July 2023, which would have triggered the adoption of new versions of the PPE and the SNBC. To date, this law has still not been adopted, and new versions of the SNBC and PPE have suffered significant delays (Interviews 4 & 5, French NGOs; Interview 6, CNDP Participant). Moreover, these strategic documents are likely to be adopted by decree, meaning they are not submitted to national debate (Interviews 5 & 6). However, the Directorate General for Air, Climate and Energy (DGACE), the administrative staff supporting the ministry in charge of climate and energy planning, has been consistently involved in the elaboration of these strategic documents.

In addition to these structural aspects, it is important to underline that the period 2018-2024 saw an unprecedented level of political instability. First, in 2018–2019, with the crisis of the Gilets Jaunes [Yellow Vests Movement], followed by the Covid pandemic, and since the re-election of President Macron (2022) an increase in polarisation and a lack of political predictability. The prime example of this is the dissolution of the National Assembly, the lower chamber of the parliament, following the European elections in 2024. For the first time in modern French history, there is no clear majority in the Assembly, and the executive (the President and Prime Minister) must negotiate each legislative proposal based on new coalitions.

France conducted public consultations in only three cases: the draft NECP (2018), the final NECP (2019), and the draft updated NECP (2023). While both 2018 draft and 2024 final update were delivered on time, the final 2019 and draft update 2023 were submitted with 107 and 134 days of delay respectively. France is a notable

⁷ Code de l'environnement [Environmental Code], art. L. 121-2, version in force as of 10/07/2026.

⁸ Code de l'environnement [Environmental Code], art. L. 121-8, version in force as of 10/07/2026.

case because it reported multiple, fragmented public consultations relating to its national climate and energy documents, while omitting the EU mandate and character of these consultations when delivering them (Interviews 4, 5 and 6). As a result, interviewees could not give any concrete input about “NECP-specific” consultations, since the participation processes that took place were not framed as such.

3.4.2 First NECP process (2018–2019)

Starting in June 2017, France conducted public consultations on the second version of its national climate plans: National Low Carbon Strategy (SNBC) and the Multiannual Energy Program (PPE) (see Section 3.4.1 for more details). These consultations incorporated two distinct participation formats. For the PPE, the first format involved a dedicated committee of 80 representatives drawn from civil society, the private sector, trade unions, the national parliament, and local authorities. These representatives convened three times for in-depth discussions as well as several focused sectoral workshops (Interview 4, French NGO). The second format consisted of a four-month public debate organised by the national participation commission (the CNDP). This debate focused on the PPE and combined in-person meetings, online platform contributions, and written submissions in rural areas. The SNBC, by contrast, was subject to a shorter online consultation lasting one month. Both consultations were connected with each other and led to the submitted NECP report. Much of the final NECP report draws on the participation processes conducted for the SNBC and PPE. In addition, it references a series of new consultations formally required under French law under the various participatory bodies related to climate and energy (the CESE, the CNTE and the CNDP). The latter organised an additional public debate with 400 citizens selected by sortition.

Overall, France implemented several fragmented participation processes that, taken together, enabled it to meet many procedural criteria for its NECPs which we evaluated in Section 2. It fared well on aspects of inclusiveness and robustness (see also Duwe et al., 2019). Similarly, interviews highlight that the participation procedures were inclusive, organised early in the policymaking process, and that constant efforts were made to enhance this normative, procedural aspect of the participation process through new innovations (Interview 4, French NGO; Interview 6, CNDP Participant). Despite these strengths, France performed rather poorly on reporting requirements, such as on the availability of draft documents (given that the NECP as such was never shared), participant information, website accessibility, and publicity. It also performed badly on reporting how it considered and incorporated public input in policy decisions (which were not reflected in the NECP report). However, one interviewee confirmed that there were also specific platforms where the organisers of public consultations had published how the input was incorporated in decisions and explained why it had been rejected in certain cases (Interview 5, French NGO). Interview 6 also highlighted that the DGACE had developed a consistent method to explain why it would consider certain inputs and not others, in (a method which drew on working groups related to the CNDP). Finally, there were no specific recommendations from the Commission to France regarding the participation quality (European Commission, 2019d).

3.4.3 Second NECP process (2023–2024)

France's process for updating its NECP again combined multiple consultation formats. An online public consultation ran from 2 November 2021 to 15 February 2022, focused on the low-carbon transition, and drew 14,325 contributions (e.g., comments) from around 100 stakeholder groups. This was complemented by a second consultation for citizens on France's energy mix (Oct. 2022 – January 2023) which ended with a Youth Forum that brought together 200 young participants. Beyond these, three further consultations addressed the SNBC and the PPE, lasting 3.5 months, one month, and six weeks respectively (Sicaud-Clyet & Didi, 2025). Notably, there were no new consultations reported for the final version submitted in June 2024 (Ibid).

The European Commission acknowledged the breadth of France's consultation efforts, noting that a wide range of interest groups and citizens were identified and encouraged to participate in preparing the documents underlying the NECP update (European Commission, 2023a). France also mobilised regional and local actors to carry out the participation process and maintained the CNTE as a standing forum for dialogue with civil society and other stakeholders (CAN Europe, 2023). The first SNBC consultation was also praised for occurring early in the process, while all policy options remained open (Sicaud-Clyet & Didi, 2025).

Despite these strengths, several concerns persisted. The Commission could not assess whether communication channels had been adequate, found the timeframe for public preparation poorly described, and noted that

although a summary of public views was included, it was unclear whether or how those views had influenced the plan (European Commission, 2023a). A formal multilevel energy and climate dialogue was also absent (Ibid). CAN Europe (2023) similarly flagged that the SNBC itself was never submitted to public consultation, that existing consultations covered only certain topics such as the energy mix, and that it remained unclear whether stakeholder feedback through the CNTE was genuinely incorporated. By the final NECP assessment in 2024, the Commission concluded that France had only partially addressed its recommendations, since the consultation process was designed around broader national documents rather than the NECP specifically, and still lacked detail on how inputs were integrated (European Commission, 2025a, pp. 86–87). CAN Europe and WWF (2023) added that the final consultation round came too late, i.e., after the NECP had already been submitted to the Commission, and that the distinction between existing and newly envisioned measures was poorly explained, even though detailed sectoral documentation existed.

3.4.4 Overall assessment

Public participation procedures in France are codified through legally enshrined requirements distinguishing different types and levels of public engagement. In that regard, strengths of the system include the existence of the CNDP as an independent authority that organises public consultations, as well as the existence of permanent discussion fora such as the CESE and CNTE. Moreover, most public consultations reflect the procedural requirements for meaningful engagement and that constant efforts are made, in particular by the Directorate General for Air, Climate and Energy (DGACE), to enhance the participation procedure, as well as making sure that public input is considered and incorporated into policy where possible (Interview 4, French NGO; Interview 6, CNDP Participant).

However, through the interviews we identified several drawbacks and limits. First, they point towards the difficulties raised by the complex subject matter that make it difficult to involve lay citizens. Second, they also criticise the fragmentation and multiplication of various consultations processes. This fragmented landscape is difficult to navigate with the limited, often shrinking, capacity of most NGOs which do not have the ability to participate in all existing processes in an in-depth way. In addition, it is often unclear whether these consultations have a real impact on policy decisions. The combination of lack of capacity on one hand, and fragmentation on the other, leaves much of civil society disillusioned about the investment/impact ratio (Interviews 4 & 5, French NGOs). Finally, interviews 5 and 6 point towards recent weakening relating to the scope of public participation. They explain that certain bodies were removed from mandatory consultations on environmental, energy and/or climate policy planning. In some instances, policy decisions have been taken before a public consultation took place, therefore seriously undermining the impact of the participation process (Interview 6, CNDP Participant). For example, the CNDP was exempted of organising a mandatory public debate on the SNBC and PPE, following the revision of the climate law in 2019. This means that the decision of organising public consultations for that matter is now a discretionary choice of the ministry (Interview 6).

From an institutionalisation perspective, the French case speaks to a substitutive institutionalisation process. From Interview 6, we learn that the update of the climate framework law of 2019 was certainly developed to adapt the French climate and energy planning cycle to the EU climate planning one. However, in practice, since the related programmatic law planned for 2023 has never been adopted, both planning cycles are not aligned in practice. Furthermore, the fact that these consultations were mandated by the EU and fed into the larger EU climate and energy planning process has been completely omitted at the domestic level. Interview 4 argued that this is probably intentional, in particular for the second cycle, because of the general environmental backlash that local and national environmental NGOs and policymakers are facing. They say that emphasising the European dimension of the consultations would exacerbate this issue. Furthermore, it is probably easier to create a public participation process and adapt it to a climate and energy planning process when no such infrastructure exists beforehand (Interview 6, CNDP Participant). Therefore, one could also ask whether recent developments in the French case could not be linked to a de-institutionalisation of public participation in climate and energy policy planning. For example, the absence of an updated programmatic law has de facto limited any public debate about both the law itself and related strategic documents (the SNBC and the PPE). The absence of the law has also de facto bypassed the consultation of the CESE (Interviews 5, French NGO) and not even an expert/political debate has taken place within the national assembly, since the strategic documents have been/will be adopted by decree, bypassing therefore a presentation and discussion in parliament (Interview 6, CNDP Participant).

Therefore, we identify political will and support as one driving factor for the institutionalisation of public participation. Interviews 4 and 6 highlight the efforts made by the DGACE in enhancing the breadth of public consultations and creating working groups in which discussions and debates have taken place. On the other hand, the French case also highlights, a priori, the barrier that constitutes political instability to plan high-quality public participation processes, connected to specific climate and energy policy planning processes. Interviews 4 and 5 highlight the general context of environmental backlash that has developed since 2023 and made it particularly difficult to raise challenges related to climate and energy policy planning, and the shortcomings of the related public consultations. Finally, Interview 4 also highlights that these issues receive very little media coverage, which is unfortunate since it may constitute a lever to evaluate whether public input has been incorporated in policy decisions.

3.5 Sweden

3.5.1 Context

Sweden has a long-standing and highly institutionalised system for stakeholder consultation related to the legislative process. The core of this system is the remiss procedure, which sees documents related to proposed legislation circulated to a set list of stakeholders as well as being available to the public for comment (Lundberg, 2014; Lundberg & Hysing, 2016). Previous research has argued that this procedure plays an important role in Sweden's approach to consultation and that organisations respond to it in part because it is an important part of building legitimacy as a stakeholder. One interviewee in Lundberg and Hysing (2016, p. 14) jokingly stated, when discussing this legitimising function: "I submit referral responses, therefore I am."

Since 2017, climate and energy governance in Sweden has centred on the Swedish Climate Policy Framework adopted in that year (Bäckstrand, 2025; Bäckstrand et al., 2024). Within the framework, the Swedish Climate Act requires that the national government base climate policy on overarching goals, publish an annual climate report, and create a climate policy action plan every four years. The government has set a goal of net-zero GHG emissions by 2045 (including an 85% reduction in domestic emissions) as well as specific reduction targets for domestic transport and the sectors covered by the EU Effort Sharing Regulation. This policymaking process also led to the creation of an independent expert advisory body, the Swedish Climate Policy Council (SCPC) and the Fossil Fuel Sweden initiative to serve as a government-led platform for dialogue and collaboration with non-state actors on climate and energy issues (Nasiritousi & Grimm, 2022; Widerberg et al., 2024). While Sweden has widely been seen as a climate leader (Bäckstrand, 2025), it has also been critiqued due to a growing implementation gap, especially since the 2022 general election and the formation of a centre-right Liberal-Conservative coalition government (Bäckstrand, 2025; Swedish Climate Policy Council, 2026, p. 12).

Politically, the NECP processes took place on either side of the 2022 Swedish general election, which saw the formation of a centre-right government with the support of the far-right Sweden Democrats, replacing a government led by the Swedish Social Democrats (Aylott & Bolin, 2023). The first round of NECPs was therefore held under the Social Democrat-led government and the second round under the Moderate-led government. Sweden conducted public consultations that preceded submission to the Commission on three occasions: the draft NECP (2018), the final NECP (2019), and the final updated NECP (2024). A consultation was eventually carried out for the draft updated NECP in 2023 after the document had been submitted to the European Commission. The 2023 consultation therefore did not meet the Governance Regulation's requirement that the public be involved in the preparation of the draft NECP. The first NECP-related documents were submitted slightly late (between 11 and 17 days), while the 2024 final updated plan was submitted on time. It was common for the Swedish government to be running broader consultations in parallel to NECP consultations, both under the remiss procedure or other processes related to e.g., the national climate policy action plan.

Overall, existing research and the interview related to this case study suggest that the NECPs were not given high priority by the government or stakeholders (Lindberg & Wettestad, 2024; Interview 7, Swedish NGO/former government). The Swedish policy response was seen as setting a leading example within the EU and so the NECPs were framed as a reporting exercise for what was already happening rather than the trigger for an additional, in-depth planning process (Interview 7). Staff in the climate ministry had a large number of

files to coordinate, and the institutionalised remiss procedure (required for legislative proposals) was used so often that it was difficult for stakeholders to respond effectively, leading to a process of prioritisation.

3.5.2 First NECP process (2018–2019)

Sweden's first draft NECP was submitted on 17 January 2019 (Swedish Ministry of the Environment and Energy, 2019). Prior to its submission, the Swedish government sent the draft NECP to 30 stakeholders and requested written comments, of which ten were received “mainly from trade associations” (Swedish Ministry of Infrastructure, 2020, p. 10). In its analysis of the draft NECP, the European Commission briefly referred to the stakeholder consultation and noted that further consultation was planned for the finalisation of the NECP (European Commission, 2019c, p. 4). The Commission’s 11 formal recommendations to the Swedish government did not refer to public participation or consultation (European Commission, 2019e).

Sweden submitted its final NECP in January 2020 after holding an information meeting in August 2019 and carrying out a written consultation beginning in September 2019 that gathered a total of 36 responses (Swedish Ministry of Infrastructure, 2020, pp. 10–11). An annex to the final plan listed a number of responses from stakeholders but did not clearly state if or how they were incorporated into the final document. In its assessment of the Swedish NECP, released in October 2020, the Commission discussed the government's summary of public views, but noted that the NECP did not describe how those views were incorporated into the draft or final plans (European Commission, 2021b, p. 4). The final assessment also called on Sweden to “maximise the potential of multilevel climate and energy dialogues to actively engage with regional and local authorities, social partners, civil society organisations, the business community, investors, and other stakeholders” (European Commission, 2021b, p. 16).

3.5.3 Second NECP process (2023–2024)

In 2023 and 2024, Sweden prepared its updated NECP. The draft update was submitted in July 2023 and the final version was submitted at the end of June 2024 (Swedish Ministry for Climate and Industry, 2023, 2024). The government did not carry out public consultations on the draft update prior to its submission to the Commission. Related laws connected to Sweden’s update of its domestic climate action plan were subject to the remiss procedure (Swedish Ministry for Climate and Industry, 2023, p. 14). However, in its final update, the government reported that it had carried out a limited written consultation on the Swedish Energy Agency website in September 2023 which attracted seven responses (Swedish Ministry for Climate and Industry, 2024, p. 32). Therefore, limited public consultation was carried out on the draft update, but it took place after the document had been submitted to the Commission.

The Commission's analysis in the staff working document was more in-depth than in the previous round of NECP drafts. The Commission noted that a public consultation had not been organised specifically related to the updated NECP before its submission, as required by the Governance Regulation (European Commission, 2023d, p. 8). The analysis noted that the underlying objectives and instruments had been consulted through the remiss procedure. The Commission also explicitly addressed participation in its recommendations (European Commission, 2023e). The 2023 Commission response listed 25 recommendations (up from 11 in 2019), one of which (Recommendation 22) was explicitly focused on public participation. It called for inclusive, timely, and transparent consultation with clear communication about the process by which stakeholder input was incorporated into the NECP.

During the preparation of the final updated NECP, the Swedish Energy Agency organised a stakeholder meeting attended by approximately 25 organisations, followed by a written consultation that attracted thirteen responses (Swedish Ministry for Climate and Industry, 2024, pp. 32, 279). The final document includes an annex with extensive stakeholder comments from both the draft and final updated NECP consultations (Swedish Ministry for Climate and Industry, 2024, pp. 280–289). Once Sweden submitted its final updated NECP, the Commission assessed the document in May 2025 (European Commission, 2025b). It stated that Sweden had partially addressed its recommendation on participation and consultation. However, it noted that it was unclear whether sufficient time had been given for the consultation and noted that the final NECP did not include a discussion of how public views had been incorporated into the document. Bäckstrand (2025, p. 291) notes that during the time when the updated NECP was being prepared, the focus of consultation was on Sweden’s second climate policy action plan which was presented in December 2023.

In parallel to the increasing institutionalisation of participation-related recommendations by the Commission, the Swedish Climate Policy Council (SCPC) also became involved. As noted in Section 3.5.1, the SCPC is an independent scientific advisory body that is mandated to provide analysis and recommendations to the Swedish government on climate policy (Aarthun & Sundqvist, 2025). In previous reports, the SCPC had already critiqued the government's climate-related consultation approach as too narrowly focused and lacking inclusivity across civil society (SCPC, 2024, p. 111). In 2026, they made a more detailed assessment and recommendation about NECP-related participation, focusing on how the Swedish government could more effectively incorporate public participation in the process (SCPC, 2026, p. 132). Noting that the Governance Regulation set detailed requirements for these processes, the SCPC stated that in the Swedish case there had been minimal consultation and noted that the government had been criticised by the European Commission, representing a missed opportunity. The Council concluded by stating that it felt that "there is significant untapped potential in strengthening stakeholder collaboration ahead of the next mandate" (SCPC, 2026, p. 131, translated from Swedish). The timing of the SCPC's intervention in 2026 meant that it did not affect existing NECP-related procedures in 2023–2024, but it nevertheless provided evidence for increased attention to the issue in the wider policy community.

3.5.4 Overall assessment

Sweden's NECP consultations appear to show a mix of substantive and substitutive institutionalisation. Because the NECPs were not national climate legislation, they were not addressed through the pre-existing institutionalised consultation procedures through which those laws pass. But these pre-existing procedures were reported on extensively in the NECPs, indirectly impacting the process. At the same time, consultations focused on the NECPs were indeed carried out. They tended to be relatively high quality but were also ad hoc and show few signs of leading to new and enduring participatory processes. There is also no evidence of legal codification surrounding NECP-related consultation, although some procedural routinization can be seen in the regular consultations on the final NECPs in 2019 and 2024.

Overall, the NECP process appears to have held a low-priority position in the broader Swedish landscape of climate and energy policy. The very fact that the overall policy mix was seen as quite advanced and consultation on national laws is highly routinized appears to have indirectly led to a situation where the NECPs are not seen as adding significant new impetus to the process. As a result, both the government and stakeholders appear to treat the process as one of reporting to the European level. This framing contributes to the relatively low level of attention given to the NECP process, as well as the public consultations which surround it. That attention instead is directed toward national-level climate policy (such as the climate action plan under the Swedish Climate Policy Framework) and specific EU legislation which more directly impacts on the Swedish policymaking process (such as the Effort Sharing Regulation) (Bäckstrand, 2025; Interview 7, Swedish NGO/former government).

3.6 Slovenia

3.6.1 Context

Slovenia is a parliamentary republic with a proportional electoral system. Within the legislative branch, the National Assembly is the sole body that can adopt laws (Žumer & Rittelmeyer, 2021).⁹ The Assembly is composed of 90 deputies elected every four years. Executive power is held by the Government, which is composed of the Prime Minister and 15 Ministers. Finally, the judicial branch ensures the rule of law in Slovenia.

Slovenia's approach to climate and energy governance is underpinned by a complex, multilevel legal framework. Responsibility for environment, climate, and energy policy has rarely sat within one ministry for long, instead splitting and recombining repeatedly as governments have reorganised the administration. The most significant consolidation came in 2023, when a new Ministry of the Environment, Climate and Energy, was created that brought these three policy areas together (Todorović, 2022). However, this arrangement proved short-lived. Following the March 2026 elections, the Ministry was re-divided into the Ministry of the Environment and Spatial Planning and the Ministry of Infrastructure and Energy (Ministry of Infrastructure and

⁹ The other legislative body, the National Council, is consultative and composed of social and economic stakeholders.

Energy, 2026).

Before the adoption of its NECPs, Slovenia had a formal framework for public participation, but it was not specific to climate and energy governance and was rather superficial. Public participation provisions stem from the Aarhus Convention which Slovenia ratified in 2004. This international commitment provided the normative foundation on which subsequent national legislation was built. Two main legal instruments translated international commitments concerning public participation into domestic practice, although implementation remained inconsistent. First, the Resolution on Normative Activity requires ministries to prepare legislation transparently and provide at least 30 days for affected organisations and interested publics to participate in policymaking (National Assembly of the Republic of Slovenia, 2009). Although the resolution was intended to improve openness and ensure public consultation, monitoring by the Civil Society Information Centre, a network of national NGOs, demonstrated that ministries repeatedly failed to comply with these standards, whether by shortening deadlines, providing inadequate information, or omitting consultations altogether (Civil Society Information Centre, n.d.). Second, the Environmental Protection Act (2022) establishes the publicity principle, mandating the public's right to "participate in the procedures for adopting regulations, policies, strategies, programs, plans and designs relating to environmental protection". In practice this requirement is usually implemented only after draft documents have already been substantially prepared. Slovenia itself acknowledged this limitation, noting that consultation typically occurs "at the stage when a draft plan has already been prepared" (Republic of Slovenia, 2025, p. 2). Furthermore, research undertaken by the Bertelsmann Stiftung between 2016 and 2022 has shown that consultation requirements remain partly discretionary in practice (Bertelsmann Stiftung, 2016, 2022).

Despite these structural weaknesses, Slovenia has gradually expanded its participatory instruments, especially in the realm of digital participation mechanisms. The IPropose online platform¹⁰ enables citizens to submit policy proposals and legislative suggestions, while a government portal allows users to follow draft government decisions and monitor public comments submitted during consultation procedures. While these instruments do not oblige the government to adopt public suggestions, they represent an improvement in transparency and accessibility compared to earlier periods (Bertelsmann Stiftung, 2024, 2026). These digital tools have been accompanied by improved international evaluations, including the OECD Infrastructure Governance Index (IGI), which ranked Slovenia above the OECD average for stakeholder participation and oversight in 2022 (OECD, 2023).

Taken together, these developments indicate that public participation in Slovenia has developed over time, moving from limited and often late-stage rules and inconsistent practice towards a richer participatory framework. The NECP public consultations, in other words, were not designed within a mature participatory system, but rather one characterised by minimal procedural requirements and in practice often bypassed by government.

Slovenia submitted all four NECP reports but conducted public consultations only in the three first cases (final 2019, draft updated 2023, and final updated 2024). While both the draft 2018 and draft update 2023 were delivered on time, the final 2019 and final 2024 updated NECPs were submitted with 58 and 191 days of delay respectively. Slovenia stands out as one of the only Eastern European and former Communist countries that we consider as a leader in terms of public participation quality. As the case study below will illustrate, Slovenia had a comparatively under-developed public participation framework in place to inform environmental policy planning.

3.6.2 First NECP process (2018–2019)

Slovenia's first NECP took place in a context of limited capacity and time constraints, and uncertainty regarding the public participation requirements. The initial draft NECP was submitted in December 2018 under significant time pressure. The Governance Regulation entered into force on 24 December 2018, while Member States were required to submit their draft NECPs 7 days later, on 31 December 2018. Therefore, the public consultation requirements did not apply to the draft but only to the final NECP (Oberthür et al., 2025). In practice, a government interviewee argued that meaningful participation was "impossible" under these conditions (Interview 8, Slovenian Government official). The Ministry's energy department was described as

¹⁰ <https://predlagam.vladi.si/>

small and overloaded, with insufficient staff capacity to conduct the time- and resource-intensive process of public consultation (Interview 8, Slovenian Government official). It also lacked the expertise and the capacity to develop a strategic document such as the NECP (Ibid). However, public consultations were conducted for the final NECP. They were organised in three phases. First, Slovenian authorities organised a preliminary consultation phase before finalising the plan, between March and April 2019, during which local authorities, civil society organisations, investors, businesses, and members of the general public were invited to provide input (Republic of Slovenia, 2020). Second, Slovenia introduced and conducted targeted workshops and expert dialogues in 2019. Third, the final consultation phase took place between January and February 2020, during which draft documents and environmental reports were presented during a public hearing, and stakeholders were again invited to submit comments. In 2019, Slovenia also conducted thematic workshops aimed at targeted consultation as part of the NECP process (Republic of Slovenia, 2020; Interview 8, Slovenian Government official). The document was finally submitted in February 2020 and showed substantial procedural improvements.

External assessments were highly critical of the draft stage and confirmed the absence of meaningful consultation (European Commission, 2019b). Duwe et al. (2019) ranked Slovenia second to last among EU Member States on public consultation quality for that period. For the final stage external assessments highlighted the detailed descriptions of consultation processes, phases, and stakeholder engagement activities. Slovenia also established a dedicated NECP website through which documents, materials, and consultation information were made publicly available (Republic of Slovenia, 2020). These developments were confirmed by the European Commission's assessment (European Commission, 2021a). However, the Commission criticized Slovenia for failing to provide a sufficiently clear summary explaining how public views had been incorporated into the final plan (European Commission, 2021a, p. 8).

Despite procedural progress, the process remained constrained. Interviews characterised this period as particularly demanding, emphasising that the time was insufficient to prepare such a comprehensive document properly, and resulted in delayed submission (Interview 8, Slovenian Government official; Interview 9, Slovenian Government official). Importantly, government officials identified stakeholder distrust in the fairness and transparency of the process as one of the principal barriers to effective participation (Interview 8, Slovenian Government official; interview 9, Slovenian Government official). Civil society offered a related account of this same period from the stakeholders' side. Reflecting on the early phase of the NECP, an NGO representative identified it as a moment of trust-building, noting that civil society perceived the process as more serious and the authorities as more willing to listen than in earlier pre-NECP exercises (Interview 10, Slovenian NGO). This cautious optimism, however, did not survive once the outcome of the first cycle became apparent, undermining public trust in both the process and the value of participation (Interview 10, Slovenian NGO). This was due in part to the NGO's assessment that the final outcome fell short of what scientific evidence required (Interview 10, Slovenian NGO). Consequently, the NGO interviewee suggested that civil society approached the second cycle with diminished rather than restored confidence.

3.6.3 Second NECP process (2023–2024)

The updated NECP cycle marked a shift to a more structured model of consultation. This cycle was planned earlier, organised in a more iterative way, and built more consciously around stakeholder engagement. A government official described the second cycle as substantially revised and strengthened compared with the first (Interview 8, Slovenian Government official). The NGO representative similarly regarded the process as a clear improvement, highlighting its multiple stages, the opportunities for stakeholders to participate throughout the process, the use of both the online portal and direct email notifications, and the overall openness of the consultation process (Interview 10, Slovenian NGO). Yet, these procedural advances did not fully resolve persistent questions about whether stakeholder input genuinely shaped the substance of the final plan.

Preparatory work for the updated NECP began before its formal launch in summer 2022. Slovenia developed a Public Engagement Framework Plan with the purpose of "establishing a comprehensive multilevel climate and energy dialogue", in line with Article 11 of the Governance Regulation, and "ensuring early and effective public involvement" (Republic of Slovenia, 2023, p. 12). The Plan foresaw three distinct moments of participation between May 2022 and June 2024. First, in autumn 2022, a preliminary consultation on the preparation of the draft updated NECP was carried out, in which local authorities, civil society organisations,

the business community, investors, and the general public were invited to a public hearing, an online consultation, and a series of targeted thematic consultations on the national 2030 targets and the pathway to climate neutrality. Second, in spring 2023, a second round of consultation addressed the proposed orientations and objectives of the first draft update, combining a public presentation, a general online consultation, and several targeted expert consultations with key stakeholders. Third, the Plan already envisioned a consultation for spring 2024, to inform the final NECP report. The draft updated NECP document was ultimately submitted in July 2023.

The final updated NECP, submitted in December 2024, displayed further procedural improvements. An additional set of expert consultations, originally not foreseen in the Public Engagement Framework Plan, was carried out in autumn 2023, and the aforementioned final consultation, following the Ministry of the Environment and Spatial Planning's positive opinion on the adequacy of the NECP and the accompanying environmental report, was carried out in spring 2024 (Republic of Slovenia, 2024). The dedicated NECP platform was upgraded, and a multilevel dialogue was set up "in which local authorities, civil society organisations, the business community, investors and other stakeholders, as well as the general public, can actively participate" (Republic of Slovenia, 2024, p. 27). In its Annex, the Slovenian government responded directly to the Commission's recommendations on public participation, pointing to more detailed information available on the NECP online platform, including a summary of the views and comments expressed and an explanation of how these had been taken into account (Republic of Slovenia, 2024).

External assessments of the draft update process were substantially more favourable than those of the first cycle. The European Commission acknowledged that Slovenia had ensured early public participation before decisions were taken, involved a broad range of interest groups, and used multiple communication mechanisms to notify and engage the public. It also positively evaluated the consultation timeframe, recognising that Slovenia had allowed sufficient time for participation (European Commission, 2023c). Similarly, NGO research acknowledged substantial improvements in procedural design. The assessment noted that Slovenia had conducted preliminary consultations through online questionnaires, public presentations, and thematic consultations, and that information regarding consultations was publicly available (CAN Europe, 2023).

However, important criticism persisted regarding the actual influence of stakeholder input on policy outcomes. CAN Europe (2023) concluded that civil society recommendations were ultimately not reflected in the draft update NECP, which aligned with the European Commission's (2023c) comments. CAN Europe further criticised the structure of online questionnaires used for that phase, arguing that they did not sufficiently allow participants to challenge the document's underlying assumptions (CAN Europe, 2023). However, according to the interview with the government official, this critique is not valid. He stated that all relevant comments, summaries, and supporting reports were already available online, making their full inclusion in the NECP document itself redundant and impractical given the document's already substantial length (Interview 8, Slovenian Government official). This reflects a genuine tension between national procedure and EU-mandated requirements, that goes beyond the Slovenian case.

Finally, the interviews diverge on the quality of the outcomes of the updated NECP cycle. From an official point of view, many comments were repetitive and oppositional, with little room to challenge core assumptions or move toward shared solutions. This polarised pattern of engagement was identified as the most challenging obstacle to overcome (Interview 9, Slovenian Government official). The NGO's account highlighted the segmentation of consultation events by stakeholder type, making it harder to reach a compromise, arguing that the separation of civil society organisations from actors with financial interests limited direct exchange and made compromise more difficult to achieve (Interview 10, Slovenian NGO). Moreover, the NGO interviewee suggested that trust in the fairness of the process fluctuated throughout the updated cycle, where even a well-designed and open consultation process may fail to sustain trust if participants perceive that the substantive decisions are ultimately taken elsewhere (Interview 10, Slovenian NGO).

3.6.4 Overall assessment

Across the two cycles, the Slovenian NECP process shows a shift from minimal and delayed participation in the first NECP cycle to a much more structured and iterative consultation architecture in the updated NECP. However, the interviews nuance this reading of a simple trajectory of progress. The first draft NECP began

under severe time pressure, with almost no room for early public consultation and very limited administrative capacity and expertise to support meaningful engagement. As a result, the initial draft was largely a compliance document, and participation only became substantive later in 2019, with the drafting of the final NECP document. Even then, however, the process remained constrained by short deadlines and strong distrust among stakeholders on the efficacy of the participation process. The updated NECP cycle, by contrast, demonstrated a much more mature and organised participatory approach. Slovenian authorities introduced a dedicated Public Engagement Framework Plan, organised consultations across multiple stages, and significantly expanded online participation mechanisms. Consultations began earlier in the policymaking cycle, and the process also became more transparent, with consultation materials, comments, and summaries published online through dedicated NECP platforms.

Despite procedural improvements, concerns about the actual influence of stakeholder input on final outcomes persisted. In particular, the trajectory of trust between the government and stakeholders, the design of feedback mechanisms, and the ultimate influence of stakeholder input on the final updated NECP, describe a recurring gap between how open and well-organised the consultation process appeared to be on procedural grounds, and how stakeholders experienced its substance and outcomes.

Slovenia resembles a substantive institutionalisation case. The government treated the NECP as a genuine planning instrument to shape both its climate and energy planning process and organise an adapted public participation framework. Different markers of institutionalisation can also be observed: discursive changes are observable in the way various stakeholders are brought together beyond pre-existing silos, and implementation routines are visible in the adoption and revision of the Public Engagement Framework Plan, despite constrained administrative capacity. Furthermore, some signs indicate nascent changes related to legal codification and organisational change. First, the revision of the Environmental Act extended requirements for public consultations, drawing on the NECP experience (Interview 8, Slovenian Government official). Second, an inter-ministerial working group on NECPs and LTSs was launched, indicating that the climate and energy planning process was given the space and means to operate beyond the sole reporting measures (Interview 8, Slovenian Government official). It also translated the appropriation of the planning and participation processes by the ministry (implementation routine).

The Slovenian case showcases the role of specific enabling conditions for the institutionalisation of NECP-specific participation processes. First, the EU-mandated character of the NECP operated through a conditionality framing. As explained in an interview, government officials connected the completion of the NECP to Slovenia's wider access to EU funds, instead of framing it solely as an EU requirement (Interview 8, Slovenian Government official). Second, the case illustrates the role of change agents in setting up and implementing a complex process as the NECP one. However, such change agents are also vulnerable to political turnover, where government can reverse or dissolve formalised arrangements.

3.7 Discussion: The four case studies

Our case studies reveal several important findings. First, Member States differed substantially in how they have approached the NECPs, which has strongly shaped participation outcomes. Where governments approached the NECP as a genuine planning instrument, climate policy planning and participation were thought about and organised together in the plan's design. Where they treated it merely as a reporting exercise to compile decisions taken elsewhere, participation was largely reduced to a reporting requirement. For instance, Germany is a clear reporting case. Government officials were said to describe the plan as a "library of climate policies" (Interview 2, German NGO), and in both cycles they conducted consultation only after the draft had been completed. In the French case, the NECP is invisible as a reference point in domestic politics. Planning, and the participation attached to it, was mostly carried out through the national low-carbon strategy (SNBC) and the multiannual energy programme (PPE). Similar patterns can be seen in the Swedish case, where greater attention was placed on national policy, such as the climate policy action plan required under the Swedish Climate Policy Framework (but where processes focused on national law and the NECP existed side by side). For these countries, the NECP often served less as an opportunity for strengthening public participation in climate and energy governance than as a mechanism for communicating existing participation outcomes from other planning processes to the EU (Interview 3, EU-level NGO). Slovenia differed from the other cases because it entered the process without an elaborate national climate and energy strategy in place. Earlier

attempts to adopt such a framework had failed, so the NECP became the country's de facto planning instrument, with public participation built in from the beginning (Interview 8, Slovenian Government official; Interview 9, Slovenian Government official). This suggests that Member States with existing national planning frameworks, especially where domestic timelines were misaligned with the proposed timeline of the NECP cycle, often saw little added value in an additional EU-level plan. Countries without such frameworks, by contrast, were more likely to treat the NECP as a genuine planning opportunity (Interview 3, EU-level NGO; Interview 8, Slovenian Government official; Interview 9, Slovenian Government official; Interview 10, Slovenian NGO).

Second, the EU has had limited success in externally inducing public participation in the sense of making national climate and energy governance more democratic, robust, and legitimate across the board. In fact, the Governance Regulation has not improved overall participation quality across both NECP cycles, consistent with the stagnation in the second round of NECPs documented in Section 2. Its main effect was instead to pull Member States towards a broadly comparable level of participation quality and – to some limited extent – institutional embedding. Building on our first finding on the treatment of the NECPs as a planning versus a reporting instrument, the plans generated limited institutional change in countries with strong pre-existing participatory institutions (i.e., Germany, France, and, to a certain extent, Sweden), even where the suitability of these structures for integrated climate planning as envisioned under the Governance Regulation remains questionable. At the same time, it helped trigger more substantive participatory institution-building in the Member State that previously lacked developed participation mechanisms in climate and energy governance (i.e., Slovenia). These results generally concur with the broad Europeanisation literature (Börzel, 2002; Börzel & Risse, 2003), where adaptation occurred in those instances where the misfit between the EU obligations and existing domestic practices was greatest, while it stalled where a comprehensive, existing participatory architecture allowed governments to claim compliance without meaningful change.

Zooming into the Slovenian case, the NECP process started from a low baseline marked by failed strategies and stakeholder distrust. Over time, public participation in the NECP context developed into a multi-round consultation process with thematic workshops and targeted dialogues involving municipalities, businesses, NGOs, and civil society (particularly youth organisations) (Interview 10, Slovenian NGO). This was accompanied by a discursive shift in which the NECPs came to be framed as a broad societal undertaking rather than a merely technical endeavour (Interview 8, Slovenian Government official; Interview 9, Slovenian Government official). Some lessons and best practices from the first NECP cycle also appear to have influenced Slovenia's approach to consultation at earlier stages of environmental assessment (Interviews 8, Slovenian Government official). This suggests that the discursive shift has begun to translate into policy change, indicating a substantive form of institutionalisation, even if legal and organisational change remains overall limited.

In countries with strong participatory traditions and/or climate and energy policy, we discerned a substitutive type of institutionalisation as a characteristic response to the NECP participation requirements (especially in Germany and France). However, here the distinction between operational and declaratory substitution is empirically significant. All three frontrunner cases invoked pre-existing participation channels to fulfil the NECP obligation, although in some cases they also paired this with NECP-focused consultation (Sweden). In particular, Germany relied on corporatist association consultation, Sweden (in part) on the remiss procedure that focused on national climate policy, and France on sectoral dialogue and consultation around the SNBC and PPE. In principle, this approach can be a legitimate and efficient response for countries with well-developed participatory infrastructures. Empirically, however, the official NECP documents lack any explanation of how the input from these upstream participation channels was taken into account for the plans. It should, however, be noted that this lack of information about how consultation input was used was widespread: Slovenia's NECPs did not clearly discuss the issue, and only 19% of NECPs across all Member States had such a summary. In Germany, the Commission flagged this gap and lack of detail for both NECP cycles. In France, operational substitution was impossible in the second cycle because the updated NECP was submitted before the consulted strategies had been finalised (Interview 6, CNDP Participant). Any participatory input generated through those strategies therefore could not have shaped the plan.

Third, a substitutive type of institutionalisation dominated the cases examined. Yet this substitution remained largely declaratory rather than operational. It allows governments to appear compliant while leaving unclear whether participation in upstream processes had any bearing on the NECP itself. In fact, without a documented

account of how input was assessed and integrated, participants and observers cannot distinguish meaningful substitution from a box-ticking exercise (Interview 3, EU-level NGO). This finding reflects a broader pattern in the participation literature. Comparative research has shown that the delegation of influence to participants, rather than the mere existence of consultations, is the strongest predictor of substantive participation effects (Newig et al., 2023). Similarly, legally protected participation rights have limited value when participants have little opportunity to shape the final outcome (Lee et al., 2013). In effect, an approach that requires consultation but not demonstrable uptake therefore risks incentivising procedural compliance rather than meaningful participation.

Fourth, the role of the Commission has been inconsistent overall. It maintained close contact with governments through country desks and working groups and was receptive to civil society input (Interview 3, EU-level NGO). Its recommendations on participation also became more explicit and more widely distributed in the second NECP cycle, with participation-related recommendations issued to the vast majority of Member States, including near-identical recommendations to Germany and Sweden. Yet the underlying guidance remained limited, where it largely reproduced the language of the Aarhus Convention obligations without specifying expectations on timing or format and gave governments little direction on the standing of multilevel dialogues foreseen in Article 11, which in many cases were never meaningfully established (Faber et al., 2025). Enforcement was also confined to procedural grounds. In addition, the Governance Regulation does not give the Commission the authority to impose compliance on Member States after the recommendation process related to the draft NECP (outside of the infringement procedure). While the Commission assessed the extent to which the 2018 final NECP and 2024 final updated NECP addressed their participation-related recommendations on the draft documents, this did not lead to any changes by the Member States since the process had already been completed at that point. While infringement proceedings were opened for late submission, they did not address the substance of participation, despite formal complaints (Interview 3, EU-level NGO; CAN Europe, 2024). Interviewees attributed this restraint to the Commission's discretion, limited enforcement capacity, and reluctance to intrude on core Member State competences. This results in an environment of compliance in which participation provisions are formally binding but weakly enforceable in practice, lending support to stakeholder calls for "stronger soft governance" in the upcoming revision of the Governance Regulation (Interview 3, EU-level NGO; Bruch et al., 2024).

Fifth, the cases suggest that institutionalisation is most likely where several enabling conditions come together. Positive movement occurred where the NECP was framed as a planning instrument, where administrative responsibility was stable and where institutional entrepreneurs advanced the process despite limited overall capacity and resources, where domestic civil society had the capacity and knowledge to engage and demand continuation, and where Commission feedback provided external validation for domestic actors seeking to deepen the process. The cases also point to an agency-based condition, where individual change agents matter. In Slovenia, changes in public participation routines depended heavily on a small number of dedicated government officials who carried the NECP process across both cycles and used successive consultations to build trust with relevant stakeholders. This finding is consistent with existing research showing that institutionalisation often depends on individual actors who combine policy innovation with institutional entrepreneurship (Bakir et al., 2021; Brouwer & Huitema, 2018). Yet this also reveals a vulnerability. Individual agents can initiate change in participation routines, but institutionalisation depends on whether this agency leads to a change in the formalisation of rules, procedures, and capacity building in organisations. Where such follow-up is limited, new participation routines risk remaining tied to the individuals who advanced them. In fact, in Slovenia, interviewees openly questioned whether existing participatory practices would survive a change of government or personnel (Interview 8, Slovenian Government official; Interview 9, Slovenian Government official).

Extending this argument, several contextual factors shaped the institutionalisation of public participation in the NECP process. Electoral turnover, for instance, emerged as a particularly disruptive condition. In Germany, three federal governments across three NECP cycles prevented accumulated practice from consolidating, and interviewees anticipate regression in the third cycle (Interview 1, German NGO; Interview 2, German NGO). In France, a broader cross-party backlash against mandatory consultation, including proposals to curtail the national public debate commission, points in a similar direction (Interview 9, Slovenian Government official; Interview 10, Slovenian NGO). External shocks had more ambiguous effects. The COVID-19 pandemic normalised online formats and accelerated the use of digital platforms for public participation to some extent.

At the same time, it constrained in-person dialogue and limited meaningful interaction between governments and the wider public (Interview 3, EU-level NGO). Russia's war against Ukraine and the resulting energy crisis also shifted political attention towards energy security and public spending, pushing the climate agenda, including public participation, further down the list of priorities (Interview 3, EU-level NGO).

Overall, the cases suggest that EU-mandated participation in domestic climate and energy governance becomes institutionalised not simply through the transposition of an obligation but through its appropriation by national actors who have reasons and capacity to sustain it. Where this appropriation occurred, EU requirements served as a resource for domestic institutional entrepreneurs. Where it did not, the same requirements produced mostly shallow compliance. For the EU's role in multilevel climate governance, this suggests that procedural obligations are less likely to shape domestic practice unless they are clearly specified and linked to consequences. Indicative timelines, clearer expectations on format, and mandatory documentation of how input was integrated (or dismissed, with reasons provided) would make participation requirements more actionable. The current revision of the Governance Regulation offers an important opportunity to address these shortcomings.

4. Synthesis and conclusion

This report has examined public participation in EU climate planning from two complementary angles. Section 2 provided a quantitative assessment of the quality of public participation related to the NECPs and LTSs across all Member States. Section 3 examined whether and how mandated participation became embedded in four national contexts, providing an in-depth account of how the NECPs have been approached by different EU Member States. Taken together, these two approaches support the claim that EU-mandated participation is neither uniformly improving in terms of participation quality nor is it durably institutionalised in most settings. In fact, they point to the shortcomings of limited draft-stage participation and a missing feedback loop between consultation and the actual content of the plans.

A second insight is that the relationship between participation quality and institutionalisation is not straightforward. From a general perspective, Germany and France can be described as leaders on participation quality (Section 2), yet they show little to no NECP-specific institutionalisation. High scores can result from well-executed but largely isolated consultation events, whereas institutionalisation requires repetition, embedding, and shared expectations. This cautions against reading the quality scores in Section 2 as direct indicators of durable democratic governance.

Third, the weakest dimension in the quantitative assessment and the most consistent qualitative finding describe the same problem at different levels. Transparency and policy impact were the lowest-scoring dimensions in the quantitative study. The comparative case studies and expert interviews consistently found that governments rarely documented how public input shaped the plans' content (Interviews 1, German NGO; Interview 2, German NGO; Interview 3, EU-level NGO; Interview 4, French NGO; Interview 5, French NGO; Interview 6, CNDP Participant; Interview 7, Swedish NGO/former government; Interview 10, Slovenian NGO). Both findings thus highlight the integration of participation outcomes into policymaking as a critical weakness of the current framework. This confirms and extends Oberthür et al.'s (2025) conclusion that the potential of the NECPs to strengthen democratic legitimacy remains underutilised.

Overall, our research contributes to several bodies of literature. The combined design goes beyond previous assessments focused on individual instruments or planning cycles (e.g., Righettini & Vicentini, 2023) by covering the full extent of NECP and the LTS preparation between 2018 and 2024. It also complements implementation-focused accounts of the Governance Regulation (Bocquillon & Maltby, 2025; Lindberg & Wettstad, 2024) with a systematic account of participatory institutionalisation. For debates on experimentalist and harder soft governance, the findings suggest that repeated review can increase the procedural specificity of the Commission's recommendations without necessarily improving Member State practice, especially if such reviews remain weakly connected to enforcement. For participation research, the findings show that the current approach taken under the Governance Regulation is more suited to ensuring that consultation takes place than to advancing the conditions that make participation meaningful, especially in relation to early and effective participation (Newig et al., 2023).

Across the 106 NECPs and 26 LTSs that we studied, overall participation quality improved in the first cycle

and stagnated in the second. This is very visible when considering all countries together, but also when only considering countries that carried out consultations: the 2019 median NECP score and the 2024 median score are almost equivalent. Overall, quality was lowest for the transparency and policy impact dimensions and was highest for inclusiveness and deliberative quality. Greece is the only country that can be considered a champion in NECP-related public participation. As a group, Central and Eastern European countries carried out lower quality participation than the rest of the Member States, with notable exceptions including Latvia and Slovenia. In the aggregate, the quality of LTS-related participation was similar to that reached in the 2023–2024 phase of the NECPs. However, there was little relationship between the participation quality in these two processes at the level of individual Member States (e.g., Greece, a highly consistent participation champion for the NECPs, did not carry out a consultation for the LTS).

Our in-depth qualitative analysis of four case studies of NECP participation suggests that participation quality and institutionalisation are not causally linked in a straightforward way. In these cases, the Governance Regulation only induced durable institutional change when the NECP was perceived domestically as a planning instrument. Elsewhere, pre-existing channels were invoked declaratively, and little NECP-specific institutionalisation took place. When enabling conditions for institutionalisation occurred, they appeared to be multiple and reinforcing. These conditions included cases where the government treated the NECP as a planning document rather than a reporting instrument and those with higher capacity and expertise to steer both a complex planning process and a diverse, nationwide consultation. Civil society organisations were also key actors in meaningful engagement, insofar as they had the time and capacity to meaningfully contribute to the participation process. Finally, these four cases also point towards the role of agency, including policy entrepreneurs in government departments, in shaping the quality and institutionalisation of public participation (e.g., in Slovenia and France). On the other hand, the EU-mandated character of the NECPs does not seem to be sufficient to motivate the holding of meaningful public participation. Furthermore, unstable political contexts and electoral cycles can affect the planning and continuity of consultations. Regarding the European Union's role, the European Commission appears to have raised the floor on participation practice when NECP participation is carried out but has not been able to induce high-quality institutionalised participation across all Member States.

Our findings relate to several key characteristics of democracy that form the core of the RETOOL project's analytical framework (Brawley-Chesworth et al., 2024). The most relevant characteristic is **participation**. From a broad perspective, the Governance Regulation and its public consultation requirements contributed to the creation of a wide range of participatory processes across the European Union, and several of our in-depth case studies highlight well-designed consultations. On the other hand, our large-scale analysis of participation quality highlighted several weaknesses in the way consultations were carried out, weaknesses that were confirmed by our four case studies. This included a lack of consistency from Member States when implementing the consultations (high variation in the quality of consultations within Member States over time), a lack of clear reporting on how the public's input had informed policy decisions (policy impact dimension) and unclear communication with the public about what the NECPs are and what they are used for (transparency dimension). Another key weakness in the process is a lack of clear reporting by Member States, which made it difficult to analyse significant changes and developments in the way that Member States approached the planning process. The case studies suggest that it is common for the NECPs, and as a result, their related consultations, to be seen as low priority by national governments, but also in some cases for stakeholders, including NGOs.

Second, on the topic of **deliberativeness**, consultations varied widely in their deliberative quality. Slightly more than half of implemented NECP/LTS consultations (including 70% of LTS consultations) made use of more deliberative, two-way processes. However, these processes were commonly reported using ambiguous, general language, making it difficult to assess their exact design and format. In our case studies, we also found examples of well-designed deliberatively oriented processes (e.g., France).

On the topic of **representation**, the NECP/LTS consultations scored relatively highly on the diversity of participants, including citizens, stakeholders and local authorities. However, there were also instances highlighted in the case studies where businesses and economic interests predominated, for example in the German consultations or in the Swedish Multilevel Climate and Energy Dialogue.

Finally, on the topic of **accountability**, the transparency dimension of participation quality, which is key to

effective accountability, was the dimension where Member States scored the lowest on average (with a median score less than one third of the inclusiveness and deliberative quality dimensions). In our four cases, the lack of discussion on this topic made it impossible to trace the impact of consultation on government planning and the NECPs. As noted above, some countries have nevertheless made efforts to publish documents explaining how public inputs have been considered and why certain recommendations were not incorporated into the plans. However, these attempts were uncommon (see, e.g., the France case study).

These findings have implications for policymaking both at EU level and Member State level. The Governance Regulation is currently being revised. We suggest that EU policymakers could further specify the requirements for meaningful public participation related to the NECPs and LTSs and clarify the nature of the Multilevel Climate and Energy Dialogues in this context. In addition, it would be helpful to clarify and narrow the wording of the administrative burden clause. Finally, providing a formal way for countries to integrate existing consultation institutions into NECP participatory processes would be helpful, under the condition that these existing institutions 1. Engage diverse interests and publics; 2. Reflect a nationwide engagement and not only local/regional consultations; and 3. Provide information on how public input is incorporated by policymakers. This overall approach would aim to respect the fundamental criteria for participation quality while avoiding the creation of unnecessary administrative burdens related to the creation of new participatory processes by Member State governments.

Our findings also point to several high-priority areas for future research. First, researchers could examine how certain conditions (and combinations of conditions), e.g., pre-existing participatory infrastructure, shape the institutionalisation and quality of public participation across a larger number of EU Member States. This type of research would require a standardised framework of analysis that can draw on information that is publicly available for all or most Member States. Second, our case studies of Germany, France, Slovenia, and Sweden have underlined the added value of studying these processes in detail. Similar studies could be carried out for countries with interesting or unexpected findings, such as Greece's high-quality approach, the conditions and drivers for consistently low-quality participation in some Member States, and the relationship between institutionalisation and quality in regions not covered here, such as Southern Europe. Finally, with potentially important changes expected to the Governance Regulation in its next revision, e.g., the potential combination of the NECPs and LTSs into one process, it will be important to examine how these changes at EU level affect climate planning and related participation at national and sub-national level.

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Annex A: Codebook

This annex provides a summary version of the codebook used to assess participation quality in the National Energy and Climate Plans and National Long-term Strategies.

1. INCLUSIVENESS

Inclusiveness refers to who participates in the public consultation and the manner in which they participate. An inclusive process should be as open as possible to ensure that all citizens, civil society organisations, stakeholders, and subnational authorities with legitimate interests can participate. Additionally, the participating sample should be a representative and balanced set of the population and its size. This dimension features three criteria.

1.1 Accessibility: Do participants need to be invited to engage in the participation process, or can they join without an invitation?

Code	Score
None	0
Invited	0.33
Open call	0.67
Both or a representative sample	1

1.2 Participation size: How many individuals and groups have participated in the consultation?

Code		Score
None		0
-	Not communicated / missing data point	NA
Low	=< 50 participants	0.33
Medium	51-200 participants	0.66
High	> 201 participants	1

1.3 Participant diversity: Who was included in the public consultation?

We distinguish three groups: citizens, stakeholders (including civil society organisations, academics, and private interest organisations), and subnational authorities.

Code	Score
No consultation	0
Not communicated	NA
citizens or stakeholders or sub-national authorities (one group)	0.33
citizens and stakeholders; or citizens and sub-national authorities; or stakeholders and sub-national authorities (two groups)	0.67
citizens, stakeholders and sub-national authorities (all groups)	1

2. DELIBERATIVE QUALITY

Deliberative quality refers to the 'how' of public participation. A deliberative process empowers participants through the provision of information, procedural transparency, a neutral setting, and multiple types of participation processes (such as consultation and deliberation). Consequently, the provision of information and a transparent, independent, and methodologically diverse process are essential dimensions of deliberative quality.

2.1 Availability of draft: Has the draft been made available to the participants before or during the consultation for them to engage meaningfully with the content?

Code	Score
No consultation or no draft	0
Yes	1

2.2 Consultation length: How long did the consultation last?

Code	Score
No consultation	0
Not communicated	999
Between 1 and 20 days	0.33
Between 21 and 45	0.67
Above 45	1

2.3 Diversity of participation methods: What type of methods have been used for public consultation?

One-way mechanisms included online consultations and presentations, allowing stakeholders to express their

views. Two-way exchanges are facilitated by formats like workshops or roundtables, enabling discussions of different points of view.

Code	Score
None	0
One-way exchange	0.5
Two-way exchange or both	1

3. POLICY IMPACT

Policy impact refers to the ‘*what*’ of public participation in terms of its impact on substantive policies. To enable policymakers to learn from public involvement and integrate its results into policymaking, public participation should be timely and take place well before important decisions are made. Moreover, policymakers must engage with the substantive results of public participation. Consequently, the timeliness of public involvement and the communication of governmental responses to participation are essential dimensions of policy impact.

3.1 Consultation summary: Does the NECP/LTS contain a summary of the participants’ input?

Code	Score
None	0
Short summary	0.5
Extended summary	1

3.2 Early involvement: Did the public consultation happen early enough in the drafting process to ensure that the public's inputs could be considered?

Early involvement is defined as a process that involves the public more than three months before the submission date of the NECP/LTS to the European Commission. The consultation must both start and end earlier than three months prior to submission.

Code	Score
No or no consultation	0
Early involvement of participants	1
Early involvement of citizens	1

3.3 Government response to comments: Did the government respond to consultation input e.g., explain why they will or will not consider specific requests?

Code	Score
No	0
Yes	1

4. TRANSPARENCY

The transparency dimension aims to assess the openness of NECP/LTS public participation processes. This dimension encompasses transparency in both informing the organisation and undertaking the process of public involvement, as well as in the reporting of completed participation processes. A transparent process enables higher-quality participation by exposing a larger number of people to participation methods and allowing participants to be better informed about their participation. Transparency in reporting is a value of open governance and can improve the legitimacy of the participation process and the NECPs/LTSs more generally.

4.1 Participant information: Did the NECP/LTS list the stakeholders that participated (excluding individuals)?

If the NECP mentions the overall types of stakeholder groups that participated, it is considered general information (0.5). If the specific names of groups are mentioned, it is considered specific information (1).

Code	Score
No	0
General	0.5
Specific	1

4.2 Webpage: Did the government create a dedicated webpage for the NECP/LTS?

Code	Score
No	0
Accessible webpage without clear information about NECP	0.5
Accessible webpage with information about NECPs	1

4.3 Public awareness: Did the government organise an awareness raising campaign for the NECP/LTS?

Code	Score
No	0
Yes	1