

# **STRUGGLING FOR A VOICE: THE MIXED REALITY OF PUBLIC PARTICIPATION IN NATIONAL ENERGY AND CLIMATE PLANS**

MARCH 2025



**ACCELERATE CLIMATE  
ACTION IN EUROPE**

PREPARED BY  
CAN Europe and WWF EPO

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# 1. EXECUTIVE SUMMARY

The EU will not reach climate neutrality by chance - it will require thorough planning. National Energy and Climate Plans (NECPs) are a central strategic tool in this regard, laying out key reforms at national level for achieving climate and energy targets, mobilising crucial investments and reacting to the fossil energy price crisis.

In 2023 and 2024, EU Member States were tasked to update their NECPs and outline their reforms to achieve their climate and energy objectives by 2030. Planning the fundamental reforms that will directly affect the ways of life of millions of European citizens cannot take place in an ivory tower. Given the scale and pace of climate action that is required, citizens and stakeholders must be consulted and participate meaningfully in the elaboration of NECPs – or else society will not consent to the proposed measures.

According to Governance Regulation ([Regulation \(EU\) 2018/1999](#)) and in line with the requirements of the [Aarhus Convention](#), Member States have the obligation to organise early and effective public consultations prior to the submission of draft and final NECPs. These instruments lay out precise [legal obligations](#) for public participation during the updating of the NECPs.

In practice, the reality has been quite different. Member States have the obligation to report on their public consultation process in their [final revised NECP](#). In this briefing, CAN Europe and WWF offer an analysis based on the views of other actors on the organisation of public consultations in the NECPs revision process.

## **A. The European Commission's views on public consultation in the draft updated NECPs**

The European Commission's assessment of the public consultation process during the update of National Energy and Climate Plans across EU Member States revealed widespread shortcomings. Despite legal obligations under the Climate Governance Regulation and the Aarhus Convention requiring early, effective, and inclusive public participation, the majority of Member States fell short of these requirements.

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1. See section 1.3 (iii) of each NECP: "Consultations of stakeholders, including the social partners, and engagement of civil society and the general public".

# 1. EXECUTIVE SUMMARY

Out of 27 Member States, 25 received specific recommendations from the Commission to improve their public participation processes. Key deficiencies included late or absent consultations, lack of transparency, and failure to clearly demonstrate how public input was considered. Only a small number of countries ensured consultations took place when all options were still open.

The Commission's analysis highlighted that in over 60% of Member States, public participation either did not occur early enough or was not sufficiently effective, limiting citizens' ability to influence National Energy and Climate Plans. Furthermore, in 21 Member States, the required summaries explaining how public input was taken into account were either missing or inadequate. In several cases, the public was not properly informed about the regulatory context or decision-making processes behind the NECP updates.

The Commission's specific evaluation criteria focused on whether: (1) early and effective participation was provided; (2) a summary of public views was included; (3) there was a clear explanation of how public input was taken into account; (4) the public was sufficiently informed; (5) the consultation period was reasonable.

As stated earlier, the majority of Member States failed to meet these basic standards, with late consultations, inadequate document for public input, and limited transparency being common across the board. The Commission's recommendations emphasise the urgent need for improved processes to ensure compliance with EU law and meaningful public participation in shaping national climate and energy policies.

## **B. Civil society's views on the overall public consultation process during the NECPs update**

This analysis examines the public consultation process on National Energy and Climate Plans across 18 Member States, based on insights from 26 civil society organisations within the CAN Europe and WWF networks. Our study evaluates consultation formats, duration, follow-up processes, and overall effectiveness while identifying best practices and areas for improvement. Key findings:

# 1. EXECUTIVE SUMMARY

## 1. Consultation format

- Some consultations were conducted exclusively online, often with restrictive formats that limited meaningful public engagement.
- A mix of online and in-person consultations was more common but did not always ensure proactive exchanges or inclusive participation of all stakeholders.

## 2. Consultation Length and Follow-Up

- Several consultations were open for less than a month, which is insufficient to provide adequate input given the complexity and length of NECPs.
- While some consultations lasted at least one month or included multiple rounds, many stakeholders still found the timeframe too restrictive for meaningful input.
- A lack of transparency was noted in several instances where governments did not clearly communicate how public feedback was incorporated or not in the final revised NECPs.

## 3. Timing and Early Participation

- The EU Climate Governance Regulation and the Aarhus Convention require early and effective public participation, when all options are still open. However, in many countries, consultations occurred too close to or even after submission deadlines, limiting their impact.
- In some instances, the draft NECPs were submitted to the Commission before consultations began, contradicting regulatory requirements for transparency and accessibility.
- Early-stage consultations - before the draft submission - were often conducted without making the full revised NECP available, reducing the quality of public contributions.

## 2. POLICY RECOMMENDATIONS

### Best practices and recommendations to Member States for future consultations

- 1. Summarised documents:** Providing an accessible summary alongside the full draft NECP can improve public engagement during the public consultation, especially given the technical nature of the plans.
- 2. Adequate resources:** Governments should allocate sufficient resources to ensure meaningful consultations, including thorough consideration of public input.
- 3. Extended consultation periods:** Longer consultations result in more substantial participation, as evidenced by cases where extended periods led to significant public contributions.
- 4. Preliminary consultations:** Organising early-stage consultations up to a year before submission deadlines can enhance public awareness and participation.

### Recommendations to EU policy makers

- 1. Ensure improved processes for forthcoming consultations on Social Climate Plans (SCPs) and National Building Renovation Plans (NBRPs):** The European Commission should urgently press Member States to learn from the NECPs revision process to improve their public consultations, especially as regards their inclusivity levels, in the forthcoming plans to be submitted, such as the Social Climate Plans (due in June 2025)<sup>2</sup> and the National Buildings Renovation Plan (due in December 2025). Both the National Building Renovation Plans and Social Climate Plans should be aligned and mutually supportive, despite differing timelines.
- 2. Strengthen the Governance Regulation:** When the Governance Regulation is revised, the public participation requirements should be improved. Any revision should ensure the following:

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2. For additional recommendations on public participation in the preparation of the SCPs and NBRPs, see this report from CAN Europe and Ecodes (especially p. 23-25): [‘Planning a fair and ambitious Renovation Wave Tools and practices to build better lives through the implementation of the Fit for 55 strategy’](#) (October 2024).

3. These recommendations are in line with the findings of an earlier report from CAN Europe and EEB: [‘A revised and responsive Governance Regulation - Respecting environmental democracy rights in climate planning’](#) (March 2024).

## 2. POLICY RECOMMENDATIONS

### A. Improve and clarify legal rules relating to public participation

- Revise **Article 10** of the Governance Regulation to explicitly require public participation at a stage when all options are still open, in line with the requirements of the **Aarhus Convention**. This should take place well before submission to the European Commission, allowing meaningful integration of public and stakeholder input.<sup>4</sup>
- Include reference to the **Strategic Environmental Assessment (SEA) Directive** in Articles 10, 12, and Recital 28 of the Governance Regulation to ensure systematic application to the NECP and national Long-Term Strategy (nLTS) processes.<sup>5</sup>

### B. Establish clear minimum timeframes

- Define a **minimum consultation period** (following best practices and international standards) to ensure **sufficient time for public participation**, as required by Article 10 of the Governance Regulation.

### C. Enhance transparency and accountability

- Mandate the publication of a **written and reasoned decision detailing how public input was considered and incorporated into the NECPs**. This should go beyond a simple summary to demonstrate compliance with the Aarhus Convention and Decision VII/8f of the Aarhus Convention Compliance Committee (ACCC).

### D. Standardise consultation stages

- Distinguish between the draft for public consultation and the draft for submission to the European Commission, providing clear procedural guidelines for each stage to improve consistency across Member States.<sup>6</sup>

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4. The Review Report on the functioning of the Governance Regulation mentions that “Member States did not set up sufficiently early and inclusive public consultations, as required by the Regulation”, explaining this by a potential lack of sufficiently precise or prescriptive provisions.

5. The Review Report on the functioning of the Governance Regulation recognises that “the links to the public involvement requirements under the Aarhus Convention or the Strategic Environmental Assessment Directive may also not be sufficiently clear”.

6. The Governance Regulation Articles 9 and 14 demand the submission of a draft to the European Commission at a certain point in time. Article 9(4) demands that in the process of the public consultation (art 10) a draft must be made available publicly. However, if that later draft was to be the same draft which was submitted to the Commission, then at that stage the public consultation would come too late for all options to still be open. There must, therefore, be different iterations of drafts available publicly at some point to fulfill both the public participation and the submission to the Commission obligations. Clarification in this area is needed.

## 2. POLICY RECOMMENDATIONS

### E. Capacity-building and administrative support

- Support Member States with technical assistance and capacity-building initiatives to address gaps in administrative structure, expertise, and resources needed for effective public engagement.<sup>7</sup>

### F. Monitor and enforce compliance

- Establish a **robust monitoring mechanism** to ensure that Member States comply with the consultation requirements of the Governance Regulation and Aarhus Convention.
- Encourage the **European Commission to issue country-specific recommendations** more consistently, especially to address deficiencies in public participation practices, as evidenced by the 22 out of 24 cases identified.

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7. The Review Report on the functioning of the Governance Regulation mentions that “in some cases, a lack of national experience, problems linked to administrative structure and capacity and/or a lack of political support could also play a role” in the low quality of the public consultation processes in NECPs.

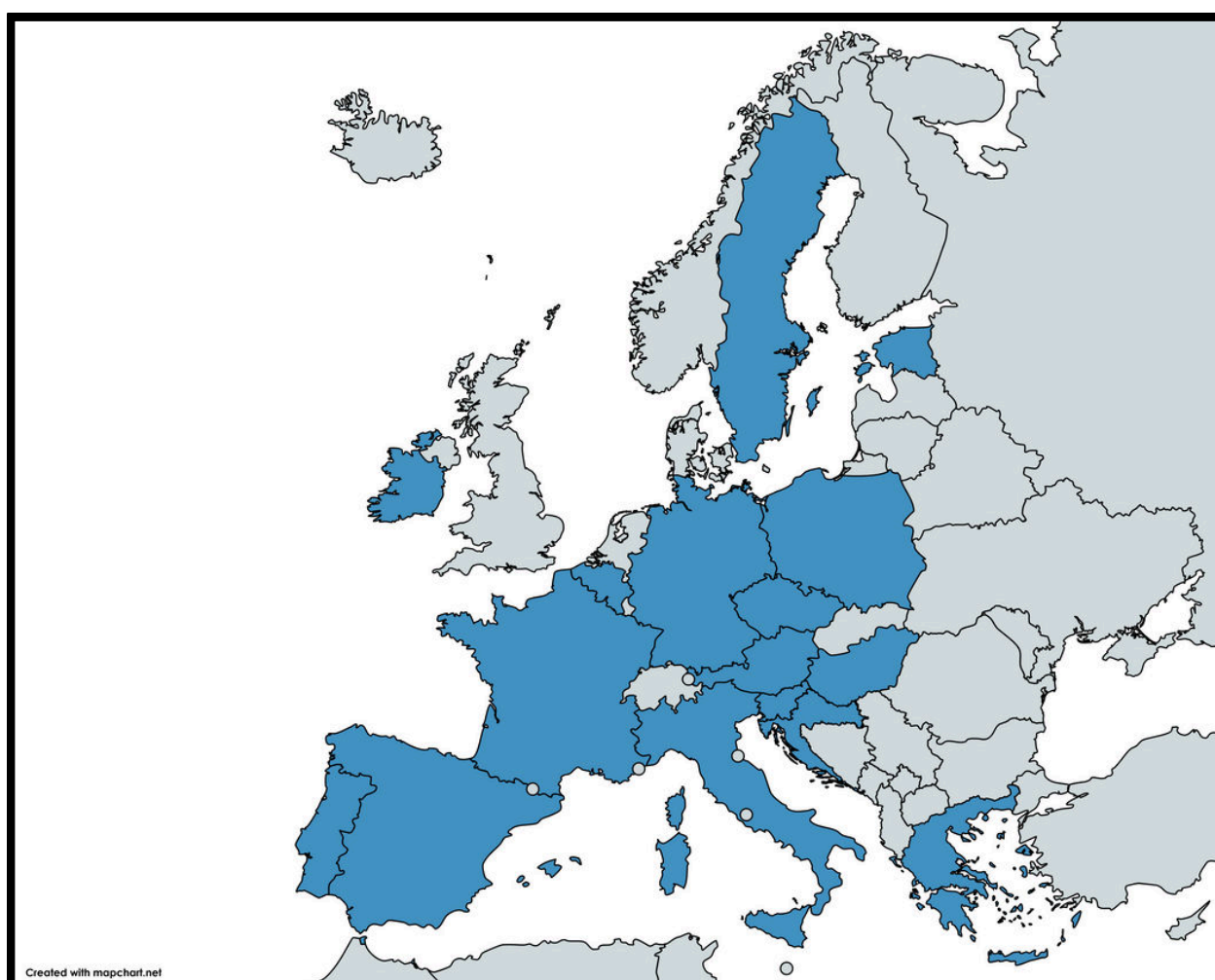


### 3. CIVIL SOCIETY EVIDENCE

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Our analysis was conducted with the support of 26 civil society organisations across the CAN Europe and WWF networks, covering 18 Member States: Austria, Belgium, Bulgaria, Croatia, Czechia, Denmark, Estonia, France, Germany, Greece, Hungary, Ireland, Italy, Poland, Portugal, Slovenia, Spain, Sweden.

We raised several questions to these organisations, relating to the NECPs consultation format, length, follow-up and timing. We also identified good practices in a limited number of Member States and issues we believe should be avoided for next public consultations. This section analyses the responses we received. For an overview of information per Member State, please refer to the Annex.



*In blue: EU Member States analysed in this section*

## A. Consultation format

Several countries only organised an online public consultation (Bulgaria, Croatia and Germany). Some countries organised online consultations with restrictive input limits which made it difficult to meaningfully engage, with tick boxes questions and very limited space to write further comments (Germany, Ireland, Italy). The format of questions and space left for responses in an online questionnaire is therefore highly important to guarantee meaningful input.

In most countries, the government organised a mix of online and in-person consultations (Belgium, Czechia, Denmark, Estonia, Greece, Hungary, Poland, although there was no proactive exchange of views during the events, Portugal, Sweden, Slovenia and Spain). In Italy, the in-person events held during the consultation process did not include all relevant stakeholders, such as civil society. To ensure a more inclusive process, it is essential to invite a diverse group of participants.

With regards to more specific cases, civil society considered that the consultation in Austria was not reasonable (only one workshop was organised with the possibility of providing written feedback). France seems to be a particular situation as consultations did take place on some constitutive elements of the NECP<sup>8</sup>, but not on the NECP as a whole.

## B. Consultation format and follow-up

In four countries, the public consultation was open for less than a month - which is by far insufficient to provide meaningful input given the length and complexity of NECPs: Bulgaria (14 days), Greece (3.5 weeks), Hungary (2-3 weeks) and Italy (3 weeks).

In several countries the consultation was open for one month: Croatia, Denmark, Estonia, Ireland and Poland. Many national organisations have expressed that one month is insufficient to provide meaningful input.

Austria, Germany and Spain organised a consultation lasting more than a month. Some countries organised several rounds of consultations which put together went beyond a month, but with individual rounds of consultation below or equalling 4 weeks: Czechia (3 + 7 weeks), France (14 + 4 + 6 weeks), Portugal (4 + 7 weeks), and Slovenia (8 + 4 + 4 + 4 weeks).

In addition, there were at least four countries where the government did not (or at least not clearly) give explanations as to how the views of the public were incorporated or not in the final version of the plan: Czechia, Hungary, Ireland, Spain.

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8. Such as the *Stratégie nationale bas-carbone* and the *Programmation pluriannuelle de l'énergie*.

### **C. Providing early and effective opportunities for public participation**

Article 10 of the Governance Regulation requires governments to give ‘early and effective’ opportunities for public participation in the preparation of the NECPs and their revision. Likewise, Article 6(4) of the Aarhus Convention requires “early” public participation; that means when all options are open and effective public participation can take place.

In three countries, the respondent civil society organisation considered that the consultation took place early enough, when all options were still open: Belgium, Slovenia and Spain. In Portugal, there were mixed views: a first consultation did take place early in the revision, but without a draft revised NECP made available. The second consultation happened when the draft updated NECP had already been submitted to the European Commission and was very close to the final deadline for submitting the finalised updated plan.

In many countries, the consultation on the draft plan took place too close or even after the deadline for the submission of the NECP to the European Commission in June 2023, which made it hard for national governments to meaningfully consider the comments received: Austria, Croatia, Czechia, Denmark, Estonia, Germany, Italy and Sweden.

In some countries, a first consultation took place when the draft plan had already been submitted to the European Commission: Germany, Greece, Ireland and Sweden. In these cases, it is clear that the consultation did not happen when all options were still open.

Finally, in many countries a consultation took place before the submission of the draft plan to the Commission, but without the full draft NECP made available: Czechia, Hungary, Italy, Poland, Portugal and Spain. This goes in contradiction with the requirement set out in Article 9(4) of the Governance Regulation to make the draft plan available during the consultation process for the preparation of the draft NECP. In such conditions, it is impossible for the public to provide meaningful input.

## D. Good practices

Alongside the legal requirements stemming from the Governance Regulation and the Aarhus Convention, we have identified good practices that some Member States have adopted during the NECPs public consultation process:

- During the consultation process, a summary of the plan should be made available alongside the full draft. This would ease the general public engagement with the consultation, given the length (+250 pages documents) and complexity of such plans.
- National administrations should be given adequate means to organise a meaningful consultation process and properly consider the answers received. Several countries analysed in this report demonstrate that organising meaningful public consultations is possible, provided that adequate resources are put in place.
- The longer the consultation period, the more contributions will be received - making it more likely that the plan becomes a truly participatory document. As an example, Spain's second consultation was open for more than two months and attracted more than 10 000 contributions from 382 participants.
- The organisation of preliminary consultations, up to one year before the draft submission deadline, helps to alert the public that proper consultations are coming up. Such preliminary consultations should be encouraged.

# 4. COMMISSION RECOMMENDATIONS

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On 18 December 2023, the European Commission published country-specific recommendations, as per Articles 9.2 and 34 of the Governance Regulation. Those are recommendations regarding the draft updated NECPs, that Member States should take into account when drafting their final updated NECPs. The following table gives an overview of these recommendations on public participation, on the basis of 5 evaluation criteria:

1. Whether early and effective participation was provided;
2. Whether a summary of public views was included;
3. Whether there was a clear explanation of how public input was taken into account;
4. Whether the public was sufficiently informed;
5. Whether the consultation period was reasonable.

Based on the Commission's assessment, it is unclear whether the Member State complied with its obligations.

Based on the Commission's assessment, it seems clear that the Member State did not comply with its obligations; or the Commission highlights that this information is missing from the draft plan.

Based on the Commission's assessment, we consider that the Member State only partially complied with its obligations.

Based on the Commission's assessment, it seems clear that the Member State complied with its obligations.

The Commission didn't provide any assessment

Early and effective opportunity to participate in the preparation of the NECP

Summary of the public's views or provisional views

Summary of how the public's views have been taken into account

Public is informed

Reasonable timeframe allowing sufficient time for the public to be informed, to participate and express its views

AUSTRIA

BELGIUM

BULGARIA

CROATIA

CYPRUS

CZECHIA

DENMARK

The draft NECP was not open to public consultation before its submission to the European Commission

	Early and effective opportunity to participate in the preparation of the NECP	Summary of the public's views or provisional views	Summary of how the public's views have been taken into account	Public is informed	Reasonable timeframe allowing sufficient time for the public to be informed, to participate and express its views
ESTONIA	Green	Red	Green	Orange	Green
FINLAND	No specific consultations were organised in the context of the NECP update. Only based on consultation held in the preparation of the national strategies and plans factored into the draft updated NECPs.				
FRANCE	No specific consultations were organised in the context of the NECP update. Only based on consultation held in the preparation of the SNCB and PPE factored into the draft updated NECP.				
GERMANY	No specific consultations were organised in the context of the NECP update. The plan explains that consultations will take place in the course of 2023-2024.				
GREECE	Green	White box	Red	Orange	Grey
HUNGARY	Green	Red	Red	Red	Red
IRELAND	The draft NECP was not open to public consultation before its submission to the European Commission				
ITALY	Green	Red	Red	Green	Red

	Early and effective opportunity to participate in the preparation of the NECP	Summary of the public's views or provisional views	Summary of how the public's views have been taken into account	Public is informed	Reasonable timeframe allowing sufficient time for the public to be informed, to participate and express its views
LATVIA	No specific consultations were organised in the context of the NECP update. The plan explains that consultations will take place in the course of 2023-2024.				
LITHUANIA					
LUXEMBOURG					
MALTA	The draft NECP was not open to public consultation before its submission to the European Commission				
NETHERLANDS	No specific consultations were organised in the context of the NECP update. More based on consultation around climate & energy policies in general than on the plan.				
POLAND	The plan states that an updated version will be presented for public consultation around Q2/Q3-2024.				
PORTUGAL					
ROMANIA	This plan does not indicate that the public was consulted.				



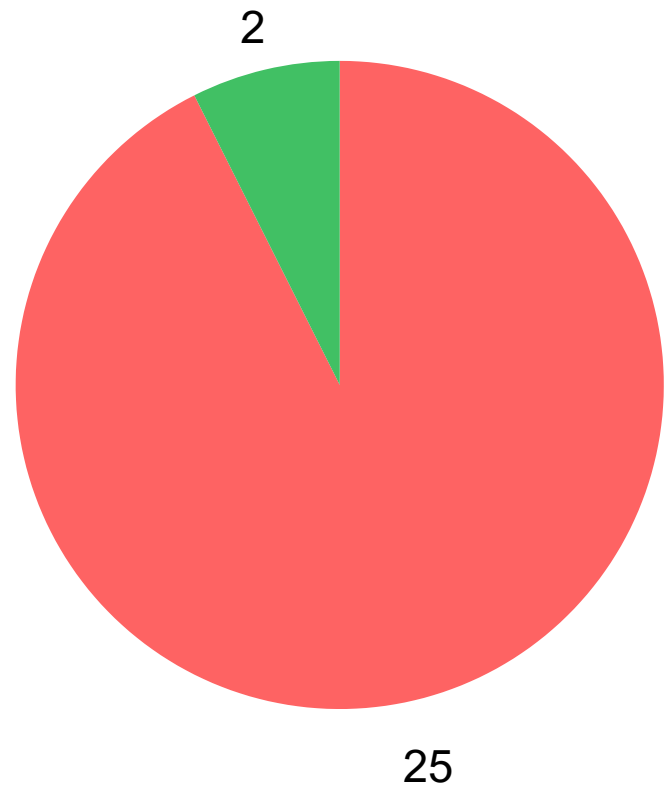
	Early and effective opportunity to participate in the preparation of the NECP	Summary of the public's views or provisional views	Summary of how the public's views have been taken into account	Public is informed	Reasonable timeframe allowing sufficient time for the public to be informed, to participate and express its views
SLOVAKIA	Grey	Red	Grey	Red	Red
SLOVENIA	Green	Green	Red	Green	Green
SPAIN	Green	White box	White box	Green	Green
SWEDEN	No specific consultations were organised in the context of the NECP update. Only based on regular national consultation procedure factored into the draft updated NECP.				

## A. Overview

25 out of the 27 countries assessed received specific recommendations to improve public participation processes.

*In green: Member States which did not receive specific recommendations to improve public participation processes.*

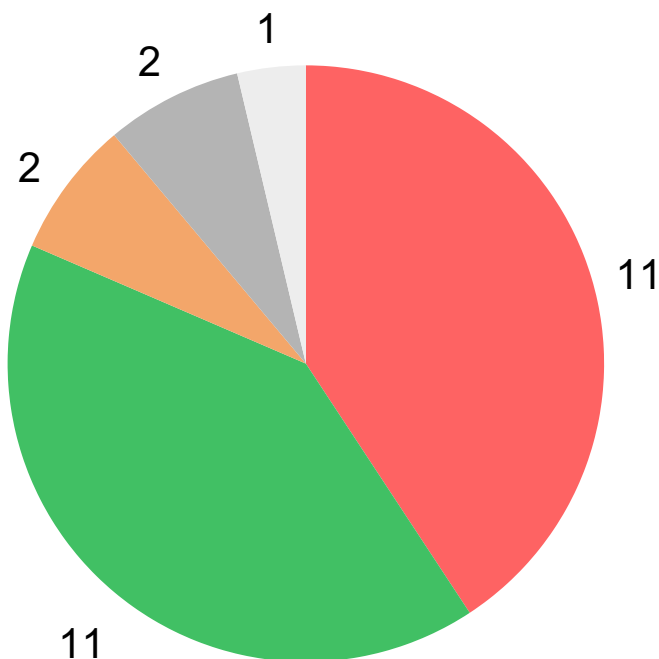
*In red: Member States which received specific recommendations to improve public participation processes.*



## B. Early and effective opportunities to participate in the preparation in the draft NECP

Based on the Commission's assessment:

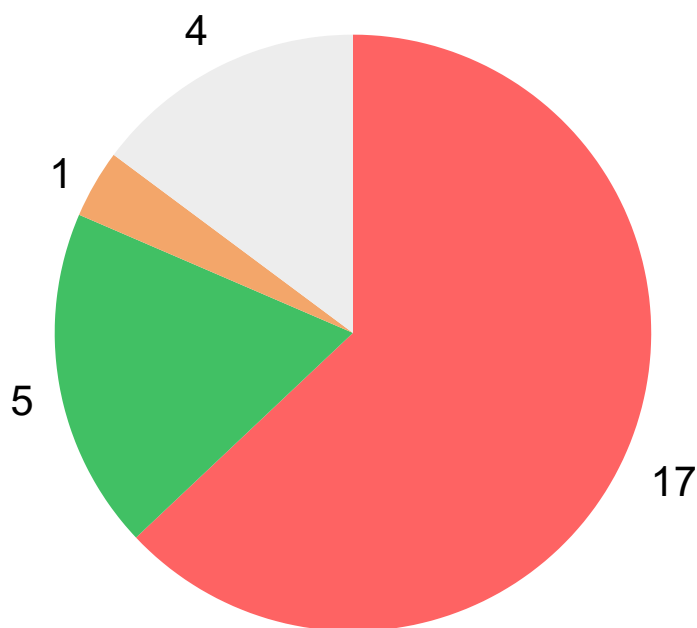
- In 11 out of 27 Member States (*red*), it seems clear that Member States did not comply with their obligations; or the Commission highlights that this information is missing from the draft plan.
- In 11 out of 27 Member States (*green*), it seems clear that Member States complied with their obligations.
- In 2 out of 27 Member States (*grey*), it is unclear whether Member States complied with their obligations.
- In 2 out of 27 Member States (*orange*), we consider that Member States only partially complied with their obligations.
- 1 out of 27 Member States (*white*) does not have an assessment provided by the Commission.



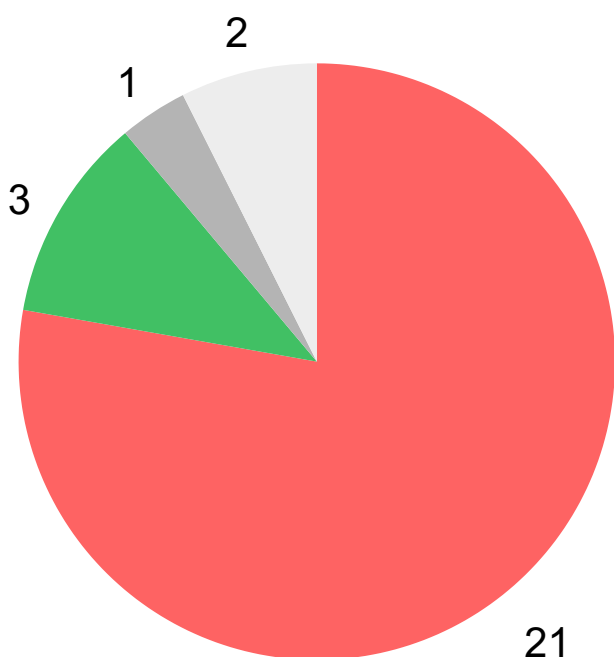
### C. Summary of the public's views or provisional views

Based on the Commission's assessment:

- In 17 out of 27 Member States (*red*), it seems clear that Member States did not comply with their obligations; or the Commission highlights that this information is missing from the draft plan.
- In 5 out of 27 Member States (*green*), it seems clear that Member States complied with their obligations.
- In 1 out of 27 Member States (*orange*), we consider that the Member State only partially complied with its obligations.
- 4 out of 27 Member States (*white*) do not have an assessment provided by the Commission.



### D. Summary of how the public's views have been taken into account



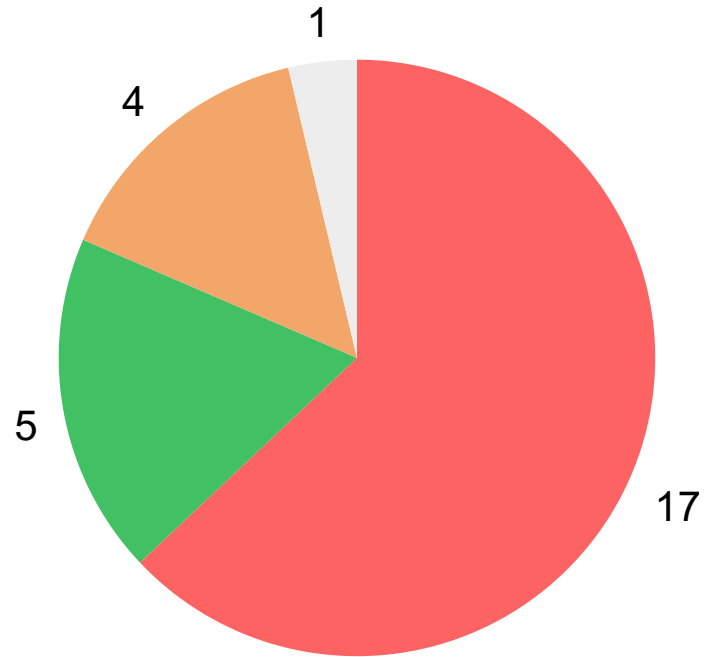
Based on the Commission's assessment:

- In 21 out of 27 Member States (*red*), it seems clear that Member States did not comply with their obligations; or the Commission highlights that this information is missing from the draft plan.
- In 3 out of 27 Member States (*green*), it seems clear that Member States complied with their obligations.
- 2 out of 27 Member States (*white*) do not have an assessment provided by the Commission.
- In 1 out of 27 Member States (*grey*), it is unclear whether the Member State complied with its obligations.

### E. Public is informed

Based on the Commission's assessment:

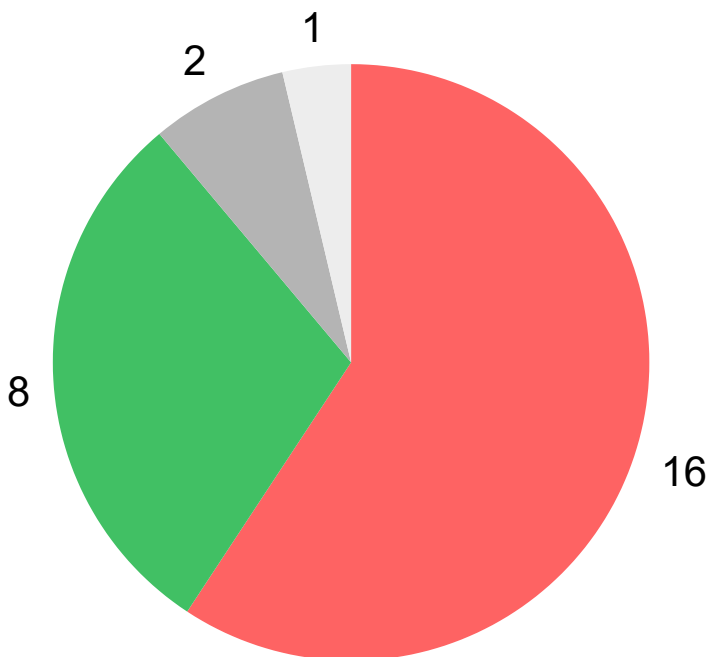
- In 17 out of 27 Member States (*red*), it seems clear that Member States did not comply with their obligations; or the Commission highlights that this information is missing from the draft plan.
- In 5 out of 27 Member States (*green*), it seems clear that Member States complied with their obligations.
- In 4 out of 27 Member States (*orange*), we consider that Member States only partially complied with their obligations.
- 1 out of 27 Member States (*white*) does not have an assessment provided by the Commission.



### F. Reasonable timeframe allowing sufficient time for the public to be informed, to participate and express its views

Based on the Commission's assessment:

- In 16 out of 27 Member States (*red*), it seems clear that Member States did not comply with their obligations; or the Commission highlights that this information is missing from the draft plan.
- In 8 out of 27 Member States (*green*), it seems clear that Member States complied with their obligations.
- In 2 out of 27 Member States (*grey*), it is unclear whether Member States complied with their obligations.
- 1 out of 27 Member States (*white*) does not have an assessment provided by the Commission.



# ANNEX

# ANNEX

In order to inform this report, WWF EPO and CAN Europe circulated a survey to national organisations across their networks. The survey gathered information on key aspects of the public consultation process. It explored the format in which consultations took place (e.g., online or in-person), their duration, and whether they were conducted early enough to allow meaningful public input. The survey also examined the content shared, specifically whether the public was informed about new envisaged measures (WAM) or only existing ones (WEM). Additionally, it assessed whether participants were provided with information on the regulatory context and decision-making process for updating the NECP.

## Austria

- ✗ The respondent civil society organisation considered that there was no “reasonable” consultation taking place in Austria regarding the draft updated National Energy and Climate Plan. Only one workshop was organised by the Austrian government, giving the opportunity to provide written feedback.
- ✗ The public consultation on the draft NECP took place from 5 July until 30 August 2023, which was later than the June deadline for the submission of the draft updated NECP. Therefore, the public consultation didn’t take place early enough to be meaningful (when all options are still open).
- ✗ The public has not been informed of the regulatory context for the review and the decision-making procedure to be followed for the update of the NECP.

## Belgium

- ✓ Belgium organised different public consultations on the draft updated NECP: online, in-person meetings, through advisory councils and through citizen panels, depending on the level of government. However, there was significant variety across the levels of government, so the quality of the public consultation was not the same in the different regions of the country.
- ✓ The length of the public consultation varied across governments but overall, according to the European Commission, this was enough to give the public opportunity to participate in the consultation.
- ✓ The public consultation took place early enough to be meaningful, when all options were still open.
- 🤔 The public has been informed about new envisaged measures (WAM) as well as existing measures (WEM). However, the quality and substance of the consultations varied intensely across time and across government levels.
- ✓ The public has been informed of the regulatory context for the revision and the decision-making to be followed for the update of the NECP. The formal procedures were part of the communication surrounding most consultation procedures and were also part of the press discussion of the NECP update.

## Bulgaria

🙄 A public consultation took place - however, it was an online consultation only, since the in-person event was meant only to present the updated version.

✗ The length of the public consultation was not enough, according to civil society (and EC), lasting only 14 days (10 working days). Also, the public consultation took place in the last 2 weeks of June 2024.

✗ Some found that the public consultation took place early enough to be meaningful (when all options were still open), and some others didn't. The European Commission, however, concluded that this consultation didn't take place early enough.

✓ The public has been informed about WAM.

✓ The public has been informed of the regulatory context and the decision-making procedure to be followed for the update of the NECP.

## Croatia

🙄 A public consultation took place - however, it looks like it took place only through a national online platform, without organising further in-person meetings. According to the European Commission, the plan was not even submitted to consultation (which took place after the publication of the Commission's recommendations).

🙄 The length of the public consultation was a month-time.

✗ The whole final updated NECP development process was late, which also includes to consultation which took place in late 2024. Everyone was able to publish comment(s), but it remains to be seen whether they have been taken into account once the final revised NECP is available.

✓ The public has been informed about WAM and WEM. Indeed, both scenarios were described in the NECP that was published for public consultation.

🙄 The public has been informed of the regulatory context and the decision-making procedure to be followed for the update of the NECP, but not very clearly and not transparently enough. It was available on the Ministry's website and published on the online channels of some NGOs; the media were not interested in this topic.

## Czechia

🙄 A Platform for Energy and Climate Strategies was established in April 2023 with various stakeholders represented, including two civil society representatives. Members of the Platform were given access to working drafts of the NECP and were able to provide comments. However, regions and cities were only represented through associations of cities and regions, without any consultations happening at the local or regional level. Also, two rounds of online public consultation took place in the form of a simple online form. However, there were no supporting materials provided beyond a link to the draft NECP.

✗ The length of the public consultations was not enough: the first round of online public consultation lasted less than three weeks without prior notice. The second round of online public consultation took place in January or February 2024 and lasted approximately 7 weeks and also started without prior notice.

✗ The first round of online public consultation took place in May and June 2023, which is not early enough given the June deadline for the submission of the draft updated NECP. This first round of online public consultation took place before any meaningful draft or supporting materials were available. Later, the second round was conducted after the submission of the draft updated NECP to the European Commission.

🙄 In the first round of public consultation, the public has not been informed about WAM. During the second round, a link to the 2023 draft updated NECP was provided, without any further supporting documents or explanation.

✗ The public has not been fully informed of the regulatory context and the decision-making procedure to be followed for the update of the NECP: only very basic information about the expected timeline for the NECP to be submitted to the Commission was provided. There was no active effort to promote the consultation beyond a simple press release on the Ministry's website.

✗ The final NECP includes a link to a summary of the online consultation results, but it fails to provide any information about how the results of the consultation have been taken into account.

## Denmark

🙄 A public consultation on the draft updated NECP took place, including a 2-hour in-person meeting and a 4-week written process. In light of these figures, it looks like the length of the public consultation was not enough to allow sufficient time for the public to be informed and participate.

✗ The public consultation didn't take place early enough to be meaningful (where all options were still open), with a deadline for the public to provide their comments on the 18 June 2024, meaning 12 days before the submission of the draft updated NECP to the Commission.

✅ The public has been informed about both WEM and WAM, even more information about WAM would have been welcomed.

✅ The public has been informed of the regulatory context and the decision-making procedure to be followed for the update of the NECP on the portal for public consultations on legislation (Hoeringsportalen).

## Estonia

✅ A public consultation on the draft updated NECP took place, including a seminar to inform stakeholders about the NECP draft, and an online consultation taking place in April and May 2023. After this, the Ministry of Climate held another public seminar, informing about which suggestions were included in the draft.

✗ The public consultation didn't take place early enough since the end of the consultation was less than 2 months before the deadline for Member States to submit their draft updated NECPs.

✗ The length of the public consultation was not enough, with only one month for sending a written feedback to the draft updated NECP.



🙄 The public was informed about WAM and WEM. However, there are no new measures or policies in the Estonian NECP, and all of them have been agreed elsewhere in strategic documents or law.

✅ The public has been informed of the regulatory context for the review and the decision-making procedure to be followed for the update of the NECP.

## France

🙄 A public consultation on the draft updated NECP as a whole didn't take place; only 3 consultations regarding the Stratégie nationale bas-carbone, and the Programmation Pluriannuelle de l'énergie took place.

✅ On the length of these consultations, the first one was 3.5 months long, the second one was a month long, and the third one should last 6 weeks.

🙄 The first public consultation took place very early (when all options were still open), but didn't lead to meaningful changes. The last one is definitely too late, since it comes after the submission of the final updated NECP to the European Commission.

🙄 The public has been kind of informed about WAM and WEM. Indeed, this distinction is not very clear in the Stratégie nationale bas-carbone, but the online documentation is quite detailed and contains sectoral memos on where the sectors stand, and which policies are considered to update this strategy. There is a feeling that the NECP generally lacks the measures to achieve the objectives.

❌ Because the public consultations focused on the Stratégie nationale bas-carbone and the Programmation pluriannuelle de l'énergie, and not on the NECP itself, the public has not been informed of the regulatory context for the review and the decision-making procedure to be followed for the update of the NECP.

## Germany

🙄 A public consultation on the draft updated NECP took place. However, this happened in the shape of a "satisfaction form" with tick boxes on Germany's target along the 5 dimensions of the Energy Union, with very limited space to write further comments. This resulted in a very poor public participation.

🙄 The public consultation was open for 7 weeks to fill in the satisfaction form.

❌ The public consultation didn't take place early enough (when all options were still open). The consultation took place between January and March 2024, when the draft NECP had already been submitted to the Commission.

❌ The public has not been informed about WAM, but only about WEM.

❌ The public has not been fully informed of the regulatory context for the review and the decision-making procedure to be followed for the update of the NECP: there was only a webpage on the Ministry of Climate page (BMWK), and the Ministry only communicated late about the consultation through their newsletter.

## Greece

- ✓ A public consultation took place on the official government website. In addition, the Ministry of Environment and Energy held a physical meeting inviting several CSOs to exchange on the NECP. Finally, CSOs were also invited to participate in the interministerial meeting held a couple of days after the consultation ended.
- ✗ The official public consultation on the official government website lasted for a bit less than four weeks, from 22 August until 16 September 2024.
- ✗ The public consultation didn't take place early enough (when all options were still open). The consultation indeed only took place when the draft NECP had already been submitted to the European Commission. During the preparation of the draft updated NECP no public consultation was conducted, and the Ministry of Environment and Energy instead opted for a "closed" consultation among a handful Ministries, regulatory authorities and CSOs. Thus the draft of the revised NECP was submitted to the European Commission without any consultation with the general public.
- ✗ Besides the measures for LULUCF, the Greek NECP had no clear indication between the WEM and WAM during the public consultation process. We consider it impossible for the general public to be considered properly informed with such an approach.
- ✗ The public has not been informed of the regulatory context for the review and the decision-making procedure to be followed for the update of the NECP. Overall, the Ministry's approach has been focused on closed-group consultations. The public was then informed through media leaks. Information on the regulatory context and decision-making process has come primarily through communication activities of NGOs.

## Hungary

- 🙄 An online public consultation took place in the draft phase of the NECP, but only on a summary of the draft NECP and not the full draft NECP itself. In addition, two rounds of in-person discussions were organised by the government with green NGOs in the preparation of the draft version. The final version of the NECP was not published for consultation. It should be noted that another online consultation took place as part of the Strategic Environmental Assessment of the draft NECP revision. However, the SEA consultation deadline was on 22 September 2024, and the final NECP was already submitted by the government to the Commission in early October, so there was no way to incorporate the received public opinions and suggestions.
- ✗ The length of the public consultation was not enough, with only 2-3 weeks for the consultation on the draft NECP. The SEA online consultation lasted one month.
- 🙄 Some respondents considered that the consultation took place when all options were still open. However, the way in which the public's recommendations were addressed was missing.
- ✗ The document made available during the consultation (a 45 page summary of the draft NECP, and not the NECP itself) only presented one single scenario (WAM) compared to the baseline (WEM) scenario, but no real alternatives.
- ✗ The public has been informed of the regulatory context for the review and the decision-making procedure to be followed for the update of the NECP, but with limited scale. For example, there was no information on how the received feedback would be addressed.

## Ireland<sup>9</sup>

🙄 Two consultation periods were held online, using a survey format. The survey had restrictive word limits and did not ask questions on specific scenario, sectoral or policy options relevant to the update of Ireland's NECP. As part of the first consultation, respondents were invited to submit tick-box answers (such as Yes/No and Agree/Disagree) to questions about their awareness of the NECP prior to the consultation, the importance of the NECP, sectoral responsibility for achieving the NECP, and whether the draft NECP sufficiently addressed listed key areas. No questions were asked on scenario, sectoral or policy options. Respondents were then invited to submit open comments on any additional feedback they'd like to provide (restricted to a maximum 300 words), or anything else they'd like to see included in the final NECP (restricted to a maximum of 150 words). As part of the second consultation, and using a survey form provided, respondents were asked to give tick-box answers to questions on awareness of the NECP prior to the consultation, and whether the NECP adequately addressed key areas. Respondents were asked for open comments on whether the NECP was 'practical and realistic', which targets were 'more important', 'what measures / topics should be identified for acceleration to 2030?', 'what more could people/industry be doing to support Government...', and if there was 'anything else you would like the Department to consider when undertaking future reviews of the NECP'. No questions were raised regarding the Five Dimensions of the Energy Union, or any scenario, sectoral, or policy-specific issues.

🙄 Both consultations last approximately four weeks: 8th February to 7th March 2024 and 30th May to 27th June 2024

✗ The public consultation didn't take place early enough to be meaningful (where all options were still open). The two public consultations which did occur took place after the draft had been filed with the European Commission.

🙄 The first consultation only included information about existing measures (WEM). The second/final consultation included information about WEM and WAM measures. It is worth noting that these scenarios are not aligned with Ireland's legally binding 2030 targets.

🙄 Information on the regulatory context was made available. However, there was limited information available on the decision-making process, particularly regarding whether and how submissions from the public consultation and recommendations from the European Commission's assessment were fully addressed and incorporated into the final updated NECP, as well as the rationale provided for any submissions or recommendations that were not addressed.

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9. For more information, check this [report](#) from Environmental Justice Network Ireland.

## Italy

✗ In May 2023, an online public consultation took place. The draft NECP was however not made available and the consultation consisted of multiple choice questions. Although the public never had access to the draft updated NECP, on 30 June 2023 MASE submitted its draft updated NECP to the European Commission. A second online consultation took place in February-March 2024 through an invitation to complete an open-ended online questionnaire. However, once again, participants were not given the opportunity to review or discuss the proposed updated NECP. In addition, there was no publication or discussion on the inputs provided. This approach reduced participation to a mere collection of diverse viewpoints, without fostering meaningful dialogue or engagement between the relevant ministry and the members of the public. Alongside these online consultations, three closed-door thematic tables were initiated from end 2023 until mid 2024. These tables involved institutional stakeholders, including ministries, agencies, research bodies, trade unions, and industry associations. However, they excluded the NGOs in the sector from participation.

✗ The first consultation on the draft NECP lasted for less than three weeks. The second consultation lasted one month.

🙄 It is questionable whether the first consultation took place early enough (when all options were still open), since it took place roughly one month before the submission of the draft NECP to the European Commission - raising question on whether there was sufficient time to incorporate the views received.

✗ Regarding WEM and WAM, the draft NECP included reference to potential measures that do not exist yet (for example on nuclear energy) but not adequate information on new measures were connected to the consultation process.

✗ Information on the regulatory context was provided, but there was no specific effort to promote the consultation.

## Poland

🙄 In June 2023, a preliminary consultation was conducted without the draft NECP being available. In October 2024, an online consultation took place on the draft updated NECP. In parallel, the Ministry organised a limited number of in-person meetings regarding the NECP. However, these sessions primarily focused on presenting the NECP rather than actively gathering feedback from stakeholders and some of these discussions took place without the draft NECP nor WAM scenarios.

🙄 The second online consultation lasted for one month.

✗ The public consultation didn't take place early enough (when all options were still open). The consultation indeed only took place when the draft NECP had already been submitted to the European Commission.

🙄 WAM scenarios were made publicly available quite late in the process, in October 2024. At the time of the publication of the WAM scenario presented WAM as an equally valid scenario as WEM, reflecting the government's openness to exploring both pathways. However, the WAM scenario does not incorporate a significantly greater number of new actions compared to the WEM version. This raises questions about whether its basis on the WAM scenario is more than a declaration.

## Portugal

✔ Two public consultations were carried out online. The first consultation was held before the submission of the draft updated NECP and contributions were to be submitted by answering a questionnaire. The second consultation was held before the deadline for the submission of the final updated NECP and contributions did not have to follow a specific format, as you could upload a document with your comments via the platform. Five in person participatory assemblies were also held in different parts of the country at the start of the process of preparing the draft updated NECP, with the participation of the public authorities with competences in the energy and climate areas (also responsible for the NECP development process) and civil society.

😞 The first online consultation was open for contributions for 1 month. The second online consultation was open for contributions for 45 days.

😞 It is unclear whether the public consultation took place early enough to be meaningful. On the one hand, the first public consultation took place at an early stage of the NECP update process, but had as a starting point the previous version of the NECP submitted in 2019 (and not the draft updated version). On the other hand, the second consultation happened when the draft updated NECP had already been submitted to the EC and was very close to the final deadline for submitting the finalised updated plan.

😞 The public has been informed about both WAM and WEM, but only on the second public consultation.

😞 The public was informed of the regulatory context for the review and the version of the final updated NECP made available in the second online public consultation had some information about the decision-making procedure followed. However, the information lacked detail and there was no information about the step-to-step process. This information should also have been available at the beginning of the NECP development process.

## Slovenia

✔ The process of revision of the Slovenian NECP was technically well prepared. An online preliminary consultation took place in 2022. There were then 2 online consultations on the first draft NECP in Spring and Autumn 2023 and one formal consultation on the final document in spring 2024. Workshops also took place as part of the SEA procedure. The different consultations were coupled with meetings with selected stakeholders.

✔ The preliminary consultation lasted 8 weeks. The two consultations on the draft NECP and the consultation on the final text lasted one month each.

✔ The public consultation took place early enough to be meaningful, when all options were still open.

😞 The public has been informed about new envisaged measures (WAM) as well as existing measures (WEM), but with a delay because in the first two consultations there was no measure chapter in the draft. That chapter has only been included in December 2023.

✔ The public has been informed of the regulatory context for the review and the decision-making procedure to be followed for the update of the NECP. A dedicated [webpage](#) centralised all information.

## Spain

🙄 1. First, the Ministry for the Ecological Transition in Spain (MITECO) opened an online preliminary public consultation during Summer 2022, but without any draft of the revised NECP available. 2. Then, the MITECO held three in-person working sessions in Spring 2023, only open through invitation, to discuss the different elements of the NECP, where selected stakeholders intervened in different roundtables, organised with pre-set questions and no presentation of drafts or scenarios. 3. Afterwards, the MITECO opened an online second public consultation to comment on the updated NECP draft during Summer 2023. 4. Also, the MITECO held various in-person working sessions on renewable energies and territory in Spring 2024, to exchange knowledge and views on a sustainable and just deployment of renewables, where selected stakeholders intervened in different roundtables. Sessions were streaming on YouTube and an online form was facilitated to make external contributions. 5. Finally, the MITECO opened a third online public consultation to comment on the Strategic Environmental Study, but it was done on the updated draft NECP instead of the updated final NECP.

✅ 1. The preliminary consultation was opened between 2 August and 15 September 2022 (6 and a half weeks, although during the Summer period), with more than 2,000 contributions from a total of 128 participants. 2. The debate sessions took place in April and May 2023. 3. The second public consultation took place between 28 June and 4 September 2023 (again, mostly during the Summer), with more than 10,000 contributions from a total of 382 participants. 4. The debate sessions took place in March and April 2024. 5. The third and last public consultation took place between 12 June and 12 July 2024.

✅ The public consultation took place early enough to be meaningful, when all options were still open, as preliminary consultation started as early as summer 2022. However, no information was given on how the outcomes (more than 2,000 allegations received) were considered in the draft text.

🙄 During the first phase of the consultation process, the public worked without a proper draft text, only counting on the information about the existing measures (WEM). The new measures (WAM) were only made public with the publication of the first draft that was then opened to a consultation process (second phase).

❌ There has been a general lack of knowledge about how the MITECO was going to plan the public consultation process for the NECP updating process. In fact, the open public consultations and organised work sessions were notified with short notice and little room for manoeuvre. It is also unclear as to how the outcomes of the public consultation were considered in the NECP. For example, the final revised NECP gives no information on how outcomes of the second public consultation process (more than 10,000 allegations received) were considered in the final text.



## Sweden

✗ In October 2023, a first online consultation took place on the draft updated NECP with an invitation to leave comments. However, the consultation took place after the submission of the draft updated NECP to the European Commission. The consultation was not widely advertised and attracted only 7 written comments. In April 2024, a new document was made publicly available and an in-person consultation took place in May with a limited number of stakeholders. Those selected stakeholders were given the opportunity to leave potential complementary written comments.

🙄 The second consultation, which was open only to a limited number of stakeholders attending an in-person event, allowed three weeks for the submission of complementary written comments.

✗ The public consultation didn't take place early enough to be meaningful (where all options were still open). The public was indeed not given the opportunity to participate in the preparation of Sweden's draft updated NECP ahead of Sweden's submission of the plan to the European Commission in July 2023, and was consequently not provided early and effective opportunities to participate in the preparation of the draft updated plan. Moreover, the deadline for the submission of potential complementary written comments as part of the second consultation was on 13 May. As the final updated NECP was due at the end of June questions arise whether comments received this close to the finalisation of the final NECP allowed time enough for the comments to be properly considered.

✅ The draft updated NECP described existing measures and a few new envisaged measures, mainly by referring to coming processes that would affect the content of the updated NECP. The final updated NECP was descriptive in nature with main focus on existing measures, with a few new envisaged measures. The new envisaged measures mainly consisted of governmental investigations with uncertain outcomes and uncertain climate and energy effects. It should be noted that in the final updated NECP a gap remained between the described existing measures and a pathway to achieving the climate and energy targets.

🙄 The draft updated NECP and the final updated NECP offer some information as to the regulatory context. There has been limited information as regards the decision-making process in the various documents in particular in relation to how the views of the public have been considered. Additionally, the government did not make sure that there was widespread knowledge of the process in the general public. It is worth noting that the NECP public consultation did not follow the usual practice of public consultation process in Sweden. Using this practice would have helped to make the NECP process more visible and open to anyone to be able to leave comments on, in contrast to only the ones invited to do so.



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