Fostering transformative climate governance? The potential of multilevel climate and energy dialogues

A criteria-based assessment of Member States reports under Article 11 of the Governance Regulation

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Abstract

Integrating climate policy across sectors by, for example, involving multiple levels of government and a diversity of stakeholders in climate policy decision-making processes, is a key element in fostering transformative climate governance. Such processes can generate additional information and political support for the design and implementation of policies towards a climate-neutral future. As a specific procedural innovation under the EU's Governance Regulation (GovReg), Member States must implement permanent multilevel climate and energy dialogues (MLCEDs) and report on their progress in doing so. Article 11 of the GovReg stipulates the requirements for the MLCEDs: multilevel participation of a variety of stakeholders, ensuring dialogue and active engagement in climate and energy-related policymaking and planning, and review progress. However, there is little existing research on how Member States implement the MLCEDs and to what extent they fulfil the requirements of the GovReg. To help fill this gap, this report presents the results of the first comprehensive analysis of the available information on these dialogues. It does so through a criteria-based content analysis of the 26 available Member State MLCED progress reports submitted to the EU as well as 11 semi-structured interviews with relevant stakeholders in seven Member States. The assessment finds substantial weaknesses in the implementation of the dialogues and in the quality of Member State reporting. These findings suggest that, despite its potential, in its current form Article 11 of the GovReg does not contribute sufficiently to a transformative EU climate governance framework. These results – and recommendations for changes to process and legal requirements – should inform the ongoing revision of the Governance Regulation and provide input for policymakers on how to make the EU climate governance framework fit for net zero.

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Abbreviations

CPI	Climate Policy Integration
EC	European Commission
EPI	Environmental Policy Integration
ESABCC	European Scientific Advisory Board on Climate Change
ESR	Effort Sharing Regulation
ETS	Emissions Trading System
EU	European Union
EUCL	European Climate Law
GHG	Greenhouse Gas
GovReg	Governance Regulation
IPCC	Intergovernmental Panel on Climate Change
LTS	Long-Term Strategy
MLCED	Multilevel Climate and Energy Dialogue
NECP	National Energy and Climate Plan
NECPR	National Energy and Climate Progress Report
NGO	Non-Governmental Organisation
NIMBY	Not-In-My-Backyard
SDGs	Sustainable Development Goals
QAQC	Quality Assurance and Quality Control
UN	United Nations

Executive summary

Scope of this report and limitations

Using a criteria-based content analysis of 26 mandatory Member States' progress reports and 11 semi-structured interviews, we provide an overview of implementation progress and possible gaps of the innovative policy instrument - the multilevel climate and energy dialogues (MLCEDs) – as required under the Governance Regulation (GovReg) (EU 2018/1999). Based on the results, we also provide insights into the quality of the reporting and draw conclusions concerning the mechanism's overall contribution to creating a robust and effective EU climate governance system in line with the EU goal of achieving climate neutrality. Although 11 expert interviews support the research, the analysis builds mostly on the information provided in Member States' reports. It is thus possible that the results are biased by the quality of these reports. Further in-depth research could verify the findings and fill existing information gaps.

Why multilevel climate and energy dialogues?

MLCEDs were introduced in Article 11 of the GovReg to foster transparent and deliberative governance processes through the engagement of multiple levels of government and a wide range of stakeholders in climate and energy policy decision-making processes in a comprehensive fashion, including long-term planning and progress monitoring. Article 11 leaves much room for Member States to implement the dialogues as deemed adequate in their national context, but also sets out a list of specifications concerning who to involve and what to address. We examined the extent to which Member States met these specifications using an assessment matrix to analyse the available progress reports, which national governments submitted for the first time in March 2023.

Weak progress on current MLCED implementation

The assessment of Member States' progress reports suggests that the MLCEDs may not deliver their intended function in most Member States.

Half of MS report on permanent MLCEDs, with new dialogues deployed in most countries and in a variety of formats, lack of clarity persists

Although 12 reports indicate the establishment of new dialogues and five countries report on existing structures with a variety of dialogue formats, we find that there is a persistent lack of clarity about what the dialogues must entail. This is underlined by our finding that public consultations are the most reported on approach for implementing MLCEDs, which in general do not provide a two-way dialogue.

Only half the dialogues are multilevel

Half of the analysed reports do not contain keywords or information indicating the involvement of subnational actors in the dialogues, in direct contradiction to a central tenet of the concept of

MLCEDs. If different levels of decision-making are not involved in the dialogues, they may not qualify as 'multilevel' and would not fulfil their intended role.

Stakeholder coverage needs improvement

Member States include various stakeholders in their MLCEDs, but only one Member State reports on engaging all five types listed in the law. Investors are the group mentioned in the law but covered the least in the reports, although interviews suggested that their involvement may have been reported under the 'business' stakeholder group in some countries.

Active stakeholder engagement and discussion well provided for

Reports from the majority of Member States suggest some capacity for active exchange and discussion with stakeholders. Most countries report on providing for active engagement by giving stakeholders an advisory role or through public consultations, with some making specific mention of a two-way dialogue. As the dialogue function is a key characteristic of the MLCEDs, this is a noteworthy and positive finding.

Mandatory thematic scope largely not explicitly addressed, NECPs dominate the reporting

None of the reports cover all three mandatory thematic topics, such as contribution to the EU's climate neutrality target, scenarios for energy and climate policy, and progress review. No report specifically refers to the EU goal, and only five mention a review of progress. The National Energy and Climate Plans (NECPS) are the most covered topic in Member States' reporting on MLCEDs, despite the fact that their inclusion in the dialogues is optional. Considering that the broader scope of the dialogues is an attribute that sets them apart from dedicated publication consultations, this result, if verified, casts doubt over the adequate implementation of the MLCEDs.

Design is adequate in principle, but implementation not fit for net-zero guidance

Our content analysis of Member State progress reports also informed a broader assessment of the extent to which the dialogues were able to able to guide policymaking successfully toward climate neutrality and therefore contribute to a transformative climate governance system. This additional analysis shows that the mechanism's design in principle creates potential for the MLCEDs to be effective overall as it entails crucial elements of a just transition of the EU's economies, such as involving government and non-governmental agency in climate-related multilevel dialogue. The assessment also demonstrates that the design provides a significant degree of policy resilience due to the mandatory regular evaluation process (Article 45, GovReg) that allows for adjustment of the legislation.

However, the problems with the quality of the implementation suggest that the mechanism's desired functions, e.g., fostering participation and, thus, integrative and deliberative decision-making processes are currently not met – at least for many if not most Member States, and thus for the EU as a whole. The contribution of MLCEDs to a transformative governance system in the EU can only be realised if the weaknesses in implementation are addressed.

Recommendations: What could be done?

Based on our assessment, we make the following recommendations to address the shortcomings we have identified.

- **Add specification** on the dialogues' intended objectives and adequate formats in Article 11 in the upcoming revision of the Governance Regulation. This would still leave room for Member States' individual implementation but would clarify the desired functionality they need to deliver.

- **Expand reporting requirements** with more detail concerning all aspects mentioned in the law: who was involved when, how often and in what form? Without better information, monitoring the progress in implementing the dialogues as intended is difficult to realise.

- **Improve the quality assurance and quality control (QAQC) process** concerning the submissions, rejecting insufficiently detailed reports and asking Member States for more information. This change could be implemented immediately, without a change in the Governance Regulation.

- **Implement a follow-up** on the dialogues and their implementation in the Regulation as a process (and already now in the Commission's interactions with Member States). An exchange on experiences thus far and lessons learned could improve existing practice and increase political visibility of the dialogues, adding weight to the importance of their adequate implementation.

In conclusion, there are clear indications of significant weaknesses in the current implementation of the MLCEDs, but also several opportunities to improve, both in actual practice and in the legal and procedural framework created by the Governance Regulation. For example, the European Commission can enhance the legal text of Article 11 and, thus, provide more guidance to Member States on what the implementation of the dialogues entails. As a result, greater transparency and information can help to improve the functionality of the dialogues, and ultimately can make the climate governance framework fit for reaching climate neutrality by 2050.

1. Introduction

1.1 Orienting EU policy towards climate neutrality

Why multilevel climate and energy dialogues?

Transitioning to a climate-neutral future requires substantial changes in various economic and social systems, all within a tight timeframe (IPCC, 2023). This complexity and the wickedness of climate change as a policy problem calls for integrative processes in climate governance to facilitate the finding of a consensus on just solutions underpinned by dialogue and knowledge sharing (Sprain, 2016). Integrating the viewpoints and expertise of actors from multiple levels of government into climate decision-making processes can therefore play an important role in accelerating this transition. In this context, the multilevel climate and energy dialogues (MLCEDs)[1], established under EU law, are a new instrument that could make an important contribution to creating a robust EU climate governance framework to help guide the EU on its path to achieving climate neutrality by 2050.

EU climate governance has been oriented towards climate neutrality

The EU considers itself a global leader in climate mitigation policy and governance (Dupont et al., 2023).[2] It has come a long way, from an earlier focus on market-based policies in the 2000s to a more comprehensive policy mix in the 2010s, and a stronger emphasis on more integrative decision-making processes since the Paris Agreement in 2015 (Duwe, 2022; Oberthür & von Homeyer, 2023). Today, there are many substantive governance tools in place that directly address the reduction of greenhouse gas (GHG) emissions, such as the Emissions Trading System (ETS) or the Effort Sharing Regulation (ESR). In parallel, the EU has started to build up a procedural governance system that supports the implementation of such policies through adequate and effective frameworks, mechanisms and instruments (Görlach et al., 2022; Moore et al., 2023, Duwe 2022). First, the Governance Regulation (GovReg) ((EU)2018/1999) of 2018 integrated energy and climate policies in the areas of planning, reporting, and progress monitoring. To further accelerate climate action, the EU adopted the European Green Deal in 2019 and introduced the climate-neutrality objective, which through the adoption of the EU Climate Law (EUCL) ((EU)2021/1119) has been made a binding target across all policy areas. The EUCL also established additional mechanisms and institutions to orient EU policy towards this objective.

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[1] Throughout this report, we interchangeably refer to the multilevel climate and energy dialogues as 'the dialogues' and 'multilevel dialogues'.

[2] In this report, we focus on the climate mitigation policy framework due to the fact that the EU's governance framework for climate adaptation is still in its infancy (Rietig & Dupont, 2023).

Climate governance needs to become transformative

In its 2023 synthesis report for policymakers, the Intergovernmental Panel on Climate Change (IPCC) underscores the urgency of taking more ambitious climate action as global greenhouse (GHG) emissions continue to rise and widespread adverse impacts on global ecosystems intensify (IPCC, 2023). Although policies and laws addressing climate mitigation have consistently expanded since the 1990s, gaps in the implementation of policies and the estimated results to meet climate goals across all sectors and regions persist (Ibid.). While the EU considers itself a global leader in climate policy and governance, its climate governance framework shows room for improvement - if the EU wants to reach climate neutrality by 2050 (ESABCC, 2024; Duwe, 2022; Görlach et al., 2022). Accordingly, climate policy must become transformative, shifting from incremental practices and silo-based thinking, to become more integrative across sectors and involve multiple levels of government in decision-making processes (Görlach et al., 2022). Coherence across sectors (vertical integration) and effective policy coordination between governmental institutions working on different areas (horizontal integration) is often referred to as the 'whole of government' approach (Christensen & Lægreid, 2007; Görlach et al., 2022). Given the widespread socio-economic impacts of climate change, an expanded version of this approach emphasises the participation of non-governmental stakeholders in such decision-making processes – the 'whole of society' approach (ESABCC, 2024; Howlett et al., 2017).

Legal obligations for Member States under the Governance Regulation

The GovReg introduces a number of changes to the previous climate governance system. As a key innovation, the law combines previously separate processes for national planning and reporting. These include the integrated national energy and climate plans (NECPs) (Article 3), which Member States must update every five years, and long-term climate strategies (LTSs) to 2050, which NECPs must be consistent with (Article 15). The legal obligation for Member States to organise a permanent multilevel climate and energy dialogue (MLCED) is contained in Article 11. The qualification "multilevel" signals a clear intent to involve different levels in policymaking and implementation. Furthermore, the use of "multilevel", "dialogue", and mandatory climate-neutrality-thematic scope serve to differentiate between the dialogues outlined in Article 11 and other engagement procedures, such as public consultation (Article 10), or the incorporation of social partners, civil society, and the general public in the NECP process (Annex I of the GovReg). While the latter two also aim to foster a participatory process with diverse stakeholders, neither explicitly specifies the requirement for involvement at more than one level of government, a two-way communication process, or the requirement to discuss policies needed for a climate-neutral future.

In its brief text, Article 11 prescribes provisions for the stakeholder types which should be involved, the nature of the dialogues, and specific topics that should be covered. It leaves open other issues, including the frequency and the form in which such a dialogue may take place. Chapter 2.4 describes the MLCEDs in more detail.

1.2 Research objective and questions

This analysis seeks to assess the extent to which the GovReg's MLCED provisions contribute to making the EU's climate governance framework transformative (in the sense of facilitating the transition to climate neutrality).

MLCEDs are not a widely understood and well-defined concept in academic literature but a specific creation under EU law, even if variations of such dialogues may well be in existence in the practice of policymaking in various countries. The GovReg itself does not provide a clear definition and contains few qualifications for these dialogues. It does not contain specifications on form or frequency, for example. There is also no formal quality review process, other than the obligation for Member States to report on the implementation of these dialogues in their integrated national progress reports – first due in March 2023. This is the only central source of public information. The European Commission (EC) has the obligation to assess the information provided (this is true for all aspects under the integrated national energy and climate progress reports) and present the information contained in them. In its first such assessment published in October 2023 (SWD(2023) 646 final), it included a section dedicated to the MLCEDs, summarising overall implementation , with few specifics or concrete recommendations. This paper goes beyond that formal report by the Commission in the detail presented, the sources used, and the recommendations drawn on that basis.

The research is based on a content analysis of Member States' mandatory reports, and a literature review, complemented with expert interviews (see chapter 3). The evaluation not only provides an **overview of the implementation progress and gaps** of the dialogues to date, but also yields information on the **quality of the reporting** which can inform the revision of the GovReg and the EUCL expected to be taking place in 2024/2025. Ultimately, it allows the drawing of conclusions regarding potential improvements to legal text and implementation practice. Moreover, the analysis contributes to the body of literature on multilevel climate governance and climate policy integration.

Within the context of these research objectives, our research questions are as follows:

   I) To what extent and how do Member States implement the MLCEDs?

   II) To what extent do the MLCEDs contribute to a transformative EU climate governance system?

1.3 Plan of the report

In chapter 2 of this report, we describe the research framework explaining what constitutes a transformative climate governance framework, the role of multilevel integration in the EU's transition to climate neutrality, and how the MLCEDs are embedded in EU legislation. Chapter 3 outlines our methodology and the data used for the assessment. In chapter 4, we present our

findings on implementation progress and gaps based on a criteria-based analysis and expert interviews. Chapter 5 contains a discussion of the MLCEDs in the context of criteria for a transformative climate governance system. Based on the insights generated, we conclude with policy recommendations in chapter 6.

2. Research framework

The research framework focuses on the "multilevel" aspect of the dialogues because multilevel participatory processes in climate policy decision-making are underpinned by the involvement of a variety of stakeholders at multiple levels of governance as well as through the creation of dialogue and knowledge sharing. As such, we do not dive deeper into what for example meaningful participation entails. In chapter 2.1, we explain what transformative climate procedural governance is, how it can be measured, and how participation can foster multilevel integration. In chapter 2.2, we describe how multilevel integration can play a key role in reaching climate neutrality. In subchapter 2.3, we explain how the multilevel dialogues are established under EU law.

2.1 What is transformative procedural climate governance and how can it be measured?

Görlach et al. (2022) identify four core challenges in designing climate policy that supports the climate-neutral transition of the EU's economies. Besides the challenges of fostering innovation, ensuring the required investment and infrastructure for a sustainable transition, Görlach et al. (2022) state that without effective integration of climate policy considerations across all sectors and at all government levels – a 'whole of government' approach – the transition will not take place at the needed depth, breadth, and speed to ensure a climate neutral future by 2050.

The EU's strategy for meeting its climate targets combines specific procedural and substantive governance instruments (Moore et al., 2023). To be more precise, substantive governance directly reduces GHG emissions through instruments such as the EU Emissions Trading System (EU ETS) or the Effort Sharing Regulation (ESR). In contrast, procedural governance underpins the decision-making, design, and implementation process for such substantive policies. In tandem, they are a key requirement for successfully reaching the EU's transformation to climate neutrality by 2050 (Ibid.).

Integration as a lever for transformative procedural governance

For procedural governance to be of a transformative nature, it must ensure the integration of policy objectives and targets across all sectors and at multiple government levels (Görlach et al., 2022). In other words, policymaking must steer away from single-purpose thinking and instead coordinate overlaps across sectoral and government structures. Policy integration is thus an

essential quality that procedural governance needs to deliver. The EU climate governance framework under the GovReg and the EUCL has placed a strong emphasis on policy integration, in planning, reporting and progress monitoring (Duwe, 2022). Overall, however, the EU 2030 Climate and Energy Framework can still be regarded as incremental, and more efforts are needed to further strengthen EU climate legislation in the current decade if the EU wants to achieve climate neutrality by 2050 (Kulovesi & Oberthür, 2020). So how can policymakers enhance such integrative capacities?

Participation as a function of policy integration

According to Moore et al. (2023), procedural governance can be grouped into governance mechanisms, frameworks, and instruments. To facilitate an assessment of effectiveness, Moore et al. (2023) group procedural climate governance mechanisms by their functionality, identifying eight different functions. One of the functions is participation, meaning the incorporation of viewpoints and knowledge from stakeholders into decision-making processes.

Participation in political decision-making processes can be defined as a process of consulting and involving non-governmental stakeholders in policymaking processes within the stages of the policy cycle such as agenda-setting, decision-making, policy formulation and revision (Rowe & Frewer, 2004). Article 10 of the GovReg focuses on the participation of the public through consultations. Article 11 distinguishes itself from this type of participation as it requires Member States to implement structures that enable 'dialogue' and 'active engagement and discussions' for a multilevel involvement of local authorities and other stakeholders in national climate policymaking processes (in section 2.3 we describe Article 11 in more detail).

Designing participatory processes such as the EU's new MLCEDs can increase the legitimacy of the policymaking process and the reaching of policy targets by allowing for input from stakeholders, raising awareness, and increasing the level of political engagement (Willis, 2022). Effective participation is often understood as involving stakeholders in policymaking processes early on and allowing them to provide active inputs (Perlaviciute, 2022). Such participation creates an opportunity for transformative engagement and for participants to meaningfully shape policy. This in turn can make them feel heard and empowered and can foster policy acceptance (Ibid.). But what really is active engagement, and, thus, meaningful participation? Participatory governance processes take many shapes and forms (Bobbio, 2019; Perlaviciute, 2022). Some formats for what governments label as participation are essentially briefing sessions with one-way communication. However, meaningful participation – in this case dialogue and active engagement - needs the space for creating impact, and for this the communication must go two ways (Bobbio, 2019).

With the MLCEDs, the EU aims to contribute to such deliberative policymaking processes – integrating climate and energy-related strategies, targets, and objectives by involving multiple governance levels and stakeholders in climate decision-making process. But what exactly makes integrated governance practices transformative and how can we assess their effectiveness?

Measuring transformative procedural governance

In the EU's climate governance architecture, MLCEDs (as per GovReg Art. 11) are a procedural governance instrument designed to facilitate sub-national and local actors' involvement in relevant decision-making processes of national climate and energy policy. To be able to assess how the multilevel dialogues as a procedural governance instrument contribute to the transformative nature of EU climate policy, we use Moore et al.'s (2023) assessment framework that consists of three distinct but interrelated criteria to assess procedural governance:

- **Overall effectiveness:** The "mechanism's ability to successfully carry out its functions and to adequately support alignment with the move to climate neutrality" (p. 20).

- **Resilience:** The "mechanism's ability to maintain its coherence and adapt in the context of changing internal and external factors, such as changing political conditions (i.e., after elections) or the 2022 Russian invasion of Ukraine" (p. 20f).

- **Quality of implementation:** "Successful implementation determines whether a governance mechanism's design results in the on-the-ground outcomes foreseen when it is adopted" (p. 22f).

The framework of Moore et al. (2023) also provides a list of potential assessment questions, corresponding to each of the three criteria. We operationalise our findings through these criteria and their related assessment questions, tailored to the process of the MLCEDs. Chapter 5 contains a more in-depth look at the criteria and the assessment questions and discusses how the MLCEDs contribute to the transformative nature of EU climate governance.

2.2   Multilevel integration as an ingredient of transformative climate governance

Multifaceted problems, such as climate change, require the involvement of complex arrangements of institutions and instruments. The climate policy integration literature distinguishes between horizontal integration – coherence between different policy tools and targets across sectors, and vertical integration – the integration of policy across different levels of government and jurisdictions (Howlett et al., 2017). Howlett et al. (2017) find that challenges to horizontal and vertical environmental or climate policy integration can be addressed by increasing communication, policy coordination and cooperation between decision-makers, agencies, and those affected by the policy, e.g., non-state actors such as local communities. The authors call for the inclusion of procedural tools such as public participation in complex policymaking processes in order to create better policy integration (Ibid.).

The concept of multilevel climate governance has also evolved to include stakeholders from the subnational levels to understand the dynamic potential of each governance level in shaping climate action (Jänicke & Quitzow, 2017). The multilevel governance concept was first introduced

to conceptualise governance processes in the EU within the context of Europeanisation and decentralisation. It was later broadened to include non-governmental actors and issue-focused coalitions to more efficiently and effectively address societal challenges (Ibid.). The adoption of the UN Agenda 2021 introduced a new model of global multilevel sustainability governance by placing greater emphasis on the involvement of the local level and the creation of a cross-sectoral approach.

Within this context, in this report we focus on multilevel stakeholder participation in climate policy decision-making processes for the reinforcement of climate policy integration. Accordingly, we focus on the involvement of subnational actors and how they can support cross-level integration (Box 1).

Box 1 Scope of climate policy integration in this report

> *Scope of climate policy integration in this report*
>
> *Traditionally, the academic literature conceptualises climate policy integration as the integration of policy targets and objectives across sectors (horizontal integration) and the coordination of policy across multiple levels of government (vertical integration). In this report, we apply an expanded understanding of what constitutes such integration to look beyond governmental actors, as the involvement of a wide range of stakeholders in climate policy decision-making processes can enhance policy integration through dialogue and knowledge sharing. This paper focuses on the reinforcement of vertical policy integration through the involvement of stakeholders from multiple levels of decision-making. We refer to this as* **multilevel integration** *for the purposes of this paper.*

The climate transition requires the participation of multiple levels

The call for more integrative – and transformational – climate governance frameworks (see chapter 2.2) goes hand-in-hand with the call for greater climate action on the municipal and regional levels (De Pascali & Bagaini, 2018; Fuhr et al., 2018). For example, through the mandatory National Energy and Climate Plans (NECPs) local decision-makers must implement measures to decarbonise their industries and energy systems, which makes them dependent on regional and national governance mechanisms (Fuhr et al., 2018). Climate transition research demonstrates the need for an infrastructure that supports necessary energy system integration for energy production and distribution, but also transportation (De Pascali & Bagaini, 2018; Geels, 2011; IEA, 2023). The planning and implementation of strategies to achieve an enabling infrastructure creates socio-economic and environmental challenges and, thus, needs to involve policymakers, public officials, private sector producers, and civil society representatives. As such, the role of sub-national actors such as regional networks, municipalities, cities, and individuals has taken centre stage in the debate on climate-related decision-making processes (Geels & Schot, 2007).

Multilevel co-creation fosters capacity building

Previous research shows that building climate-resilient habitats requires co-creative processes. Sub-national governments such as regions, municipalities and cities create the institutions and infrastructures that promote behaviour changes toward a climate-neutral future (Jörgensen et al., 2015; Betsill and Bulkeley, 2007). In Sweden, for example, municipalities are key stakeholders in discussions on long-term climate and energy planning because they own many energy utilities (Gustafsson & Mignon, 2020). However, subnational governments are not in sole control of urban development. Designing strategies for such transformations requires collective action from both public and private actors (Hofstad et al., 2022). Litt et al. (2022) investigated the capacity of Italian small- and medium-sized municipalities in their attempts to define integrated solutions to climate impacts. The lack of up-to-date knowledge of dynamic urban spaces and structures, technological and territorial expertise and required funding needs often resulted in ineffective planning processes. This can be explained as cities must be treated as individual subjects as they develop according to the natural, social, political, economic, and cultural conditions they are in. There is no one-size-fits-all approach. Developing lasting and truly transformational solutions in line with local needs therefore requires knowledge and skills exchange between all governance levels (Næss & Vogel, 2012; Swart et al., 2021).

Multilevel integration enables policy feedback

Consulting with sub-national actors on existing climate and energy-related policy provides national policymakers with valuable insights that can feed back into the policymaking process (Bobbio, 2019; Jörgensen et al., 2015). Moreover, dialogue between multiple levels of governance can also serve as a means to gain insights into how well past, current, or planned policies are designed. Experimentation for innovative solutions through pilot projects in individual cities or regions allows for testing before new policies and measures are rolled out more broadly across the economy. Such 'laboratories' also eliminate uncertainties and foster better-informed decisions in the policymaking process. They allow national governments to form partnerships with local stakeholders (Ettelt & Mays, 2019). By implementing the MLCEDs outlined in Article 11 of the GovReg, Member States are required to facilitate such exchanges.

Multilevel participation: Policy gridlock vs. policy legitimacy

Despite the many benefits of the multilevel climate governance approaches mentioned above, the rise of participatory governance processes such as the multilevel dialogues or public-private partnerships has also faced criticism (Marquardt et al., 2022). For example, subnational stakeholders can disagree with national climate plans and therefore act as disruptive or confrontational agents. An exemplary case of this is when political polarisation in Bavaria halted the German *Energiewende* as municipalities ran a 'Not-in-my-Alps' campaign and, as a result, blocked the expansion of renewable energies (Hockenos, 2014). The not-in-my-backyard (NIMBY) phenomenon as well as lobbying activities from affected parties show how different interest

groups shape policy formulation processes. This can serve as evidence for the importance of creating some level of collective consent on a future vision and the actions needed to get there. Further, in a representative democratic system, diverging interests should be tackled through discussion rather than authoritarian practices (Bobbio, 2019). This example suggests that robust collaboration, if well-designed and implemented, can serve as a proactive measure to mitigate potential "veto points" (i.e., NIMBY) and address the complexities of divergent perspectives in the pursuit of sustainable policy outcomes. Therefore, in contrast to creating possible policy gridlock, involving multiple levels of governance in decision-making processes may empower and create policy legitimacy through joint problem-solving, the development of multiple policy options, and building trust (Bobbio, 2019; Moore et al., 2023; Termeer et al., 2011).

In this paper, we focus on how and to what extent the GovReg's specific requirement for multilevel dialogues is implemented in the EU Member States. Attention to multilevel governance processes can, however, be given to any state with a federal or highly decentralised system (Steurer, 2013). In the following sub-section, we explain how Member States are obliged to implement MLCEDs under EU regulation and outline the requirements stipulated in Article 11 of the GovReg.

2.3 Multilevel climate and energy dialogues in EU legislation

Policy integration advances in EU climate governance since Paris

The GovReg introduced several changes to the EU's climate governance system. As a key innovation, the law combines previously separate processes for national planning for and reporting on climate and energy objectives. The key vehicle for communicating essential targets and policies are the **integrated national energy and climate plans** (NECPs) (Article 3), which are prepared through an iterative process of drafts and final documents, reviewed by the Commission. The focus of NECPs is on the period 2020 to 2030, although projections of greenhouse gas emissions need to go beyond that timeframe. NECPs need to be updated every five years (the first sequence took place in 2018-2019 and updating is taking place in 2023-2024). To allow for regular monitoring of the implementation of the NECPs, Member States must prepare **integrated national energy and climate progress reports** (NECPRs) every two years (starting in 2023) (Article 17). Moreover, the Regulation expands upon a previous obligation to develop **national long-term strategies** (**LTSs)** with a view towards 2050, which NECPs have to be consistent with (Article 15). The LTSs had to be submitted at the same time as the first final NECPs, but updating is only expected every 10 years. All of these new and revised process should lead to enhanced horizontal policy integration across several policy areas.

Multilevel integration through dialogue

The obligation to organise a **multilevel dialogue** is contained in Article 11 of the GovReg in one brief paragraph (see box 1), and in the preambular text to the Regulation. Despite its brevity, the article indicates the content of the dialogues (including different policy scenarios and progress review) and specifies several stakeholder types that should be involved. The text of Article 11 as adopted in 2018 was amended in 2021 through the EUCL, which inserted a mention of the achievement of the EU's climate neutrality goal as a topic for discussion in the dialogues. In the recital text of the Regulation, information about the dialogues largely repeats the language of the article but adds a specific mention of LTSs as a subject for the dialogues and explains that the dialogues should be "permanent" – as opposed to one off. Separate from the dialogues, the Regulation stipulates in Article 10 provisions for "public consultation" on the NECPs and LTSs. The distinction between "dialogues" and "consultation" may lie in the ongoing and inclusive nature of the former, fostering continuous engagement and discussion. This contextualisation underscores the significance of these multilevel dialogues as dynamic, enduring platforms designed for sustained collaboration and two-way interaction, in contrast to the more specific and periodic nature of consultations outlined in Article 10. Article 17.2.b includes the obligation for Member States to report on their progress in establishing multilevel climate and energy dialogues.

The idea for the dialogues stems from the European Parliament, which adopted its position on the Commission's original legislative proposal on 17 January 2018 (TA/2018/11/P81), based on the report by MEPs Michèle Rivasi and Claude Turmes (A8-0402/2017). Amendment 113 asked for the insertion of a new separate Article 10a on "A permanent Multilevel climate and energy dialogue platform" intended "to support active engagement of local authorities" and other stakeholders. In the EP's proposed amendment, the role of these actors in the process of elaborating plans, strategies, and reports under the GovReg was more pronounced than in the law as adopted. The mention of "permanent" is also noteworthy here, as this seemingly important characteristic of the dialogues was later excluded from the text of Article 11 and only mentioned in the preambular text of the GovReg. The Parliament had also wanted to mandate that "adequate human and financial resources" be provided to the platforms and that they "function in a transparent way". The option that Member States use an existing structure was not mentioned in the original amendment. The final text adopted after negotiation between the Council and Parliament does not include any mention of resources or specific provisions regarding transparency – but the obligation to implement a national multilevel dialogue itself remained.

Reporting on MLCED implementation as a means of checking progress

In terms of checking progress on implementation, the GovReg only contains the obligation to report "where applicable" on the establishment of the dialogues (Article 17.2.b). Its subsequent Implementing Regulation ((EU) 2022/2299) lays down details for the progress reports requiring each Member State to spell out details on how it was implementing the obligation to carry out a dialogue.

What happens with this information? The GovReg gives the EC the duty to assess overall progress (Article 29) using the national reports, and the power to issue country-specific recommendations to Member States (Article 34). The regulation establishes no process for what happens with the reporting on the dialogues, other than their being made publicly available through an online platform (Article 28). The reports are publicly accessible via the EU's platform 'CIRCABC'[3] where the part of Member States' reporting under the GovReg that falls under the responsibility of DG ENERGY at the EC is publicly available[4]. These reports include the reporting on the MLCEDs.

3. Methodology and data

In this chapter, we outline the methodology applied and the data used for our assessment. To evaluate whether multilevel climate and energy dialogues are a transformative procedural governance instrument, we uncovered how and to what extent Member States implement the dialogues domestically. To do so, we conducted a qualitative criteria-based assessment of available Member States' reports using the requirements set out in Article 11 as criteria. To fill knowledge gaps and to validate our findings, we conducted 11 semi-structured expert interviews with relevant stakeholders from seven Member States. We present our findings in chapter 4 of this report. In the following sub-chapters, we explain in detail what methods and data we used to answer our research questions.

3.1   Criteria-based content analysis of Member States' reports

To understand the formal requirements under which Member States must implement multilevel climate and energy dialogues, we investigated those EU laws that provide the legal basis for the implementation of MLCEDs by Member States, namely the EU GovReg ((EU) 2018/1999) as amended by the EU Climate Law (EU 2021/1119) and the EC's Implementing Regulation ((EU) 2022/2299) of the GovReg and its Annex XXIII, which provides specifications for the reporting on the MLCEDs. The essentials are outlined in chapter 2.4.

Member States' progress reports on the implementation of the dialogues are made available to the public via the platform 'CIRCABC'. As per the cut-off date of 20 December 2023, 26 out of 27 reports were available for download. The QAQC process for the report of Romania had been finished at the time of writing, however the report itself had not yet been published. We collected and organised the data from the 26 available reports in tabular form.

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[3] The reporting that falls under the purview of DG CLIMA is published via a different portal, managed by the European Environment Agency, called Reportnet 3 – online at https://reportnet.europa.eu/public/dataflows, last accessed 20 December 2023.

[4] European Union Communication and Information Resource Centre for Administrations, Businesses and Citizens, CIRCABC, is a collaborative, fully open source platform to securely share information between various interest groups and is published under the EUPL license. Accessible online at https://circabc.europa.eu/, last accessed 20 December 2023.

Table 1 provides an overview of the assessment criteria that we extracted from the legal documents and used for our content analysis of the reports.

Table 1 Assessment criteria based on legal requirements stipulated in Article 11

Main cluster	Criteria	Specification in EU law
Administrative requirements for the reports	Submission timing	The reporting was due 15 March 2023 (Art 17).
	Formal completeness of the submissions	Member States must report on 1) the general setup and 2) progress in establishing the dialogue (Implementing Regulation).
	Length of submissions	Character count of the reports.
Structure and format of the dialogues	Dialogue structure	Existing vs. newly established dialogue structures.
	Dialogue format	The GovReg states that "dialogue may take place by means of any national structure, such as a website, public consultation platform or another interactive communication tool".
Nature of the dialogues	Permanence	The preamble of the GovReg says that "Each Member State should establish a *permanent* multi-level energy dialogue".
	Multilevel scope	Checking for specifics on the dialogue involving stakeholders beyond the national level.
	Stakeholder groups listed	The GovReg lists the following stakeholder groups: "local authorities, civil society organisations, business community, investors and other relevant stakeholders and the general public".
	Provisions for active stakeholder engagement and discussion	The GovReg requires that stakeholders "are able actively to engage and discuss".
Thematic scope	*Mandatory scope* − EU climate neutrality target − Scenarios for energy and climate policies − Progress review *Optional scope* − NECPs − LTSs or other relevant processes	Based on the legislation, we check for the following topics: − the achievement of the Union's climate-neutrality objective, − the different scenarios envisaged for energy and climate policies, including for the long term, − progress review, − reference to the NECPs, − reference to LTSs and other relevant processes.

Note: We clustered the criteria into four categories: administrative requirements for the reports, structure and format of the dialogues, nature of the dialogues, and thematic scope. We applied the criteria as codes, examined the 26 reports, and presented the data in tabular format. Table 12 in the Annex provides a detailed explanation of the coding applied.

3.2 Semi-structured expert interviews

We conducted **11 expert interviews with experts from seven Member States** to a) confirm the information on the MLCEDs reported by Member States, b) obtain additional information on the MLCEDs, and c) fill in information gaps that persisted after the analysis of the reports. When selecting countries for the interviews, we based our decision on the limited availability of 12 reports at that time, and our choice was made from this pool of information.

The countries, selected for the expert interviews were **Greece, Finland, Lithuania, the Netherlands, Portugal, Spain,** and **Sweden**. We selected countries based on the following criteria:

1. **Open questions in the reports that needed verification**. As a first methodological step, the mapping of Member States' reporting against the requirements of the GovReg resulted in open questions. While the majority of open questions were general and directed at the concept of MLCEDs, three countries required country-specific questions. Both the general and the country-specific questions aimed to expand the fact base of our assessment and clarify uncertainties. Table 14 in the Annex contains a list of interview questions.

2. **Level of detail included in the reports**. Our assessment of reports' level of detail showed that **Spain** has the highest character count and **Sweden** has the lowest. However, interestingly, both countries cover identical themes and neither has fully covered the mandatory scope in their reporting (see Chapter 4.4, Table 11). By selecting countries, based on similar disparities, we aimed to either confirm or disprove that the information in the reports is accurate and exhaustive, and ultimately fill in information gaps.

3. **Geographical scope**. Our selected countries are spread around Europe for geographical balance. There are three countries from Southern Europe, two from Northern Europe, one from Western Europe and one from Eastern Europe. We interviewed one to two experts per country. To acquire a variety of viewpoints and construct a fuller picture of Member States' progress in the implementation of MLCEDs, we aimed for interview partners to be a mix of national government officials, local government officials and representatives of civil society, i.e., NGOs. With this in mind, we had representation of two governance levels in **Lithuania**, **the Netherlands**, and **Sweden**.

4. **Area size of country**. With our selection, we tried to include small and medium-sized countries to ensure a more balanced representation.

We selected experts for the interviews by first compiling a list of sub-national institutions that were mentioned in Member States' reporting and conducting desk research on their representatives. This included searching for interviewees online, i.e., on organisations' home pages and on LinkedIn. We also examined personal networks for relevant experts. Importantly, our objective was to achieve a balanced representation encompassing officials from national governments, local authorities, and civil society, in order to capture a diverse array of perspectives.

The interviews took place between 26 October 2023 and 10 November 2023 and lasted approximately 45 minutes. Table 14 in the Annex provides a list of interview questions. All interviews were conducted online via the Teams or Zoom platforms, except for one, which was carried out via phone. Interviews were held under the Chatham House Rule. Table 2 provides an overview of the selected Member States and the interviewees.

Table 2 Overview of interviewees by Member State, geographical scope, country size, and type of stakeholder

Member State	Geographical scope	Country size	Type of stakeholder
Greece ●	South	Medium	Civil society
Finland	North	Medium	Local authority
Lithuania ●	East	Small	Civil society
			National government
Netherlands	West	Medium	Civil society
			National government
Portugal	South	Medium	Civil society
Spain ●	South	Medium	Civil society
			National government
Sweden	North	Medium	Civil society
			National government

Note: "●" indicates that the interview included country-specific questions.

4. Findings on the progress of multilevel dialogue implementation

The criteria-based analysis of Member States' reporting on the implementation of MLCEDs generated several interesting insights. A noteworthy upfront observation in this context is the great diversity in the level of detail and the topic coverage in the reporting. The break-down into specific aspects along the criteria developed here allows us to untangle this diversity and identify more specific commonalities and differences as well as apparent gaps in the coverage.

4.1 Administrative requirements for the reports

Member States must submit their integrated progress reporting under the GovReg by 15th March every two years, starting in 2023. The reporting requirements include "*Where applicable, information on the progress in establishing the dialogue referred to in Article 11*" (Article 17.2 GovReg). The seeming limitation on the reporting to those Member States establishing a new dialogue structure was foregone in the Implementing Regulation (EU 2022/2299), which provided a mandatory format for Member States in its Annex XXIII (see Figure 1). Annex XXIII contains two cells to fill in: a more general "detail on multilevel climate and energy dialogue" and the specific "progress in establishing" one. To count reporting as complete, we consider that Member States using an existing structure for the dialogues do not need to fill in the second cell – but all countries should provide text in the first.

Figure 1 Annex XXIII of the Implementing Regulation (EU 2022/2299)

Under this criterion, we aimed to check a) for timely delivery of the submission against the deadline of 15th March, and b) the completeness of the submissions compared against the template in Annex XXIII as well as c) the general length of the submitted texts as a proxy for detail (using a character count).

4.1.1 Submission timing

The dates of reports' submissions are included in a 'State of play' document on the CIRCABC platform.[5] Alongside the exact date of the submission, the document, last updated on 8 December 2023, provides information on whether the Quality Assurance and Quality Control (QAQC) process for the reports has been carried out.

Per the cut-off date of 20 December 2023, the document included a date of submission for every Member State. According to the file, all countries had submitted their reports, and these had passed the QAQC process. Our total sample encompasses 26 reports.

We classified the submission timing of Member States' reports according to two criteria. We consider reports submitted within a month of the deadline as "on time", while reports submitted more than one month after the deadline we regard as "late". No report was submitted prior to the 15 March deadline. Table 3 provides a summary of the submission timing.

Table 3 Submission timing of Member States' reports.

On time (within a month of the deadline)	Late (more than one month after the deadline)
Total: 8	Total: 19
(HR, DK, EE, FI, NL, PT, SI, SE)	(AT, BE, BG, CY, CZ, FR, DE, EL, HU, IE, IT, LV, LT, LUX, MT, PL, RO, SK, ES)

Source: European Commission, 2023. Note: At the time of analysis, some of the submitted reports were undergoing a quality check and were thus not available via the CIRCABC platform.

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[5] The latest version available at the time of writing dates from 20 December 2023 and can be found here: https://circabc.europa.eu/ui/group/da8e36ea-9d6e-47fd-bc85-a485cf354922/library/b6834deb-f040-457c-9e4a-03fb4f4d3830/details. Last accessed 20 December 2023.

Grouped along these categories, eight countries submitted their reports on time (Croatia, Denmark, Estonia, Finland, the Netherlands, Portugal, Slovenia, and Sweden), while 18 Member States were late in submitting their reports (Austria, Belgium, Bulgaria, Cyprus, Czechia, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Poland, Romania, Slovakia, and Spain). In sum, **a two-thirds majority of Member States were late by more than one month** with their reporting.

4.1.2 Formal completeness of the submissions

Of the 26 reports available for this analysis, **all Member States' submissions included the sections that they were required to fill in**. In fact, some provided text in the second cell even if they were not required to (e.g., **Austria**). This formal completeness check would likely have been included in the Commission's QAQC process and the results is thus to be expected.

All told, the submitted reports analysed were formally complete, but many arrived with a delay. In terms of transparency, one third of the national reports was still inaccessible to the public as of nine months after the submission deadline.

4.1.3 Length of submissions

The length of the reports by means of a character count reveals two information points. One, there is **significant variation in the length of these reports**. Second, the length of the submission is not necessarily indicative of the quality or comprehensiveness of the content within the reports. For example, while **Spain** has the highest character count of 5724 and **Slovakia** the lowest – of 158, neither country has covered the mandatory thematic scope of the content to be addressed in the dialogues in their reporting (see section 4.4.1).

4.2 Structure and format of the dialogues

The GovReg stipulates that Member States must establish a new means of carrying out a MLCED unless there is already an existing structure in place that serves the same purpose. This indicates that **new and existing structures are not mutually exclusive** and that a country could have both serving the purpose of a MLCED at the same time. The regulation also provides suggestions on the format of MLCEDs. These may take place by means of a website, public consultation platform or another interactive communication tool.[6] However, the **choice of format is ultimately left to Member States**. This chapter examines the nature of the dialogue structures that Member States used, as well as the types of formats applied.

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[6] European Union (2018), (30)

4.2.1 Dialogue structure

The reports suggest that the dialogues are largely perceived as a new phenomenon, and that the requirement has led to the establishment of novel processes (Table 4). 15 countries established **new dialogue structures**: **Belgium**, **Croatia**, **Denmark**, **Finland**, **France**, **Greece**, **Ireland**, **Latvia**, **Lithuania**, **Luxembourg**, **Malta**, **the Netherlands**, **Portugal**, **Slovenia**, and **Spain**. Six out of 26 Member States report that they already had **existing dialogue structures** in place before the initial adoption of the GovReg in 2018: **Austria**, **Cyprus**, **Finland**, **Germany**, **Lithuania**, and **Sweden**. **Germany** reports establishing structures in 2014 and 2015, **Austria** and **Cyprus** in 2017, **Lithuania** in 2009, and **Finland** in 2011. **Sweden** refers to its 2018 NECP process, which suggests that the country already had dialogue structures set up at that time (although the short text of the submission does not explicitly say so). Two countries are in both lists: **Lithuania** and **Finland** are the only **countries which report on both existing dialogue structures and the establishment of new ones**. In the case of **Bulgaria**, **Czechia**, **Estonia**, **Hungary**, **Italy**, **Poland**, and **Slovakia** the reporting does not provide a clear statement about whether the dialogue structures were new or already in place. For example, the **Hungarian** reporting states that there was an established structure "before the adoption of Hungary's first National Energy and Climate Plan". The draft plan was submitted in 2018 and the final version in 2019.

Table 4 Nature of the dialogue structures, as reported by Member States.

	AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	EL	HU	IE	IT	LV	LT	LU	MT	NL	PL	PT	SK	SI	ES	SE	Total
New dialogue structures		•		•			•		•	•		•		•		•	•	•	•	•		•		•	•		15
Existing dialogue structures	•				•				•		•						•									•	6
Unclear			•			•		•					•		•						•		•				7

Note: "●" indicates information obtained from Member States' reporting.

Belgium refers to the establishment of 10 "climate roundtables" in 2022. **Finland's** report mentions several bodies, including its independent Climate Change Panel, created in 2011 and consisting solely of academics (meaning it is a single stakeholder body), without explaining the multilevel dimension that it would have – and whether it would thus qualify as a contribution to an MLCED. The Finnish report also includes the 2020 launch of a national 'Climate Policy Roundtable' to discuss key carbon neutrality government initiatives, legislative proposals, and strategies, and a 'Citizen's Jury on Climate Action' established in 2021 as a representation of civil society contributing to public opinion. **Hungary's** report talks about the establishment of the National Environmental Protection Council. **Latvia** mentions establishing a National Energy and Climate Council in 2019. Similarly, **Lithuania** includes in its reporting a 'National Climate Change Committee' established in 2009 to provide advice on the development of domestic climate change

policy and its coordination. Lithuania refers to the adoption of its 'National Climate Change Management Agenda' in 2021 to outline the country's strategy to implement NECP-related policies. To make science-based decisions on the formulation, assessment and implementation of national climate change management policies, Lithuania has established an independent 'Committee of Scientists' in 2023.

While a majority of analysed reports indicate the establishment of new dialogue structures, most lack a clear statement regarding whether these were specifically created to facilitate an MLCED and comply with the GovReg. Our assessment finds a **tendency for Member States to report on various dialogue structures that may not necessarily be relevant** for addressing the requirements of Article 11 – e.g., that may not meet the criteria to qualify as 'multilevel' (i.e., involving sub-national stakeholders). **Luxembourg's** report specifically states that its Platform for Climate Action and Energy Transition (Climate Platform) was established pursuant to Article 11 the GovReg.

All 11 expert interviewees had no knowledge about a **multilevel dialogue set up specifically as a response** to the requirements of **Article 11 of the GovReg**. In conclusion, the analysis cannot verify whether the specific legal obligation on MLCEDs has acted as a stimulus for creating additional venues to involve subnational actors in national climate policy discussions.

4.2.2 Dialogue format

Member States report on the utilisation of a variety of dialogue formats, including a public consultation, a committee, a council, panel, or platform, working groups, targeted workshops, an online platform, a citizens' jury or assembly, roundtables, awareness campaigns, a commission, and a conference (see Table 5).

Table 5 Overview of MLCED format by type

	AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	EL	HU	IE	IT	LV	LT	LU	MT	NL	PL	PT	SK	SI	ES	SE	Total
Public consultation			●		●			●	●	●			(●)	●	●							●			●		11
Committee	●				●		●			●		●		●			●								●		8
Council, panel, or platform						●			●		●		●			●		●						●	●		8
Targeted workshops								●		●			●	●					●			●		●			7
Working group										●	●						●		●			●		●			6
Online platform													(●)						●	●				●	●		5
Citizens' jury or assembly					●				●				●							●					●		5
Roundtable		●		(●)					●						●												4
Awareness campaign																			●	●	●						3
Commission						●																●			●		3
Conference												●							●								2
Unclear																							●			●	2

Note: "●" indicates information obtained from Member States' reporting, while "(●)" indicates information obtained from other sources.

The most common approach to implementing the MLCEDs is the establishment of a **public consultation** (**Bulgaria**, **Cyprus**, **Estonia**, **Finland**, **France**, **Hungary**, **Ireland**, **Italy**, **Portugal**, and **Spain**), with 11 Member States reporting on it. As an example, **Hungary** states that an "open, online consultation is planned" for public discussion of the NECP.

Eight countries utilised a **dedicated committee** (**Austria**, **Cyprus**, **Denmark**, **France**, **Greece**, **Ireland**, **Lithuania**, and **Spain**). **Denmark**, for instance, reports that it has established two committees to discuss opportunities and barriers for the green transition, namely the Danish Association of Local Authorities and the Association of Danish Regions. The **Hungarian** report mentions the "National Environmental Protection Council". A further eight countries reported creating a **council, panel, or platform** (**Czechia**, **Finland**, **Germany**, **Hungary**, **Latvia**, **Luxembourg**, **Slovenia**, and **Spain**). **Czechia** reports on a "government council for energy and raw materials strategy and government council for sustainable development". **Germany** reports on a "Energy Efficiency Platform" with a plenary session and meetings taking place once a year. **Latvia** established a "National Energy and Climate Council". In **Luxembourg**, the Climate Platform was created.

Six countries established **a working group** (**France**, **Germany**, **Lithuania**, **Malta**, **Portugal**, and **Slovenia**), or **targeted workshops or webinars** (**Estonia**, **France**, **Hungary**, **Ireland**, **Malta**, **Portugal**, and **Slovenia**). As an example, while **France** reports on the creation of technical working groups and targeted workshops, **Portugal** reports that it has established an NECP 2030 Coordination Group to organise the updating of its NECP.

Five countries reported engaging an **online platform** (**Greece**, **Malta**, **the Netherlands**, **Slovenia**, and **Spain**), or a **citizens' jury or assembly** (**Denmark**, **Finland**, **Ireland**, **the Netherlands**, **Spain**). The national climate law of **Greece** establishes a "Climate dialogue website" to foster MLCEDs – but does not explicitly state this in its reporting. According to its reporting, in 2019, **Denmark** founded a citizens' assembly. **Ireland** reports on a National Youth Assembly on Climate.

Four countries used **roundtables** (**Belgium**, **Croatia**, **Finland**, and **Italy**). **Belgium** reports organising 10 "climate roundtables". Although the **Croatian** reporting mentions a "multilevel climate and energy dialogue platform", this platform is part of the NECPlatform project, and it is thus reasonable to assume that its format is rather that of a roundtable.[7] The **Italian** reporting includes a reference to a "technical table", specifically for dialogue between ministries and regions.

Three countries have carried out an **awareness campaign** (**Malta**, **the Netherlands**, and **Poland**), and a further three have engaged a **commission**. **Malta** launched an awareness campaign in 2021 – "ClimateOn", supported by an online platform aiming to foster continuous dialogue among stakeholders. **The Netherlands** created two campaigns – a "national umbrella campaign" and a National Climate Week. **Poland** states that an "informational and educational campaign" called "Get to Know the Atomics", along with a "Nuclear Energy Every Day" campaign but goes into no further detail about who was involved or how. **Portugal** refers to its Climate Action Commission (CAC).

Two countries – **Ireland** and **Italy** – refer to a conference. **Italy**, for instance, states that a "Unified Conference of the State-Regions and Cities-Autonomous Localities" took place as the formal expression of the informal discussions and dialogue with regions and local authorities.

Slovakia and **Sweden** do not provide any detail on the format of their dialogues.

We find that the reports lack precise definitions for the various formats used. The distinction between terms like "committee," "commission," and "working group" remain unclear. These terms might carry distinct, similar, or even identical meanings, potentially influenced by national languages and interpretations. To comprehensively understand the formats of MLCEDs, our research treats these formats as distinct entities. Due to the difficulty in ascertaining the exact intentions behind these terms in the reports from Member States, the information regarding dialogue formats should be approached with a degree of caution.

Interviewees also suggested that multilevel dialogues took place in diverse formats. Apart from confirming the formats from the reporting by mentioning, for example, committees, consultations and citizens' assemblies, interviewees additionally stated that open hearings and workshops with local authorities had taken place – for instance, in **Finland**. **Dutch** and **Swedish** experts also suggested that dialogue between the national and sub-national levels happens during informal meetings as exchanges between the two levels are deeply embedded in the political cultures of

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[7] According to the NECPlatform project website, the project will support six EU Member States (**Bulgaria**, **Croatia**, France, Italy, Portugal, and Romania) in setting up and managing permanent MLCED Platforms, which will have the form of a roundtable.

the two countries and the necessity for a formal dialogue format is often overlooked. One **Spanish** interviewee also stated that the dialogue which happens between the national government and the Spanish Federation of Municipalities and Provinces is informal and mainly revolves around the government's financial support for climate initiatives on the local and regional level.

4.3 Nature of the dialogues

The GovReg describes an MLCED as:

1) "**Permanent**". The preamble of the GovReg stipulates that "Each Member State should establish a permanent multi-level energy dialogue". This term is omitted in the text of Article 11. We nevertheless consider the permanence aspect in our assessment, as the inclusion of the term in the GovReg signifies the importance of maintaining a continuous and enduring dialogue through the MLCEDs, rather than a one-off exercise.

2) Taking place across **multiple levels of government**,

3) Including "**local authorities, civil society organisations, business community, investors and other relevant stakeholders and the general public**",

4) Giving stakeholders the freedom and opportunity "**actively** to **engage and discuss**" various topics.

Against this backdrop, we examine the nature of the dialogues according to three criteria:

- Is the nature of the dialogues permanent or temporary?

- Are subnational actors mentioned, to prove that multiple levels are involved?

- Which stakeholder groups were included?

- Is there clear dialogue and active engagement?

4.3.1 Permanence

Our assessment of whether the reported dialogues were of a permanent nature constituted a scan of the reports for any indication of permanence. Some reports explicitly state that the dialogues are permanent – i.e., **Austria**. In the text of others, it stands to reason that the structures are permanent – i.e., **Luxembourg**. In instances where there was no clear indication of permanence, or the information provided was too vague or insufficient for a conclusive assessment, we categorised these cases as "unclear". Table 6 provides a summary.

Table 6 The permanence dimension of MLCEDs, according to Member States' reporting

	AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	EL	HU	IE	IT	LV	LT	LU	MT	NL	PL	PT	SK	SI	ES	SE	*Total*
Permanent	●						●		●	●	●		●	●	●	●	●	●		●					●		13
Unclear		●	●	●	●	●		●				●							●		●	●	●	●		●	13

Note: "●" indicates information obtained from Member States' reporting.

The reports of half the countries (13) indicate that the dialogues are of a permanent nature. **Austria** reports that its National Climate Change Committee was instituted through a 2017 amendment to the Climate Change Act and has consistently convened annual meetings since that time. Interestingly, the website of the Austrian Ministry responsible for climate policy speaks of a dedicated "KlimaDialog" created to implement the MLCED requirement and expresses the intention to hold at least eight dialogue sessions in 2023 and 2024.[8] This information is, however, missing from the formal report submitted by the government. This example serves as anecdotal evidence of cases in which the reality of the implementation is better than the MLCED progress reports convey. In **Denmark**, the two committees and the Youth Climate Council are reportedly permanent bodies – as is the **Finnish** Climate Change Panel. The creation of permanent Regional Energy Committees in **France** is stipulated in law, although these do not seem to be active yet, per the reporting. The **German** Energy Efficiency Platform has been active since 2014 with plenary sessions taking place once a year. However, the government reports that the platform's work "will continue in a reduced scope with more ad-hoc-themed gathering". Additionally, the Energy Transition Research and Innovation Platform "acts as an advisory body for overarching issues of funding policy in energy research", which may indicate a permanent nature. In **Hungary**, the National Environmental Protection Council is an "established" body for consultation, including on the NECP. The **Irish** report signifies that Ireland has an "annual public consultation" platform – the Climate Conversations. In **Italy**, concerning the NECP process, there is "an institutional forum where this dialogue finds formal expression—the Unified Conference of the State, Regions, and Local Autonomies". The **Latvian** National Energy and Climate Council has been operational since 2019. A National Climate Change Committee for advisory purposes on climate change policy was established in **Lithuania** in 2019. In **Luxembourg**, "the Climate Platform was launched in October 2022 and has since met on several occasions". It also receives annual funding from the state. The National Climate Platform has operated in the **Netherlands** since November 2022. **Spain's** report indicates several permanent dialogue bodies.

The reports of the other 13 countries do not provide an indication that dialogues were permanent, are too vague, or provide insufficient information to make an assessment about the permanence dimension of the dialogues. In **Belgium**, the organised climate roundtables seem to be a one-off exercise with a closing event in December 2022. Reporting on

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[8] See Ministry website at https://www.bmk.gv.at/klima-dialog/umsetzung.html - last accessed 6th February 2024

Flanders, however, may indicate permanent dialogues there, as the text mentions a "structural general stakeholder consultation", as well as a "scientific panel" and "strategic advisory councils", which provide ad-hoc advice. The **Bulgarian** report only mentions public consultations around the NECP draft. According to the **Croatian** reporting, the MLCED, created with support from the NECPlatform project, "will first meet before the submission of the draft NECP and will continue to operate throughout its development". This wording does not signify that the platform will remain operational after the end of the NECP process, or the NECPlatform project. It is unclear whether the **Cypriot** "technical committee", responsible for the NECP process is a permanent structure, and regardless, there is no indication that this is a multilevel dialogue structure. The committee is said to be consulted by expert working groups, which "meet regularly" – but it remains unclear whether these operate outside of the timeframe of the NECP preparation process. According to **Czech** reporting, its multilevel platforms are "designated", although there is no indication of their permanence and multilevel scope. In **Estonia**, the only hint of a permanent body is the "council of renewables" which has "regular meetings" but the information about it is limited to a single sentence, rendering it impossible to make an assessment about its permanence. The **Greek** "Inter-Ministerial Committee on Energy and Climate is the main actor for the update of the NECP", which leaves it open for interpretation whether it is a permanent structure or not. It is unclear whether the **Maltese** ClimateOn awareness campaign is a permanent body for multilevel dialogue. There is no mention of a permanent dialogue structure in the **Polish** report, but rather of one-off events. The permanent Climate Action Commission in **Portugal** is said to ensure the promotion and monitoring of the NECP, but there is no indication of this contributing to a multilevel dialogue. More information would be necessary to determine whether the Coordination Group dealing with the NECP "in coordination with entities from various sectors" is a permanent body and to what extent this constitutes a multilevel dialogue. In **Slovakia** and **Slovenia**, there is no indication that the public consultations on the countries' respective NECPs were of a permanent nature. The report of **Sweden** leaves it unclear whether there are dialogues of a permanent nature.

4.3.2 Multilevel scope

In assessing the presence of a multilevel dimension in the dialogues, we investigated whether the reports from Member States **indicated engagement beyond the national level**. Our analysis centred on the mention of sub-national actors involved in the decision-making process as prescribed in Article 11. As such, we also searched for specific keywords such as "regional," "sub-national", "municipal", and "local" in the reports. Table 7 provides a summary of which Member States provided a reference to a multilevel scope in their reports.

Table 7 The multilevel dimension of MLCEDs, according to Member States' reporting

	AT	BE	BG	HR	CY	CZ	DK	EE	FI	FR	DE	EL	HU	IE	IT	LV	LT	LU	MT	NL	PL	PT	SK	SI	ES	SE	Total
Multilevel	●	●		●	●		●			●	●		●		●			●		●				●	●		13
Unclear			●			●		●	●			●		●		●	●		●		●	●	●			●	13

Note: "●" indicates information obtained from Member States' reporting.

Half of the Member States include wording that **suggests a dialogue across multiple levels of government**: **Austria**, **Belgium**, **Croatia**, **Cyprus**, **Denmark**, **France**, **Germany**, **Hungary**, **Italy**, **Luxembourg**, **the Netherlands**, **Slovenia**, and **Spain**. A frontrunner in referring to the multilevel scope and thereby involving all levels of governance, **the Netherlands** mentions involving local governments, "co-governments", local councils, and regions. **Austria** reports on involving "federal provinces and local governments". **Belgium** states that the federal government has engaged with "representatives of regional administrations". According to the Belgian reporting, the Flemish government also consults local authorities. **Croatia** reports involving "local and regional governments". **Denmark** mentions two green cooperation committees with its National Association of Municipalities and Association of Danish Regions, which "discuss opportunities and barriers for the green transition as well as concrete climate measures at municipal and regional level". **France** refers to a "multilevel" dialogue directly and reports on involving "local authorities", holding a "'tour de **France** des régions' (tour of the regions)" and creating regional energy committees. **Germany** reports on engaging with the federal states and municipalities' associations. **Hungary** states that "national and regional concepts and bills related to environmental protection" are discussed in its Council. **Luxembourg** reports on involving "local and national authorities". **Spain** includes wording on the "Spanish Federation of Municipalities and Provinces as a representative of the local administration". **Slovenia** specifically talks about "local authorities".

The other Member States – Bulgaria, **Czechia**, **Estonia**, **Finland**, **Greece**, **Ireland**, **Latvia**, **Lithuania**, **Malta**, **Poland**, **Portugal**, **Slovakia**, and **Sweden** – **do not provide information that would confirm whether dialogues involved actors from multiple levels**. In the case of **Poland**, the keyword search found multiple mentions of "multilevel". However, the report does not explain what this entails.

Considering the fact that the word "multilevel" is in the title of Article 11 and that the engagement of actors beyond the national level is thus an essential ingredient to the dialogues, this omission in half the submissions analysed is noteworthy. If the dialogues reported on by these Member States did not involve subnational actors, then they may not in fact qualify as "multilevel" – which would essentially be a violation of the requirement of Article 11 of the GovReg.

The seven countries covered by expert interviews encompass two of which the reporting specifically states that dialogues took place on multiple levels – **the Netherlands** and **Spain** – and five countries (**Finland**, **Greece**, **Lithuania**, **Portugal**, and **Sweden**) for which the information was unclear. When asked about multilevel dialogues in their respective countries,

most interviewees did not automatically associate "multilevel" with subnational actors, but rather with *any* stakeholder group, for example NGOs and industry representatives. Interviewees also often talked about participation processes, in which their own institution was involved but had limited knowledge about any other dialogue that may have taken place.

These findings from the interviews call for the consideration of several possibilities. First, it is possible that the dialogues which our interviewees mentioned had indeed not involved multiple levels of government. It is also imaginable that these dialogues had not put enough emphasis on participants from the sub-national levels and the multilevel element was thus overlooked or missed by interviewees. Furthermore, it is possible that stakeholders outside the national government may hold a particular viewpoint regarding the extent of their organisation's participation in dialogues with the government. This could result in a biased dataset being used to assess the nature of the dialogues. Lastly, it is also possible that interviewees simply had limited knowledge about multilevel dialogues taking place in their country. These possibilities open up the necessity for further research on the topic, ideally utilising a more extensive dataset derived from expert interviews, as well as other means of verifying information from the reports.

4.3.3 Stakeholder groups listed

A majority of Member States – 16 out of 26 – report on including multiple stakeholder types in their MLCEDs (Table 8). However, **Italy is the only country which reports on involving all stakeholder groups listed in the Regulation.**

12 countries – **Austria**, **Belgium**, **Croatia**, **Denmark**, **France**, **Germany**, **Hungary**, **Italy**, **Luxembourg**, **the Netherlands**, **Slovenia**, and **Spain** – have included **local authorities** in their dialogues, according to their submissions.

18 countries (**Austria**, **Belgium**, **Bulgaria**, **Croatia**, **Finland**, **France**, **Germany**, **Hungary**, **Italy**, **Latvia**, **Lithuania**, **Luxembourg**, **Malta**, **the Netherlands**, **Portugal**, **Slovakia**, **Slovenia**, and **Spain**) report on involving **civil society organisations**, such as NGOs.

A similar majority (16 countries: **Austria**, **Belgium**, **Bulgaria**, **Croatia**, **Denmark**, **France**, **Germany**, **Greece**, **Italy**, **Latvia**, **Lithuania**, **Luxembourg**, **Malta**, **the Netherlands**, **Portugal**, and **Spain**) report engaging with **businesses** (in the case of **Austria** and **Portugal**, for example - regarded as "industry").

13 countries (**Bulgaria**, **Denmark**, **Finland**, **France**, **Germany**, **Hungary**, **Ireland**, **Italy**, **Lithuania**, **the Netherlands**, **Slovakia**, **Slovenia**, and **Spain**) report involving the **general public**.

Table 8 Stakeholder groups listed in Member States' reporting on MLCEDs

	Local authorities	Civil society organisations	Business	Investors	General public	Other	Unclear	Total
AT	●	●	(●)			●		3/5
BE	●	●	●			●		3/5
BG		●	●		●	●		3/5
HR	●	●	●			●		3/5
CY							●	0/5
CZ							●	0/5
DK	●		●		●			3/5
EE							●	0/5
FI		●			●	●		2/5
FR	●	●	●		●			4/5
DE	●	●	●		●	●		4/5
EL			●			●		1/5
HU	●	●			●	●		3/5
IE					●	●		1/5
IT	●	●	●	●	●	●		5/5
LV		●	●			●		2/5
LT		●	●		●	●		3/5
LU	●	●	●	●		●		4/5
MT		●	●					2/5
NL	●	●	●		●			4/5
PL							●	0/5
PT		●	(●)					2/5
SK		●			●			2/5
SI	●	●			●			3/5
ES	●	●	●		●			4/5
SE							●	0/5
Total	12	18	16	2	13	13	4	

Note: "●" indicates information obtained from Member States' reporting.

13 Member States report including **other relevant stakeholders**. **Austria**, **Croatia**, **Finland**, **Germany**, **Hungary**, and **Lithuania** engaged with scientists. **Finland** additionally states that it has involved journalists. **Belgium** reports on including "anti-poverty, women's and youth organisations", and **Bulgaria** mentions the involvement of "employer organisations". **Germany** and **Luxembourg** report involving youth organisations. The **Greek** report lists a variety of stakeholders - predominantly representatives of energy operators, but also including managing directors, such as the one of WWF, for example, as well as "external experts" who "can be invited by the Chairman, without a right to vote" during meetings of the Inter-Ministerial Committee. **Ireland's** report states that vulnerable groups have been consulted. **Italy** reports on engaging with universities. **Latvia** has reportedly involved regulators and "other stakeholders".

Only Italy and Luxembourg report on interacting with investors. This may indicate that most national authorities do not consider investors as a separate stakeholder group. For example, these could be subsumed under the category "business".

The reports of **Cyprus**, **Czechia**, **Estonia**, and **Sweden** do not provide any statements about the type of stakeholder groups involved and are thus insufficient to judge whether the implementation is in line with the requirements of Article 11 of the GovReg. Although the report of **Poland** lists various stakeholders, they are only mentioned as the signees of agreements, and there is no indication that a multilevel dialogue involving these stakeholders took place.

In sum, only **Italy's** report mentions all the five groups listed in the law. Additionally, interviewees from **the Netherlands**, **Spain**, and **Sweden** referred to the involvement of banks in dialogues with the government – which would constitute the involvement of investors. However, only the **Dutch** interviewee mentioned these in the context of a dialogue involving sub-national stakeholders – in **Spain** and **Sweden** these were mentioned in the context of general dialogue with the national government. **Overall, we find that stakeholder coverage is clearly incomplete, judging from the reports** – and that the reporting itself lacks specification in several cases.

4.3.4 Provisions for active stakeholder engagement and discussion

To check if the requirement that stakeholders should be able to "actively (…) engage and discuss" has been met, we scanned the reports for details on *how* the interactions have taken place. From the reports, we identified four themes that would likely indicate active engagement of and discussion with stakeholders, although only a more in-depth assessment could verify this. It is important to note that while we differentiate between the four categories, they are not mutually exclusive and certain overlaps may exist. Table 9 presents our findings.

Advisory role: While one could argue that public consultations naturally possess the ability to generate advice, we distinguish them from the advisory role of the dialogues by determining whether dialogues yielded specific recommendations or advice. 12 Member States mention stakeholders taking up an advisory role in different forms. For instance, the **Belgian** reporting states that roundtable discussions resulted in 60 written recommendations and a synthesis report of the dialogues. In the case of **Croatia**, the platform "provides inputs and feedback from all relevant stakeholders". **Denmark** reports that the work of its citizens' council has resulted in two reports containing 192 recommendations. **Finland** also reports on its citizens' jury presenting recommendations on 14 relevant measures to the country's Climate Policy Roundtable. **Germany** reports that the "Energy Transition Research and Innovation Platform Acts as an advisory body for overarching issues of funding policy in energy research". **France** reports on a nationwide consultation on the energy mix resulting in citizen contributions being taken into account. Moreover, the French report states that "The Government will present to Parliament, before the examination of the draft [Multi-annual Energy Plan], a response report to the synthesis of the consultation carried out by the guarantors and make it public". In **Ireland**, the work of the National Youth Assembly on Climate resulted in a report. **Italy** states that a "consultation process aimed at gathering opinions, criticisms, and proposals on the topics of the Plan" took place.

According to **Latvia's** reporting, its expert groups prepare recommendations, including on additional measures for the NECP. **Lithuania** reports establishing a National Climate Change Committee which provides advice on the formulation, assessment, and implementation of domestic climate change management policies. In **Luxembourg**, the Climate Platform can "issue opinions, at the request of the Government in Council, on national climate policy, in particular on the implementation of international commitments" and "formulate an opinion on the preliminary draft of the NECP". A joint opinion document of the Climate Platform on the preliminary draft of the NECP has also been created. **The Netherlands** reports that its National Climate Platform "provides solicited and unsolicited advice". These are indications of avenues for providing an input to the policy process – and are thus an active engagement option. To what extent recommendations indeed inform policy, or in what way a response to the recommendations may have manifested would require further investigation.

Table 9 Provisions for active engagement and discussion in Member States' reporting on MLCEDs

	Advisory role	Public consultations	Discussions	Dedicated fora	Unclear	Total
AT			●			1/4
BE	●					1/4
BG		●				1/4
HR	●					1/4
CY		●				1/4
CZ					●	0/4
DK	●			●		2/4
EE		●				1/4
FI	●	●		●		3/4
FR	●	●	●	●		4/4
DE	●		●			2/4
EL					●	0/4
HU			●			1/4
IE	●	●	●			3/4
IT	●	●	●			3/4
LV	●		●			2/4
LT	●					1/4
LU	●		●	●		3/4
MT			●			1/4
NL	●		●	●		3/4
PL					●	0/4
PT		●				1/4
SK					●	0/4
SI		●		●		2/4
ES		●				1/4
SE					●	0/4
Total	12	10	10	6	5	

Note: "●" indicates information obtained from Member States' reporting.

Public consultations: 10 Member States report on conducting public consultations (**Bulgaria**, **Cyprus**, **Estonia**, **Finland**, **France**, **Ireland**, **Italy**, **Portugal**, **Slovenia**, and **Spain**). **Slovenia**, for example, reports on a three-stage public participation process that consists of a

five-week pre-consultation, a targeted consultation through communication workshops, and a one-month concluding consultation and dialogue. We consider the specific reference to a "dialogue" in the Slovenian case to indicate that active dialogue took place. However, as discussed in chapter 2.4, as opposed to the two-way, permanent, and interactive nature of the multilevel dialogues, public consultation processes are expected to be rather specific, intermittent and of an advisory nature (e.g., per Article 10 of the GovReg). This means that while we acknowledge public consultations as a means to actively engage with stakeholders, further examination of whether these also constitute a discussion would be necessary.

Discussions: 10 Member States report discussing relevant thematic topics with stakeholders (e.g., **Austria**, **France**, **Germany**, **Hungary**, **Ireland**, **Italy**, **Latvia**, **Luxembourg**, **Malta, the Netherlands**). **France** reports on a "public debate for the Multi-annual Energy Plan", as well as on a national consultation process aiming to create a "debate on the major societal choices". Regional energy committees in France are also able to "debate and provide opinions on all subjects related to energy that have an impact on the region." **Germany** states that energy efficiency measures and market design options for a renewable electricity system are being discussed in two platforms. **Ireland** specifically mentions a "two-way dialogue". **The Netherlands'** report states that "conversations" on climate policy are being held with companies, NGOs, citizens, and young people in particular. The words "discussion" and "conversation" both suggest an interactive format.

Dedicated fora: Cyprus reports that discussions with relevant stakeholders on the proposed policies and measures of the current NECP have been continuous throughout the implementation period. **Denmark** reports actively engaging with actors from civil society by establishing a Citizen's Assembly and a Youth Climate Council – with the aim to engage with and encourage individuals and young people in particular to participate in climate debates. **Finland** also states that it has engaged a national Citizens' Jury on Climate Action. The **French** Climate & Resilience Law of 2021 provides for the establishment of a regional energy committee in each region. According to **the Netherlands'** report, citizen assemblies have been or are being organised in the North Brabant and Gelderland regions. **Slovenia** mentions the involvement of its Youth Movement for Climate Justice in the debate and its contribution to the "climate and energy future".

The **Greek** reporting considers its overall governance structure "comprehensive and inclusive", but only speaks of stakeholders that "may be invited" to the meetings of its inter-ministerial committee, "without a right to vote". There is no indication as to the nature of the input they can provide – and thus it remains unclear whether this is a means to "actively (…) engage and discuss". The same is true for the **Czech**, **Polish**, **Slovak**, and **Swedish** submissions, which do not contain sufficient information to assess this criterion. **Finland**, **Italy**, and **the Netherlands** stand out in comparison, with three types of relevant formats or roles mentioned.

All told, in a majority of Member States the reports indicate some form of ability for active exchange (without judgement as to which stakeholders this refers to or whether this is indeed a multilevel interaction). **France is the country which covers all four provisions for active**

engagement and discussion. Nevertheless, our analysis of Member States' reporting shows that **information is overall insufficient or not specific enough in the vast majority of the reports** to get a sense of whether the implementation lives up to the intended nature of the MLCEDs.

A **Finnish** interviewee expressed concern that their opinion as a representative of the local level was not heard and that the dialogue process was "not too well planned". Both **Dutch** interviewees, on the other hand, confirmed the initial findings that **the Netherlands** has provided for an active dialogue. One **Dutch** expert stated that "high-placed policymakers from the ministry" attended the dialogues and took notes of comments and recommendations, and that the "informal culture" between the national and the sub-national level ensured an active dialogue. The second expert from **the Netherlands** also expressed an opinion that the dialogue between the national and the local level is "very active" but did not refer to specific provisions that ensured that. Interviewees from **Greece** and **Sweden** also confirmed the initial findings, as none had knowledge about whether active dialogue and participation had taken place.

Across the three aspects evaluated under the heading "nature of the dialogues", only **three out of the 26 countries analysed provide information that suggests the criterion can be counted as having been largely fulfilled: Finland, Italy, and the Netherlands.**

4.4 Thematic scope

As laid out in Chapter 3.1, the GovReg prescribes that Member States must cover several specific topics in their MLCEDs: the achievement of the EU's climate neutrality objective, the different scenarios envisaged for energy and climate policies, including for the long term, progress review. In addition, Member States have the option to discuss NECPs and LTSs within the framework of their dialogues. In the following sub-chapter, we present the findings concerning the thematic scope of our content analysis.

4.4.1 Mandatory scope

None of the reports covers all three mandatory aspects (see Table 11). The first scope, the achievement of the EU's climate neutrality goal is not once mentioned explicitly by the 26 reports, despite the fact that the amendment that inserted this requirement was adopted more than 1.5 years prior to the reports being prepared. Only **Belgium**, **Germany**, and **the Netherlands** can be considered to be partially covering the mandatory aspects through reference in some form to both policy scenarios and a progress review. 14 additional reports cover at least one item explicitly. The remaining 10 country submissions do not explicitly reference any of the topics that should be addressed as per Article 11 of the GovReg.

4.4.1.1   EU climate neutrality objective

No report specifically refers to the EU climate neutrality goal. Cyprus may do so indirectly, by mentioning the European Green Deal. Member States largely refer to the GovReg and its implementation. And there are references to long-term goals and the transition. **Austria**, for example, mentions "the long-term reduction of greenhouse gas emissions towards a low-carbon society". However, none of these references relate to the specification of the GovReg (as amended by the EU Climate Law in July 2021) for the dialogues to "discuss the achievement of the Union's climate-neutrality objective".

4.4.1.2   Scenarios for energy and climate policies

15 Member States explicitly report on scenario discussions with relevant stakeholders. For example, **Austria** reports on discussions relating to "long-term scenarios to increase energy efficiency and the share of renewable energies". **Belgium** states that its dialogues involved "a reflection on additional avenues for adjusting and strengthening these policies and measures". **Bulgaria's** reporting mentions a Committee for Energy Transition, which "develops energy transition scenarios and a Roadmap for climate neutrality". **Cyprus** talks about "continuous" discussion on "proposed policies and measures of the current NECP with key stakeholders". According to the **Estonian** report, climate and energy dialogues are held in relation to the preparation of studies and prognosis, including for changing climate ambition and modelling pathways and action plans. **Denmark** addresses barriers and opportunities related to NECP policies. **Finland** reports on discussions of initiatives and proposals related to the transition and mentions "roadmaps". In **France**, "technical working groups with stakeholders have been conducted for the development of climate and energy scenarios and the identification of major measures to achieve objectives by sector". The **German** Energy Efficiency Platform aims to "develop suitable strategies for increasing energy efficiency in a broad discourse with stakeholders with the perspectives 2030 and 2045". Additionally, in Germany, stakeholders convene "to deliberate a shared vision of the future energy system". **Ireland** reports deliberating on the "vision for a climate neutral and resilient Ireland" with stakeholders. **Italy** reports on discussions regarding "distribution scenarios among regions for the national targets on photovoltaic and wind energy". **The Netherlands** reports on "monitoring [...] the time path towards 2030", while **Latvia's** report states that climate and energy "projections" are discussed in a working group, made of various stakeholders. **Lithuania** reports on exchanges to "find the best measures to implement", and **Slovenia** obtains guidance from experts and the general public on the update of the NECPs.

11 reports remain vague or do not mention policy scenarios. Croatia, **Czechia**, **Greece**, **Malta**, **Portugal**, **Slovakia**, **Slovenia**, **Spain**, and **Sweden** do not provide any information on presenting policy options to relevant stakeholders. **Portugal**, for example, reports on "collecting perspectives on the updating of NECPs". It may be that other Member States that do not explicitly

mention scenarios for policies equate the discussions on the NECPs as synonymous with these – however, this cannot be verified on the basis of the reports alone.

4.4.1.3 Progress review

The review of progress is mentioned in the reports of five countries. Belgium reports on "assessing the progress of existing federal policies and measures". **Germany's** report states that "'Energy transition platforms' serve as a forum for stakeholders to take stock of the transition process". Additionally, the German report refers to an Alliance for Climate Action, where progress review on national climate policy was carried out. However, according to the report, the alliance was only operational between 2015 and 2021, as "participants did not see added value in the Alliance, compared to other existing dialogue platforms". **Luxembourg** states that at the request of the government, the Climate Platform may "study on its own initiative the appropriateness of new measures or changes to existing measures". According to the submission of **the Netherlands**, "the Climate Agreement Progress Meeting (VGO) discussed the progress of the Climate Agreement", the latter of which is described in the report as "a package of measures and agreements between approximately 150 parties […] to reduce greenhouse gas emissions by 2030". Additionally, **Portugal** specifically states that progress review was included within the framework of its NECP and its revision.

4.4.2 Optional scope

The picture is slightly better concerning "optional" topics. **Five out of the 26 countries reference both NECPs and LTSs** (or related processes), while the **NECPs** in particular are **mentioned frequently (in 15 out of 26 reports)**, making them the single most discussed policy process the dialogues are connected to in some form.

The many NECP references may be due to the fact that NECPs are considered as the key process under the GovReg even if that is not the case for Article 11 itself. It is also possibly the process most on governments' minds, as the updating of NECPs is the most high-level process under the GovReg in 2023. One could also argue that some Member States may have implicitly taken NECPs as being synonymous to, for example, "scenarios for climate and energy policies", and thus NECP references might be counted as speaking to that content pillar. Another possibility could be that Member States have 'recycled' their NECP reporting for the MLCED reporting.

A less positive interpretation of the results is that they indicate the reporting on implementation of the dialogues itself has not been considered worthy of enough attention by national governments to speak to the aspects covered by the law. Considering the lack of detail on other aspects evaluated in this paper, this hypothesis could be worthy of further exploration through additional research.

4.4.2.1   Reference to NECPs

NECPs are the most referred to thematic element in Member States' reporting on MLCEDs. 19 out of 26 countries (**Austria**, **Bulgaria**, **Croatia**, **Cyprus**, **Estonia**, **Finland**, **France**, **Greece**, **Hungary**, **Ireland**, **Italy**, **Latvia**, **Lithuania**, **Luxembourg**, **Portugal**, **Slovakia**, **Slovenia**, **Spain**, and **Sweden**) mention the plans in one form or another. The reporting of **Bulgaria** and **Slovakia** focuses solely on their NECPs, the former only including limited information about the related public consultation process. According to **Latvia's** report, "expert groups were established mainly to prepare the recommendations on how to implement (in detail) the measures set in NECP and recommendations on additional measures to be included in updated NECP."

4.4.2.2   Reference to LTSs (or similar processes)

Nine countries mention their LTSs or related relevant national climate and energy policy processes: Estonia, **Finland**, **France**, **Hungary**, **Ireland**, **Italy**, **Lithuania**, **the Netherlands**, and **Slovenia**. **Estonia** refers to its Strategy Estonia 2035. **Finland** and **Slovenia**, for example, mention their national aims for climate neutrality, while the former also refers to its National Climate and Energy Strategy. **France** mentions its LTS and Multi-annual Energy Plan. **Hungary** talks about "major energy and climate policy related documents" being discussed. **Lithuania** includes the National Climate Change Management Agenda (Strategy) in its reporting. **Italy** mentions its National Recovery and Resilience Plan. **The Netherlands** mentions the country's Regional Energy Strategies. Our analysis of the reports shows that the topics that the dialogues are required to address are not adequately covered in the reporting by Member States.

4.4.3 Summary of thematic scope coverage

Table 11 provides a summary of the thematic scope coverage of MLCEDs, while the following assessment examines Member States reporting for mention of these topics in more detail, distinguishing between their mandatory and optional natures.

Table 10 Thematic scope coverage in Member States' reporting on MLCED

	EU climate neutrality goal	Scenarios	Progress review	Summary of mandatory scope	NECPs (optional)	LTSs et al (optional)	Summary of optional scope
AT	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Not mentioned	Optional scope partially covered
BE	Not mentioned	Mentioned	Mentioned	Mandatory scope partially covered	Not mentioned	Not mentioned	Optional scope not covered
BG	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Not mentioned	Optional scope partially covered
HR	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Mentioned	Not mentioned	Optional scope partially covered
CY	Somewhat mentioned	Somewhat mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Not mentioned	Optional scope partially covered
CZ	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Not mentioned	Not mentioned	Optional scope not covered
DK	Not mentioned	Somewhat mentioned	Not mentioned	Mandatory scope largely not covered	Not mentioned	Not mentioned	Optional scope not covered
FI	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Mentioned	Optional scope fully covered
FR	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Mentioned	Optional scope fully covered
DE	Not mentioned	Mentioned	Mentioned	Mandatory scope partially covered	Not mentioned	Not mentioned	Optional scope not covered
EE	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Mentioned	Optional scope fully covered
EL	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Mentioned	Not mentioned	Optional scope partially covered
HU	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Mentioned	Mentioned	Optional scope fully covered
IE	Not mentioned	Somewhat mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Mentioned	Optional scope fully covered
IT	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Mentioned	Optional scope fully covered
LV	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Not mentioned	Optional scope partially covered
LT	Not mentioned	Somewhat mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Mentioned	Optional scope fully covered
LU	Not mentioned	Not mentioned	Mentioned	Mandatory scope largely not covered	Mentioned	Not mentioned	Optional scope partially covered
MT	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Not mentioned	Not mentioned	Optional scope not covered
NL	Not mentioned	Somewhat mentioned	Mentioned	Mandatory scope partially covered	Not mentioned	Mentioned	Optional scope partially covered
PL	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Not mentioned	Not mentioned	Optional scope not covered
PT	Not mentioned	Not mentioned	Mentioned	Mandatory scope largely not covered	Mentioned	Not mentioned	Optional scope partially covered
SK	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Mentioned	Not mentioned	Optional scope partially covered
SI	Not mentioned	Mentioned	Not mentioned	Mandatory scope largely not covered	Mentioned	Mentioned	Optional scope fully covered
ES	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Mentioned	Not mentioned	Optional scope partially covered
SE	Not mentioned	Not mentioned	Not mentioned	Mandatory scope not covered	Mentioned	Not mentioned	Optional scope partially covered
Totals	Somewhat mentioned: 1	Somewhat mentioned: 5. Mentioned: 10	Mentioned: 5	Fully covered: 0 Partially covered: 3 Largely not covered: 14 Not covered: 9	Mentioned: 19	Mentioned: 9	Fully covered: 8 Partially covered: 12 Largely not covered: 0 Not covered: 6

Note: For the codebook of this table, see Table 13 in the Annex.

Our analysis of the reports shows that **the topics that the dialogues are required to address are not adequately covered in the reporting** by Member States. **None of the reports cover all three mandatory aspects**. The first aspect, the achievement of the EU's climate neutrality goal is not mentioned explicitly by any of the 26 reports, despite the fact that the amendment that inserted this aspect was adopted more than 1.5 years prior to the reports being prepared. Only **Belgium**, **Germany** and **the Netherlands** can be considered to be partially covering the mandatory aspects through reference in some form to the same topics. 14 additional reports cover at least one topic explicitly. The other 10 country submissions do not explicitly reference the topics that should be addressed as per Article 11 of the GovReg. **Malta** and **Poland** cover neither the mandatory nor the optional topics.

Several interviewees confirmed that national processes were the focus in their countries' respective dialogues – not the EU goal or respective EU policies. To the knowledge of one of the **Dutch** interviewees, in **the Netherlands** this entailed a discussion about the NECP with the climate law and its targets used as context. According to the second Dutch interviewee "the EU does not play a role" in climate discussions in the Netherlands. Without specifically saying that the two topics were discussed during dialogues, one **Lithuanian** interviewee stated that the discussions on the EU climate neutrality goal and national climate goals are "related", as it is "hard to talk about national goals without considering EU goals". In the case of **Spain**, a national government official stated that all three mandatory scope areas were discussed during dialogues with various stakeholders, "because national goals are part of the EU goal". Interestingly, the second Spanish interviewee – part of a civil society organisation – stated they had no knowledge that the three topics were ever discussed with stakeholders at the sub-national level. Additionally, a **Swedish** expert said that the mandatory themes have been discussed during stakeholder dialogues, "but not on the local level".

Almost half – five - of the interviewees stated that the dialogue structures they were aware of were created as part of the NECP process. These were one expert from **Greece**, **Portugal**, and **Sweden** each, as well as both from **Lithuania**. This does not automatically disqualify such structures from acting as MLCEDs under the GovReg, but for this to be the case, the topics covered would need to be increased over time to cover the full breadth of mandatory topics and the involvement of stakeholders from multiple levels of government would need to be assured.

4.5 Summary: Weak implementation progress

The assessment of 26 Member States' reports combined with the 11 targeted expert interviews yielded important insights on how and to what extent Member States implement MLCEDs domestically as well as on the level of detail contained in the reporting itself. To assess the level of detail of the reports, we checked whether they include information on (all) the key parameters specified in the GovReg. To facilitate this assessment across a broad set of parameters, we used insights from the detailed evaluations on some of the criteria from previous sections.

Table 12 provides a summary of our findings on the progress of MLCEDs in Member States. The main insight is that **in terms of actual content, no Member State report analysed covered all aspects** required by the legal text.

Mixed picture on overall detail – all country reports lack information

Belgium, Germany, and the Netherlands are the **only countries that report on all criteria and partially cover the mandatory thematic scope.** 12 Member States (**Austria**, **Croatia**, **Denmark**, **Finland**, **France**, **Hungary**, **Ireland**, **Italy**, **Lithuania**, **Luxembourg**, **Portugal**, and **Slovenia**) report on all or most criteria, but largely do not cover the mandatory thematic scope. Four countries report on some criteria but largely do not cover, or completely fail to cover, the mandatory scope – **Bulgaria**, **Cyprus**, **Estonia**, and **Latvia**. Lastly, **Czechia**, **Poland**, **Slovakia**, and **Sweden** report on one or no criteria and do not cover the mandatory thematic scope at all. These four reports include so little information that it warrants asking whether they should have passed the QAQC process. The low level of information contained prohibits an assessment of the implementation of the MLCEDs in these countries on the basis of the reports.

Late submissions and late publication reduce transparency?

While **19 of the 26 Member States' reports were more than one month late**, of the 26 reports available for this analysis, **all submissions included the sections that they were required to fill in**. This was to be expected after a QAQC process. However, even nine months after the reporting deadline, not all reports are publicly available, which creates a transparency issue, and one report is still not submitted. Additionally, the evaluation shows that the **length of the submissions is not indicative of the quality or comprehensiveness** of the content within the reports.

New dialogues deployed in most countries and in a variety of formats

A majority of the reports (15/26) indicate that **new dialogues have been established.** In six countries, an **existing structure** is available, while another seven provide so little information that it is not possible to make an assessment about the nature of the dialogue structure. Both new and existing structures are implemented using a **variety of formats** with the establishment of **public consultations** and **committees** being the most common approach.

Half the reported dialogues are not explicitly shown to be multilevel

Half of the existing reports contain keywords or information indicating a subnational dimension and thus showing the involvement of multiple levels in decision-making in the MLCEDs. Our evaluation reveals a trend among Member States to report on diverse dialogue structures, some of which may not necessarily meet the criteria for qualifying as 'multilevel'. If more than half of the dialogues did not in fact involve subnational actors and they do not, hence, qualify as multilevel, this would essentially be a violation of the requirement of Article 11 of the GovReg.

Stakeholder coverage needs improvement

Countries include various stakeholders in their MLCEDs, but only **one Member State – Italy – reports engaging all five types listed** in the law. Investors are the group mentioned in the law but covered the least in the reports, although interviews suggested that they may have been involved in three additional countries. Generally, **the reports do not indicate adequate coverage of stakeholders in 12 countries**, where less than three out of five stakeholder groups were mentioned – and sometimes none.

Active stakeholder engagement and discussion well provided for

Reports from **the majority of Member States suggest some capacity for active exchange and discussion with stakeholders**. Findings show that most countries report on providing for active engagement by giving stakeholders an **advisory role**, or through **public consultations**, with some making specific mention of a two-way dialogue. However, it is worth noting that the specifics of which stakeholders are involved or whether this constitutes a true multilevel interaction remain unspecified.

Mandatory topics largely not explicitly addressed, NECPs dominate the reporting

The three **topics that the dialogues should address are not adequately covered** in the reporting by Member States. **None of the reports covers all three mandatory topics**. No report specifically refers to the EU climate neutrality goal, and only five mention a review of progress.

NECPs are the most covered topic in Member States' reporting on MLCEDs, but this is an optional process to address, as per the letter of the law. A friendly interpretation sees this as being implicitly synonymous with "scenarios for energy and climate policies" which should be a subject of the dialogues. However, a more sombre perspective could suggest that this phenomenon, paired with the predominance of MLCEDs taking the form of public consultations, could mean that there is confusion among Member States between Article 10 (stipulating provisions for "public consultation" on NECPs and LTSs) and Article 11 of the GovReg, which could mean that consultations are then misreported as dialogues, even if no other topics are covered or other qualities not met.

In sum, the analysis paints a diverse picture of country specific activities to engage stakeholders on climate policy, with insufficient information available to judge whether many of these should qualify as multilevel dialogues and are thus adequately reported. The absence of key information indicates further weaknesses in the current implementation on several fronts, including the types of stakeholders invited and the topics addressed.

Table 11 Summary of findings on the progress of multilevel dialogue implementation

	Administrative requirements for reporting		Structure and format of dialogues		Nature of the dialogues			Thematic scope coverage		Summary
	Timing of submission	Length (character count)	New or existing structure?	Format specified?	Clearly permanent?	Clearly multilevel?	Stakeholder groups listed?	Provisions for active dialogue?	Mandatory thematic scope coverage in report (see 4.4.3)	
AT	Late	907	Existing	Yes	Yes	Yes	Yes	Yes	Mandatory scope largely not covered	Reporting on all criteria but largely not covering mandatory scope
BE	Late	4063	New	Yes	Unclear	Yes	Yes	Yes	Mandatory scope partially covered	Reporting on all criteria and partially covering mandatory scope
BG	Late	1674	Unclear	Yes	Unclear	Unclear	Yes	Yes	Mandatory scope largely not covered	Reporting on some criteria and largely not covering mandatory scope
HR	On time	777	New	Yes	Unclear	Yes	Yes	Yes	Mandatory scope not covered	Reporting on most criteria but not covering mandatory scope at all
CY	Late	3637	Existing	Yes	Yes	Yes	Unclear	Yes	Mandatory scope largely not covered	Reporting on most criteria but largely not covering mandatory scope
CZ	Late	201	Unclear	Yes	Unclear	Unclear	Unclear	Unclear	Mandatory scope not covered	Reporting on one criterion and not covering mandatory scope at all
DK	On time	1081	New	Yes	Yes	Yes	Yes	Yes	Mandatory scope largely not covered	Reporting on all criteria but largely not covering mandatory scope
EE	On time	3206	Unclear	Yes	Unclear	Unclear	Unclear	Yes	Mandatory scope largely not covered	Reporting on some criteria and largely not covering mandatory scope
FI	On time	1793	Both	Yes	Yes	Unclear	Yes	Yes	Mandatory scope largely not covered	Reporting on most criteria but largely not covering mandatory scope
FR	Late	3879	New	Yes	Yes	Yes	Yes	Yes	Mandatory scope largely not covered	Reporting on all criteria but largely not covering mandatory scope
DE	Late	2688	Existing	Yes	Yes	Yes	Yes	Yes	Mandatory scope partially covered	Reporting on all criteria and partially covering mandatory scope
EL	Late	3255	New	Yes	Unclear	Unclear	Yes	Unclear	Mandatory scope not covered	Reporting on some criteria but not covering mandatory scope at all
HU	Late	1002	Unclear	Yes	Yes	Yes	Yes	Yes	Mandatory scope not covered	Reporting on most criteria but largely not covering mandatory scope
IE	Late	5070	New	Yes	Yes	Unclear	Yes	Yes	Mandatory scope largely not covered	Reporting on most criteria but largely not covering mandatory scope
IT	Late	3486	Unclear	Yes	Yes	Yes	Yes	Yes	Mandatory scope largely not covered	Reporting on most criteria but largely not covering mandatory scope
LV	Late	1765	New	Yes	Yes	Unclear	Yes	Yes	Mandatory scope largely not covered	Reporting on most criteria but largely not covering mandatory scope
LT	Late	2247	Both	Yes	Yes	Unclear	Yes	Yes	Mandatory scope largely not covered	Reporting on most criteria but largely not covering mandatory scope

	Administrative requirements for reporting		Structure and format of dialogues		Nature of the dialogues			Thematic scope coverage		Summary
	Timing of submission	Length (character count)	New or existing structure?	Format specified?	Clearly permanent?	Clearly multilevel?	Stakeholder groups listed?	Provisions for active dialogue?	Mandatory thematic scope coverage in report (see 4.4.3)	
LU	Late	1526	New	Yes	Yes	Yes	Yes	Yes	Mandatory scope largely not covered	**Reporting on all criteria but largely not covering mandatory scope**
MT	Late	698	New	Yes	Unclear	Unclear	Yes	Yes	Mandatory scope not covered	**Reporting on most criteria but not covering mandatory scope at all**
NL	On time	3123	New	Yes	Yes	Yes	Yes	Yes	Mandatory scope partially covered	**Reporting on all criteria and partially covering mandatory scope**
PL	Late	3681	Unclear	Yes	Unclear	Unclear	Unclear	Unclear	Mandatory scope not covered	**Reporting on one criterion and not covering mandatory scope at all**
PT	On time	1683	New	Yes	Unclear	Unclear	Yes	Yes	Mandatory scope largely not covered	**Reporting on most criteria but largely not covering mandatory scope**
SK	Late	158	Unclear	Unclear	Unclear	Unclear	Yes	Unclear	Mandatory scope not covered	**Reporting on one criterion and not covering mandatory scope at all**
SI	On time	3663	New	Yes	Unclear	Yes	Yes	Yes	Mandatory scope largely not covered	**Reporting on most criteria but largely not covering mandatory scope**
ES	Late	5400	New	Yes	Yes	Yes	Yes	Yes	Mandatory scope not covered	**Reporting on all criteria but not covering mandatory scope at all**
SE	On time	212	Unclear	Unclear	Unclear	Unclear	Unclear	Unclear	Mandatory scope not covered	**Reporting on no criteria and not covering mandatory scope at all**
Totals	Late: 18 On time: 8	Between 158 and 5400 characters	New: 15 Existing: 6 Both: 2 Unclear: 7	Yes: 24 Unclear: 2	Yes: 13 Unclear: 13	Yes: 13 Unclear: 13	Yes: 21 Unclear: 5	Yes: 21 Unclear: 5	Mandatory scope partially covered: 3 Mandatory scope largely not covered: 14 Mandatory scope not covered: 9	Reporting on all criteria and partially covering mandatory scope: **3** Reporting on all criteria but largely not covering mandatory scope: **5** Reporting on most criteria but largely not covering mandatory scope: **9** Reporting on most/some criteria but not covering mandatory scope at all: **5** Reporting on no criteria/one criterion and not covering mandatory scope at all: **4**

Note: For the codebook of this table, see Table 13 in the Annex.

5. Multilevel dialogues in the context of transformative climate governance

In this section, we discuss how multilevel climate and energy dialogues, as analysed above, contribute to the transformative nature of EU climate governance, using the assessment framework outlined in section 2.2 of this report and elaborated in Moore et al. (2023). The main categories for this discussion are 1) overall effectiveness of the instrument, 2) its resilience, and 3) the quality of its implementation. For each of the three categories, we have formulated several assessment questions that operationalise them. These are as follows:

- **Overall effectiveness:** Do the MLCEDs have the ability to fulfil the desired governance function? Are the MLCEDs' overall goals in line with achieving climate neutrality? Do the MLCEDs consider a long-term perspective?

- **Policy resilience:** Does the GovReg and any other underlying legislation have a review/revision obligation that requires regular evaluation? Is there a process for responding to changing economic, political, scientific conditions? How effective is this process? Do the MLCEDs have sufficient buy-in from key stakeholders and policymakers to continue? Does the policymaking process to adapt the MLCEDs require the agreement of a large number of 'veto players'?

- **Quality of implementation:** To what extent are MLCEDs being implemented effectively? Are the MLCEDs adequately resourced?

5.1 Overall effectiveness of MLCEDs

Our research framework stipulates that MLCEDs as required by the Governance Regulation are meant to contribute to the procedural governance function *participation* and that they are intended to support *climate policy integration.* The criterion 'overall effectiveness' seeks to assess the potential of fostering integrative decision-making processes, i.e. dialogue, as a mechanism in the form that it is designed in the law, as compared to actual implementation, which is covered in a separate criterion (see chapter 5.3).

Do MLCEDs have the ability to fulfil the desired governance function?

The design of MLCEDs as laid down in the GovReg should arguably provide for both intended functions. Regarding participation, and thus integrative decision-making processes, Article 11 lists several specific groups of stakeholders to include, and it contains a provision for active stakeholder engagement and that the dialogues must cover certain climate-related topics, leaving open the formats and structures that seem suitable in the national context for Member States to decide. Concerning vertical integration, it specifically includes the word 'multilevel' in its title and repeats

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innovation·investment·infrastructure·integration

this in several places. Moreover, local authorities are explicitly listed as one of the stakeholder groups to be involved, clarifying the intention to include subnational actors in the conversation.

Are the instrument's overall goals in line with climate neutrality?

While the GovReg is a piece of EU legislation, the MLCEDs established through it are a national-level instrument. They can contribute to an EU path to climate neutrality only via the contributions of national policy. A direct reference to the EU's climate neutrality objective was inserted through the EUCL into the Article, requiring that the dialogues consider the national contribution to that objective. Arguably this is an implicit means of also suggesting a path to climate neutrality for each country at national level, although this is not a requirement under EU law (at the time of writing). Regardless, most EU Member States have already set climate neutrality goals (see NECP report assessment (SWD (2023) 646, page 6). Moreover, MLCEDs are required to address aspects and processes relevant to the long-term transformation towards climate neutrality, such as climate and energy policy scenarios and a review of progress. Ergo, while the MLCEDs do not explicitly consider climate neutrality at the national level, this is implicitly assumed to be the objective being worked towards. The mechanisms' overall goals can thus be considered to be in line with climate neutrality – judged by the specifications provided by the law.

Does the instrument consider a long-term perspective?

There are several explicit references in the legal text establishing the MLCEDs that suggest that a long-term perspective is considered. Article 11 obliges Member States to address the policy scenarios which can be understood to be covering a longer time period. There is also the explicit reference to the EU's climate neutrality goal, which is for 2050 at the latest, adding another long-term point of reference. The reference to Member States' long-term strategies in the preamble only makes this an optional topic for the dialogues but adds another specific element that is long-term. Moreover, NECPs, which are also mentioned as possible topics, and which in fact most Member States included in the MLCED scope, must include a consideration of the impact on long-term goal of climate neutrality (see GovReg Article 3.2 f) as well as projections included in NECPs are now for the next 25 to 30 years (Article 2 GovReg). The reference to NECPs can thus also be argued to bring an additional means of inserting a long-term perspective.

In sum, based on the answers to the operationalisation questions for this criterion, which judged the dialogues as per the legal text, overall effectiveness in the context of transformative climate governance is provided in the design of the instrument. However, real-world implementation may not deliver the intended functionality (see Chapter 5.3 below).

5.2 Policy resilience of MLCEDs

Effective climate policy needs to deliver change over long periods of time and the corresponding governance frameworks should be both stable to provide guidance over such timeframes and also

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responsive enough to change as needed – for example in response to new information or unforeseen crises. Policy resilience is thus considered as a criterion that encompasses the ability of the governance mechanism to be both adjustable but also predictable and robust (meaning: relatively safe from being dismantled).

Does the underlying legislation have a review/revision obligation that requires regular evaluation? Is there a process for responding to changing economic, political, scientific conditions?

The Governance Regulation that establishes the MLCEDs includes a dedicated review clause in Article 45. The timing of the review is connected to the updating cycle of the Paris Agreement, which foresees a Global Stocktake of progress and subsequent ratcheting up of countries' climate action commitments ("nationally determined contributions") every five years. The GovReg review, like many other climate policy instruments in the EU, demands that the Commission issue a review report within "six months of each Global Stocktake" under the Paris Agreement. It can then propose changes to the legislation based on this report – but is not required to do so. The first such review of the performance of the GovReg is underway at the time of writing of this report and should be published in the first half of 2024.

The effectiveness of this evaluation process cannot be generalised, but it can be stated that a mechanism exists, it is legally mandatory to happen at regular intervals and can lead to adjustments of the legal basis. It can thus respond to changing circumstances on a regular basis. And the EU has proven that its climate policy instruments can also be revised outside these regular timeframes if the circumstances require it. Following entry into force of the Paris Agreement, EU leaders decided in December 2020 to increase the EU's 2030 greenhouse gas emission reduction target from at least 40% to 55%. Subsequently, the European Commission proposed a package of new and revised laws (known as the "Fit For 55" package) to achieve this more ambitious goal. While the GovReg was not included in this package, this process proves that EU policy can adjust its climate policy to respond to changed circumstances, i.e. political salience.

Beyond revising the legal basis in EU law, there are other ways that the dialogues themselves can be changed and adjusted. The Regulation leaves room for Member States to devise their own mechanism and to decide what structure, formats, and frequency work in their respective national context. The dialogues are meant to be permanent, if implemented according to the regulation, and thus one can infer that they should have a certain robustness in formats and composition. However, in the absence of more specific requirements, governments have significant flexibility in the implementation to react to changing circumstances.

Does the mechanism have sufficient buy-in from key stakeholders and policy makers to continue?

The GovReg itself arguably has sufficient buy-in, as Member States are investing in its implementation, for example through the drafting of updates to their NECPs, and by delivering on the required reporting. However, additional analysis would be needed to provide dedicated

information to answer this question for the dialogues themselves. The findings in this report indicates that the lack of specification in the law on the MLCEDs has led to wide variation in implementation. This approach, which leaves much flexibility to Member States could be argued to benefit buy-in at the level of governments. On the other hand, it may have come at the expense of the actual functionality delivered. Moreover, with concerns over implementation of the dialogues, buy-in from stakeholders themselves to the current approach may be reduced. At the same time, where new structures have been established and are set up to be permanent, their operation may also generate additional support for the dialogues as a mechanism, support that would stand in the way of a roll-back.

Does the policymaking process to adapt the mechanism require the agreement of a large number of 'veto players'?

Agreement on changes to the legal basis, the Governance Regulation, requires qualified majority votes (QMV) in the Council of the European Union and a simple majority in the Parliament under the ordinary legal procedure. No individual country (not even a combination of two or three) or parliamentary grouping can by themselves create a blocking minority to prevent a decision being taken. In reality, however, country representatives in Council strive for consensus, regardless of QMV (Mintel & Von Ondarza, 2022). Moreover, the MLCEDs originated in the European Parliament and were not a proposal from the Commission. Member States weakened the proposed provisions by the Parliament. To what extent this historical origin may still influence positioning and voting behaviour in a possible review in 2024/2025 cannot be reliably estimated at present and would require further research.

In sum, the consideration of the operationalisation questions suggests a significant degree of policy resilience for the Governance Regulation as a whole and positive indications for the dialogues.

5.3 Quality of MLCED implementation

As a third dimension to the assessment of transformative procedural governance, we consider quality of implementation of the dialogues. To operationalise our assessment, we investigate whether Member States implement the instrument effectively. We also assess if the instrument is adequately resourced.

To what extent do Member States implement this instrument effectively?

Chapter 4 contains the details of our assessment on the state of Member States implementation of MLCEDs, based on the requirements set out in Article 11 and based on their own reports. Our analysis suggests that a majority of **Member States do not presently implement the instrument effectively**. Most of the mandatory requirements are not considered sufficiently.

Only half of the Member States analysed explicitly report that they involved **multiple levels of governance** in their dialogues. This suggest that a central tenet of the mechanism, the one that is meant to support vertical policy integration, may not be ensured in practice. Similarly, only half of the reports indicate that the structures created are of a permanent nature.

The **vast majority of Member States' dialogues involves a diversity of stakeholders**, but only one out of 26 lists all five types mentioned in the law. This is concerning regarding the fulfilment of the function of participation, which the MLECDs are meant to contribute to. Investors are the group listed that does not feature in all but one report. Vast amounts of public and private investments are required for the transition (Klaaßen & Steffen, 2023), so a potential lack of involvement of financial stakeholders is a worrisome observation. However, it is conceivable that Member States might have included these types of stakeholders in other categories, such as under 'business'.

Article 11 can be seen as an instrument to foster integration through participatory processes. Creating space for dialogue – a two-way communication – between multiple levels of government and a diverse range of stakeholders is understood as a process that can make the EU's climate governance framework fit for a net-zero future. Our assessment shows that overall, the **majority of Member States seems to provide for active engagement and discussion – or dialogue**. As such, most Member States report providing advisory roles to stakeholders involved in the dialogues, with the creation of policy recommendations or a synthesis report. However, we also find that most Member States report establishing public consultations, which is questionable as the requirement to conduct public consultations is specifically stipulated in Article 10 of the GovReg and does in general not reflect a two-way communication. Some of these reports mention 'two-way dialogue' or a three-stage consultation where results from the consultations were incorporated into follow-up consultations. If we want to accelerate the EU's transition, this **seemingly varying understanding of what a 'dialogue' or 'active engagement'** entails is something to flag and might suggest a need for further specification of Article 11. Lastly, the **topics covered in the dialogues** as reported by Member States show many important elements **not being considered or underrepresented**, including long-term strategies and policy scenarios, as well as the contribution to the EU climate neutrality goal. Considering the importance of including a long-term perspective and being aligned with climate neutrality, the low level of attention to these topics risks not delivering the desired contribution of the dialogues contributing to a transformative procedural governance system.

5.4 Summary: Limited transformative contribution due to weak implementation

The assessment shows different results across the three criteria. The design of this policy mechanism creates **potential for the MLCEDs to be effective overall**, and current options for review and flexible implementation also suggest a **significant degree of policy resilience**.

However, **significant problems with the quality of the implementation** suggest that the desired functions, e.g., fostering participation and, thus, integrative and deliberative decision-making processes, are currently not met – at least for many if not most Member States, and thus for the EU as a whole. The contribution of MLCEDs to a transformative governance system in the EU can only be realised if these weaknesses in implementation are addressed. The following concluding chapter offers some ideas for how to do this.

6. Conclusions and recommendations

This report has analysed the innovative instrument of multilevel climate and energy dialogues, a new procedural mechanism to enhance vertical policy integration through the participation of stakeholders from different levels, established through the EU Governance Regulation in 2018. It analysed the state of implementation based on a combination of information from formal government submissions and evidence from expert interviews. In addition to evaluating the current state of implementation on this basis, we have used the information for a broader assessment of the overall contribution of these dialogues to creating a robust and effective EU climate governance system in line with the EU goal of achieving climate neutrality. This section interprets the results and the research process with a view to drawing recommendations for improving on the status quo.

Key insight: Dialogues are not delivering intended function in most countries

We identified a variety of shortcomings in the way Member States currently appear to be implementing the dialogues, which cast doubts on the effectiveness of the mechanism and its ability to support the transformation to a climate neutral economy.

Two weaknesses stand out in the analysis:

First, half of the **reports do not demonstrate the involvement of multiple levels of government** in the dialogue. Given the role of the involvement of the sub-national level in climate policy decision-making, this suggests that one of the central intentions of the mechanism is not being delivered. If confirmed, this would imply that several of the reported dialogues do not qualify as implementing the legal requirements under the Governance Regulation.

Second, the reports indicate that the majority of **Member States limit the dialogues** mainly to the discussion of national energy and climate plans and do not address the broad scope of climate policy questions that the legislation foresees. This is concerning because it could mean that there are cases in which standard public consultation processes for the NECPs are reported as also counting as multilevel dialogues, which are explicitly meant to be a distinct process – at least in that they are both permanent and look at more than the NECPs.

Data limitations do not allow further categorisation

The research has, however, faced limitations that need to be considered in weighing the results of the analysis. The information analysed is provided by Member States. The interviews conducted to complement the information added useful anecdotal evidence but were not sufficient in number and scope to verify or disprove the information contained in government reports. It is thus possible that the results are biased by the quality of these reports. The brevity of several of the submitted documents and the lack of detail contained in many indicates that half of the Member States did not provide a comprehensive account of what may have taken place that could qualify as a multilevel dialogue. There are thus not just indications of problems with the quality of the implementation, but also with the quality of the reporting on the dialogues.

There are at least three scenarios that could lead to this picture, that lead to low-quality information, suggesting low quality implementation.

- It is possible that in some cases the reporting itself is inadequate and has not been given enough attention to include all the necessary information. This could result from a lack of capacity to prepare the report, a low perceived importance of doing so in detail, or a lack of access to the information needed by the authority (or individual within) filing the report.

- It is also possible that the implementation itself is flawed in that it only partially or hardly meets the spirit and the letter of Article 11, with Member States creating/implementing structures designed for other purposes and reporting these structure in order to fulfil their obligation to organise an MLCED. The lack of information would thus represent a lack of implementation.

- It is also possible, that these two options happen in combination: a low level of detail is provided because there is little to report that would qualify as an MLCED, and this fact is further obscured by the poor quality of reporting.

The available data does not allow a reliable categorisation of Member State submissions into these three categories. Further research would be needed to expand the evidence base through additional in-depth country specific analyses. It is easier to identify the positive cases, the ones national progress reports actually provide a sufficient level of detail and where the information available seems to indicate that a form of multilevel dialogue has been established. **Belgium** and **the Netherlands** stand out as good practice examples in this context, as the only two countries that report on dialogues that signal multilevel engagement and cover the topics that should be addressed.

Despite the data problems, the overall conclusion is robust, and in line with the experience of other actors looking into MLCED implementation: improvements are needed. This is also being recognised as important in the broader context of enhancing EU climate policy. Just as this paper was being finalised, the European Scientific Advisory Board on Climate Change, created under the EU Climate Law, recognised the importance of multilevel stakeholder involvement in national

policy-making in its first ever assessment of progress and policy consistency, and decided to highlight existing shortcomings through a clear call on the European Commission to "strive to ensure stronger compliance with Article 11 of the Governance Regulation" (ESABCC 2024: 268).

Improvements possible through enhanced practice and a revised legal basis

What do the insights from our detailed analysis mean going forward. Where, and how is improvement needed and possible?

An obvious route for better dialogues and greater transparency about their implementation lies **with Member State practices**. National governments could a) consider all of the parameters specified in Article 11 and create structures that do them justice, providing a real opportunity for subnational actors to engage in discussion on long-term climate policy choices and their implementation – and b) **provide more detailed information** to the Commission and the interested public in their reports. Where the reasons for shortcomings in either one of the two aspects is due to capacity and resources, these could in principle be supported through EU level means (see the NECP Platform project as a concrete example). Where a lack of political attention is the root cause, the dialogues could be placed on the agenda of relevant EU-level meetings and by enquiries from the Commission.

The second route would be to change the legal basis of the MLCEDs and the way that the dialogues are handled at EU level and by the European Commission. Part of the problem may lie in the negotiated form of Article 11 as it currently stands. The notion of the multilevel dialogue is not being given a justification in the law, there is no clear definition of its goals or what would be accepted as passing for such a dialogue. Such specification can be provided by **making Article 11 more precise in the upcoming revision of the GovReg** being prepared by Commission services for 2024/2025. This would signal the importance of these dialogues and give them more weight, both in implementation and for reporting. The law could expand on the intended function, specify the added value sought for national climate policy, and stress the qualities that need to be met to qualify.

A second possible source of the shortcomings observed are the **reporting requirements**, which leave it entirely open to Member States to include whatever they see fit. These **could be expanded** to ask for more detail concerning all aspects considered in this assessment, as mentioned in the law: who was involved, when, on what topics, how often, and in what form? This would require an adjustment of the Implementing Regulation, for example following a change in the GovReg.

Moreover, the **QAQC process undertaken by the Commission concerning the submissions could be improved** and strengthened, rejecting insufficiently detailed reports and asking Member States for more information. This could already be applied to the current set and to future reports, regardless of a change in the format for the reports. A more explicit assessment process could also be built into the Governance Regulation.

This connects to the last point: **official follow-up on the dialogues and their implementation** could have an impact on existing practices. There is currently no formal follow-up process – other than mandatory MLCED reporting – that creates any kind of exchange between Brussels and Member States on the issue of the dialogues. Member States do not expect to be checked concerning their implementation. Such a follow-up could be anchored in the Regulation as a process (e.g., by including information on MLCED implementation in State of the Energy Union reports, and by including it in topics the Commission may issue recommendations on). However, the Commission could also already address this issue in its interactions with Member States and place attention on these dialogues by providing space in meetings, giving it airtime in bilaterals, as well as providing resources to technical exchange and other fora.

In conclusion, there are several options to enhance the use of permanent and effective multilevel climate and energy dialogues. For example, the European Commission can enhance the legal text of Article 11 and, thus, provide more guidance to Member States on what the implementation of the dialogues entails. As a result, greater transparency and information can help to improve the functionality of the dialogues. Both means to enhance the dialogues should be implemented to contribute to a climate governance system that is robust for reaching climate neutrality by 2050.

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Annex

Table 12 Codebook for our measuring MLCED implementation progress and quality

Main cluster	Criteria	Code	Description
Administrative requirements for the reports	Submission timing	On time	Within a month of the deadline
		Late	More than one month after the deadline
	Formal completeness of the submissions	General reporting	The Member State submitted general reporting only
		Progress reporting	The Member State submitted reporting on the progress only
Structure and format of the dialogues	Dialogue structure	Existing dialogue structures	Established before 2018
		New dialogue structures	Established after 2018
		Unclear	Insufficient information to make an assessment
	Dialogue format	Public consultation	Per Article 11 text
		Committee	Per Article 11
		Working group	Per Article 11
		Council of panel	Per Article 11
		Online platform	Per Article 11 text
		Citizens' jury or assembly	Per Article 11
		Targeted workshops	Per Article 11
		Roundtable	Per Article 11
		Awareness campaign	Per Article 11
		Commission	Per Article 11
		Conference	Per Article 11 and synonymous formats such as 'national events'
		Unclear	Insufficient information to make an assessment
Nature of the dialogues	Permanence	Permanent	Per preamble text of GovReg
		Unclear	Insufficient information to make an assessment
	Multilevel scope	Multilevel	Engagement beyond the national level
		Unclear	Insufficient information to make an assessment
	Stakeholder groups listed	Local authorities	For example, municipalities
		Civil society organisations	For example, NGOs
		Business community	For example, industry representatives
		Investors	For example, banks
		General public	Citizens
		Unclear	Insufficient information to make an assessment
	Provisions for active stakeholder engagement and discussion	Public consultations	For example, targeted consultation with the general public
		Advisory role	For example, stakeholders producing recommendations
		Discussions	For example, conversations with stakeholders on relevant topics
		Dedicated fora	For example, a citizens' assembly
		Unclear	Insufficient information to make an assessment.
Thematic scope	Mandatory scope	EU climate neutrality target	Do the dialogues cover topics relating to the achievement of the Union's climate-neutrality objective?
		Scenarios for energy and climate policies	Do the dialogues cover topics relating to the different scenarios envisaged for energy and climate policies, including for the long term?
		Progress review	Do the dialogues cover topics relating to progress review?
	Optional scope	NECPs	Do the dialogues cover topics relating to reference to the NECPs?
		LTSs or other relevant processes	Do the dialogues cover topics relating to reference to the LTSs or other relevant processes?

Table 13 Codebook for the analysis of the thematic scope coverage

Topics			
Code	Not mentioned	Somewhat mentioned	Mentioned
Point system	0	0.5	1
Summary of mandatory scope			
Code	Mandatory scope not covered	Mandatory scope largely not covered	Mandatory scope partially covered	Mandatory scope fully covered
Point system	0 / 3	0.5 – 1.0 / 3	1.5 – 2.0 / 3	2.5 – 3.0 / 3
Summary of optional scope			
Code	Optional scope not covered	Optional scope largely not covered	Optional scope partially covered	Optional scope fully covered
Point system	0 / 2	0.5 / 2	1.0 / 2	2.0 / 2

	EU climate neutrality objective	Scenarios for energy and climate policies	Progress review	Summary of mandatory scope	Reference to NECPs (optional)	Reference to LTSs et al. (optional)	Summary of optional scope
AT	0	1	0	1	1	0	1
BE	0	1	1	2	0	0	0
BG	0	1	0	1	1	0	1
HR	0	0	0	0	1	0	1
CY	0.5	0.5	0	1	1	0	1
CZ	0	0	0	0	0	0	0
DK	0	0.5	0	0.5	0	0	0
FI	0	1	0	1	1	1	2
FR	0	1	0	1	1	1	2
DE	0	1	1	2	0	0	0
EE	0	1	0	1	1	1	2
EL	0	0	0	0	1	0	1
HU	0	0	0	0	1	1	2
IE	0	0.5	0	0.5	1	1	2
IT	0	1	0	1	1	1	2
LV	0	1	0	1	1	0	1
LT	0	0.5	0	0.5	1	1	2
LU	0	0	1	1	1	0	1
MT	0	0	0	0	0	0	0
NL	0	0.5	1	1.5	0	1	1
PL	0	0	0	0	0	0	0
PT	0	0	1	1	1	0	1
SK	0	0	0	0	1	0	1
SI	0	1	0	1	1	1	2
ES	0	0	0	0	1	0	1
SE	0	0	0	0	1	0	1
Totals	Somewhat mentioned: 1	Somewhat mentioned: 4. Mentioned: 3	Mentioned: 2	**Fully covered: 0** Partially covered: 1 Largely not covered: 7 Not covered: 4	**Mentioned: 9**	Mentioned: 4	**Fully covered: 3** Partially covered: 7 Largely not covered: 0 Not covered: 2

Table 14 List of interview questions

No.	Interview questions	Country-specific
1	Does the formal report submitted to the European Commission represent the current state of play regarding multilevel climate and energy dialogues that have taken place in your country? Is there missing information?	All
2	To what extent did the government initiate dialogues with sub-national stakeholders? Which stakeholders were involved?	All
3	Were active dialogue and engagement ensured? How?	All
4	Were investors involved in the dialogues?	All
5	Had dialogues been set up with the intention to contribute to the discussion about the EU climate neutrality goal, or rather national climate goals?	All
6	Was progress towards climate goals reviewed?	All
7	Were dialogue structures specifically created to facilitate a multilevel climate and energy dialogue, or were they part of another process, i.e., the NECP?	All
8	Were scenarios for energy and climate policies unrelated to or beyond the scope of the NECP discussed during the dialogues?	All
9	Have dialogues resulted in recommendations?	All
10	Had the government stated that it would respond to or take up recommendations?	All
11	To what extent have recommendations informed policy, i.e., has the government responded to the recommendations?	All
12	To what extent have the dialogues been mentioned by other stakeholders, i.e., NGOs, media? To what extent does the public know about them?	All
13	Based on the reporting, what is the difference between the committee, the commission, and the council?	Spain
14	Based on the reporting, what is the difference between the committee, the commission, and the council?	Spain
13	Based on the reporting, what is the difference between the committee and the working group mentioned?	Lithuania
13	A "Climate dialogue website" is included in the Greek climate law. What is its status? Do you know if there is a reason why it was excluded from the reporting?	Greece
14	According to the reporting, during the meetings of the Inter-Ministerial Committee, stakeholders do not have the right to vote. Can you tell us more about these meetings and what has been discussed?	Greece

Note: All interviewees were asked a catalogue of 12 questions, with some countries receiving additional questions.

About the project

4i-TRACTION – innovation, investment, infrastructure and sector integration:

TRAnsformative policies for a ClimaTe-neutral European UnION

To achieve climate neutrality by 2050, EU policy will have to be reoriented – from incremental towards structural change. As expressed in the European Green Deal, the challenge is to initiate the necessary transformation to climate neutrality in the coming years, while enhancing competitiveness, productivity, employment.

To mobilise the creative, financial and political resources, the EU also needs a governance framework that facilitates cross-sectoral policy integration and that allows citizens, public and private stakeholders to participate in the process and to own the results. The 4i-TRACTION project analyses how this can be done.

Project partners