

Multi-Level Governance in EU Energy and Climate Policy – First findings from NECPlatform

Executive summary

Multi-level governance (MLG) promotes collaborative decision-making, inclusiveness, and the effective use of resources and expertise across different levels and sectors of governments and society. It has two main components: a vertical one – involving different administrative levels; and a horizontal one – involving different sectors of society. According to Article 11 of the Governance Regulation, Member States should implement multi-level governance processes when designing, implementing and monitoring national energy and climate policy (namely Climate and Energy Dialogues).

Within the [NECPlatform project](#), we supported six Member States (Bulgaria, Croatia, France, Italy, Portugal and Romania) in setting up such dialogues, with mixed results. Despite our best efforts, the implementation of the first round of CED platforms in the six Member States has not always gone smoothly or been straightforward. If, on the one hand, local and regional governments and other stakeholders have generally accepted with great enthusiasm to participate on the CED dialogues in all 6 MS, on the other hand, the national level has been more difficult to involve, with varying degrees of acceptance.

The reasons behind this are numerous and vary case by case. However, in generic terms we noticed that national governments are accustomed to working with a **top-down approach**, and **generally tend to work against European deadlines**, rather than perceive the need of having long-term plans and strategies as a structured and continuous process. In some cases then, the **NECP is seen as a bureaucratic tool rather than a political priority**. Moreover, different ministries tend to **think in silos**, so that priorities are competing instead of building on one another. Furthermore, from our analysis we observed that the non-binding nature of the NECP trajectories and the long-term horizon of the reduction targets leads national governments to dedicate **little focus on the implementation of these targets and the necessary measures**. **The main challenge for any national planning exercise is to put measures into practice**. However, this should be done consistently, in a concerted manner (including other stakeholders and sub-national authorities) and not according to political convenience.

- **Reiterate even more strongly a better implementation of Article 11 by Member States** in its assessments of the draft and final updated NECPs.
- Anticipate the assessments with a written recommendation to Member States **stressing the mandatory aspect and benefits of multi-level dialogues**, to make the best use of the year between the submission of the draft updated NECP (June 2023) and the final updated NECP (June 2024).
- **Pay as much attention as possible to the quality of the dialogues** in its evaluation and distinguish between well-structured and robust processes versus consultations made at the end of the process when the plans are a done deal.
- Push MS to establish such Climate and Energy Dialogues **as structured long-term advisory groups not limited to the development of NECPs, but encompassing all future energy and climate laws and strategies**.

NECPlatform and Article 11 of Regulation 1999/2018

[NECPlatform](#) aims to support six Member States in implementing Climate and Energy Dialogue platforms, one forum each, where all relevant parties can meet and contribute to the co-creation of the National Energy and Climate Plan. These platforms aim to make the process of discussing different scenarios for energy and climate policies a participatory exercise, where national Ministries and national energy agencies participate in concerted action and actively exchange with other important stakeholders and sub-national authorities.

By doing this, the project is supporting Member States in complying with **Article 11 of the Regulation on the Governance of the Energy Union and Climate Action (1999/2018)**. In fact, the regulation requires Member States to “*establish a multilevel energy and climate dialogue, bringing together local authorities, civil society organisations, the business community, investors and other relevant stakeholders to discuss the different options envisaged for energy and climate policies [...] Integrated national energy and climate plans may be discussed within the framework of such a dialogue*”. By the end of this 30-month project, six Climate and Energy Dialogues will have taken place in each of the six Member States (Bulgaria, Croatia, France, Italy, Portugal and Romania), with the objective of making the platforms permanent, e.g. by transferring their ownership to National Authorities or another relevant partner for their continuation after the end of the project.

Multi-Level Governance and features for success

Multi-level governance encourages cooperation in decision-making, inclusivity, and the optimal utilisation of resources and expertise across multiple tiers of government and various sectors of society. It consists of two key aspects: a vertical dimension that involves different administrative levels, and a horizontal dimension that involves different sectors within society.

In order to support the 6 national partners who are acting as leaders of the CED platforms in the six Member States, we shortlisted and analysed, through structured interviews, 21 successful examples of multilevel governance initiatives in the EU and beyond (full list available [here](#)). Through this analysis, we identified some common features between the leaders of these multi-level governance processes that seem to contribute to their success:

- **Independence from the political sphere:** the process leader should be perceived as independent, both politically and financially. Ideally, the forum should not be managed by the national ministry in charge of drafting, updating and monitoring the NECP, as this might lead to an imbalance between parties. As a result, “less powerful” parties could feel they are not listened to, or not considered as a peer amongst equals (e.g., **DK2050**, led by the national energy agency or **Viable Cities**, led by a consortium of independent organisations).
- **Legitimacy:** the involved stakeholders should be coherent with the group’s objectives and the leader should demonstrate having the right contacts to reach all required participants (e.g. in some countries the presence of the ministries is essential; this is specifically relevant for those Member States who use a consultant to support the drafting phase).
- **Patience:** setting up trustworthy groups and procedures takes time. It is important that the leader allows the necessary time for participants to be confident in the group and build trust (e.g. in the **Dutch Natural Gas Phase-out Strategy**, the Dutch government took the time to consult with all lower levels, all the way down to single houses).
- **Flexibility:** in multi-actor and multi-level processes, things do not always go according to plan, as different actors have different priorities and interests. It is important to

accommodate some leeway and leave room for the unexpected (e.g. **Viable Cities** had initially planned on having 12- year plans and decided then to move to yearly contracts).

- **Persistence and regularity:** the process should maintain a regular flow to avoid periods of inertia, which can lead to loss of interest (e.g. **CitiES's** members have set meetings every last Monday of the month).

Two examples of Multi-Level Governance best practices

FLEMISH CLIMATE PACT

Website: <https://lokaalbestuur.vlaanderen.be/lekp>

Europe – Belgium

Flanders' regional government in collaboration with Flemish municipalities established the Flemish Climate Pact in 2019 (in force in 2020) to ensure effective links with the regions regarding local needs on four key pillars: **nature-based solutions, energy mitigation policies, mobility, and water management**. In order to join the initiative, municipalities are invited to sign the Covenant of Mayors – Europe and commit to 16 pre-defined target points, on top of pledging to a small list of other actions (e.g. developing a heatmap, banning taxes on windmills, etc.).

Nearly 300 municipalities are participating so far (more than 95% of the total) choosing between **3 possible levels of engagement:** the standard one – aligned with 2030 targets before the fit-for-55 package; the more ambitious one, aligned with the fit-for-55 package; or the most ambitious one, aligned with the fit-for-55 package and including social measures to alleviate energy poverty. One very important component of the Flemish Climate Pact is the **change of narrative**, using a multiple benefit approach and not only focusing on the fight to climate change, in order not to polarise or politicise the model. Moreover, **common objectives are made easy** so that everybody can understand and are proportionate to the size of the municipalities e.g. objective to plant 1 tree per inhabitant. **Monitoring is also a collective action** and is **publicly visible** on the initiative's platform. Reports are automatically generated bi-monthly by the platform. These serve as a basis to **compare performance against identified objectives**, also during meetings dedicated to such discussions among involved actors. Dialogues with the National Belgian Government occur every two years to assess progress and implementation. These dialogues encourage interactions between public authorities and other actors (including ordinary citizens) to provide input and identify concrete contributions to achieve local/regional goals, highlighting co-creation and citizens' involvement.

VIABLE CITIES

Website: <https://en.viablecities.se/>

Europe – Sweden

In 2017 Sweden launched **17 strategic innovation processes** (programmes with a mission-driven approach) of which one was Viable Cities. The programme got a **12-year mandate until 2030** with the idea of setting a **common objective – climate neutrality by 2030** – and come up with a **comprehensive cross-sectoral, cross-area and multi-level methodology** to reach it. A call was launched in 2019 and 9 Swedish cities were selected. Three government Agencies decided to join the initiative in April 2020. As the pandemic had just started and times were uncertain, stakeholders decided to go for a contracting process rather than signing a single binding document to 2030. Therefore, each year in December Viable Cities members meet and sign a yearly contract. The first version of the contract (9 cities + national government) was signed in December 2020. Already in 2021, this initiative generated interest from other ambitious cities in Sweden, to the point that now 40% of the Swedish population lives in a signatory city (23). As the initiative grew, Cities started signalling that the government should come in as a player, not only as a funder, as many local policies (e.g. on transport) depend on national policies (e.g. infrastructures). **More and more governmental agencies joined the initiative**, which has been very positively received from the participating cities, **making the initiative more trustworthy**. Viable Cities has a budget of 8/10 million euros per year, co-funded by stakeholders. The budget covers capacity building, skills, and operational costs, not infrastructure. Having heard of the initiative and having a similar mission-driven approach in mind, in 2019 the European Commission made the Swedish case the **official pilot for the next EU wide programme for climate neutral cities to be rolled out within Horizon Europe, started in 2020**.

The first CED dialogues in the 6 participating countries

NECPlatform's National partners have been busy trying to set up the CED platforms in the 6 participating countries with mixed results. Below we present a summary by MS of the main outcomes 8 months after the project's start:

Bulgaria

National partner: [EnEffect](#) – Foundation Center for Energy Efficiency, active since 1992 in Bulgaria to support energy conservation.

Date of the first CED meeting: 2 June 2023

Participants: Ministry of Regional Development and Public Works, Sustainable energy Development Agency; Regional administration of Veliko Tarnovo; Regional administration of Smolyan; Sofia Municipality; Burgas Municipality; Gabrovo Municipality; Varna Municipality; Botevgrad Municipality; Lom Municipality; Troyan Municipality; Yambol Municipality; Polski Trambesh Municipality; Momchilgrad; Pavlikeni Municipality; Perushtitsa Municipality; Vidin Municipality; Knezha Municipality; Etropole Municipality; Yambol Municipality; Plovdiv Energy Agency; Energy Efficiency and Renewable Sources Fund; Bulgarian Chamber of Commerce; EVN Bulgaria (Electricity distribution company for South-Eastern Bulgaria), NGOs; business associations; business companies; media, etc. – a total of 57 people.

Main outcomes: Participants reaffirmed the crucial role of involving local and regional authorities (especially municipalities) in the drafting phase of the document from the start, contrarily to what was done in the drafting of the NECP submitted in 2019. Bulgarian municipalities have the obligation to prepare a 10-year program for energy efficiency and for promotion of renewable energy use. The compilation and consolidation of such documents could add a bottom-up component to the top-down one already used for drafting and monitoring the NECP. However, so far, municipalities have rarely been consulted by national authorities and do not feel supported. Moreover, municipalities' position is considered crucial not only for the implementation of the plan, but also for making the implemented measures transparent and understandable by the general public. In July, during an event by the title "Mayors talk", the second CED platform will be organised. There, a number of Bulgarian municipalities intend to prepare a position paper addressed to the government to make their voices and requests heard.

Croatia

National partner: [REGEA](#) – North-West Croatia Regional Energy and Climate Agency

Date of the first CED meeting: 21 March 2023

Participants: Ministry of Economy and Sustainable Development; Ministry of Regional Development and the European Union funds; Ministry of Finance; Ministry of Agriculture; Ministry of Labor, Pension System, Family and Social Policy; Ministry of the Sea, Transport and Infrastructure; Ministry of Spatial Planning, Construction and Infrastructure, Ministry of Science and Education; Croatian Association of Cities; Croatian Chamber of Economy; Terra Hub; Society for Sustainable Development Design; HEP d.d.; INA d.d.; Energy Institute Hrvoje Požar; Ekoneg; University of Zagreb.

Main outcomes: Participants reaffirmed the crucial role of involving local and regional self-government units and tailoring NECP measures to align with the capabilities and requirements at the local and regional levels. Additionally, the necessity for sector-specific workshops was acknowledged. The need to have a holistic and future-oriented approach to energy and climate measures was highlighted. Furthermore, participants noted that in addition to focusing on renewable energy sources and decarbonisation, measures should be extended to the sectors of waste, water and other aspects that can contribute to climate neutrality. The participants agreed that it is necessary to consolidate and more clearly structure the measures in the context of the NECP, alongside the need for a clear monitoring and verification mechanism. To ensure coordination, the need to harmonize the NECP and create synergies with other strategies and action plans was recognised, as well as with the documents regulating the use of structural funds. It was also pointed out that energy efficiency monitoring for large cities should be updated and improved. Finally, the importance of harmonising measures with possible sources of financing was highlighted to speed up their implementation.

France

National partner: [Energy Cities](#) – network of cities active in the energy transition

Date of the first CED meeting: 31 May 2023

Participants: CLER (Network for the energy transition), FLAME (local energy and climate agencies federation), France Urbaine, Région de France, Intercommunalités de France, ADEME (French climate transition agency), AFCCRE (French Association of the Council of European Municipalities), Serétariat Général à la Planification Écologique (under authority of the Prime minister), Minister of ecological transition and cohesion of territories, Conseil National de la Refondation (under the authority of the Prime minister).

Main outcomes: While on one side, a multiplication of consultative processes at national level (led by various Ministries) has been observed, on the other, local and regional authorities feel they are not being sufficiently consulted and listened to. At the same time, the government lacks feedback and data on the implementation and effectiveness of certain measures. During the first dialogue, this paradox was brought to the forefront by analysing a mapping of already existing consultation processes. Participants collectively assessed what works and what does not, while exchanging on the quality of the dialogue and the relationship between the State and local and regional authorities.

Participants identified a number of shortcomings, including: a lack of feedback on how discussions are taken into account in national policies; a lack of forums for bottom-up feedback during the implementation phase and implementation of national objectives; and a lack of ongoing dialogue during the implementation phase. It also sparked reflections regarding certain barriers encountered by local authorities, particularly the lack of long-term perspective and stability in funding, which predominantly relies on calls for proposals, when local and regional authorities advocate for multi-annual financial programming. The lack of qualified staffs in local and regional governments was also raised in the discussion.

Italy

National partner: [Coordinamento Agende 21 locali italiane \(CA21L\)](#) – Network of local and regional authorities committed to improve environmental management and sustainability.

Date of the first CED meeting: 3 April 2023

Participants: National Energy Agency (ENEA); Research on the Energy System (RSE); Kyoto Club; AISFOR; CapaCITIES; University of Bologna; Bocconi University; IUAV University of Venice; Agency for Energy and Sustainable Development (AESS Modena); 5 municipalities (Bologna, Borgofranco d'Ivrea, Lecco, Mantova, Padova).

Main outcomes: The first CED has been used to draft a list of priorities which will be channeled to the ministry in the second meeting: need of availability and interoperability of data, including the possibility of exchanging and reusing data even between non-homogeneous information systems; setting up of "territorial coordinators" acting as a one-stop-shop that supports local and regional authorities with funding and financing options; offering adequate, continuous and integrated training programmes to the technical personnel of local and regional authorities; integrating different planning tools at national and local level; activation and empowerment of the local level to create positive spillover effects.

Portugal

National partner: [ZERO](#)– Association for a sustainable future on earth– is an independent non-profit association advocating for a more sustainable future.

Date of the first CED meeting: 17 April 2023

Participants: Directorate General for Energy and Geology; Portuguese Environment Agency; Association of Energy and Environment Agencies (RNAE); Intermunicipal community of the West; Institute of Social Sciences of the University of Lisbon; adapt.local association; 8 municipalities (Cascais, Coruce, Figueira da Foz, Lezíra do Tejo, Lisboa, Loulé, Mafra, Torres Vedras).

Main outcomes: It was consensual among all participants that the transport sector is the most responsible in terms of greenhouse gas emissions (GHG), but also has the greatest potential to reduce them. Besides this sector, the buildings and agriculture sectors were also mentioned as priority areas for decarbonisation. The role of energy agencies was considered very important in the implementation of all measures and in providing technical support to the most vulnerable communities. From a more general point of view, it was mentioned that the policies and measures of the strategic plans are often devised for large urban centres with high population density, and it would be important to also take into consideration other typologies. Regarding the development of local climate and energy plans, the lack of information and data for their elaboration was mentioned, implying that it would be important that the municipalities have more funding to collect data that reflects their territorial reality.

Romania

National partner: [OER](#) –Energy Cities Romania

Date of the first CED meeting: structured into 2 stages – the first destined to the dialogue with Local Authorities (29 March 2023) and the second focusing on the dialogue with National Authorities and Local Authorities Associations (20 April 2023)

Participants: first stage - 22 local authorities, Ministry of Energy, private sector representatives in the field of energy and green solutions, Energy Cities Romania; second stage - Ministry of Energy, Ministry of Environment, Waters and Forests, Energy Cities Romania, Romanian Association of Communes private sector representatives in the field of energy and gas.

Main outcomes: Discussions of the first stage revealed the need of involving the local level in the NECP during the drafting, revision, implementation, and monitoring phases of the NECPs. It was highlighted that the challenges faced by local authorities when it comes to energy and climate are very similar to the bottlenecks faced at national level, and that the local level can provide tailored solutions inspired from the ground. Topics also focused on the importance of data used in energy and climate strategies and plans, as the lack of qualitative data leads to a high degree of error. The major lack of data necessary for modelling or for revising the NECP targets and potential results was also addressed.

The second stage of the dialogue allowed the ministries to give details on the status of the updated NECP and to acknowledge the importance of long-term strategies and of involving local and regional authorities. Representatives of LRAs demanded for more occasions to exchange, not only at the end of the process. The ministries were open to the possibility of including representatives of local authorities in the official working group on the NECP. The main takeaways of the first CED emphasise that national and local authorities, together with other relevant stakeholders, need to find a way to work together to implement a digitalisation process of energy and climate strategies, and to increase the collection of correct data. Multi-level dialogue needs to be properly implemented for a productive exchange of information between stakeholders at several levels of governance, in support of the NECP development, implementation and monitoring.

Main takeaways from the process

The implementation of the Climate and Energy Dialogues in the 6 Member States is challenging and heterogeneous.

First, building trust is a fastidious exercise, but is essential for these dialogues to be successful. As noted above, the process of setting up multi-level dialogues takes time, because the bodies facilitating them must establish confidence among all the participants in the process (all participants need to acknowledge the importance of each contribution). They also need to inspire confidence in their role as facilitator, which must be perceived as impartial by the participating institutions. This is a particularly difficult exercise in countries where the dialogues needed to be established from scratch.

It is also difficult for all the players involved to see that they have a vested interest in the success of these dialogues, given their different competencies and power allocations. In fact, some national ministries or agencies perceive their participation as a “losing game”, since it implies sharing their competences with sub national authorities and other actors.

It is therefore important to use the **appropriate narratives and arguments** with each of the involved stakeholders, so that they all perceive the Climate and Energy Dialogues as a support structure creating added value.

When addressing the national level, it was particularly necessary to point out that the NECPlatform project is a means of supporting national institutions in implementing the Article 11 of the Regulation on the Governance of the Energy Union and Climate Action (1999/2018), unburdening them from the logistics of having to set up and organise the exchanges amongst different actors. However, this was at times not sufficient to raise the necessary interest.

It was thus fundamental to also reiterate the importance of these dialogues and what collaboration between the national, regional, and local levels can contribute to the national climate and energy strategy. It is particularly important to insist that these exchanges contribute to making **national energy and climate policies more robust and coherent** by allowing measures for energy and climate to be looked at holistically. This better prepares and motivates sub-national authorities, responsible for a large part of the plan’s implementation, by integrating a bottom-up component, by sharing barriers and best replicable/scalable practices, and by aligning the existing bottom-up monitoring and verification system.

On the other hand, when **addressing local and regional governments and other actors**, the project highlighted how they can benefit from the Climate and Energy Dialogues, giving them a space **to bring to the national level’s attention some issues that are not visible** (e.g. lack of funding, lack of know-how, lack of resources, regulatory barriers, etc.), **present best practices which can be scaled and replicated elsewhere**, and most importantly, **to feel empowered and part of an organic process**, where each actor involved is part of a concerted mechanism.

The drafting of NECPs is not only a technical exercise based on data and models which could lead to an optimal trajectory. The modelling work is essential but alone cannot replace political decisions, such as trade-offs between the efficiency of certain measures, or setting of structural assumptions for modelling based on uncertain data (e.g. the long-term costs of technologies). That is why it is fundamental for the dialogues to be as transparent as possible and to highlight the reasoning behind political choices, to start an open and honest dialogue.

Despite our best efforts, the implementation of the first round of CED platforms in the six Member States has not always gone smoothly or been straightforward. If, on one hand, local and regional governments and other stakeholders have generally accepted with great

enthusiasm to participate on the CED dialogues in all 6 countries, on the other hand, the national level has been more difficult to involve, with varying degrees of acceptance.

The difficulty in reaching the national level can be due to different reasons:

- National governments are accustomed to working with a methodology that foresees a **top-down only** approach when it comes to drafting, implementing and monitoring national policies, which excludes any structured debate with other actors. They do not see the added value of including additional actors, as this might result in making the process longer and slower.
- National governments **generally tend to work against European deadlines**, rather than perceive the need of having long-term plans and strategies as a structured and continuous process. Consequently, numerous Member States resort to hiring consultants at the very last minute, resulting in the production of off-ground documents that are not prepared in concertation with other actors.
- In some countries, the **NECP is seen as a bureaucratic tool rather than a political priority**. This means that often there is no incentive to write a strategy and work together with other players, as there is simply no debate on these issues. In other countries, political turnover prevents the stability of objectives and political priorities. In addition, long term strategies sometimes stay on paper, while governments tend to prioritise and implement individual measures with political convenience.
- **National governments tend to think in silos**, which means energy and climate objectives are sometimes perceived by other Ministries as contradictory to other objectives (economic growth for example). Changing this mindset, which can be considered as a structural problem, takes time.
- **National governments tend to be understaffed**, like all public bodies.
- So far, **in most Member States, NECPs have been instruments to raise awareness on climate and energy objectives rather than a steering tool**, as the process of drafting such plans raised awareness on the nature and scale of the required efforts, also leading to the inclusion of formal emission reduction targets. However, the non-binding nature of the NECP trajectory and the long-term horizon of the reduction targets leads national governments to dedicate **little focus on the implementation of these targets and the necessary measures. The main challenge for any national planning exercise is to put it into practice**. However, this should be done consistently, and not for political convenience. The risk is that otherwise the plan remains a mere policy document which does not drive different sectors and stakeholders into actions, and especially does not specify the concrete implications for local and regional authorities.

Concretely, the dialogue fora should be the place to co-define the path for reaching climate neutrality while, at the same time, defining the means (financial instruments, human resources) to do so, as well as the specific role each actor must play to reach a common result. Moreover, the control and the monitoring of these plans should be improved and addressed as well.

First takeaways from discussion

To underline the importance and interest of these dialogues, we highlight below a few examples of topics addressed in some of the Member States during the first round of CED platforms of the project:

- **Availability and interoperability of data** and capacity to use data (often lacking in small LRAs) via e.g. agreements with major data managers to make data available to the entities, ensuring that this avoids time loss and is made accessible in a usable format; use of a shared methodology, at national level, so as to facilitate the comparison between the different experiences, taking examples from some already available tools; create a single integrated platform for collecting and making data available and / or activating a digital energy file for cities that can be updated year by year.
- **Streamlining financing and making it more accessible to LRAs** via e.g. a "territorial coordinator" or something similar for aggregation (e.g. territorial Covenant of Mayors coordinator or local energy agencies); eliminating funding for fossil fuels and simplifying incentives for renewables; facilitating self-consumption and forms of renewable energy sharing; facilitating the pathway for local activation of innovative financing; standardising financing projects to promote transferability and scalability.
- **Need to harmonise and to create synergies between different planning tools both** at national and at local and regional levels, such as the National Energy and Climate Plans (NECPs), the Recovery and Resilience Plans (RRPs), the National Adaptation Strategies (NASs), etc. but also the Sustainable Energy and Climate Action Plans (SECAPs), Sustainable Urban Mobility Plans (SUMP), etc.
- **Creation of solutions for sectors which have a strong multi-level component, such as transport**, via e.g. the possibility of cooperation between municipalities, regions and national level to achieve scale gains; investment in intermodal parks; promotion of shared transport; the possibility for local actors to become utilities - thus making available electric supply stations for vehicles; promotion of teleworking; etc.

Main suggestions

In its assessments of the National Energy and Climate Plans submitted by Member States in 2019, the European Commission included a comment on the implementation status of Article 11, suggesting that most Member States should dedicate greater effort to setting up multi-level climate and energy dialogues and should include different actors and sub national authorities in the drafting of the plans¹. However, the experience within the NECPlatform project so far has shown that involving the national level in any kind of concerted action is generally difficult, and there is still a lot of reticence in using the resources offered. We therefore suggest that:

- **The European Commission should reiterate even more strongly the need for a better implementation of Article 11 by Member States** in its assessments of the draft and final updated NECPs and in its recommendations to Member States.
- Ahead of the coming written recommendations to Member States, the European Commission **should stress the mandatory aspect of these multi-level dialogues and insist on the benefits of such exchanges** with local and regional authorities in **the working group meetings** that the European Commission has with Member States on NECPs. Also, the Commission should urgently issue an additional communication on this matter to take full advantage of the year between the submission of the draft updated NECP (June 2023) and the final updated NECP (June 2024).
- The European Commission **should pay as much attention as possible to the quality of the dialogues** in its evaluation. To ensure that these dialogues have a real impact and are not just “ticking boxes”, we recommend developing analysis criteria to assess the quality of these exchanges and consultations and to encourage Member States to move in this direction. This could consider: the number of meetings, the timetable for the meetings, if exchanges are organised ahead of deadlines to allow for co-construction and for enough time to take the feedback into account, if the list of participants is diversified, and the extent to which the conclusions of these dialogues are being incorporated at national level. In the assessment, it is important to make a clear distinction between a mere survey, a last-minute meeting held a few days prior to the submission, and a comprehensive exchange process conducted well in advance of the deadlines. Consultations at the end of the process, once the plans are a done deal, should not be considered as implementation of Article 11.
- The European Commission should push Member States to establish such Climate and Energy Dialogues as **structured long-term advisory groups not only limited to the development of the National Energy Climate Plans, but also encompassing all future energy and climate laws and strategies**. Such structures should be permanent and should ideally be **hosted by an independent third party** supporting national governments. These fora should consist of core stable participants alongside others who can rotate as necessary and based on relevance. All stakeholders, including local authorities, should be able to activate such dialogues, to avoid sole reliance on the timetable set by the national level. These structures should also integrate a monitoring role and assess whether objectives are met.

¹ [Member State] is also invited to better exploit the potential of the multilevel climate and energy dialogues to actively engage with regional and local authorities, social partners, civil society organisations, business community, investors and other relevant stakeholders and to discuss with them the different scenarios envisaged for its energy and climate policies (from EC assessments of Bulgaria, Croatia, Italy, Portugal and Romania).

About the Project

The LIFE-funded NECPlatform project will support six EU Member States (Bulgaria, Croatia, France, Italy, Portugal, and Romania) in setting up and managing permanent multi-level Climate and Energy Dialogue (CED) Platforms, as mandated by Article 11 of the Climate and Energy Governance Regulation. These dialogues will help foster vertical and horizontal integration of energy and climate policies. Each national partner will organise each Member State's six meetings of the Climate and Energy Dialogues before transferring the platforms to the national governments at the end of the project.

The project is coordinated by Energy Cities together with IEECP (knowledge partner), Coordinamento Agende 21 (IT), EnEffect (BG), OER (RO), REGEA (HR), ZERO (PT).

Authors

Giulia PIZZINI

giulia@ieecp.org

Mélanie BOURGEOIS

melanie.bourgeois@energy-cities.eu

Thibaut MARAQUIN

thibaut.maraquin@energy-cities.eu

Allison LE CORRE

allison.le-corre@energy-cities.eu

Project Manager

Thibaut MARAQUIN

thibaut.maraquin@energy-cities.eu