

Policy integration: Enhancing the social dimension in climate policy planning instruments in the EU

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Abstract

The European Union (EU) has recognised both the urgency of a transformation to climate neutrality and the social dimension at the centre of that transformation. However, the social dimension of the transition is too often treated as a secondary aspect vis-à-vis emission mitigation objectives. Notably, if climate policies are perceived as socially unfair, public support for transition efforts decreases. This report is based on the premise that advancing sectoral policy integration is a core element in fostering transformative climate governance, and that integration can enhance the social dimension in climate policy planning, increase public support for climate policies, and reduce the risk of maintaining an incoherent policy landscape. It investigates how the EU legal framework for climate policy planning, and its implementation at the national level, can be improved to enhance the integration of the social dimension in EU climate policy. The report looks at (a) integration and alignment opportunities surrounding social considerations and (b) ways in which the social dimension can be better anchored in policymaking across the EU's numerous climate-related planning instruments. First, it explores the extent to which four relevant EU policy planning instruments are already aligned by design through a document analysis. Second, it investigates how these legal requirements have been implemented at the national level in four countries (Finland, the Netherlands, Slovakia, and Spain) through another document analysis as well as expert interviews. The investigated planning instruments are the National Energy and Climate Plans, Recovery and Resilience Plans, Territorial Just Transition Plans, and Social Climate Plans. The results show that the social dimension of climate policy is integrated in the policies to some extent. However, the analysis identifies several integration opportunities in three areas: (i) building a common understanding of social dimension aspects, (ii) better aligning the timing of planning and monitoring processes, and (iii) fostering evidence-based policy making.

Key terms: *EU governance; Transformative governance; Policy integration; Climate policy; Social dimension*

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Abbreviations

This is a format for a table with headline:

EU	European Union
EU ETS	EU Emissions Trading System
ETS 2	Emissions Trading System 2
ILO	International Labour Organization
IPCC	Intergovernmental Panel on Climate Change
JTF	Just Transition Fund
JTS	Just Transition Strategy
LTS	National Long-Term Strategy
MFF	Multiannual Financial Framework
NECP	National Energy and Climate Plan
NECPR	Integrated national energy and climate progress report
NGO	Non-governmental organisation
QMV	Qualified majority voting
RRF	Recovery and Resilience Facility
RRP	National Recovery and Resilience Plan
SCF	Social Climate Fund

SCP	Social Climate Plan
TJTP	Territorial Just Transition Plan
UNFCCC	United Nations Framework Convention on Climate Change

Executive summary

Scope of this report

Research topic

- This report is based on the premise that advancing sectoral policy integration is a core element in fostering transformative climate governance, and that integration can enhance the social dimension in climate policy planning, increase public support for climate policies and reduce the risk of maintaining an incoherent policy landscape.
- It investigates how the EU legal framework for climate policy planning, and its implementation at the national level, can be improved to enhance the integration of the social dimension of climate policy. Specifically, it looks at (a) integration and alignment opportunities surrounding social considerations and (b) ways in which the social dimension can be better anchored in policymaking across the EU's numerous climate-related planning instruments.

Methodology

- First, the report explores how relevant EU policy planning instruments are aligned by design through a document analysis (EU-level). Second, it investigates how the legal requirements were implemented at the national level in four countries (Finland, the Netherlands, Slovakia, and Spain) through another document analysis as well as seven expert interviews (national level).
- The analysed documents at EU level are the Governance Regulation, the Just Transition Fund Regulation, the Recovery and Resilience Facility Regulation, and the Social Climate Fund Regulation. The investigated planning instruments at the national level are the National Energy and Climate Plans (NECPs), Recovery and Resilience Plans (RRPs), Territorial Just Transition Plans (TJTTPs), and Social Climate Plans (SCPs).

Transformative governance framework

- In the context of the *transformative governance* framework developed in the 4i-TRACTION project, the results are contextualised along three criteria: *overall effectiveness*, *policy resilience*, and *quality of implementation*.

Why look at the social dimension of climate policy?

- Achieving both social and climate objectives necessitates prioritising distributive and procedural justice throughout the formulation of climate policies.

- Climate policies that emphasise themes such as fairness, equity, and social benefits tend to garner more public support, whereas perceptions of climate policies as socially harmful or unfair can fuel opposition to them.
- Timing matters. Enhanced ex-ante coordination of climate and social policies can assist Member States in implementing policies to mitigate adverse effects and maximise social benefits, such as implementing social support measures before the initiation of new climate policies.
- Enhancing the integration of the social dimension in climate policy could result in a more comprehensive assessment of co-effects, facilitated by more precise data. So far, methodological challenges in evaluating these effects have hindered their systematic integration into quantitative policy assessments.
- Failure to adequately consider the social dimension of climate policy in policy measures leaves measures vulnerable to criticism from proponents of the status quo, such as fossil fuel advocates, potentially impeding the effective implementation of climate policy.

Results

Growing integration of the social dimension in climate policy, but significant room for improvement

- The results of this report show a growing integration of the social dimension in climate-related national planning in the EU and demonstrate that the requirements set by the EU in this regard have been partially implemented at the national level. This presents a promising basis for further strengthening of this integration process and for better aligning policy planning processes.
- Nevertheless, there is room for improvement in enhancing the integration of the social dimension of climate policy in pertinent legislation and its implementation.

Key findings from the analysis

1. Understanding of the social dimension

Plans often lack (common) definitions of key terms, inhibiting consistency checks across a member state's plans.

Plans seldom make cross-references to key terms from other plans, thereby missing out on the opportunity to set up a more comprehensive understanding of the social dimension.

The mandated connections between planning processes according to EU regulations (see section 2.2) are only established to a limited degree.

2. Public consultations

The national plans fall short of meeting the legal obligations to provide summaries of public consultations that outline how the input by the public was integrated into the plans or their implementation, which complicates the assessment of their influence on policy making.

3. Quantitative data availability

The reporting of quantitative data related to the social dimension of climate policy remains limited in the plans examined in this report.

4. Responsible bodies for implementation

Given that the responsible bodies for implementation are mostly specified in the plans of the four countries, this information offers a solid foundation for mitigating governance fragmentation when addressing the social dimension further.

5. Exchange of good practices

Regarding the exchange of good practices, there is minimal alignment evident in the plans. The SCPs are the only plans that mandate an exchange of good practices during plan preparation, whereas the NECP template mentions regional cooperation taking place in preparation of the plan. This presents an opportunity for swift and ongoing sharing of acquired and new knowledge concerning the social dimension of climate policy.

Recommendations: Integration opportunities exist in three areas

- One integration opportunity would be **creating a common understanding** of what the social dimension of climate-related policy planning entails and which common definitions are applied in all EU planning documents – while still maintaining flexibility at the national level. For example, the NECP reporting on social aspects could include more focus on the social dimension while also proposing clear definitions and indicators for operationalisation.
- **Better aligning the timing of policy planning and monitoring processes** can contribute to more efficient use of data and a more comprehensive policy approach to the social dimension overall. Comparing the timing of plans is helpful to identify windows for integration opportunities. For instance, the simultaneous submission of progress reports for the SCPs and NECPs presents a significant opportunity, although this convergence is not expected until 2027 (after the introduction of the ETS2). This highlights the need to align preparatory processes for both plans in the interim to ensure the realisation of a common and integrated approach. For example, the EU can help to better align processes by promoting technical assistance or setting up a platform similar to the Just Transition

Platform for those issues addressed under the SCF. Also, the associated public consultations for the plans should seize integration opportunities to create synergetic effects.

- Another area offering opportunities for integration involves **enhancing evidence-based policymaking**, which necessitates a substantial increase in data pertaining to the social dimension. This can facilitate the effective design and implementation of policies. A straightforward approach to expanding the evidence base involves better integrating public consultations and exchanges of good practices, and thoroughly collecting and making available the data collected through these processes. Additionally, to enhance transparency in policymaking, **establishing a data-tracking platform** could be a crucial step forward. Such a platform can build on existing tools under the European Pillar of Social Rights and the European Energy Poverty Advisory Hub.

1. Introduction

In a 2019 press appearance to mark the launch of the European Green Deal, European Commission President, Ursula von der Leyen said: “This transition will either be working for all and be just, or it will not work at all” (European Commission, 2019). These remarks demonstrate that the European Union (EU) has recognised both the urgency of a transformation to climate neutrality and the social dimension at the centre of it.

Why consider the social dimension of climate policy?

Meeting both social and climate commitments calls for a focus on distributive and procedural justice during policy formulation and the implementation of suitable mechanisms to ensure an equitable distribution of climate policy costs and benefits (Cattino & Reckien, 2021; Heyen, 2023; Lamb et al., 2020). Yet, climate and energy policies frequently fall short of achieving favourable social results; but a better incorporation of justice issues in policy design can help to foster a joint approach (Lamb et al., 2020). Moreover, recent analyses suggest that climate policies gaining greater public support are those that explicitly address fairness, equity, and social benefits (Bain et al., 2016; Dechezleprêtre et al., 2022; Karlsson et al., 2020; Lamb et al., 2020).

Integration as a lever for transformative procedural governance

Enhancing **climate policy integration** is one of the key aims of governance arrangements for attaining long-term climate objectives. For example, this involves incorporating integration-related considerations in pre-legislative assessments, establishing intra-governmental coordination mechanisms to promote a comprehensive whole-of-government approach, and actively involving climate-focused stakeholders in consultations related to policymaking in various sectors (Dupont, 2015, pp. 180–183). Integration can also be understood as a lever for **transformative procedural governance**, because the transformative power of procedural governance is partially dependent on the effective integration of climate policy objectives across sectors and governance levels (Görlach et al., 2022). **Policy planning instruments**, like the national energy and climate plans (NECPs), play a crucial role in fostering integration (Moore et al., 2023). Although the EU has historically been a frontrunner in advancing climate policy and governance, there is still scope for improvement in its climate governance framework if the goal of achieving climate neutrality by 2050 is to be realised. Moving away from incremental approaches and silo-thinking towards a more integrated approach to climate policy and governance can be an effective driver to address gaps and shortcomings in the EU’s governance architecture (Görlach et al., 2022; International Panel of Climate Change IPCC, 2023).

How the social dimension of climate policy is included in EU climate policy planning instruments

The main EU planning instruments relevant for the social dimension of the climate transition are the National Energy and Climate Plans (NECPs), Territorial Just Transition Plans (TJTPs), National Recovery and Resilience Plans (RRPs), and Social Climate Plans (SCPs).¹ Hence, these four plans have been chosen as the focus of the research presented in this paper. The NECPs are considered the central planning instrument for national climate and energy policy at EU level, while the SCPs and TJTPs are explicitly focused on two just transition aspects (distributional and territorial, respectively). The RRP has a strong climate component and is in principle an ad-hoc instrument. All three plans, the SCPs, TJTPs, and RRP, have in common that they enable access to specific funds that are somewhat connected to EU climate policy. All four plans address the social dimension of climate policy planning instruments but focus on different aspects of it. Notably, the SCPs are the first EU planning instrument to introduce an analysis of distributional effects and the TJTPs are the first one requiring Member States to identify transition challenges and avenues of how to address them.

Research aim

If not well-integrated, the parallel co-existence of related but separate planning tools bears the risk of creating an incoherent policy landscape. In turn, this can lead to gaps in policy responses, overlapping policy interventions, conflicting incentives, and mismatches between levels of ambition and available funding. Consequently, the aim of this assessment is to investigate how the EU legal framework and its implementation at the national level can be improved, with the research question being:

How can the EU legal framework and its implementation at the national level be improved to enhance the consideration of social dimension in climate policy, both in terms of

(a) integration and alignment opportunities surrounding social considerations across different policy planning instruments and

(b) ways in which the social dimension of climate policy can be better integrated in policymaking across the EU's policy planning instruments with climate relevance?

To investigate the research question, this assessment relies on a two-step approach: a comparative document analysis and semi-structured qualitative expert interviews in combination with qualitative analysis. The document analysis looks at four pieces of EU legislation relevant to the social dimension in climate policy: the Governance Regulation, the Just Transition Fund Regulation, the Recovery and Resiliency Facility Regulation, and the Social Climate Fund Regulation, as well as relevant implementing acts – mapping the understanding of the social dimension, as well as process, content, and reporting requirements.

¹ The national long-term strategies (LTSS) are not included in the assessment because they do not cover the social dimension of climate policy as much as the other four plans. Also, Velten et al. (2022) have shown that Member State reporting on socioeconomic indicators in their LTSS has been limited.

For four case studies (Finland, the Netherlands, Slovakia, and Spain), this study investigates the implementation of the requirements at national level through the respective national plans (National Energy and Climate Plans, Recovery and Resilience Plans, and the Territorial Just Transition Plans), by means of another document analysis. The expert interviews serve the purpose to verify and contextualise the document analysis results.

Structure of the report

The report is structured as follows. First, a literature review summarises the relevance and status quo of the social dimension in EU climate policy, highlights the importance of climate policy integration in the context of procedural governance, and presents three criteria to measure the transformative potential of procedural governance. The chapter also conceptualises what is understood by the 'social dimension of climate policy'. The next chapter introduces the methodology. The following two chapters include a mapping of the EU legal landscape, and the national implementation thereof in four countries. The subsequent chapter presents the results as derived from the mapping and expert interviews and the following section contextualises the findings based on the 4i-TRACTION criteria for transformative governance. Lastly, the conclusion summarises the findings, including the integration opportunities.

2. The social dimension in EU climate policy

2.1 Relevance: Why consider the social dimension of climate policy?

Within various country settings and policy frameworks, numerous instances exist where climate policy implementation successfully meets both social and climate objectives, e.g., when improving public health or alleviating energy poverty. On the international level, the interconnectedness of social and climate policies was recognised in the Solidarity and Just Transition Silesia Declaration adopted at the Katowice Conference of the Parties to the United Nations Framework Convention on Climate Change (UNFCCC) (Markkanen & Anger-Kraavi, 2019). However, climate and energy policies frequently fail to achieve favourable social results (Lamb et al., 2020), inter alia, because they fall short of addressing regional characteristics, existing socio-economic inequalities, and vulnerabilities (Sarkki et al., 2011). Meeting both social and climate commitments necessitates a focus on distributive and procedural justice, e.g., public participation, during policy formulation and the implementation of suitable mechanisms to guarantee an equitable distribution of policy costs and benefits (Cattino & Reckien, 2021; Lamb et al., 2020). Moreover, a better integration of the social dimension in climate policy may also lead to assessing diverse co-effects more comprehensively. So far, methodological difficulties in assessing co-effects have predominantly hindered their systematic integration into most quantitative policy assessments (Markkanen &

Anger-Kraavi, 2019), and consequently greater efforts in more targeted quantitative policy evaluation.

Furthermore, analyses indicate that climate policies emphasising and addressing themes like fairness, equity, and social benefits receive greater public support compared to those that disproportionately burden low-income individuals (Bain et al., 2016; Dechezleprêtre et al., 2022; Karlsson et al., 2020; Lamb et al., 2020). Thus, another reason to better integrate the social dimension in climate policy is that a lack of public support for transition efforts can be fuelled if climate policies are being perceived as socially harmful or unfair (Lamb et al., 2020). This is illustrated by the French yellow vest movement, which was a series of grassroots weekly protests in 2018 in opposition to a proposed carbon tax. Yellow vest demonstrators did not generally oppose climate action but perceived the French government's tax policy as "corrupt and unfair" (Driscoll, 2023, p. 143).

Also, social policies accompanying climate policy instruments have a timing component. Currently, they are mostly ex-post and compensatory in nature. However, it is crucial that Member States implement policies in a way to avoid potential adverse effects and maximise social benefits. For instance, a better ex-ante coordination of climate and social policies entails putting social support measures in place before a new climate policy comes into effect (Markkanen & Borbála Zálnoky, 2022). A better consideration of the social dimension in early policy stages may enhance a better upfront coordination of social policies in conjunction with climate policies.

Lastly, neglecting to consider the equity implications of climate policy measures exposes them to criticism from proponents of the status quo, such as fossil fuel advocates, which may also hinder the effective implementation of climate policy (Klinsky et al., 2017; Lamb et al., 2020).

Summary: Why consider the social dimension of climate policy?

Meeting both social and climate commitments **requires a focus on distributive and procedural justice during climate policy formulation.**

Climate policies emphasising and addressing themes like fairness, equity, and social benefits receive greater **public support**. If climate policies are being perceived as socially harmful or unfair, this can fuel opposition to climate policy.

Timing matters! A **better ex-ante coordination of climate and social policies** can help putting social support measures in place before a new climate policy comes into effect.

A better integration of the social dimension in climate policy potentially leads to assessing co-effects of climate policy more comprehensively, e.g., through more precise data. Thus far, methodological difficulties in assessing these effects have posed challenges to their **systematic integration into quantitative policy assessments.**

Neglecting to better account for the social dimension of climate policy in policy measures **exposes them to criticism** from supporters of the status quo, like fossil fuel proponents. This can obstruct the effective implementation of climate policy.

2.2 Conceptualisation: What is meant by the ‘social dimension’?

The ‘social dimension of EU climate-related planning’ in this report is understood as an extension of the just transition concept, as employed by the EU.² The regulation establishing the Just Transition Mechanism, aims to support “workers affected in the process of transitioning towards a climate-neutral Union by 2050” (Preamble (4), JTF Regulation). To avoid a too narrow use of the term ‘Just Transition’ – and to also be able to account for other groups, such as private households - this assessment will instead use the term ‘social dimension’ of climate change mitigation policy. Conceptually, this understanding of ‘social dimension’ is closely related to the definition of ‘Just Transition’ included in the 2022 IPCC report (Intergovernmental Panel on Climate Change (IPCC), 2022, p. 1806), according to which Just Transitions are: “A set of principles, processes and practices that aim to ensure that no people, workers, places, sectors, countries or regions are left behind in the transition from a high-carbon to a low-carbon economy”. This report focuses on those aspects mentioned in the IPCC report that are central to the four different planning documents investigated in this assessment. Hence, it pays particular attention to the following: (i) fairness in energy access and use, (ii) social dialogue and democratic consultation with relevant stakeholders, (iii) the creation of decent jobs, (iv) training/retraining programmes leading to decent work. Additionally, to the above principles based on the IPCC definition, this assessment also focuses on (v) distributional effects stemming from decarbonisation policies, as these are the focus of the Social Climate Fund.^{3 4}

² It will be referred to as ‘the social dimension’ from this section onwards.

³ This is in line with a general shift in the academic discourse. While the idea of a Just Transition initially focused on industrial transitions and workers’ rights, the importance of fairness and equity in the shift towards a low-carbon economy has gained significant traction in recent years with the concept being increasingly recognised as relevant to various aspects of the transition, including the broader distributional effects of costs and benefits³ as a result of climate change mitigation policies (Markkanen & Anger-Kraavi, 2019). Informed by the notion of outcome-based equity, i.e., recognizing unequal starting points of different social groups to achieve a certain outcome, social policy thus entails designing and implementing policy in a way that actively seeks to improve the circumstances of the most vulnerable groups (Markkanen & Anger-Kraavi, 2019).

⁴ Consequently, the ‘social dimension’ of climate mitigation policies as understood in this assessment does *not* focus on the following: fostering of international cooperation and coordinated multilateral actions outside of the EU; social justice considerations between countries; and poverty eradication.

2.3 What is transformative procedural governance and how to measure it?

Transformative change and transformative climate policy

Climate change mitigation, particularly the objective of achieving climate neutrality by 2050, necessitates broad and rapid societal changes (Fazey et al., 2018; IPCC, 2018, 2022). These changes are increasingly described as transformations (Moore et al., 2021, 2023).

This report relies on the definition of 'transformative change' by Fazey et al. (2018). The authors provide a definition, which can also be employed to differentiate transformative climate policies from 'business-as-usual' policies (Görlach et al., 2022). They argue that transformative change sets itself apart in terms of its depth, breadth, and speed. First, the depth of transformative change means that policy makers will have to deal with substantial technological, political, socio-economic, and socio-cultural uncertainties, e.g., social acceptance or technological feasibility are factors that remain uncertain. Second, breadth constitutes a challenge for coordination which increases the need for horizontal coordination (across sectors & governance departments) and vertical coordination (across levels of governance). Third, the speed of transformative change is faster than previously; this means that stakeholders have less time to experiment with different approaches, observe their effects, learn from mistakes, and improve over time. This may require solutions to be deployed in parallel.

The EU employs a combination of procedural and substantive governance tools to achieve its climate targets – both are crucial for effectively achieving the EU's goal of climate neutrality by 2050. Substantive governance involves directly reducing greenhouse gas emissions through instruments like the EU Emissions Trading System (EU ETS). Procedural governance, on the other hand, supports the designing and implementation processes for substantive policies (Moore et al., 2023).

Integration as a lever for procedural climate governance

One characteristic of the transition toward climate neutrality is the simultaneous occurrence of interrelated transformation processes spanning various economic sectors and governmental departments. This means moving away from single-purpose thinking and instead coordinating overlaps across sectoral and governance structures, e.g., through policy integration. In other words, in the shift towards climate neutrality, the maxim "all policy is climate policy" (Görlach et al., 2022, p. 26) holds true, creating the need for whole-of-government approaches.

Thus, the transformative power of procedural governance is partly dependent on the effective integration of policy objectives and targets across multiple governance levels and sectors (Görlach et al., 2022). A central goal and key benefit of policy planning at EU level is that Member States establish a common policy basis. However, if not well-integrated, there is a risk that many parallel

planning tools can lead to an incoherent, or even incompatible, policy landscape. Policy integration is a fundamental aspect that procedural governance must deliver.

Procedural governance can be categorised into governance mechanisms, frameworks, and instruments (Moore et al., 2023). This report is part of a series of assessments focusing on procedural governance mechanisms and institutions, published under the 4i-TRACTION project. The analytical lens of 4i-TRACTION is structured around four cross-cutting dimensions: **innovation, investment, infrastructure, and integration**. Both horizontal and vertical policy integration are crucial for a transformative approach and constitutes the main analytical lens for this assessment.

Policy planning instruments as key tools of policy integration

To enable an evaluation of effectiveness, Moore et al. (2023) categorise procedural climate governance mechanisms based on their functionality, distinguishing eight distinct functions. One of the functions is policy planning, understood as a function carried out through short-, medium- and long-term planning tools that enable policymakers to explore potential alternative scenarios for policies and emission reduction pathways, increasing the transparency of decision-making and contributing to the enhancement of policy design and implementation. Because the climate challenge is constantly evolving by nature, forward-looking policy planning procedures are especially important. This holds true for interlinkages between different time horizons, e.g., connecting short-term decisions, like determining which emerging technologies to support with innovation funding in the next year, to long-term projections, like the technological requirements needed for climate neutrality (Moore et al., 2023; Velten et al., 2022). Therefore, forward-looking policy planning structures, consisting not only of planning instruments but also regular policy monitoring and evaluation and expert input, are central to the objective of avoiding carbon lock-ins (Seto et al., 2016, pp. 443–444). For example, when drawing up plans, thinking backwards from the EU goal of achieving climate neutrality by 2050, or similar national goals, can help develop effective climate policy options, based inter alia on common long-term, strategic policy planning, monitoring and evaluation of policy, as well as scientific and public consultations (Duwe, 2022). Thus, these policy planning processes require active participation and input by both experts and the public (Duwe, 2022).

Measuring transformative procedural governance

To evaluate the contribution of national-level policy planning instruments and their respective 'parent' regulations at EU level in light of enhancing the social dimension in climate policy, this assessment employs Moore et al.'s (2023) assessment framework. The framework comprises three separate yet interconnected criteria for evaluating procedural governance:

1. **Overall effectiveness:** The "mechanism's ability to successfully carry out its functions and to adequately support alignment with the move to climate neutrality" (Moore et al., 2023, p. 21).

2. **Policy resilience:** Effective climate policy must bring about change over extended durations, requiring governance frameworks that are simultaneously stable to offer guidance over such timeframes. Also, they should be designed to adapt to changing circumstances, such as new information, unforeseen crises, or after elections. Policy resilience is thus regarded as a criterion that speaks to a governance mechanism's ability to be both 'immune to dismantling' and somewhat flexible (Moore et al., 2023).
3. **Quality of implementation:** "Successful implementation determines whether a governance mechanism's design results in the on-the-ground outcomes foreseen when it is adopted" (Moore et al., 2023, p. 22). This criterion, for instance, looks at how EU legal provisions were implemented at national level.

Moore et al.'s (2023) framework additionally offers a set of possible assessment questions aligned with each of the three criteria. Chapter 6 adjusts the questions according to the research interest of this assessment and provides a discourse on the role of policy planning instruments in enhancing the transformative aspects of EU climate governance.

2.4 How the social dimension of climate policy is included in EU climate policy planning instruments

The European Climate Law established the binding objective of climate neutrality in the EU by 2050 at the latest.⁵ The EU 2030 framework acknowledges that medium- and long-term climate policy targets, require more planning, coordination and documentation efforts of both the EU and the Member States (Sluisveld et al., 2017). Already, the EU has a highly complex climate change-related policy planning landscape. Over the past decade, there has been a notable increase in EU-directed and monitored national policy planning procedures, such as the National Long-Term Strategies (LTSs) and the integrated National Energy and Climate Plans (NECPs) (Moore et al., 2023). Another important development is increasing climate policy integration, culminating in the European Green Deal (Dupont et al., 2023). Consequently, climate and environmental priorities are now the undercurrent for all EU policy. Due to the subsidiarity principle in EU policymaking, social policy competencies are generally located at the national level, underscoring that an effective alignment of climate and social planning across multiple levels of governance is crucial.

Four climate policy related planning tools established by the EU, that are connected to the social dimension in some form, are the following: the **National Energy and Climate Plans (NECPs)**, **Territorial Just Transition Plans (TJTPs)**, **Recovery and Resilience Plans (RRPs)**, and **Social Climate Plans (SCPs)**.

⁵ Regulation (EU) 2021/1119 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ('gr')

The longest-standing of the four planning tools, the NECPs, are a requirement for all Member States under the 2018 EU **Governance Regulation** (EU 2018/1999).⁶ Their aim is to align energy and climate policy goals across all government departments and offer a planning framework that facilitates both public and private investment (European Commission, n.d.b). The mandatory template for NECPs requires Member States to describe the associated social impacts (Annex I, 5.2, Governance Regulation), also considering just transition aspects of the planned measures and policies (in terms of costs and benefits, and cost-effectiveness), and to establish national targets for addressing energy poverty, where applicable, specifying a timeline for accomplishing these objectives (Annex I, 2.4.4., Governance Regulation). Member States must also assess the number of households in energy poverty, and information on progress towards the national indicative objective to reduce this number (Art. 3 and 24, Governance Regulation). The European Commission's guidance to Member States for the updated NECPs 2021-2030 elaborates that the section 5.2 on 'social impacts' can include a comparison with the projections based on existing measures and policies with a focus on the assessment of energy poverty and distributional impacts, although this is not mandatory. Also, Member States are encouraged to include information on issues like skills bottlenecks (European Commission, 2022b).

The TJTPs were established in 2021 within the context of the **Just Transition Fund (JTF)** through EU REGULATION 2021/1056⁷, and must be submitted to access the funding for regional use. The purpose of the JTF is to ensure that the transition towards a climate-neutral economy takes place in a way that alleviates socio-economic impacts, targeting the regions most affected (European Commission, n.d.c). The fund's budget encompasses more than 19 billion euros and the fund is expected to mobilise around 25 billion euros in investments through voluntary transfers from other funds and national co-financing, over the period 2021-2027 (European Commission, n.d.c). The TJTPs need to identify the territories most negatively affected by the transition process and contain an assessment of the transition challenges faced by these territories, also identifying the potential number of affected jobs and job losses as well as describing the expected contribution of the JTF support in terms of job creation (Article 11, JTF Regulation). Additionally, Member States have to include the expected requalification needs, taking into account skills forecasts and the economic diversification potential and development opportunities (Annex II, JTF Regulation). Energy poverty is not a focus of the TJTPs, even though it is addressed in the context of efficiency investments in the (social) housing stock, which the JTF may support (Preamble (12), JTF Regulation).

Also, established in 2021, RRP are submitted by Member States to access dedicated EU funding from the **Recovery and Resilience Facility⁸ (RRF)**, established through EU Regulation 2021/241, a temporary instrument in response to the COVID-19 pandemic. RRF funds aim to

⁶ Regulation (EU) 2018/1999 on the Governance of the Energy Union and Climate Action ("Governance Regulation"). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R1999>

⁷ Regulation (EU) 2021/1056 establishing the Just Transition Fund ("JTF Regulation"). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R1056>

⁸ Regulation (EU) 2021/241 establishing the Recovery and Resilience Facility ("RRF Regulation"). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32021R0241>

support ambitious reforms and investments, fostering sustainability, resilience, and readiness for the green and digital transitions in alignment with EU priorities (European Commission, n.d.d). In their RRP, Member States must report on the macroeconomic and social impact of the planned measures, guided by a Guidance Document. Also, the RRP must lay out a detailed explanation of how the recovery and resilience plan strengthens the growth potential and job creation (Article 18, RRF Regulation). While this is not directly related to climate policy, the RRP do have to ensure that at least 37% of the supported measures contribute to the climate targets.

Finally, the newest of the four planning tools, SCPs must be submitted to gain access to the **Social Climate Fund (SCF)**⁹, which was established in 2023 through EU Regulation 2023/955 as part of the Fit for 55 package. Its aim is to provide support to vulnerable groups most affected by the new Emissions Trading System (ETS2) that will extend the existing system to housing and transport. It mobilises up to 65 billion euros for the period 2026-2032. The SCF Regulation sets out definitions for energy poverty, transport poverty, vulnerable households, vulnerable micro-enterprises, and vulnerable transport users (Article 2, SCF Regulation). The SCPs require Member States to explain how these definitions are to be applied at national level. Moreover, they must estimate the likely effects of price increases resulting from the extension of the EU emissions trading system (ETS 2) on vulnerable groups and estimate the projected impacts of the measures and investments planned for energy poverty and transport poverty (Annex V, SCF Regulation). The SCF Reg states that the measures and investments supported by the Fund shall, inter alia, contribute to sustainable and quality jobs (Article 7, SCF Regulation).

Overall, the NECPs can be understood as the central planning instrument for national climate and energy policy at EU level, while the other three plans have the primary purpose of enabling access to specific funding that is directly or indirectly connected to EU climate policy. Thus, the RRP, TJTP, and SCP, have a more singular focus than the NECP. All four plans address the social dimension of climate policy in the context of their respective planning instruments but focus on different themes. Importantly, the SCPs are the first plans to introduce an analysis of distributional effects and the TJTPs are the first plans that require Member States to identify transition challenges and describe a process of how to address them.

Additionally, in the context of the Fit for 55 package, the Council of the European Union put forth a Council Recommendation on “ensuring a fair transition towards climate neutrality”, following a proposal by the European Commission (the ‘Commission’). The recommendation is supposed to guide Member States in managing the social and employment effects of the transition¹⁰ and serves as a resource for Member States in developing and executing policy bundles that promote a just transition to climate neutrality. However, as these do not involve a mandatory national planning procedure, looking at the council recommendation exceeds the scope of this assessment. Other EU instruments, like the European Social Fund or provisions in cohesion policy also speak to

⁹ Regulation (EU) 2023/955 establishing a Social Climate Fund and amending Regulation (EU) 2021/1060 (“SCF Regulation”). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32023R0955>

¹⁰ Council recommendation of 16 June 2022 on ensuring a fair transition towards climate neutrality. Available at: [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627\(04\)](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022H0627(04))

aspects of the social dimension. As the EU policy landscape is highly complex, this assessment does not aim to cover all relevant mechanisms that pertain to the social dimension.

The social dimension in the Commission assessment of the draft updated NECPs

In December 2023, the European Commission published an EU wide assessment of the draft updated NECPs (European Commission, 2023a). As this marks the most recent Commission assessment of a planning tool relevant to the social dimension, the following paragraphs briefly summarise key points on social aspects covered in the document.

First, most plans lack structural policies and measures for the alleviation of energy poverty, especially energy efficiency and decarbonisation measures to support vulnerable groups and funding sources like from the SCF.

Second, Member States have only partially assessed socio-economic impacts of their climate and energy policies on individuals, households, and companies, including those related to income distribution and transformation dynamics. Specifically, the assessment finds that the effects of transition policies and measures, while often not accounted for at all, “do not include adequate quantitative analysis nor take into account sufficiently the distributional impacts on the different population groups” (European Commission, 2023a, p. 17).

Third, most updated NECPs do not present a comprehensive set of targeted policies to address socio-economic impacts resulting from transition policies and measures. Relevant policies are too often patchy and predominantly tackle adverse effects of transition dynamics in coal and carbon-intensive regions.

Fourth, the plans do not perform well with respect to the objective of ensuring consistency between plans relevant to the social dimension. For instance, none of the plans present sufficient information to guide the preparation of the future SCPs and how the consistency between the NECPs and SCPs will be established. Similarly, the European Commission highlights that synergies between various instruments and funds supporting the just transition, like the JTF, are only partially included.

Lastly, while the majority of Member States have conducted public consultations on the draft plans, the quality of these consultation processes differs, and many have not fulfilled all obligations set out in the Governance Regulation. Notably, the plans lack detailed information on the communication channels employed to engage the public and the methods utilised to involve diverse interest groups, including social partners and citizens. Furthermore, numerous plans lack sufficiently reasonable timeframes for enabling the public to articulate their perspectives (European Commission, 2023a).

3. Methodology

This assessment relies on a two-step approach: (1) a comparative document analysis and (2) semi-structured qualitative expert interviews in combination with qualitative analysis. The following segments outline the specific methodology used for each step and how it relates to the research objective.

3.1 Method 1: Document analysis – Mapping the EU legal framework and national implementation

The document analysis is based on the Framework Matrix Method (Ritchie et al., 2003). It focuses on the respective pieces of legislation, Governance Regulation, Just Transition Fund Regulation, Recovery and Resiliency Facility Regulation, and Social Climate Fund Regulation, as well as relevant implementing acts. The purpose of this mapping is to find out to what extent the planning instruments are integrated *by design*.

Building on these findings, the document analysis then moves on to specific examples of the national planning documents – with the aim to figure out to what extent the social dimension has been integrated into climate policy planning instruments *in practice*. The mapping results will provide the basis for an analysis focusing on potential opportunities for further integration or other improvement of the planning process. The mapping categories are included in table 1 below.

It describes (i) the understanding of the social dimension, (ii) the process (only EU), (iii) content requirements for the national plans, and (iv) Reporting on plan implementation and monitoring. The specific parameters used to further unpack especially categories ii to iv are listed in Table 1 below. For the two different document analysis exercises, the sets of parameters had to be adjusted and are not exactly the same. The plans in the case study countries were checked for the content requirements, but not for the process specifics extracted from the underlying legislation. Similarly, the monitoring and reporting segment, which was compared for the different plans in the mapping of the laws, could not be applied to the actual national plans analysed. Accordingly, the analysis of the actual planning documents focuses on the implementation of the content requirements (4.1.3), monitoring (4.1.4.), and connections to other planning processes (4.1.5.). It also investigates how the social dimension of climate policy is understood in each of the plans (4.1.1.).

Table 1 Overview of parameters for the mapping exercise

Main category	Parameters	Explanation	Used for mapping of legislation	Used for analysis of country case studies
Understanding of the social dimension of climate policy	Definition	Infers through key word search which understanding is used	x	x
Process	Submission deadlines for plans	Describes parallel processes to identify potential timing overlaps	x	
	Commission assessment of plans	Describes if and when the Commission can issue recommendations	x	
	Requirements for public consultations	Compares how public consultations and their outputs inform the plans	x	
Content requirements (of templates)	Consultation process	Checks the specific requirements, like attached summaries	x	x
	Quantitative data requirements	Helps identify the availability of data as well as data gaps	x	x
	Investment needs	Indicates how widely social dimension aspects are considered	x	x
	Bodies responsible	Indicating implementing bodies is key to foster effective governance	x	x
	Exchange of good practices	Exchanging good practices may make policies more effective	x	x

Reporting on plan implementation & monitoring	Monitoring (Commission)	Consistent monitoring & common indicators can increase effectiveness	x	
	Reporting on plan implementation	Allows that policies can be constantly improved, helps identify alignments	x	
Connections to other planning processes	Connections to other planning processes	If done well, planning instruments can better seize synergies	x	x

The selection of the case studies was a result of combining the following criteria: 1) availability of the three existing plans or their most recent updates (if applicable), 2) diversity in country size (big/small), 3) diversity in geography (Northern, Southern, Western or Eastern European). Consequently, the four case studies include: Finland, the Netherlands, Slovakia, and Spain.

3.2 Method 2: Expert interviews

The second step is to enrich and contextualize the results from step 1 with information from expert interviews. Due to the limited scope of the assessment, the interview process is conducted for the four selected Member States only, specifically looking at how the plans have been implemented at the national – or in case of the TJTPs also regional - level.

The interviews rely on a semi-structured and guideline-based approach (Meuser & Nagel, 2002).¹¹ Relevant statements for qualitative analysis were selected, paraphrased, organised into headings, and then contextualised with respect to the research topic (Meuser & Nagel, 2002).

The interviews were conducted online between October 26, 2023, and November 6, 2023. Interviewees were identified based on their expert knowledge and institutional context, with at least one interviewee per country being a government official or civil servant. Seven interviews were conducted in total, with two interviews conducted per selected country apart from one case.

¹¹ The interviews are structured around three open questions: 'What do you understand as relevant to be included under the 'social dimension' in the context of climate policy planning instruments in your country?', 'How is the social dimension integrated so far, in relation to both the four relevant EU plans (NECPs, TJTPs, RRs, and SCPs) and to national policy?', and 'In case there is room for improvement: How can the social dimension be better integrated in the future, and how can the existing EU and national plans be better integrated?'. Based on the document analysis, the interviewer asked some follow-up questions concerning the national context.

4. The EU planning landscape

4.1 Applicable legal instruments

This section focuses on both the governance mechanisms set up by the plans as well as the content included in the four laws, as far as it is relevant to the social dimension of climate-related planning. Its purpose is investigating integration opportunities for the social dimension in EU policy. Thus, this section describes (i) the timing and design of governance processes, (ii) the bodies responsible, (iii) and the content requirements for the national plans (NECPs, TJTPs, RRP, SCPs).

4.1.1 Understanding the social dimension

Summary

None of the four legal instruments provide a comprehensive understanding of the social dimension, but all include the social dimension to varying degrees or address different aspects of the social dimension of climate policy.

The Governance Regulation mandates Member States to include in their NECPs an assessment of energy poverty and distributional impacts, while the JTF Regulation requires consideration of Just Transition, the RRP Guidance considers social impacts of planned measures, and the SCF Regulation provides the most comprehensive definitions related to vulnerability and distributional effects.

Consequently, the legal instruments show **little to no integration** with respect to the understanding of the social dimension.

The following summary is based on a key word search in the four laws in focus, including the terms: 'Distributional effects', 'energy poverty', 'Just Transition', 'transformation', 'vulnerable', 'low-income', 'reskilling', and '(green) jobs'.¹² Annex 1 includes more detailed information on the assessment results of the understanding of the social dimension.

The Governance Regulation addresses the social dimension of climate policy planning (from hereon referred to as the 'social dimension') in the context of energy poverty, for which a definition must be included by Member States in NECPs, as well as other social impacts (section 5.2 of the NECP template). The European Commission's guidance to Member States for the

¹² Unless mentioned otherwise, a plan does not include a definition or other relevant description of the key term concerning the social dimension. Whether an understanding of the social dimension is considered comprehensive or not depends on how well it covers aspects of the social dimension as conceptualised in section 2.2.

updated NECPs 2021-2030 specifies that this may include a comparison with the projections based on existing measures and policies with a focus on the assessment of energy poverty and distributional impacts. Also, Member States are encouraged to report on issues such as skills bottlenecks (European Commission, 2022b). Specifically, the NECPs must include an assessment of the number of households in energy poverty (Article 3, Governance Regulation).

The JTF Regulation, while not providing a comprehensive understanding, requires Member States to engage with the notion of Just Transition, and to develop a vision for how such transitions could look like in the respective national context. Implicitly, the Regulation understands the Just Transition concept to cover changes in employment and economic diversification.¹³

The RRP Guidance requires Member States to report on the social impact of the planned measures. The plans implicitly address the social dimension, as they require detailed explanations of how the RRP strengthens job creation and at least 37% of the supported measures must contribute to the climate targets.¹⁴

The SCF Regulation displays the most comprehensive understanding of the social dimension, providing definitions for various concepts related to poverty and vulnerability of certain groups. Also, the SCF Reg mentions that measures and investments supported by the Fund must contribute to sustainable and quality jobs (Article 7), suggesting that reskilling and green jobs are understood as another aspect connected to the objectives of alleviations poverty and vulnerabilities. Furthermore, the SCF Regulation is the only regulation that considers distributional effects by requiring Member States to estimate the likely effects of price increases resulting from the ETS2 introduction, paying particular attention to vulnerable groups (Article 6 (d)).

4.1.2 Process

Summary

The four plans have **different preparation and submission timelines** (see Figure 1), with the NECPs being the only plans that are set to enter a second submission cycle within the 2020s.

Legal provisions for Commission assessments of plans diverge across the four processes. While the JTF Regulation does not include specifications assessments of the TJTPs, the Commission has to assess the other three plans within two to six months after submission.

¹³ The JTF Regulation also acknowledges that the transition to climate neutrality, while delivering “benefit[s] for all in the long term and [...] opportunities and challenges for all in the medium term”, carries the risk of “ a variable speed [of the] transition in the Union as regards climate action, but also of growing disparities between regions, detrimental to the objectives of social, economic and territorial cohesion” (Preamble (2), JTF Reg). Also, the JTF refers to energy poverty three times, without defining the term. Notably, the JTF Reg frequently employs both ‘transformation’ and ‘transition’, without providing a definition for either.

¹⁴ Also, measures funded by the RRF and are aimed at increasing social resilience are supposed to contribute to implementing the European Pillar of Social Rights (Article 18, RRF Regulation).

The **requirements for public consultations vary depending on when and in what fora public consultations occur**, but all regulations require public consultations to take place. Details on how the consultations are intended to take place and inform policy making are mostly included in the templates for the respective plans (see chapter 4.1.3).

Submission deadlines for plans

The four plans have different preparation and submission timelines, visualised in Figure 1. The Governance Regulation required Member States to produce their initial NECP by December 2019 and a draft update by the end of June 2023. The final NECP updates are due by 30 June 2024. Member States are required to submit a new NECP, covering the next decade, in 2028. The Recovery and Resilience Regulation requires RRP to be submitted by 30 April 2021. The submission of TJTPs is now closed, with Bulgaria being the last Member State to submit it in December 2023. With JTF operations taking place within the current Multiannual Financial Framework (MFF) (2021-2027), the focus is now on implementation of the TJTPs (European Commission, 2023b). The first set of the Social Climate Plans is due by 30 June 2025.

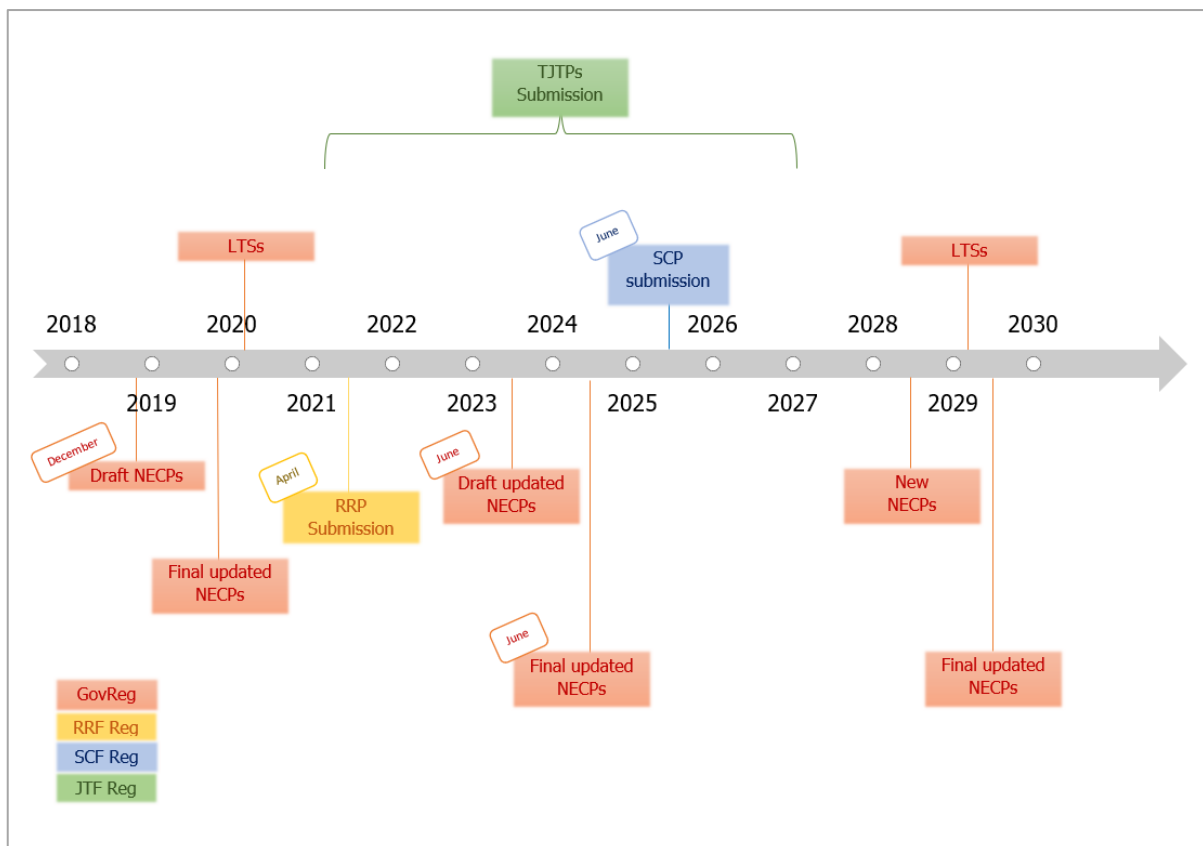


Figure 1 Draft, submission, and update deadlines for the four plans as far as available (own figure)

Commission assessment of Plans

The Commission must assess both draft NECPs (Art. 9.2, Governance Regulation) and draft updates (Art. 14.6, Governance Regulation) and submit a report containing the results no later than 6 months following the plan's submission by the respective Member State. Along with the assessment, the Commission may issue recommendations for Member States with proposed changes for the final plans and updates.

The JTF Regulation does not include specifications regarding a Commission assessment for TJTPs, but it says that a plan's approval "opens the doors to dedicated financing under the other two pillars of the Just Transition Mechanism" (European Commission, n.d.c).

For the RRFs, the Commission had to assess each plan within two months of the official submission and make a proposal for a Council implementing decision laying out the reforms and investment projects to be implemented by the Member State (including the milestones and targets, and financial contributions) (Art. 19, RRF Regulation).

For the Social Climate Fund, the Commission must assess the SCPs' relevance, effectiveness, efficiency, and coherence based on certain criteria, e.g., whether the Plan represents an adequate response to the social impact on vulnerable households (Art. 16a, SCF Regulation). The Commission decides if a plan is approved no later than five months from the date of the submission (Art. 17, SCF Regulation).

Overall, legal provisions for assessments of plans by the Commission vary across the four processes. While the JTF Regulation does not include specifications with respect to the assessments of the TJTPs, the Commission has to assess the other three plans within two to six months after submission.

Requirements for public consultations

The Governance Regulation sets out that each Member State must make sure that the public is given early and effective opportunities to provide inputs for the preparation of the draft NECP and must ensure that the public is informed (Article 10). Also, it requires Member States to establish a Multilevel climate and energy dialogue (Article 11, Governance Regulation), pursuant to national rules, through which various stakeholders can discuss the different scenarios envisioned for energy and climate policies. The JTF Regulation only mentions public consultations in the template in Annex II, requiring Member States to describe the outcome of public consultations in their TJTPs. Similarly, the RRF Regulation does not include a dedicated section for public consultations but mentions that the RRF must set out a summary of the consultation process (Article 18.4, RRF Regulation). In accordance with the requirements of Article 10 of the Governance Regulation, the SCF Regulation requires Member States to conduct public consultations with relevant stakeholders, including representatives of social partners, prior to submitting an SCP (Article 5, SCF Regulation).

In sum, the requirements for public consultations diverge depending on when and in what fora public consultations occur, but all regulations require public consultations to be implemented. Details on how the consultations are intended to happen and inform policy making are primarily included in the templates for the respective plans (see the following paragraph in chapter 4.1.3).

4.1.3 Content requirements (of templates)

Summary

Summaries of the public consultation process for the preparation, and – where applicable – for the implementation of the respective plan, are **required by all laws**. However, the templates do not explicitly address how many of the participants represent vulnerable groups or the interests of social stakeholders. Only the template for the RRP explicitly mentions that social partners will take part, but also does not provide any details on who these stakeholders must represent.

In sum, the legal instruments show **little to no integration in terms of content requirements for quantitative data** that is relevant to the social dimension. One overlap is that both the NECPs and SCPs must assess the number of energy poor households. The most recent plans, the SCPs, must collect significantly more quantitative data than the other three plans.

The **SCPs are the most concrete** in describing the **bodies responsible for implementation** because they must include, for each milestone and target, which institution is assigned with the task of implementing, measuring, and reporting. Potentially, this can help identify overlapping responsibilities and align governance processes, where this appears most efficient.

Only the SCPs include an exchange of good practices in preparation for the plan. However, the NECP template refers to ‘regional cooperation in preparing the plan’, which can also entail good practice exchange. The templates for the TJTPs and RRP do not reference an exchange of good practices.

All but the RRP have a mandatory template included in the respective regulation that must be used by Member States when drawing up their respective plans. For the RRP, the Commission has published a guidance document.¹⁵ This section maps core content requirements of the four templates.¹⁶ The headlines in bold have been identified as key themes in the content requirements

¹⁵ Commission Staff Working Document. Guidance to Member States. Recovery and Resilience Plans. SWD(2021) 12 final. Available at: https://commission.europa.eu/system/files/2021-01/document_travail_service_part2_v3_en.pdf

¹⁶ The guidance document under the RRF is also referred to as template from here onwards to improve readability.

of the plans and are summarised for all four types of plans. The format requirements for the plans are similar for the four planning documents.

Consultation process

The NECPs must report on consultations and involvement of national and EU entities and their outcome with respect to the plan's development. Also, each Member State must attach a summary of the public's views or provisional views (Article 10, Governance Regulation). The TJTPs must describe the outcomes of public consultations. The RRP must provide a summary of the consultation process of relevant stakeholders, incl. social partners. The summary has to describe the scope, type, and timing of consultation activities, and how the input of the stakeholders is reflected in the plan. Similarly, the SCPs (Article 5) must include a summary of the consultation process (for preparation and, where available, for implementation), and describe how the input is reflected in the plan.

A summary of the public consultation process for the preparation, and – where applicable – for the implementation of the respective plan, is demanded by all laws. However, they do not explicitly address how many of the participants represent vulnerable groups or the interests of social stakeholders. Only the template for the RRP explicitly mentions that social partners will take part.

Quantitative data requirements

The NECP template does not require Member States to collect, report, or reference any quantitative data related to the social dimension. However, the implementation act for the progress reports does so. According to the act, Member States must assess quantitative information on the number of households in energy poverty. On a voluntary basis, they can also report quantitative data on (national) indicators in relation to energy poverty. Additionally, they can also report data on the impact of the implementation of the national energy and climate plan on jobs, workers and regions (like 'Expected distributional impacts amongst population', 'Expected impact on quality of life, well-being', and 'Inclusiveness and participatory processes') (European Commission, 2022a). Also, Member States must describe just transition aspects of the planned measures and policies, including costs and benefits estimates. The TJTP template includes two sections that require Member States to include, collect and/or evaluate data in the context of their TJTPs: Monitoring and evaluation indicators to measure the ability of the plan to achieve its objectives and programme-specific output or result indicators.¹⁷ Also, the RRP do not require any data directly related to the social dimension. The SCPs include significant data collection and

¹⁷ Result indicators related to social dimension are: Jobs created in supported entities and Research jobs created in supported entities, SMEs staff completing training for skills for smart specialisation, for industrial transition and entrepreneurship, Population benefiting from measures for air quality, Rehabilitated land used for green areas, social housing, economic or other uses, Annual users of new or modernised public transport, Annual users of new or modernised tram and metro lines, Annual users of dedicated cycling infrastructure, Length of new tram and metro lines, Length of reconstructed or modernised tram and metro lines, Capacity of environmentally friendly rolling stock for collective public transport, Dedicated cycling infrastructure supported, Population covered by projects in the framework of integrated actions for socioeconomic inclusion of marginalised communities, low income households and disadvantaged groups) (Annex III, JTF Reg).

reporting, e.g., Reduction of vulnerable households. Notably, the SCPs are the only plans that address public access to data, indicating the establishment of a dedicated website, through which data can be extracted, sorted, searched, compared, and reused (Article 23.1). However, for the JTF, an open data platform also exists.¹⁸ As for investment needs, which also constitute an important data source, the plans have to include information to various degrees. The NECPs must provide an overview of investment needs (Annex I, 5.3, Governance Regulation). The TJTPs do not require Member States to specify investment needs. The RRP are required to provide information regarding each description of a reform or investment, including details about the proposed reforms and investments.¹⁹ The SCPs must set out the estimated total costs of the Plan (Annex V, SCF Regulation).

In sum, the legal instruments show little to no integration in terms of content requirements for quantitative data. One of the few overlaps is that both the NECPs and SCPs must assess the number of energy poor households. The most recent plans, the SCPs, must collect significantly more quantitative data pertaining to the social dimension than the other three plans.

Bodies responsible

The NECPs do not have to explicitly mention the bodies responsible for implementation but require Member States to describe the administrative structure of implementing the plan. The TJTPs and RRP need to report on bodies responsible for coordinating and monitoring the plan's implementation, but not on those bodies overseeing the implementation. The SCPs must, for each milestone and target, include which institution is responsible for implementing, measuring, and reporting.

In sum, the SCPs are the most concrete in setting out the bodies responsible for implementation because they must include, for each milestone and target, which institution implements, measures and reports. This may help identify overlapping responsibilities and streamline governance in line with a whole-of-government approach, where this appears most efficient.

Exchange of good practices

During the preparation of the SCPs, the Commission is required to organise an exchange of good practices, including on investments and cost-effective measures to be included in the Plans. While not explicitly called an exchange of good practices, the NECP template requires reporting on 'Regional cooperation in preparing the plan' in reference to Art. 12 of the Governance Regulation ('Regional cooperation').

Overall, only the SCPs entail an exchange of good practices in preparation of the plan. The NECP template, however, refers to 'regional cooperation in preparing the plan', which can also include

¹⁸ Cohesion open data platform. Just Transition Fund. (n.d.). Available at: <https://cohesiondata.ec.europa.eu/funds/jtf/21-27#>

¹⁹ see footnote 15

good practice exchange. The templates for the TJTPs and RRP do not mention an exchange of good practices.

4.1.4 Reporting on implementation and progress monitoring

Summary

The legal instruments are **aligned to some degree regarding the reporting on implementation** (see Figure 2). Apart from the TJTPs, for which a coordinated procedure could not be identified, these progress reports follow regular timelines.

The **monitoring of progress by the Commission takes place in three of the four plans** (NECPs, RRP, and SCPs). Notably, the NECPs are the only plans that require a regular progress assessment, the results of which must be included in the State of the Energy Union report every two years.

Reporting on plan implementation

Both the reporting on plan implementation and monitoring are key to ensure that the design and efficiency of policy implementation can be constantly improved. Also, the Commission collects regular updates on the status of plan implementation. Looking at the timing of progress reporting by the Member States for each of the four legislative instruments is key to identify alignments or integration opportunities between the four plans.

The Governance Regulation requires Member States to report to the Commission on the implementation status of the plans on a biennial basis in the form of integrated national energy and climate progress reports (NECPRs). The first submission deadline was 15 March 2023 (Article 17, Governance Regulation).

In contrast, the JTF Regulation leaves any reporting for the TJTPs to Member States and does not specify a coordinated procedure for this at EU level.²⁰ Yet, the TJTPs must describe the monitoring and evaluation measures planned.

The RRF Regulation requires the Member State to report twice a year on the progress made in the achievement of its RRP. The reporting happens in the context of the European Semester, i.e., the reports are to be appropriately reflected in the National Reform Programmes, which are supposed to be viewed as a reporting 'tool' (Article 27, RRF Regulation). The RRP template invites Member States to include information on monitoring and evaluation.

²⁰ The author was unable to identify the provisions related to progress reporting and monitoring in the context of the TJTPs. As the TJTPs are tied to EU fund expenditures, it is unlikely that there is no overall monitoring framework. Possibly, a more general framework from the MFF applies.

The SCP progress reports are to be submitted together with its integrated national energy and climate progress report, every two years (Article 24, SCF Regulation). The SCPs must provide a timetable for monitoring and implementation.

Summed up, the legal instruments are aligned to some degree regarding the reporting on implementation (see Figure 2). For example, the timing of the SCP progress reports and NECPRs is already aligned. The first time, however, the reports will be jointly submitted is in 2027 – after the introduction of the Emissions Trading System 2 (ETS 2)²¹.

Monitoring (Commission)

For NECPs, based on the NECPRs²², the Commission must assess, inter alia, the progress of each Member State towards meeting its objectives, targets and contributions and implementing the policies and measures. This first took place by 31 October 2021 and must be carried out every two years thereafter. The Commission is required to include its assessment as a component of the State of the Energy Union report (Article 29, Governance Regulation) every two years, a process that started in 2021. The 2023 assessment was the first based on information stemming from the new integrated reporting process.²³ In the context of the TJTPs, the Commission does not monitor or assess the Member State's reporting. It merely sets out that the access to resources is conditional (JTF Reg, Article 7.2). When it comes to the RRFs, the RRF Regulation specifies that the Commission will monitor activities, collect data, and report on expenditure. It adopts delegated acts for common indicators and a methodology for reporting social expenditure, with Member States obligated to report on these indicators (RRF Reg, Article 29). As for the SCPs, the Commission monitors the implementation of the SCPs, emphasising targeted and proportionate measures, and employing common indicators for reporting and evaluation. The performance reporting system of the Commission is supposed to ensure that data and results are collected effectively, efficiently, and in a timely manner (SCF Reg, Article 24).

²¹ The ETS 2 was created in 2023. It covers fuel combustion in buildings, road transport and small industry. As opposed to the existing EU ETS, which mostly covers big industry, the ETS2 will create the need for behavioural changes primarily for private households.

²² Commission Implementing Regulation (EU) 2022/2299 laying down rules for the application of Regulation (EU) 2018/1999 of the European Parliament and of the Council as regards the structure, format, technical details and process for the integrated national energy and climate progress reports. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32022R2299>

²³ See Commission webpage on the eight State of the Energy Union report: https://energy.ec.europa.eu/topics/energy-strategy/energy-union/eighth-report-state-energy-union_en

Summed up, the monitoring of progress by the Commission takes place in three of the four plans (NECPs, RRP, and SCPs). (It is likely that a similar exercise also takes place for the TJTPs, however the associated Article could not be identified in the legislation). Notably, the NECPs are the only plans that require a regular progress assessment, the results of which must be included in the State of the Energy Union report every two years.

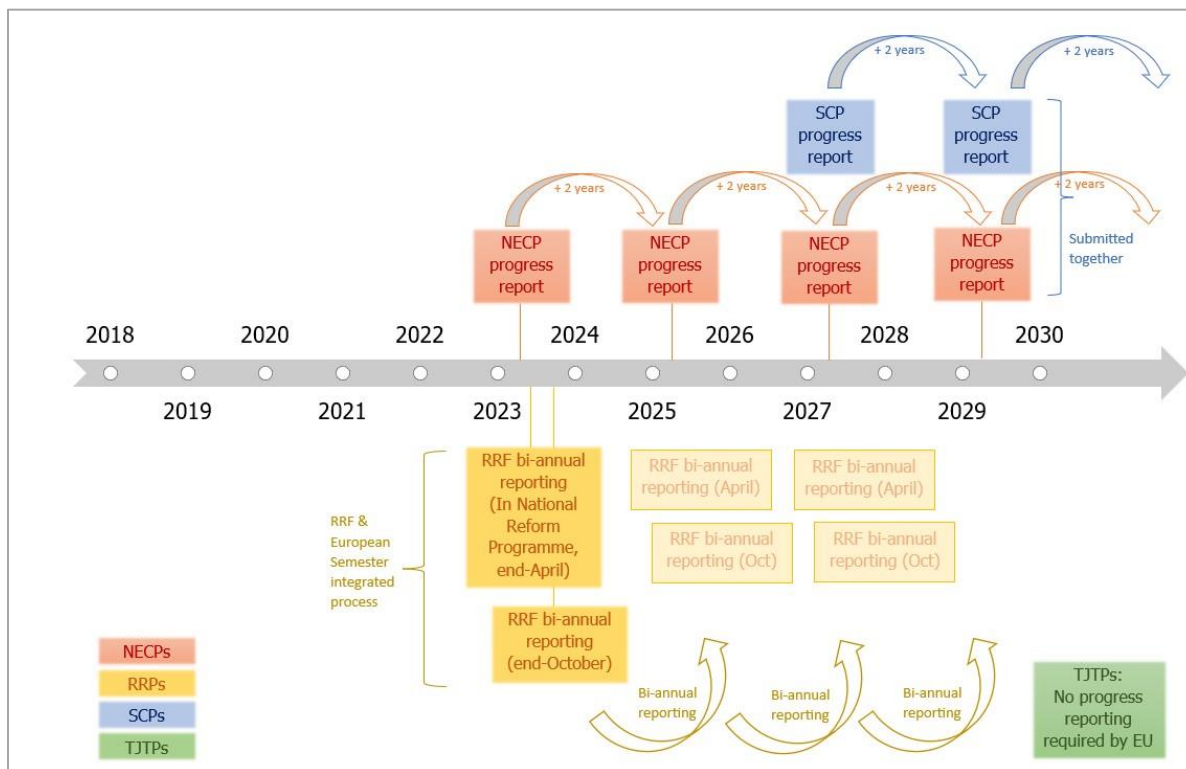


Figure 2 Timing of progress reporting by the Member States for each of the four legislative instruments analysed (own figure)

4.1.5 Connections to other planning processes

Summary

The four plans **have numerous interconnections concerning the social dimension but leave significant room for integration** in both processes and content. Primarily, this is attributable to the overlapping timelines, with distinct cycles for the MFF (lasting 7 years) and the NECPs (spanning 5 years). Although RRP constitute a distinct arrangement, they also exhibit limited alignment with these lengthier processes, albeit they are interconnected through the European semester.

To ensure that planning instruments seize synergies and avoid trade-offs, it is crucial that planning instruments covering similar themes are consistent with one another. Establishing connections between different planning processes can enhance consistency. Based on common practice in the

EU legislative process, the regulations require that the four plans are aligned. As the 'second-oldest' plan of the four, the TJTPs should be consistent with the NECPs, the first plans to be introduced (Article 11, JTF Regulation). Similarly, the RRP should be consistent with the TJTPs and NECPs (Article 17, RRF Regulation). Being introduced most recently, the SCPs "should be coherent with and framed by the reforms planned and the commitments made by the Member States under" (Preamble, SCF Regulation) all three of the other plans. The European Commission's guidance to Member States for their updated NECPs requires the updated plans to reflect all the relevant measures and policies contributing to achieving the national energy and climate objectives from the TJTPs, RRP, and SCPs (European Commission, 2022b). For the implementation at national level, this means that the Member States must clearly identify where measures and objectives of their plans overlap and how they can build on another.

4.1.6 Summary and interpretation

This section summarises the mapping results thus far and identifies avenues for integration opportunities that will be further investigated through the mapping of the national planning instruments and expert interviews in the sections to follow.

As for the **understanding of the social dimension**, the legal instruments show little to no integration thus far, evidenced by the fact that none of the four legal instruments provide a comprehensive understanding of the social dimension, but all address the social dimension to varying degrees or touch on different aspects of the social dimension. An integration opportunity would be to streamline a common understanding of what the social dimension of climate related planning entails and which common definitions are applied in all EU planning documents. While some Member States may have already integrated the social dimension significantly, others may have not; thus, a common understanding at EU level can help ensure that all Member States start thinking about key challenges related to the social dimension.²⁴ For example, this could be introduced in the European Commission's guidance to Member States for the updated NECPs (European Commission, 2022b).

Regarding the **process** for the drawing up of the national plans, the respective laws show little to no integration evidenced by the fact that neither the timing of the plans' submissions and, consequently, the timing of commission assessments are integrated so far. However, aligning the timing of plans does not automatically result in more effective policy making. However, the benefit of comparing the timing is to identify windows for integration opportunities. For instance, the preparation for both the final updated NECPs due in 2024 and the SCPs due in 2025 is underway²⁵, which likely opens up integration opportunities.²⁶ For example, Member States could use the

²⁴ Also, if a common understanding would be established at EU level, this may increase policy effectiveness, e.g., regarding the usage of funds. Nonetheless, because the EU likely cannot account for all national specificities, it would be important that flexibility remains for how Member States apply a social dimension framework at the national level.

²⁵ as of November 2023

²⁶ Initially, the EC proposed that SCP should be submitted with the final NECP. This was changed in the final regulation.

NECPs, a more overarching planning tool, to describe challenges related to distributional impacts of climate policy in their plans, which are at the centre of the SCP preparation process.

With respect to the requirements for **public consultations**, the legal instruments show integration to some degree. The requirements for public consultations are similar in scope, e.g., all plans need to include or attach a summary of their outcomes, and audience, e.g., including social stakeholders. However, the public consultations are not integrated per se, i.e., they are not jointly carried out. Potential integration opportunities could be to take up different aspects of the social dimension in public participation forums and pool information submitted through existing plans. As many Member States also carry out public consultations for national plans or strategies, integration opportunities between national and EU planning tools should also be explored. This may significantly reduce administrative burdens and provide better consultation outcomes. Although this would need good communication, so that the public understands the similarities and differences between national documents and the EU ones.

Overall, the **content requirements** of the templates show integration to some degree, i.e., the templates include some similar content requirements. The RRP, TJTP, and SCPs all must describe planned monitoring and evaluation measures; and the NECPs have a dedicated monitoring system. What monitoring measures should focus on is generally specified and includes some monitoring requirements with relevance to the social dimension.

An integration opportunity would be to develop **common indicators** for the social dimension that can be used both in planning and reporting. This is backed by the fact that, thus far, the legal instruments show little to no integration in terms of content requirements for quantitative data (but both the NECPs and SCPs must assess the number of energy poor households). The SCPs must collect significantly more quantitative data related to the social dimension than the other three plans. As for setting out investment needs, all plans must include either an estimate of investment needs or estimated costs of proposed measures under the plan. Similarly, all plans must include information on the planned policies and measures. This information may indicate to what extent Member States consider the social dimension in their climate and energy policies, which challenges they recognise, and what aspects are prioritised. The content in the plans may also provide an indication of how much the social dimension is currently integrated in climate policy planning tools for the respective Member State. Furthermore, all plans have to identify responsible bodies for implementation – though to different degrees of specificity. This means that both fragmentation and possible synergies for addressing the social dimension might be identifiable at the national level. With respect to an exchange of good practices, the plans show little to no alignment. However, both the SCPs and NECPs must organise an exchange of good practices.

The legal instruments are aligned to some degree regarding the reporting on implementation and monitoring of progress by the Commission. For example, the timing of the SCP progress reports and NECPs is already aligned. However, the first time the reports will be submitted together is

in 2027 – which is after the introduction of the Emissions Trading System 2 (ETS 2)²⁷. Thus, it is crucial that the integration of the two plans regarding the social dimension is well-prepared in the years ahead - for instance, by further aligning process and content requirements. For instance, the Technical Assistance Programme of the European Commission can support Member States in processes.

Overall, the comparative analysis of the legal requirements for the four plans has identified several existing connections and similarities regarding the social dimension, but also exposed the limited extent to which processes and content are currently integrated. Largely, this can be attributed to the dual (or even triple) timelines due to the fact that there is a separate cycle related to MFF (7 years) and to the NECPs (5 years). RRP is a separate, unique arrangement, although they were also not especially well-aligned with these longer-term processes (although they are linked through the European semester).

4.2 Mapping of the national policy planning documents in the four focus countries

This section looks at how the legal requirements (see chapter 4.1) are implemented in the respective national planning documents for each of the four case study countries. Regarding the TJTPs, not all Member States submitted an overarching document, as only territorial (regional) plans are required. Hence, this assessment relies on the TJTP for the region Pohjois-Karjala²⁸ in the Finnish case and for the region West-Noord-Brabant²⁹ in the Dutch case.

4.2.1 Understanding of the social dimension

Summary

All plans address aspects of the social dimension. Compared to the other three countries, **the Spanish plans can be considered a good practice example**, as they are integrated with each other to a significant extent, and many of the key terms are defined. However, for all case studies, the opportunities for further integration can be identified.

In the **Finnish** plans, the social dimension is addressed primarily through considerations of energy poverty and just transition in the NECP and TJTP, albeit energy poverty is considered

²⁷ The ETS 2 was created in 2023. It covers fuel combustion in buildings, road transport and small industry. As opposed to the existing EU ETS, which mostly covers big industry, the ETS2 will create the need for behavioural changes primarily for private households.

²⁸ Finnish TJTP: https://pohjois-karjala.fi/wp-content/uploads/2022/12/JTF_21.12.2022.pdf

²⁹ Dutch TJTP: <https://www.stimulus.nl/just-transition-fund/wp-content/uploads/sites/13/2022/10/Publieksversie-JTF-West-Noord-Brabant.pdf>

rare. Inconsistencies exist in defining key terms and identifying vulnerable groups across plans.

The **Dutch** plans primarily focus on energy poverty and just transition, with the NECP providing a definition for energy poverty, while the TJTP includes a definition of 'just transition'; however, inconsistencies exist in defining terms across plans, including the identification of vulnerable groups.

The **Slovak** NECP proposes a definition for energy poverty; however, there are significant gaps and inconsistencies regarding how terms and vulnerable groups are defined.

The **Spanish** plans extensively address the social dimension across plans, particularly concerning energy poverty and just transition. The plans are consistent in referencing defined concepts from national strategies, although vulnerable groups are not consistently identified.

This section describes how the social dimension is addressed in the four focus countries and across the draft updated NECPs³⁰, TJTPs, and RRP³¹. The social dimension was investigated through a key word search based on the terms identified in section 4.1.1.³²

4.2.1.1 Finland

The social dimension in Finland is addressed within the context of energy poverty and just transition, mainly in the NECP³³ and TJTP³⁴. However, energy poverty is considered to be a rare occurrence in Finland. As the plans do not explicitly define any of the key terms set out in section 4.1.1, it is not possible to compare definitions across plans and check for consistent usage of terms. Nonetheless, the Finnish NECP does recognise as a general principle "that emissions reductions should be implemented in a way that is socially and regionally fair and consults with many sectors of society" (Finnish NECP, p.138). Which groups qualify as 'vulnerable' is not consistent across plans.

³⁰ The draft updated NECPs may not contain all the information that final updates would include, so the assessment results may not comprehensively reflect Member States' approach to updating their NECP.

³¹ Finland: https://julkaisut.valtioneuvosto.fi/bitstream/handle/10024/163363/VN_2021_69.pdf?sequence=1&isAllowed=y

The Netherlands: <https://open.overheid.nl/documenten/ronl-abc474ae7a39fe82e5f6f276ab663739cdb56902/pdf>

Slovakia: <https://www.planobnovy.sk/realizacia/dokumenty/>

Spain: <https://www.lamoncloa.gob.es/temas/fondos->

recuperacion/Documents/160621Plan_Recuperacion_Transformacion_Resiliencia.pdf

³² As some documents are only available in the respective original language, the key word search relied to some extent on the tools DeepL Translate and Google Translate. Thus, it is possible that not all terms were accurately captured.

³³ https://commission.europa.eu/system/files/2023-07/DRAFT%20NECP%20update_Finland.pdf

³⁴ https://pohjois-karjala.fi/wp-content/uploads/2022/12/JTF_21.12.2022.pdf

4.2.1.2 The Netherlands

The social dimension in the Dutch plans is mainly addressed within the context of energy poverty and just transition. The NECP³⁵ is the only Dutch plan that includes a definition for one of energy poverty. 'Just transition' only plays a key role in the TJTP³⁶, which also includes a definition of the term. 'Transformation' is mentioned in various context, e.g., circular economy diversification, digital transformation, and transformation of the energy system – without explicitly linking it to the social dimension. Because the plans do not include definitions for the same terms, a consistency check cannot be done. Nonetheless, some key terms appear across plans. Vulnerable groups are not identified in all plans and are not consistent across plans.

4.2.1.3 Slovakia

The social dimension in the Slovak plans is mainly addressed within the context of energy poverty and just transition. The NECP³⁷ includes a proposed definition for energy poverty. 'Just Transition' is only elaborated on in the TJTP³⁸. 'Transformation' is used in various contexts across all three plans³⁹. However, the term transformation is usually not employed in conjunction with the social dimension. Vulnerable groups are not clearly defined across the plans; the term implicitly covers the energy poor and long-term unemployed in two plans. Because the plans do not provide definitions for the same terms, a consistency check cannot be done. Vulnerable groups are not identified in all plans and are not consistent across plans.

4.2.1.4 Spain

The social dimension in Spain is extensively addressed within the context of energy poverty and just transition, in a way that is largely consistent across plans. Just Transition as a concept is included in all three plans and all reference the definition which is provided in the national-level 2018 Just Transition Strategy (JTS)⁴⁰. The definition is based on the Just Transition Guidelines provided by the International Labour Organization (ILO). Similarly, energy poverty is clearly defined in both the NECP and RRP and anchor it in the 2019 National Energy Poverty Strategy. Notably, the first chapter of the Spanish NECP⁴¹ stresses the importance of prioritising social justice in climate policy, citing the IPCC (p.41) and the Spanish RRP references the Just Transition Strategy and the Energy Poverty Strategy as "constitut(ing) the Government's Energy and Climate

³⁵ https://commission.europa.eu/system/files/202307/EN_NETHERLANDS%20DRAFT%20UPDATED%20NECP.pdf

³⁶ <https://www.stimulus.nl/just-transition-fund/wp-content/uploads/sites/13/2022/10/Publieksversie-JTF-West-Noord-Brabant.pdf>

³⁷ https://commission.europa.eu/system/files/2023-09/SLOVAKIA%20%20DRAFT%20UPDATED%20NECP%202021-2030_EN.pdf

³⁸ <https://mirri.gov.sk/wp-content/uploads/2022/05/Plan-spravodlivej-transformacie-uzemia-SR.pdf>

³⁹ Including industrial transformation, digital transformation, economic transformation, green transformation, and regional transformation

⁴⁰ The Spanish TJTP can be found here:

https://www.transicionjusta.gob.es/Documents/Union_Europea/Fondo_Transicion_Justa/common/PLAN%20FTJ_ESP_2021-2027.pdf

⁴¹ https://commission.europa.eu/system/files/202307/EN_SPAIN%20DRAFT%20UPDATED%20NECP.pdf

Framework that will guide actions in th(e) area” of ecological transition (Spanish RRP, p.129). Vulnerable groups are not identified in all plans and are not consistent across plans.

4.2.2 Content

Summary

In terms of content requirements, there was minimal integration of the social dimension among plans, particularly evident in the **reporting on consultation processes**, where many plans lacked specific details regarding the integration of public input, posing challenges in assessing the extent of stakeholder consultation and its influence on policy making.

Quantitative data related to the social dimension has been collected to a limited extent. Notably, the Spanish NECP includes an impact analysis model, which can assess distributional effects.

Regarding the description of **investment needs**, the current plans exhibit minimal incorporation of the social dimension.

The **responsible bodies for implementation** are mostly set out, which provides a good base for avoiding governance fragmentation when addressing the social dimension.

None of the four countries’ plans explicitly include a mechanism for **exchanging good practices** in the content requirements of their templates.⁴²

Consultation process

In Finland, the Netherlands, and Slovakia the consultation processes were partially implemented and lack specific details on how public input was integrated into the plans. For example, the Finnish NECP only mentions a public consultation to take place in 2024. The Dutch NECP does not mention any public consultation, the TJTP comprehensively implemented public participation mechanisms. The Slovak NECP underscores a commitment to inclusive decision-making by engaging in consultations with the broader public for the plan’s preparation. In Spain, the consultation processes were comprehensively implemented and partially lack specific details on how public input was integrated into the plans. The deliberations of the Assembly, influencing the NECP, have been documented in a comprehensive report and recommendations were incorporated into the updated NECP. More information on this assessment is included in the Annex.

⁴² Processes for the exchange of good practices may be included other sections of the legal instruments.

Quantitative data requirements

The Finnish plans include limited quantitative data reporting or additional data requirements⁴³. The monitoring and evaluation indicators under section 3.2. of the NECP are partly related to social dimension: 'Participants who will receive a professional qualification upon leaving action' and 'Jobs created in supported units'. The Dutch plans report limited data related to the social dimension. Indicators included under the TJTP mostly focus on reskilling. The Slovak plans include limited data reporting or requirements, but the TJTP reports on six of the results indicators related to the social dimension set out by law, e.g., 'Created jobs in supported entities annual'. For the Spanish NECP, the impact analysis model DENIO incorporates the microdata from households representing the Spanish population, which makes it possible to assess microeconomic effects and distributional impacts and their social impact. For example, the social impact analysis demonstrates that disposable income would increase in all quintiles but to a greater extent in lower-income quintiles and that premature deaths due to air pollution could be halved by 2030, compared to 2019 values. Section 3.2 of the Spanish TJTP mentions the ambition to set up a performance framework to monitor the TJTP, which is supposed to include social dimension indicators, e.g., Unemployment rate in just transition zones. More information on this assessment is included in the Annex.

Investment needs

The investments included in the Finnish, Dutch, Slovak, and Spanish NECPs are largely not related to the social dimension or do not state their investment needs clearly enough to allow for an assessment. The RRP all include some investments related to the social dimension, with the Spanish RRP including the most. More information on this assessment is included in the Annex.

Bodies responsible

For Finland and the Netherlands, responsible bodies are mostly clearly⁴⁴ stated. For Slovakia, responsible bodies are mostly not clearly⁴⁵ set out, with a low degree of specificity. For Spain, responsible bodies are very clearly⁴⁶ stated, with a high degree of specificity.

Exchange of good practices

During the preparation of the SCPs, the Commission is required to organise an exchange of good practices. None of the other three plans explicitly include a mechanism for exchanging good practices in the content requirements of their templates.⁴⁷

⁴³ This assessment mostly looked at the indicators provided in each plan.

⁴⁴ In two out of three plans

⁴⁵ In less than two plans

⁴⁶ In all three plans

⁴⁷ Processes for the exchange of good practices may be included other sections of the legal instruments.

4.2.3 Connection to other planning processes

Summary

The **connections between planning processes**, as required by the respective regulations (see section 2.2), **are not established**. Nonetheless, the **Spanish plans show integration and alignment** of social dimension related content across the Spanish planning instruments to some extent, like through dedicated sub-sections in the NECP.

The connections between planning processes as drawn up in the countries analysed partly meet the requirements set out in the laws, with the Spanish plans serving as a good practice example. The Finnish NECP recognises that it must submit an SCP. The RRP is mentioned under the overview on investment needs. The RRP references the NECP. The Dutch NECP briefly mentions the RRP once as being a potential funding source but is not connected to the TJTP. Notably, it states the ambition to integrate the SCPs into broader Dutch climate and energy policy. The Dutch TJTP briefly mentions connections with the RRP. The Slovak NECP references measures planned under the JTF. It also discusses the upcoming role of the SCF several times.

However, the Spanish plans frequently cross-reference the other planning processes. For instance, the Spanish NECP continuously establishes links to the TJTP, RRP, and SCPs. It includes dedicated sub-sections for each of the plans which describe the synergistic effects between the respective other plan and the NECP. The TJTP and RRP frequently reference the NECP; the latter describes it as the guiding framework for the RRP (p.57).

4.2.4 Summary and interpretation

The analysis of the plans in the case study countries has provided several insights on real world implementation of the legal requirements analysed in section 4.1. Specifically, this section summarises the extent to which the social dimension of climate policy has already been integrated in climate policy planning instruments and refers to integration opportunities identified through the mapping of the legal instruments.

Overall, it is a promising sign that in all countries all the respective plans **address aspects of the social dimension**. Especially the Spanish plans are integrated with each other to a significant extent, and many of the key terms are defined. However, for all case studies, the opportunities for further integration can be identified. So far, the plans often lack (common) definitions of key terms, making consistency checks or identification of possible synergies across a country's plans difficult. Also, plans only occasionally cross-reference key terms that were defined in other plans – arguably missing out on the opportunity to provide a more comprehensive picture of the social dimension.

As for the **content requirements**, there was little to no integration of the social dimension between plans visible. This holds true for the reporting on consultation processes. Also, many plans lack specific details on how public input was integrated into the plans. This makes it difficult to assess which social stakeholders were consulted in the preparation (and implementation) of the plans, what their viewpoints are, and to what extent these informed policy making. Furthermore, the degree to which **quantitative data** pertaining to the social dimension was collected is limited. While the respective laws do not require a common reporting framework or a common set of data to be used for planning and reporting between the plans, an opportunity for integration is to further align data requirements across plans. For example, this could cover data to evaluate distributional effects of just transition projects. If alignments are clearly set out⁴⁸, this may alleviate administrative burdens. However, if requirements and associated processes are not well-aligned, this may in turn increase administrative burdens. Arguably not increasing the bureaucratic burden significantly, it might also be helpful if Member States report information on national-level data availability (including the lack thereof) and on the barriers for better data collection through the reporting. Potentially, **scientific advisory bodies for climate change**, both EU and national (to the extent they exist), can help with better integrating the social dimension in climate policy planning instruments. This proposition has to be treated with caution though because such an 'agenda-setting' role is dependent on many different factors, e.g., the bodies' influence may go down with a new government or the bodies might not even be involved in the drawing up of the plans investigated in this assessment. As for the overview of **investment needs**, the plans so far show little integration of the social dimension, providing an opportunity for integration in the future. As the **responsible bodies for implementation** are mostly clearly stated, this may help to identify best practices on how to avoid governance fragmentation when addressing the social dimension.

The **connections between planning processes**, as required by the respective regulations (see section 2.2), are not consistently made. However, the Spanish plans demonstrate integration and alignment of social dimension related content across the Spanish planning instruments to some degree, e.g., through dedicated sub-sections in the NECP. An integration opportunity would be that the templates of the plans could integrate the social dimension better, including through connections across plans. This has two advantages: first, addressing the social dimension more comprehensively and, second, facilitating cross-referencing and comparison between Member States.

5. Results

The document analysis in chapter 4 has demonstrated that the social dimension is increasingly integrated in EU climate policy, and that the EU requirements pertaining to the social dimension

⁴⁸ 'mostly clearly stated' refers to either (i) two out of the three plans describe the monitoring indicators and responsible stakeholders for implementation or (ii) at least two plans clearly set out either the indicators or responsible stakeholders for implementation.

have been partially implemented at the national level. It also identified some opportunities for further integration. To verify and contextualise these interim results, this section combines the mapping exercise with the expert interview results⁴⁹.

Several theses to check during the interviews were derived from the 'summary and interpretation' chapters (4.1.6. and 4.2.4.).

1. Theses on 'the understanding of the social dimension': Plans often lack (common) definitions of key terms, complicating or hindering consistency checks across a country's plans difficult.

Plans rarely cross-reference key terms that were defined in other plans, thereby missing out on the opportunity to establish a more comprehensive understanding of the social dimension.

An integration opportunity would be to streamline a common understanding of what the social dimension of climate related planning entails and which common definitions are applied in all EU planning documents.

The connections between planning processes, as required by the EU regulations (see section 2.2), are not actualised. An integration opportunity is that plans' templates integrate the social dimension better, like through making stronger connections across plans.

2. Theses on 'public consultations': An integration opportunity is to include different aspects of the social dimension in public participation forums and better pool information derived from previous public consultations on social dimension themes.

Because many Member States also conduct public consultations for national plans or strategies, integration opportunities between national and EU planning tools can create synergetic effects.

The national plans hardly fulfil the legal requirements to include summaries of the public consultations that detail how outputs were incorporated in plans or in their implementation, making it difficult to assess their impact on policy making.

3. Theses on 'quantitative data availability': Quantitative data availability is a key challenge to tackle if climate policy is supposed to be socially just.

The quantitative data availability pertaining to the social dimension of climate policy is limited in the plans investigated in this report.

⁴⁹ Interviewees are referenced by their country code and number, e.g., Finnish interview 1 = FIN 1

4. Theses on 'responsible bodies for implementation': As the bodies for implementation are mostly clearly stated, this information provides a good basis to further avoid governance fragmentation when addressing the social dimension.

5. Theses on 'Exchange of good practices': With respect to an exchange of good practices, the plans show little to no alignment, even though time to address climate change is running out. Only the SCPs require an exchange of good practices in preparation of the plan, while the NECP template refers to regional cooperation in the preparation process of the plan. This can be an opportunity to swiftly and continuously share acquired and new knowledge related to the social dimension of climate policy.

6. Theses on 'Scientific advisory boards': Scientific advisory bodies for climate change, both EU and national (in case they exist), can play an enabling role with better integrating the social dimension in climate policy planning instruments⁵⁰.

Understanding and integration of the social dimension

Streamlining the social dimension at in EU climate policy was identified as one possible integration opportunity in the previous sections. While not only addressing EU policy, but also national policy, all interviewees acknowledged that it would be helpful if the social dimension would be better integrated in climate policy in the future. For example, one interviewee criticised that the social security system does not address "*particular issues that emerge from climate policies*" and pointed out that there is no systematic way of evaluating the social dimension in Finnish policy thus far (FIN 2). Interviewees emphasised the importance of better integrating the social dimension to avoid the spreading of misinformation and public backlash against climate policies (FIN 1, SLOV 2). They also said it would be helpful to establish a common understanding but emphasised the importance to maintain some manoeuvring space at national level when applying it (FIN 2, NL 1).

Moreover, the interviewees mentioned several ideas on how to better integrate the social dimension. For example, one person suggested that there should be "*some kind of formal requirement that you really need to make this kind of assessment*" (FIN 2) and more resources made available for researchers or consultants to conduct the assessment, as government officials have limited time. They also recommend having a practical guidance for government individuals. Another interviewee stressed that more efficient usage of funds through a data-driven approach should become a stronger objective (SLOV 2). Related to that, one interviewee highlighted that a too narrow definition of the Just Transition in the TJTPs (only related to peat) made it difficult to use up all the funding (FIN 2) - if the understanding would have been more fledged-out more projects could have accessed the fund. Two interviewees brought up the idea of integrating a

⁵⁰ This thesis was derived from the mapping exercise alone. There are no references to scientific advisory boards in EU legislation.

common understanding of the social dimension at EU level. Interviewees have also emphasised that they value the guiding function of EU planning (FIN 1, SLOV 1).

According to the interviewees, not all Finnish national policies targeting the social dimension are mentioned in the EU plans. One interviewee suggested this might be because most national governments look at EU legislation in terms of: *“EU goals for climate change mitigation are very important for our [policy] planning [instruments] because that's the ultimate baseline for [...] what we really need to do”* (FIN 1). Similarly, another interviewee stated: *“without the EU, we would never do any kind of transition. (...) The (NECP) is kind of a prime example. Because up until this document, we didn't have any coherent document on energy and climate policy in Slovakia”* (SLOV 2). The SCPs require Member States to define what constitutes a ‘vulnerable household’ in their national context. The interview answers provide some preliminary insights into how these groups may be understood and defined differently in the various national contexts. The understanding of vulnerable groups diverges slightly from country to country. For example, Finnish interviewees highlighted very poor people, who cannot afford food or transportation, young people, elder people and people with disabilities and also the indigenous people, and immigrants. While appreciating the inclusion of the Sami people in policy planning and participation procedures, one interviewee criticised that other vulnerable groups were not considered. One Slovakian interviewee highlighted the Roma community as a vulnerable group that is difficult to reach with existing administrative means.

Even though present across plans, the issue of reskilling was not brought up a lot by interviewees. One Dutch interviewee stressed the need for skilled labour to bring about the transition (NL 2).

Public participation

On the topic of public consultations, and more generally public participation in the context of climate policy⁵¹, four out of the seven interviewees shared remarks and all stressed that the processes could be significantly improved. One interviewee viewed the existing Finnish public consultations favourably and commended efforts such as workshops and a citizen poll that gathered 18,000 replies. However, they pointed out that public consultation processes can be improved by better sharing the achievements afterwards. They further proposed that a database, which gathers public consultation outcomes, could be a helpful tool to increase transparency of public participation processes (FIN 1). Viewing the public consultation processes in a more negative light, one Slovak interviewee criticised the participation processes currently in place for their inaccessibility, and not seeking out particularly vulnerable groups so they can take part. They state: *“[the government] just write it [in]to the strategy that there are some consultation, but the ministry just has some announcement on their webpage for two or three weeks. And you can send the comments. [...] So you really have to be [an] insider”* (SLOV 2). One Dutch interviewee criticised that not everyone is able to participate in public consultations. The interviewee stated

⁵¹ Interviewees did not always clearly distinguish between those consultation processes related to EU policy planning instruments, and national ones.

that they worked a lot with people in poverty and that different incentives must be in place to ensure these people are also part of the process. The interviewee highlighted the participatory process of the municipality of Utrecht as a good practice example, which relied on a lottery to set up a citizen forum (NL 1). Another interviewee demanded that more attention should be paid to public participation, particularly around distributional that might emerge from climate policies in the future. Also, they suggested that there might be a need for procedures to better understand who needs to be recognised as 'vulnerable' in this context, e.g., immigrant issues in Finland are not properly addressed (FIN 2). One interviewee highlighted good practice examples public participation, like the Metropolitan Institute in Bratislava. The institute was established by the city's mayor and they "*knocked on the door and spoke to everyone who might be affected by this change*" (SLOV 2). The interviewee stressed that this approach reaches all people, regardless whether they have internet access or not, and suggests that this should be a practice to follow at different governance levels. However, as a downside, they mention that this approach is rather resource-intensive.

Quantitative data requirements

The mapping demonstrates that data capabilities regarding the social dimension need to be significantly expanded to enable effective policy designs and implementation. Most indicators and social impact analyses included in the planning instruments are high-level and do not enable a more targeted analysis of social dimension impacts. This might hinder effective monitoring. Notably, this was echoed by interviewees who brought up a lack of data availability as a central issue. For instance, one interviewee highlighted this issue in detail, pointing out that it is currently impossible to identify vulnerable groups and create better-targeted policies ("*we simply can't match the database of households who consume energy and their incomes*", SLOV 1). Yet, in preparation of the SCP, they acknowledged that ministries have recently worked on better identifying vulnerable households. Another interviewee pointed out that not even the municipalities are aware of a household's energy carrier for heating. To implement the Slovak RRP scheme to renovate houses, officials had to "*go there and collect data by [...] hand*" (SLOV 2), which was cost- and time-consuming. In the Dutch context, more data is available, e.g., on energy poor households, but due to the privacy legislation this information cannot be shared between ministries. Instead of targeting energy poor households, the government opts for targeting disadvantaged areas, which is significantly less efficient.

As mentioned in the previous paragraph, one interviewee also suggested it would be helpful to have a database for public consultation outcomes to increase transparency (FIN 1).

Pooling all these different data sources, an opportunity for integration could be to expand the 'social scoreboard' under the European Pillar of Social Rights so it also includes data on the social dimension related to climate policy. Feedback from interviewees suggests this could be a good idea, especially because climate change reporting at the national level does not consider the social dimension (FIN 1) but might be difficult to implement due to diverging competencies (ESP 1).

Responsible bodies for implementation

The mapping results show that the responsible bodies are not always clearly set out in the national plans, making it difficult to identify alignment opportunities. Several interviewees said that fragmentation in governance structures is a problem they face and that ministries approach the social dimension very differently. One Dutch interviewee pointed out that the Ministry of Social Affairs, which holds most competencies in social policy, does not work on climate policy (NL 2). The other Dutch interviewee emphasised diverging understandings of justice in different ministries (NL 1). One Slovak interviewee suggested that fragmentation hinders available funding from being allocated efficiently: *"I would say the money is there. But the fragmentation of all the programmes and all the funds is a problem in Slovakia, for example, it's a problem in energy efficiency and building insulation"* (SLOV 2). They also state: *"I see most room for cooperation [...] with the Ministry of Social Affairs and Employment. Because we are talking about notorious problems that are everywhere in Europe, like [...] lacking labour skill in green transition, working education and everything and but every ministry, do their own policies and they do not coordinate"* (SLOV 2).

Spain is a good practice example, as it not only clearly describes the responsible entities but has also set up the Just Transition Institute within the Ministry of Ecological Transition. This was echoed by the Spanish interviewee who described the institute as a *"hub"* that is involved in all processes involving the just transition away from coal: *"So we, in particular, coordinate a lot between meeting ministers and also within this ministry"* (ESP 1). Dutch and Slovak interviewees also described that cross-ministerial platforms were set up to better coordinate efforts targeting energy poverty. One Slovak interviewee also highlighted a good practice example in the Slovak context. They state that the implementation of the Slovak RRP used to be located under the prime minister, but is now a separate entity, that used to do and still does good work in coordinating the RRP policies with other policies (SLOV 2).

Exchange of good practices

While the interviewees stated that knowledge exchange, especially at the local level, is already taking place and very helpful (SLOV 2, NL 2), none of the existing EU plans explicitly include a mechanism for exchanging good practices. None of the interviewees mentioned EU-funded initiatives on the exchange of good practices regarding energy poverty, such as ComAct ('Community Tailored Actions for Energy Poverty Mitigation') or SocialWatt ('Connecting Obligated Parties to Adopt Innovative Schemes towards Energy Poverty Alleviation') (European Commission, n.d.-a). However, as the Commission is required to organise an exchange of good practices in preparation of the SCPs, this might be an opportunity for further integration.

Scientific advisory boards

Another opportunity for integration that emerged from the mapping exercise concerns the role of scientific advisory boards. If they paid more attention to the social dimension of climate policy, it

might be further enhanced in relevant legislative instruments. Apart from the Spanish interviewee, who saw no need for it in the Spanish context, other interviewees favoured the idea. In Finland, the Climate Change Panel initiated a report on how justice evaluations can be better included in climate policy (Kivimaa et al., 2023), which was then considered by the Ministry of Environment in their next plan (*"in this sense, the panels can also work to (...) bring out important issues", FIN 2*). One Dutch interviewee said that the Dutch Scientific Advisory Board is trying to better incorporate the social dimension but criticised that the members do not talk to the most affected and vulnerable groups. However, as stated in the previous section, the 'agenda-setting' role of scientific advisory boards must not be overstated.

6. Criteria for assessing transformative EU climate governance (4i-TRACTION)

In the context of achieving climate neutrality and negative emissions, governance mechanisms play a crucial role in fostering long-term thinking and transformative change in relevant sectors (Gheuens & Oberthur, 2021). While a mechanism may be effectively designed and implemented, it might lack the necessary ambition to be transformative. Several assessment questions operationalise each of the three categories for this assessment (Moore et al., 2023). The questions are as follows:

- **Overall effectiveness:** Do the applicable legal instruments (see section 4.1), by the provisions contained within them, have the ability to fulfil the desired governance function ('planning', see section 2.3) to enhance the integration of the social dimension in climate policy related planning instruments? Are the plans (as described in the laws) overall in line with climate neutrality? Do they consider a long-term perspective?
- **Policy resilience:** Do the legal instruments (see section 4.1) have review clauses that require regular evaluation? Is there a process for responding to changing economic, political, scientific conditions? How effective is this process? Do the legal instruments have sufficient buy-in from key stakeholders and policymakers to continue? Does the policymaking process to adapt the legal instruments require the agreement of a large number of 'veto players'?
- **Quality of implementation:** To what extent are the national planning instruments (see section 4.2) being implemented effectively at the national level? Are they adequately resourced to better integrate the social dimension in policy implementation?

6.1 Overall effectiveness

Do the applicable legal instruments, by the provisions contained within them, have the ability to fulfil the desired governance function ('planning') to enhance the integration of the social dimension in climate policy related planning instruments?

An answer to this question needs to consider the respective plans both individually and together. In sum, the analysis of the four laws in question shows that they provide a starting point for the desired governance function to be fulfilled, but do not presently fully deliver it.

The comparative analysis has investigated to what extent the social dimension of climate policy is already **considered in the policy planning context**, and **if existing provisions are similar across the four regulations**. Generally, the policy planning landscape is increasingly taking up matters of the social dimension in climate policy. While the Governance Regulation and the NECPs as overarching instruments only consider it on the margins, the uptake in other parallel plans, especially the TJTPs and SCPs has shone a spotlight on the social dimension of climate policy. The comparative analysis has revealed various existing connections and similarities concerning the social dimension, as well as between relevant planning requirements. Also, several integration opportunities were established through the analysis, such as providing a loose common definition of what the social dimension of climate related planning entails to prompt Member States to approach the social dimension of climate policy planning in a more joint-up manner. This suggests that the applicable legal instruments, in principle, have the ability to fulfil the desired governance function, particularly if integration opportunities to enhance the social dimension of climate policy planning are to be seized. This can also encompass a better integration of the social dimension in climate policy *across* planning instruments of a Member State.

However, the analysis has also brought to light the limited degree to which both processes and content are presently integrated. Importantly, this finding does not present a qualitative assessment and merely describes the status quo. A deeper alignment of processes and content does not automatically lead to more effective planning but is strongly context-dependent. For instance, a potentially effective contribution could be for Member States to describe in their NECPs, as a more overarching planning tool, the challenges related to distributional impacts of climate policy, which are at the core of the SCP preparation process. Nonetheless, further analysis is needed to identify where more alignment between different processes and content requirements pertaining to the social dimension will lead to more effective policy making. From a transformative governance perspective, it will be crucial to make assumptions of key objectives with a social bearing more explicit to refine policy design and implementation.

Are the overall goals in line with achieving climate neutrality?

Even though the legal instruments are largely not directly mitigation policies, they are all formulated in the context of and with reference to the EU's net zero goals to various degrees of specificity.

For the Governance Regulation, climate neutrality is right at the centre (see Article 1.1), mentioning climate neutrality by 2050 as the regulation's core objective. This is also reflected in the specifications included for the NECPs (Art. 3 and 8). Similar to the Governance Regulation, the JTF Regulation, the RRF Regulation and the SCF Regulation feature the climate neutrality objective prominently. The JTF Regulation is created to address the "single specific objective of enabling regions and people to address the social, employment, economic and environmental impacts of the transition towards the Union's 2030 targets for energy and climate and a climate-neutral economy of the Union by 2050" (Art. 2). The RRF Regulation establishes the general objective to promote the Union's economic, social and territorial cohesion by, inter alia, "complying" with the climate neutrality objective (Art. 4). The SCF Regulation states: "[t]he general objective of the Fund shall be to contribute to a socially fair transition towards climate neutrality" (Art. 3).

Therefore, the four legal instruments have to be aligned with the same long-term goal, which is an important enabler for effective transformative climate governance.

Do the legal instruments (and the plans) consider a long-term perspective?

The four legal instruments do not establish any medium- or long-term time horizons with dedicated pathways regarding the social dimension of climate policy beyond the loose assertion of the need for a just transition. This makes it difficult to assess its power to generate transformative change. The soon-to-come SCPs may offer a starting point, as they are specifically focused on the social dimension. However, their scope would have to be expanded for them to become transformative, as 'transformative' is understood in 4i-TRACTION (see section 2.3).

Summary

Climate policy related planning tools in the EU are **not presently fully set up to deliver a proper integration of the social dimension into national policymaking**. However, the **current landscape is sufficient to deliver on better integration**, as its set of instruments includes overarching, territorial and distributional plans. These offer both initial concrete steps and opportunities for enhanced integration of the social dimension within and across the various relevant legal instruments of EU climate policy. The challenge is to better connect the existing frameworks, rather than introduce completely new processes.

6.2 Policy resilience

Do the legal instruments and the plans contained within them have a review obligation that requires regular evaluation?

All four **legal instruments** include a review clause, and the Commission must submit a review report to the Council and the European Parliament at specified times. In 2024, the Commission must review the implementation of the Governance Regulation (and every five years after that). Along with its review reports, it can make legislative proposals on how to improve it (Art. 45, Governance Regulation). For the JTF, the Commission must review its implementation by 30 June 2025, based on which the Commission has to submit a report to the Council and the European Parliament which may include legislative proposals (Art. 14, JTF Regulation). Regarding the implementation of the RRF, the Commission had to write a review report to the Council and the European Parliament by 31 July 2022⁵² (Article 16, RRF Regulation). The SCF Regulation requires the Commission to provide an evaluation report on the implementation and functioning of the Fund. The report is due two years after the start of the implementation of the SCPs. Where appropriate, the Commission can submit any proposals for amendments to the SCF regulation (Art. 27, SCF Reg).

As for the **national plans**, the Commission collects regular updates on their status of implementation. Member States can update their NECPs once during the ten-year period covered in the respective plan. In principle, updating the NECPs is not mandatory. However, with the introduction of the Fit for 55 package, the groundwork of EU climate policy was altered significantly and thereby required NECP updates by all Member States mid-way through the covered period. For the plan covering the years 2021 to 2030, Member States must update their plans by 30 June 2024 (Art. 14). The TJTPs must be revised where an update of the respective country's NECP necessitates it (Art. 11). As for the RRFs, Member States may revise and update their RRF (Art. 18 and 19). They must be consistent with the NECPs and their updates (Art. 17). The SCPs may be revised by the Member States if needed, while ensuring consistency between its SCP and the updated NECP (Art. 16 and Art. 2.2, SCF Regulation).

Obligations or opportunities for reviews and revisions increase policy resilience, also with respect to the social dimension of climate policy. However, a detailed evaluation of how they impact the social dimension of climate policy cannot be carried out due to the more high-level character of the question.

Is there a process for responding to changing economic, political, scientific conditions? How effective is this process?

⁵² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52022DC0383>

Review obligations (see previous section) not only enhance the predictability and overall stability of climate policies, but they also enable policymakers to adapt legal provisions to changing circumstances. Next to regular review requirements, the EU can also use different means to adapt to changing circumstances. For example, due to changing political, economic, and scientific conditions, the EU has previously demonstrated flexibility in revising climate policy instruments outside of regular review cycles. With respect to the social dimension, it has done so by introducing the SCF as a new tool under the Fit For 55 package. At Member State level, the EU legal requirements leave some room for Member States to choose how they address the social dimension of climate policy in policy planning. Nonetheless, the SCPs – as do the other plans - attach significant governance conditionalities to the SCF. In principle, the SCF Regulation could be a much more flexible instrument, but the regulation is very specific when it comes to policy planning. Naturally, these planning obligations are also required to ensure effective spending of the fund's resources. Furthermore, the legal instruments do not require Member States to map out a set of interchangeable or combinable policy responses to key socioeconomic challenges related to climate policy. As challenges at the nexus of climate and social policy are highly complex and prone to constantly changing economic and political conditions, expanding the toolbox, and considering different policy responses for different scenarios in their national plans may assist policy makers in creating policy that is more easily adaptable to evolving conditions. Lastly, the EU misses out on the opportunities of knowledge exchanges and citizen participation processes across all four plans, both between Member States and diverse stakeholder groups, and across multiple levels of governance. These processes may provide helpful insights into changing economic and political conditions.

Do the legal instruments (and their respective plans) have sufficient buy-in from key stakeholders and policymakers to continue?

The legal instruments have buy-in from key stakeholders to some extent. First, by design, the four regulations presuppose buy-in from policymakers across the EU through the democratic process, i.e., regulations were adopted through EU legislative procedures which require majorities. Second, there is pressure on the EU to uphold and strengthen transparent and results-oriented governance arrangements, as all three funds are redistributive tools and net paying Member States are important stakeholders in the overall process. Third, if done well, the stakeholder consultations – required for all plans - may generate buy-in and support from various stakeholders. However, the analysis in chapter 4 found significant shortcomings for the implementation of public consultation processes in the four focus countries. Thus, it is questionable if the legal instruments have sufficient buy-in from key stakeholders outside of the regular democratic process, e.g., from social stakeholders or the general public, and whether the legal instruments create sufficient incentives for willingness to participate in and actively support policies.

Does the policymaking process to adapt the legal instruments require the agreement of a large number of ‘veto players’?

As all four regulations are revised in accordance with the ordinary legislative procedure at EU level, agreement on changes to the legal basis require qualified majority voting (QMV) in the European Council and simple majority in the European Parliament. It is impossible that an individual country or single parliamentary grouping can form a veto block.

From the Parliament vote on the SCF Regulation, which was adopted with 521 votes to 75 and 43 abstentions (European Parliament, 2023), it can be assumed that there is a general recognition among Parliamentarians of the social dimension in climate policy and the urgent need to address it. As the SCF Regulation requires the SCPs to be consistent with the other three plans, for example with regards to the definition of energy poverty, it can further be suggested that integration between planning tools around the social dimension is generally favourably viewed. However, as the social dimension of climate policy is a highly contested topic both at EU and national level, it is difficult to assess possible veto positioning around the issue. Also, the general support for addressing the social dimension of climate policy (at EU level) might waver with the changing Parliament composition after the 2024 European Parliament elections. Arguably, the need for initiatives like the SCF will increase going forward, with public protests against transition impacts happening in some Member States, e.g., protests by farmers in Germany and France in January 2024 (Henley, 2024). However, the topic of EU funds might also become more contentious with expected wins for right-wing parties in the European Parliament elections in June 2024 (Cunningham et al., 2024), as these parties tend to oppose EU funds that are redistributive between Member States. A well-designed policy planning landscape will continue to be necessary to ensure effective usage of funding resources and communicate the funds’ benefits to both policy makers and the public.

Summary

In conclusion, **policy resilience exists to a significant degree for the four regulations and their respective plans** as a whole. However, with respect to the enhancement of the **social dimension** within and between planning instruments, a **definitive assessment is not possible**.

Additionally, other factors might reduce overall policy resilience. Apart from the NECPs, it is yet unclear whether the planning instruments will continue beyond their original period of operation. Especially the RRF was set up as a one-off instrument and its continuation beyond its official end date is unlikely. Nonetheless, the newer instruments (like the SCPs) arguably build on the contents of previous planning instruments. Consequently, well-designed connections between planning tools can strengthen policy resilience.

6.3 Quality of implementation

To operationalise this criterion, the first paragraph explores the effectiveness of Member States in better anchoring the social dimension in policymaking across the EU's numerous planning instruments with climate relevance, based on the country analysis. The following paragraph evaluates whether the instruments are sufficiently resourced.

To what extent are the social dimension related provisions in the relevant planning instruments – and their respective integration with one another – being implemented effectively?

The analysis of the plans in the case study countries has provided insights on the real-world implementation of the legal requirements analysed in section 4.1. All respective plans analysed under this assessment address aspects of the social dimension, but the planning instruments in all countries – apart from Spain, which provided a good practice example under this aspect – could be significantly improved to better fulfil requirements set out at EU level. Potentially, this would enable Member States to avoid missing out on the opportunity to provide a more comprehensive picture of the social dimension across different planning tools and facilitating cross-referencing and comparison between Member States.

The connections between planning processes, as required by the respective regulations (see section 2.2), are largely not established. The Spanish plans perform better in comparison to the other three countries, displaying connections between planning tools to some degree, e.g., through dedicated sub-sections in the NECP. The interviewees also highlight other good practice examples which demonstrate that EU planning processes can positively impact national policy processes.

As for the content requirements of the respective plans, including the reporting on consultation processes, little to no integration of the social dimension exists between plans. This significantly reduces transparency of the policy formulation process, as it is difficult to identify which social and citizen stakeholders were consulted and to what extent their viewpoints informed policy making. Positively, the responsible bodies for implementation are mostly clearly stated. This may help to avoid governance fragmentation.

Are the national policy planning instruments adequately resourced to better integrate the social dimension in policy implementation?

Three of the four plans are directly tied to financial resources (TJTPs, RRP, SCPs). This means that there are resources for their implementation, making it more likely that the objectives set out in the planning instruments will become reality. However, it remains unclear if the national policy planning instruments are *adequately* resourced to specifically better integrate the social dimension in policy implementation. There is no common EU understanding of what the social

dimension in relation to climate policy entails and how exactly this links with the EU's set of goals. This is why it is not possible to identify a clear benchmark or associated investment needs that could justify an assessment of the resources' adequateness. Member States' estimates of investment needs in the NECPs, as required by the Governance Regulation, also do not explicitly touch upon aspects related to the social dimension of climate policy. Nonetheless, the interviews provide further insights into the matter that may help to better evaluate such questions in the future. For instance, interviewees highlighted that some processes require significant financial resources and personnel to be effective, for example in data collection or public participation.

Summary

In conclusion, **all national plans analysed include aspects of the social dimension**, but the majority – apart from Spain's, which provided a good practice example in some cases – **can be significantly expanded and improved to fully deliver the requirements established at EU level**. Three out of four plans provide resources for implementation, as they are directly connected to funds. As for the question if these resources are adequate to better integrate the social dimension in policy implementation, a final conclusion cannot be drawn.

6.4 Overall assessment

Altogether, the assessment along the three criteria for transformative EU climate governance demonstrates that the (i) the overall effectiveness can be improved but the current planning landscape is a promising starting point for the desired governance function to be fulfilled, (ii) policy resilience exists to a significant degree for the four regulations altogether but a definitive assessment regarding the enhancement of the social dimension within and between planning instruments is not possible due to a lack of information; and (iii) the quality of implementation of the EU legal instruments at the national level in the form of national policy planning instruments can be improved by establishing stronger connections between planning processes, better integrating the content requirements across plans, and defining clear investment needs to be used as a benchmark to assess adequate financial resourcing of policies and measures. Across the three criteria, this means the assessment shows transformative governance potential but on this specific aspect of procedural climate governance in the EU, changes to both the laws and their implementation is needed for it to be fully fit for the journey to climate neutrality.

7. Conclusion

The results of this report demonstrate a growing integration of the social dimension in climate policy related national planning in the EU and show that the requirements set by the EU in this

specific regard have been partially implemented at the national level. Taken together, this presents a promising basis for further strengthening of this integration process and for better aligned policy planning processes and related policymaking. Fostering such sectoral and vertical integration is key to ensuring that the EU and its Member States are not working in silos and find effective and politically robust policies for the transition to climate neutrality. If done well, more integration in policy planning generally and on this issue can help reduce administrative burdens for Member States and resources – time, money, and personnel – may be used more efficiently.

Through the analysis, integration opportunities were identified for three areas.

First, the results indicate that none of the four legal instruments provide a comprehensive and common understanding of the social dimension, but all address it to varying degrees. Hence, an integration opportunity would be **streamlining a common understanding** of what the social dimension of climate related policy planning entails and which common definitions are applied in all EU planning documents - while still allowing for flexibility at the national level. Currently, the understanding of the social dimension is strongly focused on energy poverty. Extending the understanding of the social dimension beyond energy poverty would allow for a more granular approach to a variety of social policy issues connected to climate policy. For example, the reporting on social aspects in the NECPs could include more aspects of the social dimension.

Second, when identifying integration opportunities between planning instruments, **timing and content** are essential parameters. For the latter, content requirements in the existing templates for the respective plans could be better aligned to ensure more efficient use of data and a more comprehensive policy approach to the social dimension. Also, comparing the timing of plans is helpful to identify windows for integration opportunities. For example, it is a great opportunity that the SCP progress reports and NECPs are due for submission at the same time. However, the first time this happens will be in 2027 – after the introduction of the ETS2. This raises the question of how the preparatory processes of both plans can be aligned in the meantime to ensure that the potential for a common and integrated approach is realised. For instance, the EU can help to better align processes by promoting technical assistance or setting up a platform similar to the Just Transition Platform for those issues addressed under the SCF.

Third, the analysis highlights the importance of **evidence-based policy making** and the need for a significant expansion of data related to the social dimension to facilitate effective policy design and implementation. With respect to the social dimension, a comprehensive evidence base is still lacking, creating a need for increased data availability and evaluation processes. A straightforward way to expand the evidence base is to better integrate public consultations and exchanges of good practices. Also, to increase transparency of policy making, establishing a 'data-tracking platform' would be an important step forward, potentially building on existing tools of the European Pillar of Social Rights and the European Energy Poverty Advisory Hub.

The criteria for transformative EU climate governance results, as set out in section 2.3, were applied to the results. The assessment reveals that, first, **overall effectiveness** leaves room for improvement, but the four legal instruments show promise as an initial foundation for fulfilling

the desired governance function. Second, **policy resilience** is given to some extent for the four regulations collectively, yet a conclusive evaluation of the improvement in the social dimension within and between planning instruments is hindered by informational constraints. Third, the **quality of implementation** of EU legal instruments at the national level, through the respective national policy planning instruments, can be improved if Member States establish stronger connections between planning processes, better integrate the content requirements across plans, and define clear investment needs to be used as a benchmark to assess adequate financial resourcing of policies and measures.

Overall, the EU can make use of various means to better integrate the social dimension in climate policy planning instruments and assist Member States in striving for a fair and inclusive green transition.

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Annex – Additional information from assessment of Member States’ plans

Understanding of the social dimension

Spain

The social dimension in Spain is extensively addressed within the context of energy poverty and just transition, in a way that is largely consistent across plans. Just Transition as a concept is included in all three plans and all reference the definition which is provided in the national-level 2018 Just Transition Strategy (JTS). The definition is based on the Just Transition Guidelines provided by the International Labor Organization (ILO). Similarly, energy poverty is clearly defined in both the NECP and RRP and anchor it in the 2019 National Energy Poverty Strategy. Notably, the first chapter of the Spanish NECP stresses the importance of prioritising social justice in climate policy, citing the IPCC (p.41) and the Spanish RRP references the Just Transition Strategy and the Energy Poverty Strategy as “constitute[ing] the Government’s Energy and Climate Framework that will guide actions in th[e] area” of ecological transition (Spanish RRP, p.129).

Plan	Clarity of social dimension understanding
NECP	Social dimension is extensively addressed within the context of energy poverty and vulnerable consumers, transformation, just transition, reskilling and the European Pillar of Social Rights. It provides definitions for both energy poverty and vulnerable consumers. The plan also addresses energy poverty within the context of transformation (which is mostly understood as transformation of industry). Notably, the first chapter stresses the importance of prioritising social justice in climate policy, citing the IPCC. The attention paid to the social dimension is reflected throughout the document, with the topic of Just Transition mentioned under almost every section of '1.2.3. Current energy and climate policies and measures relating to the five dimensions of the Energy Union'. Reskilling is addressed within the context of training of professionals in the renewable energy sector (Measure 1.27). The plan mentions synergies with the European Pillar of Social Rights. The plan also includes a section titled 'Measures to accompany the transition from a social and territorial point of view are established and strengthened', summarising policies related to the social dimension.
TJTP	Social dimension is extensively addressed within the context of just transition, reskilling and transformation. Just transition is addressed throughout the plan, as the topic has received considerable attention at the national level before the JTF. The dedicated Just Transition Institute has co-developed the plan with the six Autonomous Communities concerned. Transformation appears in the

	context of projects related to new forms and vectors of renewable energy, such as green hydrogen. These projects are supported as long as they are necessary for the sustainable development of industrial ecosystems and align with the objectives of the Just Transition Plan. Reskilling is implicitly addressed, as one of the objectives of the TJTP is to boost 'Promoting social infrastructure, the social economy and training and qualification initiatives'.
RRP	Social dimension is extensively addressed within the context of Just Transition, energy poverty, and transformation. Just Transition plays a central role and is clearly set out, with the Just Transition Strategy featured prominently - thereby linking it to the recovery. The term energy poverty is specifically addressed within the context of the National Strategy against Energy Poverty, which is featured in the plan's investments. Transformation is equally addressed within the context of Green transformation and digital transformation and one of the main three purposes of the plan is to support a structural transformation process, naming a 'just and inclusive energy transition' as one of its main lever policies. Notably, the Spanish RRP was renamed to 'Plan de recuperación, transformación y resiliencia' so the title also includes the 'transformation' dimension.

Finland

The social dimension in Finland is addressed within the context of energy poverty and just transition, mainly in the NECP and TJTP. However, energy poverty is considered to be a rare problem in Finland. As the plans do not include any explicit definitions of key terms, it is not possible to conduct a consistency check across plans. Nonetheless, the Finnish NECP does recognise as a general principle "that emissions reductions should be implemented in a way that is socially and regionally fair and consults with many sectors of society" (Finnish NECP, p.138).

Plan	Clarity of social dimension understanding
NECP	Social dimension is addressed within the context of energy poverty and just transition. However, energy poverty is considered to be a rare problem in Finland, as it is expected to be mitigated through social security. The plan does not define Just Transition but recognises its importance. Transformation is not defined per se; it is used in relation to the decarbonisation of the energy system.
TJTP	Social dimension is addressed within the context of just transition. Next to the term "just transition" - which emphasizes the need for a fair and equitable transition, particularly focusing on employment and economic diversification - the term "vihreää siirtymää" (green transition) is mentioned in the context of economic diversification and renewal.

RRP	Social dimension is not addressed. For example, energy poverty is not mentioned and actions involving 'energy system transformation' do not include any targets or considerations related to the social dimension. The ministerial working group on sustainable growth in Finland has outlined the general objectives of the programme, which are mostly focused on economic targets. The only one somewhat related to social dimension is "Progress in equality"; yet this is not linked to climate policy.
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Slovakia

The social dimension in the Slovak plans is mainly addressed within the context of energy poverty and just transition. The NECP includes a proposed definition for energy poverty. 'Just Transition' is only elaborated on in the TJTP. 'Transformation' is used in various contexts across all three plans, including industrial transformation, digital transformation, economic transformation, green transformation, and regional transformation. However, the term transformation is usually not employed in conjunction with the social dimension. Vulnerable groups are not clearly defined across the plans; the term implicitly covers the energy poor and long-term unemployed in two plans. Because the plans do not provide definitions for the same terms, a consistency check cannot be done.

Plan	Clarity of social dimension understanding
NECP	Social dimension is addressed within the context of energy poverty. It includes a proposed definition for energy poverty , which is to be integrated with the proposed recast of the Energy Efficiency Directive. 'Transformation' is mentioned in various context, e.g., industrial transformation, transformation of the transport system, digital transformation, and innovative and smart economic transformation. 'Just Transition' is superficially addressed within the context of investments related to the Just Transition Fund.
TJTP	Social dimension is addressed within the context of transformation and just transition. The plan discusses the vision for the transformation of the region, focusing on the needs of the region and justifying the need for special intervention from the Just Transition Fund. 'Just transition' is understood as the 'transition to a climate neutral economy', which is then linked to employment effects and regional transformation. While 'vulnerable groups' are not explicitly defined, the plan mentions measures to improve social care for vulnerable groups.
RRP	Social dimension is addressed within the context of energy poverty and just transition. For energy poverty, the point is made that energy poor households should receive not only assistance in submitting applications for subsidies, but

	<p>also in co-financing. Transformation is often used in the context of 'digital transformation' and 'green transformation'. However, none of the main objectives of 'green transformation' are related to the social dimension. Mentions socially vulnerable groups four times; the term is implicitly understood to cover energy poor and long-term unemployed individuals. Additionally, the plan mentions co-benefits of decarbonisation, namely that it will create hundreds of jobs and investments in renewable energies and will also improve public health.</p>
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The Netherlands

The social dimension in the Dutch plans is mainly addressed within the context of energy poverty and just transition. The NECP is the only Dutch plan that includes a definition for one of energy poverty. 'Just transition' only plays a key role in the TJTP, which also includes a definition of the term. 'Transformation' is understood in various context, e.g., circular economy diversification, digital transformation, and transformation of the energy system – without explicitly linking it to the social dimension. Because the plans do not include definitions for the same terms, a consistency check cannot be done. Nonetheless, some key terms appear across plans.

Plan	Clarity of social dimension understanding
NECP	Social dimension is addressed within the context of energy poverty, and partly within the context of just transition. It includes a definition for energy poverty, incl. indicators. Employment effects and training opportunities are extensively covered, but hardly within the context of just transition.
TJTP	Social dimension is addressed within the context of just transition, transformation, and vulnerability. The importance of having a just strategy is emphasized, so that the transition takes place in a fair and an inclusive manner, where everyone can participate. 'Transformation' is mentioned in various contexts, e.g., jobs, circular economy diversification. 'Vulnerability' is mentioned in various contexts, e.g., between regions and regarding the labour market. It also states that it must be prevented that not especially vulnerable people and regions are burdened by the transition. The document implies attention to the distribution of impacts and benefits ('distributional effects') by focusing on a fair transition.
RRP	Social dimension is addressed within the context of energy poverty and the concept of vulnerability. Though not defined, energy poverty is mentioned twice and said to be decreased through measures under the green transition component. Also not defined, vulnerability is implicitly addressed because the document acknowledges the financial vulnerability of households.

'Transformation' is mostly used in context of digital transformation or transformation of the energy system, but there is no explicit link to the social dimension. The European pillar of social rights is mentioned, but not in the context of climate policy.

Consultation process

Finland

NECP: The draft revision of the Finnish National Energy and Climate Plan (NECP) underwent a comprehensive public review in conjunction with the development of the National Climate and Energy Strategy, the Medium-term Climate Change Policy Plan, and the Land Use Sector Climate Plan. The iterative process ensured inclusive stakeholder engagement through consultations and meetings that involved a diverse array of participants, including government bodies, organizations, representatives from the labour market, and private citizens. In spring 2024, the government intends to initiate a formal consultation on the updated NECP before submitting it to the Commission. The public survey, conducted from January 19 to February 19, 2021, garnered significant attention, eliciting 18,000 responses. Organized by the Ministry of the Environment, the University of Turku facilitated a Citizens' Panel in April 2021 to deliberate on climate initiatives. The Panel discussions focused on evaluating the equity and effectiveness of measures outlined in the Climate Policy Plan, culminating in a formal statement. Noteworthy special considerations were given to 'special groups,' including the Sámi and young persons. Participation, a central theme, was extensively addressed, primarily in the context of other national plans such as the National Climate and Energy Strategy. However, the transparency regarding the incorporation of public comments into the plan remains limited, providing only general insights, such as the acknowledgment of the importance of a just transition. The summary of consultations spans approximately one page, lacking specific details on the integration of public input into the development of the draft updated NECP.

TJTP: The Finnish Territorial Just Transition Plan was collaboratively prepared with regional associations, government agencies, municipalities, and various public and private legal entities. The outcomes of these collaborative efforts have informed the regional plan, although the specifics are not delineated. Notably, the participation of distinct social groups in these consultations remains unclear.

RRP: The preparation of the Finnish Recovery and Resilience Plan involved a coordinated effort led by the Ministry of Finance, with representation from each ministry in a dedicated coordination group. Stakeholder consultations, encompassing the business sector, labour market organizations, and other relevant entities, were conducted during the planning phase. These consultations included a regional tour of hearings, a growth forum, and targeted engagements in priority areas and cities. Written statements and proposals were actively solicited and received from both individuals and organizations. A minister-led regional tour sought input from local operators on

the optimal utilization of EU recovery funds. This initiative involved representatives from regional councils, cities, local government, labour market organizations, business and industry sectors, non-governmental organisations (NGOs), and educational institutions. From February to April 2021, the Ministerial Working Group on Sustainable Growth hosted three events, providing stakeholders with opportunities to contribute to the preparation of the Sustainable Growth Programme. The sessions gathered input on specific targets, preliminary content, and diverse stakeholder perspectives (p.341).

Netherlands

Overall, while participation is notably emphasized in the plans, there is a lack of specific information regarding the frequency of meetings or the precise process through which input from public participation and consultation is integrated into the processes.

NECP: In the year 2022, the establishment of the National Climate Platform marked a pivotal development aimed at fostering a symbiotic relationship between the practical experiences of citizens, businesses, social institutions, and the formulation of policies. This strategic initiative was devised to address the divide between grassroots experiences and the policymaking sphere. At the regional level, collaborative efforts between public authorities, grid operators, and various social stakeholders are underway to deliberate and make locally-informed decisions pertaining to the generation of renewable electricity, the heat transition in the built environment, and the associated storage and energy infrastructure. Additionally, the National Energy Consultation serves as another pivotal forum for active public participation.

TJTP: Robust public participation mechanisms were integral throughout the stages of preparation, implementation, and monitoring of the Dutch Territorial Just Transition Plan. Notably, a significant emphasis was placed on regional involvement, encompassing diverse stakeholder meetings, inclusive of social stakeholders, and a comprehensive written consultation round.

RRP: In the context of the Dutch Recovery and Resilience Plan, specific attention is directed towards the components related to the 'Green transition' and the 'Sustainable built environment.' However, it is noteworthy that no explicit mention of public participation is made in connection with these vital components. The absence of information on public engagement in these domains raises questions about the inclusivity and transparency of the planning process for these specific elements within the broader national recovery framework.

Slovakia

Overall, while the participation mechanisms in the Slovak Plans are clearly articulated, there is a notable absence of information regarding specific outcomes and the methods employed for their integration into the planning frameworks.

NECP: The formulation of the Slovak National Energy and Climate Plan underscores a commitment to inclusive decision-making by engaging in deliberations with pertinent government departments, organizations, and the broader public. This engagement is structured within a

standardized protocol for materials submitted for government review, incorporating an essential provision for inter-ministerial input. Subsequently, an inter-ministerial consultation procedure is employed, ensuring a comprehensive and well-informed review process.

TJTP: The Slovak TJTP meticulously delineates a robust consultation process designed to solicit input from diverse stakeholders across different levels. Within the Councils of proposed legal regions, thematic working commissions have been established, providing an inclusive platform for participation from all interested parties. This approach aims to foster open and collaborative discussions, recognizing the significance of incorporating a broad spectrum of perspectives. Additionally, the plan highlights the utilization of an online survey to glean insights into the challenges faced by the younger generation amid the ongoing transformation process.

RRP: In contrast, the Slovak Recovery and Resilience Plan appears to be silent on matters related to the social dimension, thereby omitting explicit mention of consultation processes and public participation. This absence raises questions regarding the extent to which social considerations have been factored into the plan's development, prompting further inquiry into the inclusivity and transparency of the planning framework, particularly concerning the social aspects of the recovery and resilience initiatives.

Spain

Overall, the established participation mechanisms within these Spanish plans are clearly delineated. However, a nuanced examination reveals an opportunity for further enhancement in providing detailed insights into the outcomes of the participatory processes and the specific mechanisms through which these outcomes were intricately incorporated into the planning frameworks.

NECP: The deliberations of the Assembly, which played a crucial role in shaping the Spanish National Energy and Climate Plan (NECP), have been meticulously documented in a comprehensive report. This report, formally approved by the Council of Ministers on July 11, 2022, underwent subsequent submission to the Congress of Deputies. As a testament to the commitment of the Spanish Government, a thorough assessment of the recommendations arising from these discussions was pledged, with an explicit commitment to integrate these recommendations into executive actions. This commitment has materialized in the incorporation of these recommendations into the updated NECP. Social stakeholders, encompassing public administrations, companies, business organizations, unions, and various other social and economic agents, actively participated in the deliberations.

TJTP: While the Spanish Territorial Just Transition Plan (TJTP) acknowledges the participation process, it refrains from providing intricate details regarding specific outcomes. It indicates, however, that at the conclusion of the participation process, a synthesis document is prepared and disseminated to the participating agents. Additionally, the plan outlines a series of seminars designed to facilitate further engagement with participants from each geographical area.

RRP: A distinctive feature of the Spanish Recovery and Resilience Plan lies in its explicit emphasis on fostering participatory governance dynamics. This focus is aimed at shaping territorial action and initiatives for a fair transition. The engagement framework involves a wide array of participants, including public entities, social partners, stakeholder organizations, and citizens.

Data requirements (in templates)

For the NECPs, it checks the implementation of the social impact analysis under section 5.2 of the NECP template. The TJTP template includes two sections that require Member States to include collect and/or evaluate data in the context of their TJTPs: Monitoring and evaluation indicators to measure the ability of the plan to achieve its objectives (Section 3.2) and programme-specific output or result indicators (Section 4). The guidance for the RRP includes a section on the overall impact, in which Member States are requested to report on the macroeconomic, social and institutional impact of the plan (Part 4.1). Also, Member States are free to provide any other necessary evidence or other annexes (Annex 1: 'Further impact analysis'). However, the RRP Guidance does not request Member States to include specific indicators.

Finland

The 5.2 section of the Finnish NECP does not provide an assessment pertaining to the social dimension. The monitoring and evaluation indicators under section 3.2. are partly related to social dimension: 'Participants who will receive a professional qualification upon leaving action' and 'Jobs created in supported units'. However, the four TJTP output indicators, e.g., area of land released from peat production and restored in hectares, are not. The Finnish RRP does not mention any indicators related to the social dimension.

Netherlands

The social impact analysis in the Dutch NECP states that "(f)or households, the purchasing power effects of a higher CO₂ price are not necessarily equally distributed" (p.156). Also, it includes a labour market analysis with the results showing that the tight labour market makes it difficult to upscale retrofitting the built environment rapidly. The NECP and RRP do not include data requirements considered relevant to the social dimension. In the Dutch TJTP, no monitoring and evaluation indicators are included. The output and result indicators are intended to measure the impact and success of the supported actions or projects. Some indicators are connected to the reskilling aspect of the social dimension, such as SMEs investing in skills for smart specialization, industrial transition, and entrepreneurship. The Dutch RRP does not mention any indicators related to the social dimension.

Slovakia

The social impact analysis in the Slovak NECP includes a labour market analysis, also in relation to decarbonisation policies. Additionally, it estimates effects on household costs and consumption with respect to renovations and hybrid vehicles. However, the analysis does not distinguish between different income groups. In the Slovak TJTP, no monitoring and evaluation indicators

are included. However, section 4 mentions six indicators related to the social dimension, e.g., 'Created jobs in supported entities annual' (RCR 01) and 'Employees of SMEs who have quit further professional education and training aimed at developing skills for intelligent specialization, industrial transformation and entrepreneurship' (RCR 98). The RRP does not include any related to the social dimension. The 'social impacts' part of the Slovak RRP mentions the indicators linked to the European Pillar of Social Rights but does not include any additional indicators.

Spain

The Spanish NECP does not include a Section 5.2. but it has a section on the socio-economic impacts and health, which will be considered instead. It assesses the impact on employment, e.g., in relation to investment in renewables. The impact analysis model DENIO incorporates the microdata from households representing the Spanish population, which makes it possible to assess microeconomic effects and distributional impacts and their social impact. For example, the social impact analysis demonstrates that disposable income would increase in all quintiles but to a greater extent in lower-income quintiles and that premature deaths due to air pollution could be halved by 2030, compared to 2019 values. Section 3.2 of the Spanish TJTP mentions the ambition to set up a performance framework to monitor the TJTP, which is supposed to include the following indicators: Unemployment rate in just transition zones, Population variation in just transition zones, Aging index in just transition zones, Number of companies located in just transition provinces, and Emissions in just transition provinces. However, none of the output indicators in part 4 are related to social dimension. The Spanish RRP does not mention specific indicators, but it says that the executing bodies will periodically report on the progress recorded in indicators at the project level (p. 203).

Overview of investments

The investment in the Finnish NECP are mostly not related to the social dimension, e.g., investments in energy infrastructure and public recharging points for electric vehicles. However, it also channels investments into a sustainable mobility system, which may benefit low-income and disadvantaged groups disproportionately.

The Finnish RRP channels 170 million EUR for reskilling projects, however not in the context of the Just Transition.

The investment needs mentioned in the Dutch NECP are not related to the social dimension. lay out the estimated additional costs per additional Mton of CO₂ reduction by sector, e.g., built environment. As this does not break the investments down by policy, it is impossible to assess the social impact.

The investment needs mentioned in the Slovakian NECP are not related to the social dimension. It merely shows the necessary investments in the industrial sector by industry sector (in EUR million over a period of 5 years) and investments by industrial sector and sub-sector, e.g.,

renovation of buildings by households, for different scenarios (in EUR million and thousands of vehicles). Social measures, such as renovation aid for low-income households, are not mentioned.

The investment needs mentioned in the Slovakian NECP are not explicitly related to the social dimension. They are only described by five broad categories: (I) energy saving and efficiency; (II) electrification of the economy; (III) grids (iv) renewable energy (including green hydrogen) and (v) other measures.

Finland

The NECP incorporates indicators; however, these do not pertain to the social dimension, indicating a potential oversight in monitoring social aspects. In contrast, the TJTP stands out with a clearly defined monitoring framework, signaling a robust commitment to tracking territorial transition initiatives. Within the Finnish RRP, a governmental monitoring group is established to oversee the effectiveness of implemented measures. Despite this commitment, the lack of clarity on the specific indicators at this stage raises questions about the precision and comprehensiveness of the monitoring process within the RRP.

Netherlands

In Dutch national plans, the NECP focuses its monitoring efforts exclusively on energy poverty. Conversely, the TJTP establishes a robust monitoring mechanism for the JTF program. This mechanism involves multiple structures and committees, notably featuring an expert committee comprising independent experts. However, in the Dutch RRP, there is an absence of relevant monitoring concerning the social dimension of climate policy.

Slovakia

In the monitoring mechanisms of Slovak national plans, the NECP initiated the establishment of a cross-ministerial working group, specifically tasked with monitoring energy poverty. However, the development details of this mechanism remain unspecified, indicating a potential gap in transparency. The NECP does mention mechanisms for monitoring and evaluation, albeit without providing extensive details on the methodology employed. In contrast, the TJTP outlines a structured approach, with a dedicated commission for the JTF embedded within the monitoring committee of the program. This commission is responsible for evaluating progress and ensuring the achievement of plan objectives. The JTF's implementation is integrated into the standard management system of the European Structural and Investment Funds (EŠIF), encompassing various bodies such as the managing authority (MIRRI SR), intermediary bodies, an audit body, a payment body, and a monitoring committee. However, the monitoring mechanism within the Slovak RRP remains unclear.

Spain

NECP: IDAE, a publicly-owned entity linked to the Spanish Ministry for the Ecological Transition and the Demographic Challenge (MITECO) under the State Secretariat for Energy, has been

designated as the entity tasked with overseeing and revising the metrics used to gauge energy poverty in Spain. Each measure has included which body is responsible for monitoring. However, for the social dimension the plan does not provide any details on how the monitoring will actually take place (check).

TJTP: Coordination Mechanisms and coordination and monitoring bodies are clearly set out.

RRP: Independent Validation: The estimates for each component of the plan are primarily the responsibility of the component leads. However, general guidelines are provided by the Plan Coordination Authority, and the Estimates are validated by the Intervención General de la Administración del Estado (IGAE), an independent institution with experience in the economic and financial sector of the public administration (p.46). Also, an overall monitoring Unit: A Monitoring Unit for the Recovery Plan will be established within the Department of Economic Affairs and G20 of the Cabinet of the Presidency of the Government.

Planned and existing measures (additional information, not included in assessment of this report)

Finland

In the Finnish NECP, it becomes apparent that the primary objectives and existing measures outlined in the plan do not directly pertain to the social dimension. In contrast, the TJTP demonstrates a commitment to addressing the social dimension by incorporating targets related to employment and diversification. In the RRP, the social dimension gains prominence as social welfare, security, and services emerge as pivotal focal points. The RRP allocates funding to enhance 'social resilience,' with potential positive social impacts within the framework of the Just Transition. Substantial funding is directed towards Upskilling/Reskilling initiatives; however, it is imperative to acknowledge that these initiatives, although contributing to social development, are primarily focused on digital skills and lack a direct connection to climate policy objectives.

Netherlands

Examining the milestones and targets within the Dutch NECP, it is evident that the country does not have a specific policy addressing energy poverty. However, acknowledging the significance of this issue, a cross-ministerial effort materialized in the form of the National Energy Poverty Research Programme initiated in 2022. The NECP further emphasizes government-led initiatives aimed at overcoming obstacles hindering the alignment of skilled labor and training with existing demand, showcasing a commitment to addressing critical challenges in the social dimension. Conversely, the Dutch Territorial Just Transition Plan (TJTP) does not explicitly outline milestones or targets related to the social dimension. Similarly, the Recovery and Resilience Plan (RRP) lacks specific mention of targets in the social dimension, indicating a potential gap in addressing social aspects within the outlined milestones and objectives of the plan.

Slovakia

An examination of Slovakia's national plans reveals a distinct absence of explicit targets related to the social dimension. In the NECP, while specific objectives such as the renovation of 30,000 homes are identified, there is a notable lack of specificity regarding whose homes are encompassed by this target, leaving a gap in the clear articulation of social considerations. Similarly, the Slovak TJTP does not overtly outline milestones or targets explicitly tied to the social dimension, raising questions about the comprehensiveness of the plan in addressing social aspects amid transitions. This trend persists in the RRP, where no specific targets are articulated concerning the social dimension. The absence of explicit targets in these plans highlights a potential gap in addressing social considerations within the broader context of Slovakia's national initiatives, warranting further exploration and elucidation for a comprehensive understanding of the plans' social implications.

Spain

The NECP explicitly incorporates targets related to the social dimension. Specifically addressing the issue of energy poverty, the NECP demonstrates a holistic approach by intertwining social considerations with environmental and energy-related goals. Shifting the focus to the TJTP, while explicit milestones are not overtly mentioned, the plan does articulate clear objectives. These objectives, such as enhancing the skills and employability of workers and job seekers in sectors with local employment potential, reveal a commitment to addressing socio-economic dimensions within the framework of territorial transitions.

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.

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