SUPPORT FOR THE IMPLEMENTATION OF THE SOCIAL CLIMATE FUND

Note on good practices of public consultation for the Social Climate Plans

[Written by Ramboll Management Consulting,
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1. Introduction

1.1. General context of the document

The Social Climate Fund Regulation[1] (Article 5(1)) stipulates that Member States are required to (1) conduct a public consultation with key stakeholders (e.g. local and regional authorities, representatives of economic and social partners[2], relevant civil society organisations, research and innovation institutions, youth organisations, social dialogue representatives) prior to submitting their Social Climate Plans in compliance with their national legal framework; (2) summarise the received input; and (3) explain, within the template set out in Annex V for submitting the Plan, how the outcomes of the public consultation have been integrated. As highlighted in the Regulation, the Member States, in consultation with these stakeholders, are "best placed to design, implement and, where relevant, amend Plans that are adapted and targeted to their local, regional and national circumstances, their existing policies in the relevant areas and planned use of other relevant Union funds" (Recital 18). For these reasons, it is important to engage stakeholders in a meaningful way, to ensure the effectiveness of both the Plans and the overall support provided to the target groups of the Fund - vulnerable households, vulnerable micro-enterprises and vulnerable transport users, as they are defined in the SCF Regulation.

1.2. Why public consultations are important

Public consultations require significant time and effort and, as such, could at times be viewed as a burdensome exercise. However, when planned well and done with intention, they can be feasible and can bring substantial benefits and added value. Namely, they:

- Provide an opportunity to gather a critical and relevant evidence base that cannot be collected through other means, thus contributing to a much better understanding of the topic and the needs in practice, which is particularly relevant when specific cultural and societal barriers apply;
- Lend legitimacy and transparency to the initiative;
- Serve as an effective way to manage stakeholder expectations and boost public acceptance;
- Help build and strengthen the relationship between stakeholders and foster ownership among them, thus making it more likely that they will collaborate successfully during the implementation stage and increasing their investment in the success of the initiative;
- Can encourage a better understanding of the policy-making process among stakeholders;
- Enable stakeholders to voice their opinions, openly discuss matters of concern, and take part in policy-making;

[1] Regulation (EU) 2023/955 of the European Parliament and of the Council of 10 May 2023 establishing a Social Climate Fund and amending Regulation (EU) 2021/1060

[2] As per C/2023/1389 Council Recommendation of 12 June 2023 on strengthening social dialogue in the European Union, consultations with social partners should follow specific rules, which vary according to national legislation.

- Encourage the exchange of ideas among various stakeholders and offer a chance to create a shared vision;
- Ensure inclusiveness and representation of diversity.

2. About the note

2.1. Aim of the document

This note aims to outline and detail good practices in public consultation processes that may be used by Member States for the public consultations to be undertaken in the context of their Social Climate Plans. This is done in line with Article 5(4) of the Social Climate Fund Regulation.

2.2. Who this document is for

The note is intended for the European Commission, specifically DG CLIMA. The information presented should be of use to managing authorities entrusted with the development and implementation of the Social Climate Plans. While the document is solely referring to these authorities, it can also serve as a useful source of information for any other organisation supporting the public consultation activities associated with the development of the Social Climate Plans (e.g., external contractors, as part of the Technical Support Instrument) and in the context of any other public consultation, as many of the good practices described below are universal.

2.3. Methodology

This document was developed on the basis of a literature review and interviews. The first step of the literature review consisted of gathering a comprehensive list of more than 50 relevant documents, presented in Appendix 3. These included academic papers, policy reports, and any other available information related to public consultation processes. These documents were systematically analysed using qualitative analysis techniques. This involved a thorough examination of the collected reports, and identification of key messages, themes, and insights that would inform our subsequent analysis. To ensure rigour and depth, a specialised software (NVivo12) was used for coding and grounded analysis. This step allowed to organise the collected data. Drawing from the findings, the information was grouped into meaningful categories, based on good practices recommended for conducting effective public consultations. Finally, the most critical findings from this analysis were summarised and presented in this document according to the various steps for organising and implementing consultations.

The literature review was accompanied by 17 interviews, namely – five interviews with representatives of DG REGIO and DG ENER (recommended by DG CLIMA), aimed at reflecting on their experiences in the context of their work with Member States (e.g. in developing Territorial Just Transition Plans); four interviews with local and national authorities responsible for the public consultation components of four Territorial Just Transition Plans (recommended by DG REGIO or assessed as having organised successful consultations according to the Territorial Just Transition Plan assessment tool of the World Wide Fund for Nature[3]); five national authorities responsible for the public consultations of five National Energy and Climate Plans (identified based on the

[3] https://just-transitions-plan.wwf.eu/en/resources

assessments of the plans of the Commission[4]); one interview with a representative of a local citizen engagement initiative identified as a good practice from the literature review; and two interviews with organisations studying or representing the perspective of people in a vulnerable position. The interviews focused on the relevant experience of the interviewees and dove into specific topics, such as the public consultation strategy used by them; key success factors and pitfalls to avoid; optimal timing of the consultations; and stakeholder consultation methods used. The key insights from the interviews were used to enrich the findings from the literature review and to include concrete examples throughout the note.

Finally, the consultation with national authorities during a workshop organised in April 2024 where a draft version of this note was shared and discussed and the feedback received was used to further refine it.

One limitation concerns the nature of the findings from the literature review, which often offered general advice as to how to implement public consultations and lacked real-life examples detailing good practices and pitfalls to avoid. Nonetheless, the interviews with national and local authorities proved to be a useful source of information and while, originally, it was foreseen that fewer interviews would be conducted (up to 14), a decision was made to carry out additional interviews to gather relevant good practices to complement the literature review. The evidence from these interviews varied in their degree of depth and detail, but we have sought to present everything of relevance which interviewees were able and willing to share. Another limitation concerns the lack of interviews with representatives from the transport sector.

2.4. Structure of the document

The note provides a list of some of the key principles which should guide a public consultation. This is followed by an overview of the main steps of a public consultation and good practices, derived from literature and interviews with EU, national and regional authorities, and other key stakeholders. In essence, this document outlines the various steps and considerations that should be taken when organising a thorough and effective public consultation from start to finish, along with examples of the instances when said steps and considerations were implemented successfully.

[4] https://commission.europa.eu/energy-climate-change-environment/implementation-eu-countries/energy-and-climate-governance-and-reporting/national-energy-and-climate-plans_en

3. Guiding principles

The literature review pointed to various principles for a good public consultation [10], [26]. These overlapped to a large extent with some of the success factors, identified as fundamental by interviewees based on their experience organising consultations. Given their perceived importance, some of the key findings are summarised below to guide the overarching approach taken to organising a successful public consultation.

Collaboration

A public consultation should be a continuous collaborative process, involving all relevant stakeholder groups in the joint production of solutions. As such, stakeholders should be viewed as partners in the development of the initiative, plans or legislation. The consultation should start well in advance to gather the initial ideas and concerns of the stakeholders, it should continue throughout the process of drafting the documents, and should involve the stakeholders in a meaningful discussion on the final draft.

Inclusiveness and accessibility

Taking part in the public consultation should be made easy. The selected consultation methods should be appropriate for the intended audience and an effort should be made to remove any barriers to participation.

Honesty

The consultation exercise should have an honest intention and avoid political interferences and imposition of private interests. When stakeholders feel that they are treated respectfully and honestly, they are more likely to seek to reach an agreement and to view themselves as partners in the process.

Humility

Stakeholders bring valuable and insightful input, based on their respective experience and expertise. Public consultations should be approached with humility and openness to hearing new and challenging opinions and learning from them.

Trust

Time and effort should be put towards building and maintaining the trust of the stakeholders in the public consultation process. Believing that their views will be heard and accounted for and that they will be able to help shape the outcome, significantly increase the likelihood that they will invest time and effort in it and make the entire process run more smoothly.

Transparency

All consultation materials, stakeholder inputs, results, and the way in which they will be used should be made clear and available to the public. The response to the inputs received should also be publicised. Transparency is instrumental for establishing trust (see above).

Privacy

The public consultation process should respect the privacy of the stakeholders. All participants' personal information and data should be treated in compliance with the European Union's General Data Protection Regulation (GDPR). Any data collected and published should have participants' consent.

4. Good practices for public consultations

This chapter presents the findings from the above-mentioned literature review and interviews, structured along the main steps of a public consultation process, as outlined in the figure below.

Figure 1. Public consultation steps

4.1. Planning

The first step of any public consultation is planning. This stage is critical for shaping how the public consultation will be conducted and it merits sufficient time and investment, because good preparation and careful planning is likely to save time in the long run. This should result in the development of a stakeholder consultation plan, which should include the following elements:

- A clear objective for the consultation
- Consultation methods
- Stakeholder mapping
- Timing of the consultation
- Stakeholder engagement plan and communication strategy
- Data management plan
- Resources needed
- Clear roles, responsibilities, and expectations

Each of these aspects is discussed in more detail below.

Clear objective for the consultation

Before embarking on the planning and implementation of the public consultation, it is important to define its objectives, the type of input sought, and in what way it will be used [24]. Inputs can vary from expert opinions, feedback on a draft, to the development of specific solutions (e.g. proposing and elaborating measures, which can be included in the Plans) [11], [12]. They can also include the provision of data or elaboration of the needs of the target groups of the Social Climate Fund that can inform the work around the development of the Plans.

The precise choices of each Member State will be governed to a large degree by their approach, their administrative structure, and specific needs. For example, if the managing authorities already have a good idea as to what the resources from the Fund should be used for (e.g., as a result of specific objectives of their National Energy and Climate Plans (NECPs) or of any relevant analytical work presented in them, and/or REPowerEU chapters related to tackling energy poverty), stakeholders could be asked to provide feedback relative to the specific measures which are being considered. In other instances, where the managing authorities would like to assess the needs prior to identifying potential measures and investments (for instance on transport poverty, which is not yet well developed in terms of measurement), stakeholders, especially those who are intimately familiar with the needs “on the ground”, would have to be consulted extensively. Therefore, a careful reflection on the general needs and aim of the consultation early on is recommended to structure the plan accordingly.

Timing of the consultation

The timing of the public consultation process is a critical element for its success. This implies sufficient time for the deliberative process to be fruitful and a political commitment to take stakeholders’ views seriously and to respond constructively to their concern/proposals and recommendations. It should be kept in mind that the Social Climate Plans must be submitted by 30 June 2025, which implies that the consultation activities should have been completed well in advance of this date. Within this timeframe, the consultation plan should include a tailored and realistic timeline that identifies activities and sets milestones for all aspects of the consultative process and allows sufficient time for the provision of stakeholder input. Consultation activities should ideally not overlap with other events, such as elections or public holidays, or these events should be taken into consideration and additional time should be foreseen to accommodate them [2], [6], [13], [14], [24], [25].

The interviewees consulted in the context of this note underscored the importance of involving stakeholders as early as possible (conditional on the type of consultation and the type of input they can provide) and continuously throughout the development of the Plans. A single consultation activity at the end of the drafting process (e.g., through a survey or a final event aimed at presenting the draft) is likely to add limited value. It should be acknowledged that the timing of the involvement of stakeholders will also depend on the particular needs of each Member State. For example, in some instances stakeholders may be needed to bring valuable input and share data very early on to help identify the most pressing needs and inform the subsequent choices about eligible measures and investments to be added in the Plans. In other instances, there might already be a good sense of the needs and potential measures (e.g., from the National Energy and Climate Plans), thus reducing the need to consult stakeholders as early on in the process.

In any case, to capitalise on stakeholders’ knowledge and expertise, it is important to allow enough time for stakeholders to prepare their input and for national authorities to pinpoint suitable instances within the overall development process when they should be involved and can add particular value. Any communication/educational campaign prior to the consultation should be well-timed to avoid losing momentum if announced too early. If possible, the consultation process and the construction of the Plan’s analytical basis (including the impact analysis of ETS2 and the related identification of the vulnerable groups) should be thought together, so that the consultation process can be enriched by relevant data and analyses. Additionally, in case the development of the Plan is supported via technical assistance programmes, special care should be taken that the timelines of the assistance and the consultation processes are aligned.

Pitfall to avoid: Member States were eligible to receive tailor-made expertise via the Technical Support Instrument for the development of their Territorial Just Transition Plans under the Just Transition Mechanism. This included the development and implementation of a Stakeholder engagement strategy. According to one interviewee, in one Member State, the technical assistance (provided by an external contractor) began very early and there was a need to place significant focus on awareness-raising before it was deemed feasible to engage in stakeholder consultation. This meant that the necessary input was collected shortly before the end of the technical assistance, thus severely limiting the extent to which the contributions could be used. The technical assistance also ended significantly before the Plan was drafted, which made it challenging to ensure continuity.

In should be noted that in federal states, the public consultation process could include additional region-specific consultations and, thus, require more time. For instance, the consultation in the context of the Belgian NECP included a public inquiry into the latest version of the Plan in February 2024, which comprised questions concerning the federal part of the plan and two questions related to aspects relevant for each region. Additionally, surveys on the regional aspects of the plan have also been or are being carried out by the regions in parallel[5].

Stakeholder mapping

At the planning stage, it is also very important to identify the relevant stakeholders who should ideally contribute to the public consultation in order to gather representative input. The mapping should include stakeholders who will be directly or indirectly involved in the implementation of the Fund and representatives of those most likely to be impacted by the Plans[6] [4], [6], [14], [18], [24]. The table below provides examples of the type of organisations that could be targeted in the context of the Social Climate Plans.

Table 1. Examples of stakeholders for the mapping

Stakeholder groups	Examples of types of organisations
Local, regional, and national authorities	Ministries responsible for environment, climate policy, energy, transport, social policy, managing of EU funds (if they are not the managing authority of the Fund), municipalities (incl. social assistance departments), local and regional authorities, national agencies involved in the social welfare system, authorities (agencies and managing authorities) in charge of the implementation of energy-related programmes (in promoting energy efficiency, renewable energy and smart energy infrastructure), associations of municipalities, public transport authorities
Representatives of economic partners	Associations of SMEs and microenterprises, national enterprise agencies, industry associations, representatives of Energy Service Companies, associations of public transport operators, terminal managing bodies, representatives of credit institutions and commercial banks, offices of international financial institutions relevant in the national context
Representatives of social partners	Trade unions, employers' groups – in line with the applicable national legislation
Relevant civil society organisations	Representatives of people in a vulnerable position, including frontline workers active in the field, representatives of landlords, representatives of tenants, associations of social housing providers and managers, associations in charge of ensuring the quality of social housing, representatives of consumer and passenger organisations, homeowner associations, gender and youth organisations possibly with a link to the

[5] https://www.nationalenergyclimateplan.be/en/public-inquiry

[6] It may be useful to employ the "six tests for stakeholder identification" and to consider the following questions: Who will be directly impacted? Who will be indirectly impacted? Who is potentially impacted? Whose help is needed to make it work? Who knows the subject? Who will show an interest in the subject? [24]

Stakeholder groups	Examples of types of organisations
	category of beneficiaries, associations of pensioners, environmental organisations, NGOs active in areas eligible for the SCF (e.g. in sustainable mobility, cycling organisations, but not limited to it) but also organised citizen-led initiatives active in monitoring the implementation of EU-funded projects on the ground where present, representatives of organisations representing passengers with disabilities and reduced mobility (PRM) etc., representatives of "one-stop shops" and "institutionalised" renovation consultant/energy advisors if already established in the Member State, associations of community-led projects (e.g. energy communities), citizens' panels
Research and innovation institutions	National energy poverty observatories, national statistical offices (relevant departments), recognised experts, research and academic institutions relevant for the scope of the SCF (renewable energy solutions and decarbonisation research, social work research, distributional effects of energy and climate policies)

There may be a natural tendency to reuse previous stakeholder maps and contacts from previous consultations[7]. However, it is advised that the mapping is revised to better fit the objectives and the target groups of the Social Climate Fund and involve new stakeholders in the consultation activities. It is important to keep in mind that energy poverty has been defined in the EU legislation only recently, that transport poverty is a relatively new term, and that some relevant stakeholders may be working in these areas indirectly and it may not be immediately obvious that they are suitable stakeholders to consult. Depending on which authority is designated with the task to draft and implement the Plan and carry out the public consultation process, it is also recommended to collaborate with other national public authorities which may already have well-established networks of social partners working with people in a vulnerable position. Moreover, referring to national NGO registries may also be a useful way to identify relevant stakeholders.

Overall, it is important to allow for sufficient time to identify the right organisations, while also ensuring a diversity of opinions and avoiding bias by only amplifying the voices of a few stakeholder groups.

Municipalities are likely to be key stakeholders in the implementation of the Social Climate Fund and, as such, should have a decisive role in the public consultation activities. However, smaller municipalities have limited resources at their disposal, which often prevents them from meaningful participation. It is important to keep this in mind and work actively towards engaging a representative sample and/or involving associations of municipalities that could represent their views. Similarly, engaging umbrella organisations which represent regions, or any other relevant stakeholders is a good way to gather views when it is not possible to reach a sufficient number of them directly.

[7] It is important to keep in mind any data protection considerations when making use of existing stakeholder lists gathered during previous consultations or in the context of networks, expert groups or stakeholders listed. [24]

Consultation methods

The choice of consultation method(s) is also dependent on the objective of the consultation and the type of input it aims to collect. The methods can vary greatly based on the number and the level of expertise of the stakeholders that managing authorities are seeking to engage and the available time. For instance, the consultation methods can consist of in-depth and interactive debates and discussions. They can also be more targeted, like surveys, or they can be based on pre-existing methods rooted in the local democratic traditions, such as assemblies. The consultation methods should be adapted to the target group, the political and legal context, and other logistical and practical considerations, such as guaranteeing accessibility [1], [5], [18]. A combination of different methods can enrich the consultation and fill the gaps that authorities might face by only choosing one of them. The table below provides examples of methods that can be used for the public consultations.

Table 2. Examples of various consultation methods [5]

Methods	Description	Contextual factors
e-Participation *Suitable for all stakeholder groups*	e-Participation uses Information and Communications Technology (ICT) to reach a wide range of stakeholders. This can be done through a set of polls, online forums, or online meetings. *Useful tools:* • *For hosting the meeting: Microsoft Teams, Zoom* • *To organise quick polls:* Mentimeter • *To brainstorm together/visualise ideas:* Mural*;* Miro	It requires computer literacy and ownership of suitable hardware. The quality of the interaction between participants is limited. However, this method enhances accessibility as it allows the participation of a large number of stakeholders and does not require transportation costs, nor the logistical costs of hosting an event.
Surveys *Suitable for all stakeholder groups*	Surveys support the collection of information or opinions on a specific topic. *Example: In order to motivate more people to participate in the development of Sustainable Urban Mobility Plans, especially those unable to attend a dedicated citizen workshop or who usually do not take part in such events, the city of Aachen, Germany utilised an online questionnaire, where people could express their opinions and evaluate the proposals over a period of 3 weeks[8].*	Surveys can be conducted through many means: face-to-face, online, by mail, on SMS or telephone. Their limitation is that stakeholders are restricted in terms of the input they can provide as they are generally primarily made up of closed questions and there is no room for open/in-depth feedback and discussion. However, this could be an advantage when the aim is to collect targeted information in an efficient manner.

[8] https://civitas.eu/sites/default/files/participation_2.0_in_the_sump_process_dynamo_web.pdf

Methods	Description	Contextual factors
Expert Panel/ Working group/Task Force/Advisory group meetings *Suitable for stakeholder organisations, experts*	These offer a set-up for specialised discussions among a selection of stakeholders on a given issue. They help to synthesise and coordinate the input and provide targeted advice. *Example: A formal task force (consisting of companies, NGOs, authorities) was set up in the Malopolska region (Poland) to support the development of the Territorial Just Transition Plan. Eleven dedicated meetings were held, and sub-groups were formed to discuss specific aspects of the Plan depending on the expertise and knowledge of the members of the task force. Drafts of the plan were also discussed within the task force.*	They are a source of informed opinions that can be valuable. However, they can be seen as technocratic and may ignore citizen visions and local concerns, unless an effort is made to include representative organisations or members of the target group.
Public Events *Suitable for citizens*	Public events are events that are open to the public to discuss an issue. Such events provide the opportunity to inform the public about a specific issue or about a project. *Example: To raise awareness of The Territorial Just Transition Plan of Ida-Viru (Estonia), several Information Day events were held in the region. They were used to explain the concept of just transition to the wider public and to try to gain acceptance among them.*	Public events provide the opportunity for stakeholders to meet face-to-face to discuss a certain topic. They are accessible to the local public (both in terms of location but also time of day/week) and the format should make information accessible. They can involve accessibility issues, especially for rural areas with low population density, or people with restricted schedules and availability.
Workshops/ Seminars *Suitable for all stakeholder groups*	These are intensive planned sessions where citizens, stakeholders, and experts collaborate. This is a process designed to bring people from various backgrounds together by providing adequate information to all participants and equal opportunity to contribute in co-creating a vision/proposal. *Example: The development of the Territorial Just Transition Plan of Belgium involved several seminars which included key stakeholders, as well as representatives from the public.*	They are similar to public events, but their nature allows to collect more targeted input by, for example, limiting the number of participants or using break-out groups to encourage discussion and exchange. They can be held online or in-person and in each case issues such as accessibility should be considered.

The fact that a consultation takes place does not guarantee useful input. The consultation process needs to be adapted to the target audience and be participative and interactive. It is important to ensure that it is stimulating and meaningful to encourage active participation. In this sense, organisers should avoid having one-sided events with speakers talking to the public as a conference without allowing for discussion [19].

Stakeholder engagement plan and communication strategy

Once the stakeholder mapping has been completed and the appropriate consultation methods have been selected, it is time to devise a sound stakeholder engagement plan. At this stage, a decision needs to be made whether the consultation will be open to everyone interested in contributing or if it will be more targeted. In the former case, it is important to craft a solid communication strategy, detailing how interested parties can be made aware of the opportunity to contribute to the public consultation, for example through the use of media or events [2], [5], [15], [21], [24], [25]. Typically, a combination of different communication channels works best [24]. As participation works best when stakeholders are familiar with the topic, raising awareness about the objective of and measures and investments eligible under the Social Climate Fund should be a priority. It is beneficial to focus the messaging on what the participants stand to gain from taking part in the consultation (e.g., putting their views across, having a say), thus increasing the likelihood that they will do so. Similarly, it is worthwhile to communicate how the results will be used [25]. In any case, it is important to monitor the contributions to the public consultation to identify any underrepresented stakeholder groups and to take measures to involve them.

If a choice is made to target specific stakeholders, the stakeholder engagement plan should detail the appropriate consultation method for each, how they will be approached, including solid communication strategies to reach them, and how often and when they will be engaged in the consultation.

For more information, please see section 4.2.

Data management

Public consultations should typically involve numerous stakeholders and activities. It is, therefore, recommended to establish a robust data management system, which tracks who was consulted, how, where and when the consultation took place and what was the outcome. It is also a good idea to set up a registry of stakeholders, which will help preserve institutional memory in case of staff turnover.

In the interest of transparency and openness, it is a good idea to develop a website where the public consultation schedule, key documents and outcomes of discussion are stored and open for everyone to see [25].

Good examples include:

- The website set up by the Lithuanian authorities responsible for the development of the National Energy and Climate Plan: https://klimatokaita.lt/dekarbonizacija/susitikimai/[9]. All interested parties can visit it and find the following: an explanation of the process behind

[9] The page is in Lithuanian. To read it, right-click on the website and select the Translate option from the drop-down menu and select your preferred language.

the development of the Plan, a calendar with key dates and events, a list of all meetings of each working group, along with the presentations, minutes, and recordings.

- The website set up by the Slovenian authorities tasked with the development of the National Energy and Climate Plan: https://www.energetika-portal.si/dokumenti/strateski-razvojni-dokumenti/nacionalni-energetski-in-podnebni-nacrt-2024/podnebni-in-energetski-dialog-na-vec-ravneh/[10]. It offers a detailed account of the stakeholder engagement plan, the activities, their objectives, outcome, timeline, as well as specific comments received. Interested parties can also subscribe to receive an e-newsletter providing regular updates on the development of the Plan.

Sharing as much information as possible builds a level of trust, which is likely to positively impact the overall consultation process. Setting up a Social Climate Fund website would also be useful in the context of Article 23(1) of the SCF Regulation which requires Member States to make data referred to in Article 21(2), point (d)(i), (ii) and (iv) of this Regulation publicly available and keep them up to date on a single website in open, machine-readable formats.

Resources

It should be acknowledged that effective public consultations require significant resources. These would vary based on the format(s) of the public consultation, the timeframe, number of stakeholders, logistical considerations. In any case, a meaningful consultation process (virtual or in-person) requires sufficient, knowledgeable, skilled, and dedicated staff. This is particularly important as the implementation of a good public consultation process requires significant effort and expertise, and this is often underestimated. Similarly, consultations entail technical resources, such as any digital tools for communication, data management, and website development. Financial resources needed to cover the cost of human resources, meeting venues, digital platform licences, communication materials, potential financial compensations for the participants, should also be foreseen. Therefore, it is important to plan ahead and to secure the budget and trained staff needed to conduct a successful consultation [6], [14], [15], [16].

Clear roles and responsibilities

The coordination of the development of the Plans and the public consultation process is likely to involve more than one entity (e.g., several ministries). To avoid misunderstandings and to ensure a smooth collaboration, it is important to set clear roles, responsibilities, and expectations. Speaking with one voice will also ensure consistency in the messaging and a streamlined consultation process [10], [17]. It is suggested that each entity nominates a contact person and that regular meetings to inform each other are scheduled.

4.2. Informing or engaging with the stakeholders

The first step of the actual public consultation process is to inform or to approach the stakeholders. As mentioned previously, the managing authority can make a choice between opening the

[10] The page is in Slovenian. To read it, right-click on the website and select the Translate option from the drop-down menu and select your preferred language.

consultation to everyone and targeting specific stakeholders, or both. The former could work well in Member states where stakeholders are already quite actively engaged. In such cases, posting an announcement on the website of the managing authority could be a good start.

Good practice example:

Stakeholders interested in participating in the public consultation activities surrounding the development of the Lithuanian National Energy and Climate Plan could use a registration form on the website of one of the ministries to register and specify the working group they wished to be a part of. There was no limit placed on the number of entities that could participate. One representative and one back-up per entity was allowed.

However, it is advised that managing authorities make use of more than one communication channel to reach people, e.g., through local, regional, and national media, social media, newspapers, newsletters, and other appropriate means given the target audience. The snowballing technique could also be used by asking associations and civil society organisations to spread the message via their networks, if the participation is open.

As mentioned previously, it is also important to educate and explain to stakeholders why taking part in the consultation is worth their while. This can mean organising dedicated events or asking to present during events organised by other stakeholders [16], [18], [22]. As the Fund is new, it is important to dedicate sufficient time to explaining what its objectives are, and what potential measures and investments could be eligible for funding. The language used should be clear, engaging, and easily understood by diverse audiences including persons of limited linguistic proficiency [24]. These initial interactions should be viewed as a two-way process – while the main objective may be to inform, they also offer an opportunity to start learning from the stakeholders (e.g. about specific needs and previous successful or failed measures).

Good practice examples:

- The Territorial Just Transition Plan of Ida-Viru (Estonia) – a region which is primarily inhabited by a Russian-speaking population, who had a sense of distrust in any initiatives that come from the central government, used local Russian-language papers and brochures to invite them to take part in a public opinion poll. Paper versions of the poll were made available at local shopping malls. These steps were taken to remove any language or technological barriers that may have prevented locals from participating. Additionally, numerous seminars, information days, conferences, meetings with local politicians, and enterprises were organised to raise awareness and address any resistance to the idea of the Plan. As organisers of some of these events, local municipalities also promoted them via their networks. In this way various channels and modes of communication were used to inform the stakeholders of the opportunity to take part in the public consultation process.
- The public consultation process behind the recent draft National Energy and Climate Plan update of Slovenia involved numerous events. Information about each event was made available on the website of the ministry at least two weeks prior the date and stakeholders, who had agreed to be added to a dedicated list, were informed directly via email. Before key events, the managing authorities invited journalists specialising on relevant topics to present the key messages and to give them a chance to ask questions. Some of them published articles, which in turn informed the public of the opportunity to take part in the events. This was considered a good way to keep the public well-informed. Additionally, the managing authorities prepared an article about every event and activity, which was

published on the Ministry's webpage. These articles were also often used as background information by journalists to prepare news and inform public.

- The managing authorities behind the Territorial Just Transition Plan of Konin (Poland) also used an intensive media campaign to popularise the Plan and to educate the public in an effort to address the initial scepticism and promote participation in the consultations.

The value of ad-hoc consultations should not be underestimated. If the managing authorities are invited to events or discussions of relevant stakeholders to either present or exchange opinions, it is a good idea to accept. While time-consuming and unplanned, these can bring useful insights and build momentum.

If a choice is made to target specific stakeholders, it is good to send out an official email or letter inviting them to take part in the consultation. It is often helpful if the email/letter is sent on behalf of a senior official. If necessary, it may also be useful to make phone calls. However, it is important to keep in mind that a key part to a successful consultation (especially when it comes to working groups) is building and maintaining relationships. This requires a long-term investment, which spans beyond emails and requires frequent contact.

Specific considerations to ensure the views of people experiencing energy and transport poverty are accounted for

Taking into account the perspectives of people experiencing energy and transport poverty, as the target of the Social Climate Fund, is crucial for ensuring that the measures and investments foreseen in the Plans stand to benefit them. The conventional way to account for the views of vulnerable energy and/or transport users is through the involvement in the consultation process of representative organisations, such as civil society organisations that work directly with them. These organisations should have established track records and a deep understanding of the needs of the target groups of the Fund. As such, these organisations could be viewed not only as stakeholders to be included in the consultations but also as partners in them. Similarly, social workers, community centres and religious organisations, which work with the target groups of the Fund, could also be a valuable source of information about their needs, challenges and the suitability of the proposed measures.

Beyond that, there are more innovative approaches of including people experiencing poverty themselves in the consultation as described in the box below.

Involving people experiencing poverty in working groups/events

- While rarely done, because it is challenging to arrange and requires significant investment, engaging with people experiencing poverty directly can result in more tangible input. One way to do it is with the support of civil society organisations. For example, half of the members of the French National Council for Policies to Combat Poverty and Social Exclusion (Conseil national des politiques de lutte contre la pauvreté et l'exclusion sociale (CNLE)) are people experiencing poverty and social exclusion. Their participation is assisted by such organisations when it comes to logistics, analysis of key documents, and formulating statements, as well as moral support.

- The public consultations around the Territorial Just Transition Plan of Belgium also included people experiencing poverty. Specifically, a group of six activists took part in four public consultation events. ATD Quart Monde – a civil society organisation helped identify them and built a task force to assist them. The group had internal discussions with a large group of people experiencing poverty prior to attending the events to prepare and to reach a common understanding, which made it easier to express their viewpoints later on. It is important to underscore the role of such organisations not only in supporting with logistics and preparatory work but also in working with the representatives of people in situation of vulnerability to empower them and address their concerns or scepticism. This is a process which takes time and should not be underestimated.

If a choice is made to include people experiencing poverty in the consultation process, there are a number of considerations to keep in mind when approaching them. For example, formal and bureaucratic language should be avoided in favour of more inclusive language, and barriers, such as the digital gap, should be addressed [3], [7], [19], [24]. It is also important to identify and address any issues that could prevent people experiencing energy and/or transport poverty from attending in-person meetings, such as covering transportation and food costs, providing transport options, and childcare. Participation in public consultation activities should be made as easy and as convenient as possible. Financial compensation may also be considered, however, special care should be taken that it does not interfere with the conditions of, for example, any minimum income scheme they are recipients of.

4.3. Consulting

The next step of the public consultation process is to implement it. As mentioned previously, there are many ways to organise the consultation. The box below presents some examples. It is followed by a list of key considerations to keep in mind during the consultation process derived primarily from the interviews.

Examples:

- The interviews pointed to a common approach taken in the development of some National Energy and Climate Plans and Territorial Just Transition Plans, which involves a mix of surveys and working group discussions. It typically involved the following: engaging in awareness-raising and two-way educational activities via initial meetings, and forming dedicated working groups (made up of a diverse array of stakeholders) to gather data, identify needs, and collect suggestions for possible measures over the course of a series of meetings. In other instances, a survey was set up to collect suggestions for measures from the general public, which were then narrowed down and discussed within working groups. An initial draft of the plan was then developed, which was shared with selected stakeholders (ideally some who have not been actively involved in the process) for comments before revising it and making it available to the general public for comments. The comments were then analysed, discussed and, where possible, taken onboard before finalising the plan.
- An example from the literature review details the stakeholder consultation process for the development of a regional Sustainable Urban Mobility Plan in Parkstad Limburg, The Netherlands[11]. It involved a two-day workshop with the stakeholders used to define actions for more sustainable mobility in the region. This was a full-immersion workshop during which stakeholders discussed past, present, and future mobility and a common vision on mobility was agreed. The outcome was discussed among the municipalities in Parkstad Limburg and served as a basis for a proposal for a policy framework.

[11] https://projects2014-2020.interregeurope.eu/fileadmin/user_upload/tx_tevprojects/library/file_1522246472.pdf

Key considerations for surveys

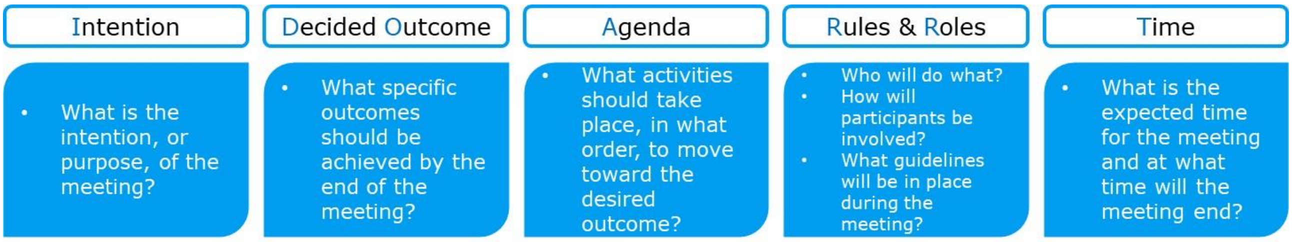
- Consider organising an introductory/information session prior to launching the survey.
- Ask clear questions, using simple language and avoiding jargon.
- Use closed questions as much as possible and include a limited number of open questions as an opportunity to elaborate on the closed questions. Using general open questions makes analysing the responses quite challenging.
- Target the questions carefully – ensure that the respondents are able to provide answers to the questions, and keep in mind that representatives of vulnerable households may be unable to respond to them due to technical or other limitations. It is thus important to employ more than one consultation method and keep the considerations mentioned in the previous section in mind.
- In case the survey has a significant number of responses to open questions, it could be worth considering using AI tools, which can summarise the main views shared, while ensuring that the AI tool used is in compliance with GDPR.

Key considerations for task forces/working groups/expert panels

- Prepare for the meetings very well and formulate the questions that should be covered carefully ahead of time. This focuses the discussions on the issues at hand and avoids unproductive discussions. The preparation includes sharing any useful background materials at least a week prior to the meeting, along with an agenda.

Framework for organising meetings

The I-DO-ARRT framework is a useful tool for defining a meeting's **I**ntention, **D**esired **O**utcome, **A**genda, **R**ules and **R**oles, and **T**ime needed. Answering the questions listed in the figure below could help structure the preparation for meetings.



- Prioritise in-person meetings as they generally increase the investment of the participants in the discussions. Online meetings, while less resource-intensive and sometimes difficult to avoid, limit engagement. They may also not be considered a viable mode of communication by some stakeholders.
- Consider recording or broadcasting the meetings for those unable to participate.
- Adhere to the timeframes of the meetings and the consultation period in general.
- Consider creating sub-groups (e.g., transport and energy sub-groups) to focus the discussion.

- Employ good facilitation techniques (e.g., listening carefully, creating an inviting space, managing conflict). The table below lists a few facilitation techniques that could be considered.

Table 3. Facilitation techniques

Name	Description
Multi-voting	This technique is useful for identifying key issues and ranking them. All participants are asked to brainstorm issues, problems, or solutions to be prioritised. The list is discussed as a group and duplicate ideas are removed and clarifications made. The final list is rewritten, and the group agrees on set of criteria to use in evaluating and rating the contents of the list. Each person silently ranks them items of the list based on the criteria. Finally, the results are shared and the final outcome of the rating at group-level discussed.
Phillips 66 method	This technique is suitable for promoting listening within sometimes large groups. The main group being divided into subgroups of six to eight people maximum, and these groups having designated a rapporteur and a timekeeper. Everyone has one minute to express themselves on a question (or give their opinion on a proposal). The rapporteur then summarises it within the framework of a collective restitution (there is no internal debate in the groups, everyone expresses themselves without being interrupted during the minute allotted to them, the effects of leadership and mobilization of speaking time are reduced, the proposals are generally more constructive).
World Cafe	The World Cafe is a creative process for facilitating collaborative dialogue and the sharing of knowledge and ideas. In this process a cafe ambiance is created, in which participants discuss a question or issue in small groups around the cafe tables. At regular intervals the participants move to a new table. One table host remains and summarises the previous conversation to the new table guests. Thus, the proceeding conversations are cross-fertilised with the ideas generated in former conversations with other participants. At the end of the process the main ideas are summarised in a plenary session and follow-up possibilities are discussed.

General considerations

- Throughout the process, continuously assess if the voices of specific stakeholders are underrepresented and try to take measures to remedy that. Be proactive and flexible in this regard.

Good practice examples:

It is possible that some stakeholders may feel intimidated or uncomfortable to express their opinions in a group. The following examples show how this can be addressed:

- During the development of the Territorial Just Transition Plan of Malopolska (Poland), some stakeholders found it difficult to express their opinions in front of representatives of big companies in the region in meetings. Anticipating this (based on previous experience, and realising the potential missed opportunity to hear their views, the organisers set up a small survey aimed specifically at them to gather their opinions and to bring them up for discussion on following occasions, thus ensuring that varied views were accounted for. Specifically, the survey covered issues like: key target groups, main environmental and labour market problems, potential obstacles, other important issues (open question). Response ratio was 50%.

- Similarly, during workshops, the moderator of the discussions in the context of the Territorial Just Transition Plan of Ida-Viru (Estonia) actively encouraged stakeholders, who were more hesitant to express their opinions, to speak up. He also approached them during the coffee breaks to discuss their viewpoints and brought them up for debate later on, thus allowing for these “hidden” viewpoints to be brought to the fore.

- Consider collaborating with authorities from other countries and learning from each other.

Good practice example:

During the process of developing the National Energy and Climate Plan, the Swedish managing authorities collaborated with their counterparts from the Nordics and the Baltics within existing structures of cooperation. They had hand-on discussions about different dimensions of the Plans and how to best address common challenges they had.

4.4. Taking stakeholder input into consideration

Having put time and effort into collecting stakeholder input, a natural next step is to use it in developing the Plans. As mentioned previously, stakeholder input can take many shapes. For example, it can consist of data that uncovers specific needs the Fund could address, suggestions for measures and investments or their more specific design, feedback on the likelihood that a particular measure would work well in practice, or comments on a draft of the Plan. Regardless of the type of input, it should be analysed carefully, and sufficient time should be planned for this. It is important not to approach it as a tick-box exercise but rather as an integral part of the process surrounding the development of the Plans, which ultimately enriches them. While not all input may be relevant or useful, the process should be transparent and choices not to use some of the input should be justified [14], [16], [19], [20], [23]. This step is particularly important, given the requirement under Article 5(2)(b) of the Social Climate Fund Regulation to summarise how the input of the stakeholders who participated in the consultation is reflected in the Social Climate Plan.

4.5. Following up after the consultation

Following up on consultation activities is crucial. It is important to thank the participants for their contribution and time (e.g., via official letter or email); to provide feedback regarding their input; to outline the next steps of the development of the Plans; and to keep them informed about progress made. Depending on the time of consultation, the feedback can be provided concurrently over the course of a meeting or in writing following a survey, detailing whether and how their suggestions will be taken into account, and explaining why they cannot be included if that is the case. It is a good practice to make the latter public or to call for a meeting and to provide it in person. The summary of how the input of the stakeholders who participated in the consultation is reflected in the Plan, that has to be included in the Plan itself (Article 5(2) point (b)) should not be considered as sufficient feedback.

Good practice example: The development of the recent draft of the Slovenian National Energy and Climate Plan (NECP) involved several surveys. While it was deemed impossible to provide feedback to each and every comment or suggestion, the results from each survey were aggregated and an explanation was provided detailing which suggestions were taken onboard and which could not be taken into account and why. A final report was published on the NECP website. This could be a practical way to close the loop when there are not sufficient resources to provide individual responses.

Following up is a sign of respect and gratitude, but it is also a good way to demonstrate accountability [14]. Lack of acknowledgement and feedback can be very disheartening, it can create or reinforce a feeling that the stakeholders are not heard and can result in disengagement and lack of trust in the process and the effectiveness of the future Plans. This is especially relevant if the consultation includes representatives of the target groups of the Social Climate Fund, as they may generally be more likely to believe that their views are not accounted for.

4.6. Monitoring and evaluating the public consultation process

Monitoring and evaluating the consultation activities, while not required by the SCF Regulation, is a good practice, which helps determine the effectiveness of the process and identify any areas for improvement. The former includes a continuous review of (1) the quality of the information and feedback collected; (2) the extent to which the results have been used; and (3) the degree to which the consultation process itself was successful and what could be done to improve it. It may also be worth using indicators to track the success of the consultation (e.g., the number of stakeholders from each category, the number of survey respondents; the number of workshop participants). An evaluation at the end of the consultation exercise is critical to document the lessons learned so that the generated knowledge within the institutions can be accumulated to improve future consultation exercises [4], [6], [8], [9], [14], [15].

Good practice example:

Interviews with representatives of managing authorities responsible for the development of the recent draft National Energy and Climate Plans showed a promising trend. All interviewees referred to significant improvements to the public consultation activities, which were introduced based on the lessons learned from the first iteration of the Plans. They considered the recent consultation processes to have been much more successful than past ones. As such, this points to the value of evaluating and reflecting upon the public consultation process.

Appendix 1. USEFUL SOURCES FOR MANAGING AUTHORITIES

- List of stakeholders working with and representing people experiencing poverty

  https://www.eapn.eu/who-we-are/our-members/

- European Energy Youth Network

  https://youthenergy.eu/members-eyen/

- Energy Poverty Advisory Hub

  https://energy-poverty.ec.europa.eu/index_en

- OECD Checklist for designing and planning a citizen participation process

  https://www.oecd-ilibrary.org/sites/f765caf6-en/index.html?itemId=/content/publication/f765caf6-en (Chapter 5)

- Guidelines to engage with people living in vulnerable situations (Action 7 of the Just Transition Platform Working Group)

  https://ec.europa.eu/regional_policy/sources/funding/just-transition-fund/guidelines-engage-people-vulnerable-situations.pdf

- Measuring stakeholder engagement and participation in just sustainability transition policies (Action 2 of the Just Transition Platform Working Group)

  https://ec.europa.eu/regional_policy/sources/funding/just-transition-fund/measuring-engagement-participation-in-just-transition-policies.pdf

- Toolkit for youth participation in Just Transition Funds

  https://youth.europa.eu/news/toolkit-youth-participation-just-transition-fund_en

- Capturing and combatting the hidden dimensions of poverty through the IDEEP (Inclusive and Deliberative Elaboration & Evaluation of Policies) tool

  https://www.srpoverty.org/wp-content/uploads/2024/02/2024-02-12-IDEEP.pdf

- BOLSTER – Bridging Organizations and marginalized communities for Local Sustainability Transitions in EuRope

  https://bolster-horizon.eu/about/

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