Report:

Youth Participation in the Greek updated NECP draft



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YOUTH AND ENVIRONMENT EUROPE

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This report aims to raise awareness among the Greek general public on the shortcomings of the implementation of the Governance Regulation in Greece, particularly regarding the updating of National Energy and Climate Plans (NECPs) in the 2022/2023 period. It further aims to encourage Greek youth to advocate for more inclusive NECP processes, at least in line with the requirements of the 2018 Governance Regulation.

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This report has been prepared following interviews with youth and non youth civil society representatives from Greece.

Introduction

What are NECPs and why should you(th) participate in them?

NECPs are national plans integrating environmental and energy policies, key to achieving the EU 2030 target of 55% GHG emissions reduction (compared to 1990 levels). They are the key plans in achieving carbon neutrality by 2050, a target that has been decided to prevent dangerous climate change (but controversial as to whether it is sufficient to do so). NECPs should therefore outline and explain policies relating to renewable energy, energy efficiency, energy poverty, agriculture, etc. These policies can have massive socioeconomic impact, on which the secure livelihoods of future generations will depend. The first NECP (draft NECP) was called to be submitted by 31 December 2018, and the final NECP by 31 December 2019. The draft and final updated NECPs then were/are called to be submitted by 30 June 2023 and 30 June 2024 respectively.

Youth participation in the drafting and implementation of NECPs is essential for several reasons:

1. The content of the NECPs will have long-lasting effects on the lives of the youngest generations. Young people will be most affected by the consequences of climate change and the energy choices made now. Involving youth ensures that their perspectives and interests are taken into account, promoting **intergenerational equity**.

2. Young people can contribute to a **long-term commitment** to climate and energy goals. By involving them in the planning process, it is possible to then encourage them to take an active role in sustainability and climate action throughout their lives

3. Youth participation can help hold **governments and decision-makers accountable** for meeting their climate and energy targets. Their involvement can ensure transparency and foster a culture of accountability in the implementation of NECPs.

4. Youth participation ensures a **more diverse set of perspectives** at the decision-making table, including those from underrepresented or marginalised groups. This diversity can lead to more comprehensive and equitable climate and energy policies.

5. Involving young people in the drafting and implementation of NECPs provides them with valuable **educational and capacity-building opportunities**. They can learn about the complexities of energy and climate issues and gain skills that are crucial for the future of the EU.

6. Youth can provide insights into how to **make NECPs more adaptable and resilient** to future challenges, as they will be dealing with the long-term consequences of today's decisions.

7. Many countries have committed to international climate agreements such as the **Paris Agreement**, which emphasise the importance of public participation. Involving young people aligns with these global commitments.

In conclusion, youth participation in the drafting and implementation of NECPs is essential to ensure that these plans are not only effective but also inclusive, innovative, and future-oriented. By involving young people, governments can better address the challenges of climate change and energy transition while creating a sense of ownership and commitment among the generation that will bear the brunt of these challenges.

Legal Basis for Youth Participation

The Governance Regulation

The legal basis for National Energy and Climate Plans (NECPs) is the 2018 Governance Regulation. This regulation outlines the rules and requirements for how countries should plan and manage their energy and climate policies within NECPs.

When it comes to involving the public, there are **two key provisions**:

1 Public Consultations

Article 10 states that there must be public consultations, which means that the public should have the opportunity to give their opinions and feedback. For public consultations, the NECPs must include a summary of what the public thinks based on the consultations. The processes used for these consultations should follow the guidelines of the Aarhus Convention. This Convention ensures that the public is given early and effective opportunities to be involved in decision-making processes related to the environment, as well as access to environmental information. In simpler terms, it's about making sure that the public has a say in the decisions that affect energy and climate policies, and these processes should be fair and transparent.

2 MCEDs

Article 11 emphasises the need for **multi-level stakeholder energy and climate dialogues** (MCEDs). This means that different groups and stakeholders should have discussions about energy and climate issues at various levels. **Article 17(2) (b)** obliges Member States to report on the progress made in establishing MCEDs “where applicable”.

Commission Guidance

In December 2022, the Commission provided Guidance on how to apply the Governance Regulation. This is, nevertheless, not legally binding but a guiding instrument on how the Governance Regulation should be implemented.

Section 3.2 refers to public participation provisions. It suggests ensuring adequate time for meaningful and easily accessible consultations. It emphasises the significance of "Social dialogue and a whole-of-society approach" in crafting and implementing effective energy and climate policies.

According to the Guidance, member states (MS) are required to clarify how the views of the public were taken into account ahead of submitting the NECPs. Additionally, MS should detail how the process allowed the public to participate transparently and fairly.



How has youth participation in the NECPs been so far in Greece?

Interviews we've conducted reveal that young individuals in Greece perceive significant neglect in the National Energy and Climate Plans (NECPs). Communication channels have been inadequate with a severe lack of transparency. The overall process of engaging in NECPs has been disappointing, failing to meet the state's obligations under the Governance Regulation. The survey below indicates the average response of youth civil society members who have been interviewed:

Between 1-10, how satisfied are you with the level of youth participation in your country?



Between 1-10, how impactful do you feel your comments have been in consultations relating to NECPs?



Between 1-10, how accessible do you think the NECP participation process in your country has been?



The issues met in terms of public participation are further elaborated here:



When it comes to **public consultations**, there was no official public consultation organised, but simply an invitation for comments by a handful of civil society members, business and industry representatives arbitrarily selected by the government. It is worth noting that there was a consultation organised for the first NECPs in 2019. As for MCEDs, there has been a complete lack thereof.

Research from the Climate Action Network from October 2023 indicates that::



“The NECP updating process is characterised by a **total lack of public participation**. The draft has only been shared with certain stakeholders for a closed consultation, which was not extensive and did not include different scenarios. At present, no information is available on the timely and inclusive participation of the general public to the revision process when all options are still open.”



Furthermore, a joint statement between WWF and Greenpeace from August 2023 reveals that public participation has been absent in this case as no consultation process has been organised at all. There was also no information at all in the ministry of the environment’s website explaining the timeline of the updated NECP process, violating binding access to information provisions.

Recommendations
to the Greek government



Create a dedicated NECP platform to promote transparency by adequately communicating participation opportunities in consultations and MCED developments. Ask for and effectively consider the feedback of civil society in setting up this platform.



Provide the draft for the final updated NECP as soon as possible, and no later than a date which still allows for early and effective public participation. This will then open the floor for public consultations, which would ideally be accompanied by an explanatory document of the NECP to reduce technical barriers for participation.



Set a clear and permanent MCED with sufficient youth and civil society representatives. The MCED should be accessible, containing flexible participation options (hybrid meetings, outside working hours). Per Article 17(2(b)), progress reports should also indicate how the MCEDs are progressing. As the European Environmental Bureau (EEB) has recommended: "Citizen participation should emulate "best practice" (Commission Guidance, section 4.3) which, following OECD guidance, should be based on principles of inclusive deliberation where diverse groups of citizens are facilitated to learn, exchange ideas and perspectives and develop collective recommendations."



Per the Commission Guidance, release a statement demonstrating how the views of the public were considered and how the NECP process followed has been transparent, at a time that allows for further participation.



Adopt good practices from other MS' NECPs: The Lithuanian NECP has included an "alternative policy measures" section based on the proposals made in the public consultations. "The alternative policy measures presented in a separate list for each sector were additionally included in the National Plan, taking into account the proposals made in the public consultation. These measures will be considered as an alternative to the elements of the PPM scenario in order to achieve the national targets prior to approval thereof in the legislation."



Host accessible presentations in educational institutions to build capacity on NECP content and gather the views of more young people. Echoing again the words of the EEB above: "diverse groups of citizens are facilitated to learn, exchange ideas and perspectives and develop collective recommendations."

Conclusion

Public participation is not there solely for the sake of participating - it is there to increase the acceptability of divisive policies and unite the Greek public to run together the climate marathon to carbon neutrality. Or, rather than a marathon, a relay race, in which the youth is fighting to pass the baton forward. We therefore want to tell Greek youth: come together and call Greece to fulfil its obligations under the Governance Regulation and involve the youth meaningfully and effectively in shaping the future of the country!

This report is part of a larger mapping of youth involvement in the drafting of the NECPs. We are also in the process of publishing reports from Italy, Bulgaria and Greece.

You can find the rest of the reports at yeenet.eu



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Written by Legal Seeds, a project part of Youth and Environment Europe

Legal Seeds aims to empower young people to engage in climate- and environmental litigation through legal education, peer support, and capacity building. It also seeks to ensure youth participation in environmental decision-making processes, and advocate for the inclusion of youth perspectives in National Energy and Climate Plans (NECPs)



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