Report:

Youth Participation in the Italian updated NECP draft



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YOUTH AND ENVIRONMENT EUROPE

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Youth Participation in the Italian updated NECP draft

This report aims to raise awareness among EU institutions, Italian institutions and the Italian general public on the shortcomings of the implementation of the Governance Regulation in Italy, particularly regarding the updating of National Energy and Climate Plans (NECPs) in the 2022/2023 period. It further aims to encourage Italian and EU institutions to pay more attention to the needs of youth as to be able to effectively participate in NECP processes, at least in line with the requirements of the 2018 Governance Regulation. Finally, this report also aims at encouraging Italian youth to advocate for more inclusive NECP processes.

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This report has been prepared following interviews with civil society organisations from Italy: ***A SUD*****,** ***ECCO Think Tank*****,** ***Legambiente***, ***WWF Italia***

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 explain policies relating to renewable energy, energy efficiency, energy poverty, agriculture, etc... which will have massive socioeconomic impact and 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 public participation in the NECP been so far in Italy?

In the absence of national governance for climate and energy, the NECP represents a key tool in defining the framework for implementing climate and energy policies for Italy. These policies have an effect on the lives of all citizens and its time horizon - ten years - is much broader than that of economic and financial planning, as well as that of Government cycles.

The long-term effect of these policies place youth in the spotlight as one of the major rights-holders and stake-holders that will benefit, or suffer, from the content of the NECP.

Despite the crucial importance of the NECP, multi-stakeholder participation in its processes in Italy has been poor and sporadic. In this framework, there appeared to be no space for youth to participate and actively engage.

In general, interviewed civil society and NGO representatives have spotted inexistent public participation processes related to climate policy-making in Italy, which, among others, left youth behind. The absence of youth representation in the NECP consultations is therefore to frame it in the bigger picture: the Italian Ministry of Environment and Energy Security (MASE) was found unprepared to organise consultations even with the biggest environmental NGOs and Think Tanks in Italy.

Some of the issues encountered with regards to public participation:



As reported by WWF Italia, the MASE did not organise formal participation procedures with regards to the NECP. The text of the 2023 NECP was made available on the Ministry's website only *after* its transmission to the European Commission, undermining the establishment of an effective and transparent participation path.



In relation to the proposal to update the NECP, stakeholders, including environmental associations, were involved exclusively through the invitation to complete a generic questionnaire, **without having the possibility of consulting or discussing the draft update**, nor its fundamental guidelines. This format made it impossible for stakeholders to express their opinion in a complete and satisfying manner.



A SUD reflected on the transparency issues around this questionnaire: it was and still is very unclear what will the results of the questionnaire be used in. The second questionnaire was launched in March, before the final deadline of June 2024, reflecting the same faulty participation procedure and lack of transparency that interested the first one. The questionnaire will stay open for a month's time.



According to ECCO Think Tank, the problem of public participation goes beyond the NECP-related processes. As reported, safe for some virtuous local examples, there are different levels of experience and culture of public participation in Italy depending on the local or regional context. In this framework, the Italian institutions were found unprepared to meet the EU legal participation requirements related to NECP processes on a national level.

Overall, at national level public participation is merely conceived as an *administrative process*., Because of this "lack of national culture of participation", even the major Italian NGOs faced many challenges when trying to have their say in the NECP. While Legambiente presented different observations and press releases, WWF Italia participated in a consultation with the EU commission before the revision of NECPs. The meetings, they said, came as a result of a lot of pressure from their side.

Overall, information about consultations were to be found in the website and the specialised press. WWF also reported to have sent three letters to the MASE, in which they requested multi-stakeholder dialogues to be organised. They have also met with the energy department of MASE, and asked for broader consultations to take place. Despite these many efforts, WWF Italia was not invited to the "technical tables", while they reported that enterprises, on the other hand, participated.

How has youth participation in the NECP been so far in Italy?

All organisations interviewed reflected the same feedback on youth participation: in the given framework, participation in NECP processes from youth civil society was extremely challenging and characterised by lack of information about participation opportunities and lack of time to properly organise.

Lack of youth involvement

WWF YOUng reported that **no youth organisations participated in NECP processes**. They reported that the NECP in Italy is not conceived as a set of *objectives*, but rather as of *technicalities*. This approach has hindered youth participation. Moreover, Italy suffers from a **problem of narrative** concerning youth: despite being citizens at 360 °C, which, among others, actively contribute to the political life of the country, the NECP example shows that youth is hardly recognised as such when it comes to put in place participatory processes in Italy.

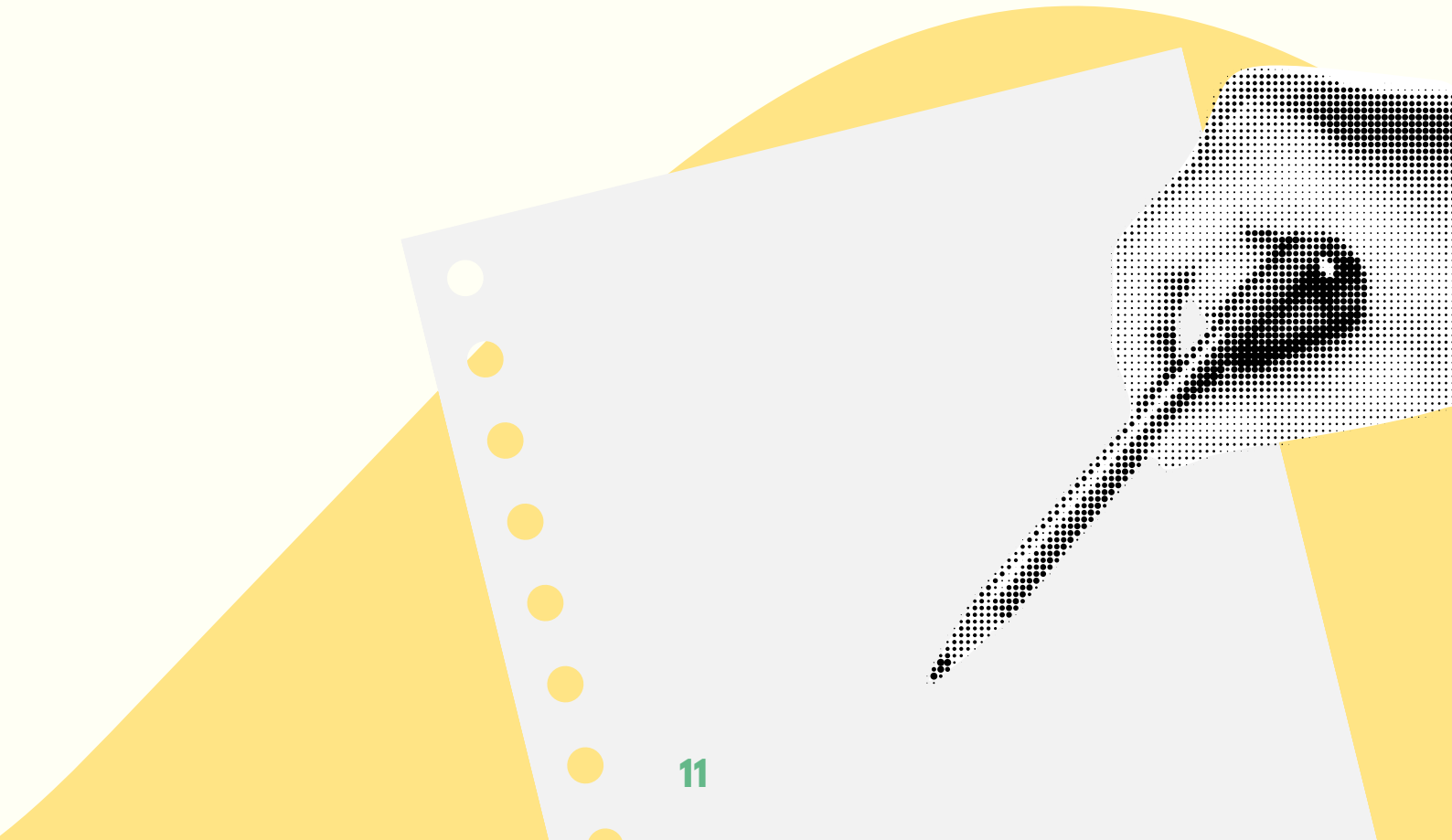
No sufficient training

ECCO Think Tank usually collaborates with youth organisations in Italy. However, they reported that on such complex plans as the NECP, it is **difficult to have all the skills necessary** to express informed judgments (even if actors participates in the consultations as an organisation), **without there having been a phase of training** and dissemination of information which, in participatory processes, should precede the discussion and deliberation phase.

Lack of transparency

Legambiente stated that youth are key rights-holders of this process. Moreover, they are unique advocates for intersectional approaches to climate change. In their experience, young people approach the climate change topic in its entirety, including eco-feminism, sustainable food, eco-anxiety, social issues, etc... Despite being key stakeholders in these processes, Legambiente also reflected on what said above, that the **non-transparent and technical nature of the plans discouraged youth from actively participating**.

A SUD also reported a general distrust from youth towards institutions, and the lack of a general participation framework which also affected youth participation.



Recommendations
to the Italian government

What all the organisations have reported is that for the case of Italy, before talking about how to increase youth participation, it is important to strengthen public participation processes in general.

Ahead of the final submission of NECPs, ECCO suggests these as basic requisites:



Bodies and resources dedicated to the management of multilevel dialogue, including both central coordination bodies and coordination bodies of the sectoral permanent tables.



Mapping of the subjects to be included in the multilevel dialogue and involved in the NECP review process.



Determining the timescale and methods of carrying out the dialogue and the participatory process in the definition phase of the Plan, before sending the final version. The time frame and methods of implementation must also be defined for the subsequent implementation, monitoring and evaluation phases of the plans.



Channels and tools for targeted participation with supervisory bodies and institutions. These should also include the channels and tools for disseminating information relating to the participatory process, with the aim of increasing its visibility.

More information can also be found here.

A good starting point could be to start learning from good practices, of those local realities in Italy that have implemented good public participation processes.

In this framework, there are additional steps to take to increase participation from youth civil society

- Legambiente clearly states that it is necessary to, first among all, **stop with youth-washing**.

> *"In order to build trust from youth, communication is key. And communication is made of two actors. In order to properly communicate, we must be ready to listen first. Until youth see a different approach to communication, until they have the proof to be listened to when consulted, there will always be scepticism on their side towards institutions"*

- WWF YOUng and ECCO Think Tank suggest that another crucial part is to **better disseminate information** and to organise specific education and capacity-building programmes, involving schools and universities.

- It is important to **change the narrative**, as the NECP is not just a set of technicalities, but a long-term plan that will affect the younger and future generations first and foremost, as from these policies we define our path to 2050. The NECP will therefore have an effect on social and environmental inequalities, including intergenerational ones.

ECCO Think Tank has produced these shadow NECP where they further underline the socio-economic impact.

Conclusion

Public participation appears to be very poor in Italian climate and environmental policymaking. What has been spotted in the NECP processes is just the tip of the iceberg, below which public participation is merely understood as an *administrative procedure* rather than a human rights obligation. If we all want to embrace the just transition, we have to start by enabling fair and transparent multi-stakeholder dialogues, starting from consultations and ending up with including the comments and suggestions of the public into the policies.

Including youth representatives in the discourse, along with many other groups, is essential as they provide a unique perspective on what the NECP should look like to be apt for a 2050 strategy.
Not realising that youth has not been given the means and right opportunity to have their say in the drafting of policies that will highly affect their lives is very worrying and discouraging. Public participation, including youth, is the sole way to build the path towards carbon neutrality, and the sole way to make sure the rights of present and future generations are not undermined.

Our call is clear: let's make NECPs fit for 55 starting from involving those people that in 2050 will either benefit from the success of NECPs, or suffer disproportionately from their failure.

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 Cyprus, 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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