

TO: Beatriz Yordi, Director DG CLIMA (Clima.B), European Commission

Cc Mette Quinn, Head of Unit DG CLIMA, European Commission; Milena Damianova, DG CLIMA – Legal Officer

Letter regarding stakeholder participation in NSCP drafting – Brussels, 2 June 2025

Dear Beatriz Yordi, Mette Quinn, and Milena Damianova,

As the deadline for EU member states to submit their National Social Climate Plans (NSCPs) approaches, we urge you to carefully consider whether the public participation has been sufficient in all member states and to encourage national governments to continue with stakeholder engagement after the European Commission has assessed the draft NSCPs.

We applaud that the Commission has placed an emphasis on public participation in its guidance documents and expert group meetings with national ministries, and urge you to carry that emphasis through to the ultimate assessments of the plans.

As you know, the Social Climate Fund is critical to supporting those most vulnerable to ETS2 prices, but the Commission should not unconditionally approve NSCPs that have been written without reasonable participation. Ultimately, without the participation of stakeholders who are most familiar with vulnerable groups a plan cannot possibly fulfill the requirement of an “adequate response to the [...] challenges faced by vulnerable households” (assessment requirement under article 16(3)(a)(i) of Regulation(EU) 2023/955).

As a membership organisation, the EEB is aware that the scale and depth of participation vary markedly across member states. While some national ministries (in Latvia) began officially consulting in 2024, others (in Ireland, Hungary) have not even begun at the time of writing (June 2025). Minimum standards of the Aarhus Convention on access to environmental information, public participation, and access to justice clearly apply to the drafting of NSCPs (applicable to NSCPs through article 10 of Regulation (EU) 2018/1999). Consultations launched too close to the plans’ submission deadline cannot meaningfully impact the content of the plans and are in violation of the Aarhus Convention’s requirement of consulting when all options are still open (article 6(4) of the Convention).

We propose two constructive approaches to improve participation:

Firstly, we strongly encourage the Commission to engage directly with CSOs from those countries in which participation in elaborating draft NSCPs has been very limited. This will enable the Commission’s assessment to reflect the inputs from civil society. Our members would be happy to engage in this.

Secondly, we urge the Commission to request that plans which are subject to either a negative assessment or an assessment with observations and additional information requests, are opened for **another round of consultations** during revision of the NSCPs.

This would allow for more meaningful stakeholder engagement and for concrete proposals to be given, as there would be a full text to comment on, as many of our members did not have the opportunity to do so during the current NSCP drafting process. This approach has also been successful in National Energy and Climate Plans where many member states rectified lacklustre consultation processes in a subsequent second round.

Our members are also concerned that their governments may not adhere to the additionality principle when allocating their SCF resources. We are very interested to know how the Commission intends to ensure additionality is respected, and what actions would be taken in cases of non-compliance.

We also wish to draw your attention to the monitoring of these funds once the SCF is released to member states. Our members have raised multiple concerns about how the Commission will ensure that the money is spent on what is promised in their NSCP, particularly in the largest recipient countries. Previous EU funds have been misused (such as the €700 million Halászka Community Reservoir, which never held any water), and we believe it is critical that measures are put in place now to ensure this does not happen again with the SCF. There is a risk of some countries using government-linked contractors to greenwash the monitoring process if the responsibility for monitoring is left to member states. We urge the Commission to dedicate funding for the independent monitoring of SCF spending, either at national or EU-level, to ensure that the money is effectively spent on the core objectives of the SCF.

Signed by:

