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## Introduction

### Executive Summary

This synthesis paper draws lessons from the fourth working package of the GreenPaths project. Based on the work by GreenPaths partners on the policy coherence of institutional, legal and regulatory frameworks for the green transition and the political economy of green transitions, it provides seven suggestions for enhancing policy coherence. We situate the political economy analysis in three dimensions of policy coherence; policy quality, policy effects and stakeholder participation. This analysis revealed profound incoherencies across EU-wide and national frameworks, reflecting underlying political-economic structures that systematically prioritise accumulation over ecological sustainability and social justice. Examining policy quality, impacts, and stakeholder participation shows that these structures produce contradictions rather than coordination.

Based on some of the most pressing issues we have identified seven suggestions for improvement in these three dimensions. First, to improve policy quality, we advise seeing the transition as a comprehensive socioecological transformation with a stronger emphasis on environmental and social objectives instead of merely an economic one. Moreover, transition planning needs to give detailed timescales for the social and environmental transition, not only for extraction. An important issue in terms of policy quality is improving its organisation by increasing capacity and funding for the green transition. To help improve and mitigate policy effects it is important to provide for comprehensive impact assessments that recognise adverse effects and impacts. Next, these negative effects and conflicts need to be addressed through policymaking. Finally, to improve stakeholder participation we suggest that policy frameworks should strengthen processes of consultation, codesign, co-decision and co-ownership and allow for alternative forms of participation and governance. Additionally, transparency and due process need to be enhanced. Taking these first steps will allow for more space to citizens, labour organisations and civil society to find their place in the upcoming social and ecological transformation.

Dimension	Suggestion
Policy Quality	Suggestion 1: Comprehensive socioecological transformation with a stronger emphasis on environmental and social objectives
	Suggestion 2: Plan for more than extraction; detailed timescales for the social and environmental transition
	Suggestion 3: Organise the green transition: Increase capacity and funding for the green transition
Policy Effects	Suggestion 4: Provide for comprehensive impact assessments that recognise non-economic effects and impacts
	Suggestion 5: Reduce negative social and environmental effects and conflicts
Stakeholder participation	Suggestion 6: Strengthen processes of consultation, codesign, co-decision and co-ownership and allow for alternative forms of participation and governance
	Suggestion 7: Enhance transparency and due process in climate policymaking

## Keywords

Policy coherence; political economy; EU and national policy frameworks; policy quality; policy impacts; stakeholder participation;

## Intended audience

This paper is intended for policymakers, researchers, and members of civil society interested in the political economy of the European green transition, its influence on policy coherence and in improving the policy coherence of EU and national policy frameworks for a green and just transition.

## Reading recommendations

The first section of this paper gives a synthesis of the work done by GreenPaths on the political economy and applies it to the three dimensions (policy quality, policy effects and stakeholder participation) of policy coherence. Next, section two gives seven suggestions to improve the policy coherence of green transitions. The paper ends with a discussion of the suggestion and a conclusion.

## Scope

The scope of Deliverable 4.4 (D4.4) is to provide a synthesis of the work done in working package 4 (WP4) of the GreenPaths project. This consisted mainly on task 4.2 on the policy coherence of EU and national policy frameworks based on the case studies conducted between July 2024 and July 2025 and task 4.3 the analysis of the political economy of green transitions with an emphasis on the drivers, obstacles, positions and trends based on the three previous working packages. This synthesis paper seeks to concisely sum up the main findings from the previous tasks and deliverables in order to give concrete suggestions for enhancing European legal and institutional frameworks to ensure greater policy coherence.

## Organization of the work

The partners worked together on preparing this synthesis paper, we distributed the analysis of the case studies, D 4.2 the discussion paper on policy coherence and D 4.3 the discussion paper on the political economy of green transitions in Europe, where partners were asked to synthesise these resources in templates (Annex 2) that could be used by the UvA to set up this final paper. We distributed the work as follows: TNI was responsible for the template on political economies in the green transition, UvA and IPE were responsible for the template on policy quality, CES was responsible for the template on policy impacts and FoEE was responsible for the template on stakeholder participation. UvA was responsible for writing the final paper.

## Approach

To synthesise the previous work done under WP4 and provide concrete suggestions for increasing the coherence of green transition policies in Europe, we have employed a group of templates. These templates consisted of guided questions that helped to synthesise the numerous sources of previous work done under WP3 and WP4. The templates focused on four different dimensions: political economy, policy quality, policy impacts and stakeholder engagements. The work on the templates was based on the case studies (in particular the recommendations that these mentioned), the templates that have been used to set up the discussion paper on policy coherence (D4.2), the policy paper on policy coherence (D4.2), and the policy paper on political economy in green transitions (D4.3). These resources were synthesised to set up concrete suggestions for enhancing policy coherence in Europe.

## 1. Political Economy of green transitions

Understanding policy coherence in Europe's green transition it is important to look beyond legal and technical assessments alone. The GreenPaths project's research in WP4 has focused on understanding the Political Economy of green transitions and the coherence of green transition policymaking in Europe. In this first section we will discuss how the Political Economy influences the three main dimensions of policy-coherence that are central to this paper: policy quality, policy effects and stakeholder participation.

### 1.1 The Political Economy of Policy Design and Implementation

To breach the influence of the Political Economy on policy quality, it is key to look at policy design and implementation. The design and implementation of transition-focused strategies, policies, and programmes in Europe highlight core tensions in setting objectives. The European Green Deal positioned itself simultaneously as a climate strategy and a growth framework, embedding a possibly irresolvable contradiction (Clifton et al., 2025<sup>2</sup>). Economic and extractive objectives consistently override climate justice commitments, as evidenced by the Critical Raw Materials Act's creation of 'sacrifice zones' and the recent shift towards the Clean Industrial Deal's emphasis on competitiveness and deregulation (Piccardi et al., 2025; Van den Berg et al., 2026)). International climate agreements (UNFCCC, Paris Agreement) remain insufficiently embedded in national frameworks, which are often treated as aspirational targets rather than binding constraints (Van den Berg et al., 2026).

The temporal scope of climate policies ostensibly reflects urgency yet leads to rushed implementation, undermining proper consultation. Extractive projects receive detailed attention and streamlined approval, whilst socially beneficial initiatives face bureaucratic obstacles and insufficient resources (Van den Berg et al., 2026). Coordination mechanisms prove inadequate across multiple scales: between EU institutions and member states; across policy domains where climate objectives conflict with competition rules; and between European frameworks and Global South demands for technology transfer and climate finance (Van den Berg et al., 2026). Enforcement asymmetries reveal the determining influence of political and economic interests: member states routinely miss renewable energy targets without sanctions, whilst competition violations trigger immediate penalties, demonstrating differential power between forces defending property relations and those demanding climate action (Van den Berg et al., 2026).

These quality deficits stem, in part, from legal architectures protecting capital mobility. State aid rules prevent necessary public intervention (Van den Berg et al., 2026). Trade agreements constrain policy space (Clifton et al., 2025<sup>2</sup>). Intellectual property regimes block technology diffusion. Market-based mechanisms dominate not because they optimally address climate change but because they minimise disruption to private accumulation (Clifton et al., 2025<sup>2</sup>). Emissions trading, carbon pricing, and green finance taxonomies channel capital through price signals rather than democratic allocation, yet financial actors have captured these instruments for fee extraction whilst simultaneously maintaining high-carbon investments (Van den Berg et al. 2025; Clifton et al 2025<sup>2</sup>).

### 1.2 Policy Responses to the Social and Environmental Impacts of the Green Transition

Policy impacts across Europe demonstrate how this policy incoherence translates into material harm. Green transition initiatives generate new forms of extraction even while claiming climate credentials. GreenPaths' case studies have examined how critical mineral mining for batteries generates pollution, soil contamination, and health risks in Portugal (Piccardi et al., 2025), Serbia (Avramović et al., 2025), and Romania (Puiet et al., 2025), creating European 'green sacrifice zones' in which local communities bear environmental costs for distant consumption. Green

hydrogen projects risk large-scale displacement and resource conflicts. Renewable energy deployment has proceeded through privatised ownership models that concentrate wealth and power, missing opportunities to build democratic energy systems. Top-down governance models exclude vulnerable communities from decisions affecting their territories and livelihoods. Impact assessments inadequately incorporate social and ecological justice perspectives, treating distributional consequences as externalities rather than as core policy concerns that require mitigation.

Beyond European borders, GreenPaths' case studies on industrial policy in Africa, Southeast Asia, and Latin America have revealed how the green transition can signify deepening extractivism. Countries in the Global South supply critical minerals and green hydrogen while facing industrialisation constraints that have never been imposed on developed economies. Morocco's green hydrogen production serves European energy security rather than local needs. EU emissions reductions correlate with increased emissions from imports, offshoring environmental burdens. Climate finance flows as loans, increasing debt rather than as grants that acknowledge historical responsibility. The two-tiered global transition locks lower-income countries into fossil-fuel pathways while high-income regions advance green industrialisation.

### 1.3 Political-Economic Structures and Stakeholder Engagement

Failures in stakeholder engagement during policy design and implementation worsen negative impacts. Corporate interests influence decision-making through consultation mechanisms, industry associations, and lobbying relationships that environmental movements and grassroots organisations cannot match. Financial institutions shape green finance taxonomies, ensuring that bankability determines resource allocation. Multinational corporations secure technological pathways that preserve existing production relations. Worker organisations are marginalised, with restructuring proceeding through redundancies rather than democratic deliberation. Where consultation occurs, it rarely concerns strategic decisions and functions as legitimisation theatre.

Communities facing extractive projects experience marginalisation acutely. Resistance to lithium mining shows how populations reject initiatives presented as climate necessities but experienced as environmental sacrifice zones. Indigenous communities confronting land appropriation resist development models that reproduce colonial extraction. These conflicts represent fundamental antagonisms over resource control, not communication failures.

Global South countries face systematic exclusion. Their demands for technology transfer, climate finance, and policy space go unmet by multilateral organisations that perpetuate Northern dominance. UNFCCC processes, IRENA, and the World Bank further 'economise' the transition through frameworks that privilege market mechanisms. EU supply chain requirements and carbon border adjustments shift costs onto poorer nations without corresponding participation in policy design.

The European Commission's pivot towards competitiveness and deregulation confirms that political-economic pressures override climate commitments when accumulation requirements conflict with ecological imperatives. Corporate interests increasingly dominate, whilst civil society faces scrutiny. Environmental regulations face rollback. Strong public opinion supporting climate action moves in the opposite direction to institutional responses, revealing whose interests determine trajectories. A lack of public participation has meanwhile eroded acceptance and shifted costs onto marginalised groups. Short-termism trumps long-term planning. Private interests override the provision of public goods.

In conclusion, genuine policy coherence would require confronting rather than accommodating fossil capitalism's political economy. Whether coalitions capable of forcing such transformations can emerge remains uncertain, but current frameworks appear constitutionally incapable of delivering the necessary change. The case study of food public procurement in the Dordogne was

an exception where we could see that coherent policy is not only possible but leads to superior environmental and social outcomes, redefining the economic logic of sustainable procurement (case 15: Mariani et al., 2025).

## 2. Creating policy coherence for a green and just transition in Europe

Notwithstanding the grave concerns mentioned above, the GreenPaths project's work on policy coherence allows for the formulation of 7 key suggestions for bringing about a more coherent policy framework for the just transition. The suggestions laid out here serve as starting points for enhancing policy coherence based on the 15 case studies undertaken in the GreenPaths project and the policy coherence analysis (D4.2).

### Section 2.1 Improving policy quality

#### 2.1.1 Suggestion 1: Aim for a comprehensive socioecological transformation that prioritises environmental and social objectives

Starting with the most important suggestion for policymakers: prepare for a comprehensive socioecological transformation. As policy quality is highly dependent on the outcome and impact of interventions, success of green transition policies can be achieved only if policy interventions prioritise ecological and social justice goals. Contrary to the exclusive and limited focus on growth, it is in the very interest of policy coherence and consistency to have ecological and social well-being as the key and overarching objective of green transition integrated in all policy areas. That said, there is a fundamental conflict that is embodied in the current policy architecture which must be recognised and resolved: growth, extraction and competitiveness are prioritised over the social and environmental objectives of green transition. As long as this primacy of economic interests is present, attempts to deal with the social dimensions of the transition, such as the Just Transition Fund, will remain residual and insufficient.

Political choices made during the early years of European Green Deal (European Commission, 2019) have since been severely shaken and the new direction of the Clean Industrial Deal (European Commission, 2025<sup>1</sup>) - followed with deregulation through Environmental Omnibus package (European Commission, 2025<sup>2</sup>) - presents a considerable barrier for further implementation of the green transition which asks for a deep and systemic transformation of institutional and governance systems. In cases where strategic economic priorities intersect with environmental and social objectives, our case studies have identified a solid number of examples where environmental protection and democratic accountability are subordinated to extraction imperatives, thus ignoring impacts for affected communities. Hence, policy coherence improvement depends highly on turning this asymmetry into more balanced relationship. This requires policy architecture that can guarantee stability and predictability of green transition policy frameworks, which are currently severely disrupted by new deregulation measures. As the large spectrum of case studies has indicated, vulnerability of affected communities, regions and social groups is very often magnified through the implementation of green transition policies, just contrary to expected outcomes. Relying on extractive practices in pursuing digital and green transition for the EU, shows rather ambiguous if not opposite results further magnifying social inequalities and even adding to poverty (Critical Raw Materials Act, Common Agricultural Policy etc). In opposition to current extractive and growth-focused policy interventions, principles of sufficiency, circularity, and material demands reduction must be embodied in green transition policies. Improvements of policy coherence, implementation, measurement and even planning cannot be successful until the fundamental conflict between growth and extraction on the one hand and environmental and social wellbeing on the other in the foundation of green transition is resolved. This requires placing ecological and social well being as the highest priority of the

transformation. **Therefore, continuation of successful green transition depends on the significant shift, if not U-turn, of policy perspective, placing ecological and social wellbeing as the key goal and main axis for future policy interventions.** In cases like the Dordogne where this wellbeing was prioritised we could also see an important improvement (case 15: Mariani et al., 2025).

### 2.1.2 Suggestion 2: Plan for more than extraction; detailed timescales for the social and environmental transition

The temporal scope of climate policies tends to reflect the urgency of climate change, urgency and time pressure, however, pose risks for the proper implementation of long-term strategies. Current extraction imperatives, for critical raw materials and renewable energy carriers for instance, do not allow for long-term strategies and planning in the Member States, which often prioritize economic objectives over green justice. The narrative of urgency in decision-making has led to inconsistent and harmful consequences, such as the so called sacrifice zones, for example in the mining sector, where it is needed to observe realistic and acceptable timeframes that guarantee planning and strategies that are proactive and representative, not conditioned by emergencies and competencies that entail unnecessary damage (Piccardi et al., 2025). This also means that are realistic temporal frameworks in place for reducing and mitigating the environmental and social impacts of policies. The growth- and competitiveness-driven logic in EU policymaking may in future enhance these tendencies, hence it reinforces the EU's reliance on market-based instruments as leading tools in green transition policymaking. These shifts together with recent global developments have significantly eroded the political capital for high-ambition climate and environmental policies in recent years. This shift may lead to reduced ambitions in future climate and environment policies, including delays or even reversals of some existing policies. Such climate backtracking severely undercuts the EU's potential to stay on track for a green and just transition.

Such shifts can be noticed in the planning of the transition. Long-term planning is oriented towards the extractive aspects of policies, while other aspects are disregarded. This means that there are clear timeframes and targets when it comes to the extraction and attainment of economic goals, but such detailed planning is lacking regarding the social goals. For instance, both the European Hydrogen Strategy (European Commission, 2020<sup>1</sup>) and REPowerEU (European Commission, 2022), predominantly address how much money will need to be invested in infrastructure and production, whereas social impacts are rarely addressed and when they are, this is done in general terms; concrete measures are missing.

These tendencies were also present in the case studies. A central finding of the case studies is that long-term planning is structurally asymmetric, with no planning for transition measures on use of resources by the affected communities and their livelihood. When planning exists through formal mechanisms like in the CAP Strategic Plans 2023-2027 (European Commission, 2025<sup>3</sup>), implementation contradicts stated sustainability objectives through various market liberalization mandates embedded in different policy domains. Extraction infrastructures receive multi-decade planning horizons and urgency while community livelihoods are treated as requiring no temporal framework at all. This asymmetry undermines policy coherence and the priorities among diverging policy goals.

Addressing these problems requires the EU to undertake an approach to planning the transition that is forward looking, but that recognises the urgency of the climate crisis. In connection to our first suggestion, this requires the **introduction of an integrated transition plan at EU level** would enhance effectiveness and simplify implementation.

**Short timeframes** of the EU legislation that require ambitious targets to be met by 2030 **should be reconsidered under holistic approach** taking into consideration natural, social and

economics conditionality, including long-term transition needs of affected communities. Holistic approach would better highlight the complex conditionality of transition planning related to green targets. In turn, longer-term planning may drive to more sustainable solutions.

**Timeline inconsistencies in EU legislation need to be mapped and fixed by future legislative amendments**, hence these negatively affect long-term transition planning at the national level. Inconsistencies between long-term strategies and national climate and energy plans may be tackled by harmonising the submission timelines. **Balancing competing short-term interests against long-term green transition commitments** seems to be persisting challenge at national level. While policy planning at national level complies and often over-performs compared to the EU targets, at level of implementation the short economic demands often override the EU climate objectives. Short-term objectives need to be anchored in long-term context, targeted at effective implementation instead of over performing political commitments towards the EU, such as in case of Romania (Puilet et al., 2025).

### 2.1.3 Suggestion 3: Organise the green transition: Increase capacity and funding for the green transition

This focus on economic objectives by the EU and its member states has an important influence on the capacity and resources that are mobilised for the social and environmental dimensions of the green transition. Even where policies may work on paper, several findings in the case studies suggest a lack in available capacity and funding have adverse effects on the green transition. For example, a study on the Common Agricultural Policy and Land Use (Pistotnik & Kušej, 2025) revealed that environmental impact monitoring in Slovenia is understaffed and data-poor, resulting in underperformance in implementing relevant policies, among other issues identified in the case study. The lack of capacity of national and local authorities to provide adequate information to EU institutions, lead to poor outcomes when it comes to reporting, coordination, monitoring, and enforcement of the policies. Another example, the case study dedicated to green financing (Clifton et al., 2025<sup>1</sup>) revealed that the European Investment Bank (EIB), which was charged by the European Commission to operationalise the European Green Deal Investment Plan (European Commission, 2020<sup>2</sup>), disproportionately allocates climate finance to cities and other urban regions, which are largely responsible for the climate crisis but better placed to attract climate finance whilst regions in the periphery and rural places, more vulnerable to the green transition, receive proportionally much less climate finance. It is also submitted in the case study that EIB's lending operations lack transparency on where climate finance actually goes and that environmental and social aspects are often neglected. These findings raise the question if the European Commission lacks staff, expertise or legal instruments to exert more effective control over EIB's operation regarding the European Green Deal Investment Plan. Finally in certain areas, there is a lack of policymaking to begin with. efforts to mitigate climate impacts in tourism remain extremely limited, without proper EU reinforcing mechanisms for implementation or developed monitoring categories for environmental and social impacts (Horvat, 2025). These examples all show how coordination, enforcement and monitoring suffer from adequate capacities and under-resourcing.

The inconsistencies in coordination, enforcement and monitoring in EU policies have also spilled over globally, so the shortcomings of the one-sided long-term planning are affecting third countries as well. In general, at the EU level, the lack of international cooperation and coordination on climate policies has led to carbon leakage in the global south (Kopp & Abbas, 2025). However, these negative outcomes are not limited to carbon leakage. One example is the production of hydrogen in Morocco (Hamouchene & Chavez, 2025): EU-based companies invested in projects that were associated with land conflicts, endangering water supply to local

populations, implemented on occupied territory, which has contributed to reinforcing Morocco's territorial claims. Another example is the case of Southern Africa (Andrews & Chavez, 2025), where a lack of (international) funding has stalled the transition for countries most at risk of adverse effects from climate change.

**This all shows that governments need to invest more resources in achieving the green transition and be more transparent about their financing of the transition.** Building public capacity and providing adequate access to funding for projects will be central to the success or failure of the transition. One example of further capacity building is to introduce **transition units across various EU Commission Directorate-Generals** for aligning and refining different policy tools. This would help find synergies among conflicting demands. Such units would be responsible for granting an integrated approach on EU legislation in different sectors and for setting clear timelines and pathway towards creating an integrated single transition plan regulatory framework. Another important step is to introduce **more consistency among EU policy coordination and funding mechanisms**, such as the economic governance framework (for example, the European Semester and Member States fiscal plans) and the Multiannual Financial Framework (MFF) could lead to more effective implementation of the green transition objectives.

Organising the transition with sufficient resources should not, however, only be a European affair. **At the global level sufficient financing options should be available to the global south.** Reparative climate finance could resource transitions in the Global South without imposing debt. Moreover, **just green transition requirements need to be integrated across EU external actions as well**, in trade and investment policy and international climate finance. Increasing international coordination and cooperation on these topics is essential for ensuring the green and just transition.

## Section 2.2 Policy Effects

### 2.2.1 Suggestion 4: Provide for comprehensive impact assessments that recognise non-economic effects and impacts

To properly understand the impacts of EU policies, a first important step is to set out impact assessment frameworks that recognise non-economic harms. Throughout the case studies it has become clear that impact assessments for green transition policy are near exclusively focused on economic indicators. For instance, cases 1 (Piccardi et al., 2025) and 12 (Avramović et al., 2025) found that current regulatory and planning frameworks fail to account for cultural, social and ecological harms arising long before mineral extraction. Existing qualitative data are sporadic and do not consistently cover all European regions or shifts in policy objectives. Case 1 calls to expand just transition frameworks to explicitly address the intersectional inequalities aggravated by green extractive projects. Social indicators (e.g. income inequality, energy poverty, employment) in environmental policy evaluation can help ensure social costs are identified early and mitigated proactively.

Addressing transition policy measurement and impact assessment gaps requires expanding indicators. For example, for the Common Agricultural Policy (case 4: Pistotnik & Kušej, 2025), indicators on land concentration and access, rural depopulation and service decline would illuminate policy effects and equitable grant distribution. Cases exploring North-South and South-South industrial policy dynamics (cases 5, 6, 7 and 8: Chavez, 2025; Sing & Chavez, 2025; Andrews & Chavez, 2025; Hamouchene & Chavez, 2025) highlight the need for data providing a full value chain perspective, connecting global and regional coordination mechanisms for critical minerals, battery manufacturing and green hydrogen, linked to policies like the CRMA, including production ownership indicators on value capture proportion by regional actors versus external corporations. Enriching data can grow knowledge on procedural SEJ

and social dimensions of renewable energy value chains. As case 2 (Puilet et al., 2025) found with Just Transition Agreements (JTAs) in the Spanish fossil fuel phase-out context, assessing policy impacts requires continuous, participatory evaluation and diagnostic processes that evaluate longitudinal, systemic risks of concentrating hazardous facilities in rural or economically vulnerable areas.

**Environmental impact assessments should be mandatory before industrial expansion, with meaningful community consultation and compensation.** Environmental Impact Assessments (EIAs) and strategic assessments should include indicators for non-economic Loss and Damage, co-designed with affected communities. This includes targeted indicators and stronger framework to capture intersectional vulnerabilities for community well-being and human/ecosystem health, embedding non-economic Loss and Damage into transition governance, strengthening the Warsaw International Mechanism (2015). Finally, it is necessary to develop context-specific well-being indicators beyond GDP - reflecting ecological health and distributional outcomes - would reorient policy evaluation away from conventional economic growth metrics (Noman and Stiglitz, 2016).

### 2.2.2 Suggestion 5: Reducing negative social and environmental effects and conflicts

The GreenPaths case studies point not only to a lack of assessment of adverse social and environmental impacts, but also to a lack of effective measures to prevent and mitigate these issues. For instance, the CAP (case study 4: Pistotnik & Kušej, 2025) increases land concentration and the loss of jobs for senior farmers and women, the distribution of climate finance by the EIB (case study 9: Clifton et al., 2025<sup>1</sup>) may deepen urban-rural divides by privileging urbanised areas and the neglect by policymakers to address the conflicts between big industry players and local communities in the tourism industry threatens to aggravate these conflicts. It is thus important to not only understand how EU and national policy frameworks affect citizens and conflicts, but also how these effects and conflicts may be mitigated.

Problematic conflicts are sometimes rooted within the frameworks themselves. A recurrent source of conflict emerges in disputed spaces between proclaimed green transition goals and policy instruments. Case 11 (Van den Berg & Radonjić, 2025) identified that enforcement can conflict with EU objectives, with EU Court of Justice rulings requiring Saharawi consent for Western Sahara green hydrogen projects. In case 1 (Piccardi et al., 2025), the CRMA's designation of a Strategic Project in Northern Portugal ignored breaches of the UN Aarhus Convention. The CAP case (Pistotnik & Kušej, 2025) exemplifies coordination failure at policy architecture level, with lack of substantive compliance and cross-compliance standards. Policy effects are overwhelmingly measured and reported through economic and financial metrics (pricing, investments, monetary and fiscal) while social and environmental impacts remain underreported. Another problematic example is a case of lithium mining in the Jadar Valley in Serbia (Avramović et al., 2025). The project caused public protests, and the scientific community in Serbia warned that the realization of the project would pose a serious risk for the environment and health, and would endanger large underground freshwater reserves. Given that Serbia is an EU candidate country European Commission issues periodic reports about Serbia's progress towards EU membership. These reports reflect the poor state of the rule of law in Serbia. Yet the very same Commission listed the Jadar Valley lithium project as a strategic project. To avoid such outcomes in the future, we suggest tying the support for projects being part of the green transition that carry substantial environmental risks to the state of the rule of law in a country, especially in third countries.

**Conflict resolution instruments must address conflicts through policy mechanisms that protect against socio-environmental threats in transition planning,** in ways that are not subservient to the financial, mineral, land, agricultural, industry interests of green energy projects. Cases 1, 6, and 12 (Piccardi et al., 2025; Singh & Chavez, 2025; Avramović et al., 2025)

suggested establishing criteria for “no-go zones” and community vetoes for mining, particularly when encroaching on protected Natura 2000 areas, EU Biodiversity sites and Globally Important Agricultural Heritage Systems (GIAHS). Land conflicts are central to the transition; proposals to better regulate green-grabbing loopholes must establish stricter oversight for large-scale land acquisitions (cases 2 and 4: Pualet et al., 2025; Pistotnik & Kušej, 2025). Financial instruments recommendations include tracking green financial policy investment and effects, mobilising public finance through reformed development banks, debt relief for climate investment, and new concessional financing instruments tailored to green industrialisation requirements (cases 7, 8, 9, and 10: Andrews & Chavez, 2025; Hamouchene & Chavez, 2025; Clifton et al., 2025<sup>1</sup>; Kopp & Abbas, 2025). Policies increasing technology transfer requirements, public research investment, and state investment in public renewable companies can retain more value chain benefits within national economies (case 8: Hamouchene & Chavez, 2025). Serious efforts towards sustainable tourism require coordination between different national ministries and EU-wide agencies (tourism, economy, transportation, environment etc.) that can better align monitoring and generate new policies recognising detrimental impacts (case 13: Horvat, 2025; case 15: Mariani et al., 2025).

## Section 2.3 Stakeholder engagement

### 2.3.1 Suggestion 6: Strengthen processes of consultation, codesign, co-decision and co-ownership and allow for alternative forms of participation and governance

In order to achieve all the abovementioned improvements, a key requirement will be the strengthening of participation by citizens, unions and other groups. The lack of stakeholder participation mentioned in nearly all case studies exacerbates the negative impacts of the transition. Many key stakeholders do not have voice in policymaking for the green transition at the EU nor at the domestic level, thus their long-term transition needs are not considered in strategy planning. Findings across the case studies point to a need for improved transparency and public participation in policy design and implementation, with mechanisms that enforce, not bypass, international human rights and environmental law. Lack of public participation in policy supports exclusionary narratives and exacerbates negative transition impact.

Guaranteeing free, prior, and informed consent (FPIC) processes that are inclusive and representative, and firmer stipulations that EU fund allocation must be conditional on integrating rigorous, participatory Socio-Environmental Impact Assessments (SEIAs) to pre-emptively evaluate impacts on vulnerable groups (case 1: Piccardi et al., 2025)). Regarding recognitional and procedural SEJ, EU procedures for participation and impact assessment should better integrate perspectives of vulnerable groups and communities especially affected by energy policies. The Aarhus Convention requirements on public participation must be applied in full, at all government levels and by third parties (cases 1 and 12: Piccardi et al., 2025; Avramović et al., 2025).

**Substantive democratic participation includes:** the legally recognised right to protest, to propose alternatives and for communities to veto green projects (1 and 6: Piccardi et al.; Singh & Chavez); and meaningful representation in policymaking bodies not consultative window-dressing (6: Singh & Chavez). Energy democracy (8: Hamouchene & Chavez), convivial conservation (2: Pualet et al.), energy communities (14: Komazlić et al.) and degrowth spatial politics (13: Horvat) are among frameworks proposed where affected communities have decision-making power over energy infrastructure development, location, and ownership affecting their territories. Findings suggest space for the aforementioned and other alternative degrowth, post-extractivist, decarbonisation and conservation models for JT policy that could be formally recognised as Other Effective area-based Conservation Measures (OECMs).

### 2.3.2 Suggestion 7: Enhance transparency and due process in climate policymaking

The final suggestion that we make is by no means a novel one, but it sits at the core of the problems that feature in our reporting. The need to enhance transparency and due process is acute, especially within the green transition. One example of the lack of transparency was encountered in the research on CAP's impact on land use in Croatia, Slovenia and Serbia (case study 4: Pistotnik & Kušej), here the lack of publicly available information on land concentration and land registry reinforced processes of land concentration. Other effects highlight data gaps. In case 9, the European Investment Bank's (EIB) European Green Deal Investment Plan (EGDIP) does not publish full data on the regional distribution of its climate finance, with over half (2021-2023) disproportionately falling to larger cities, suggesting an urban-rural divide that may exacerbate cosmopolitan, distributional and recognitional injustice. Fuller data on such structural, capacity and resilience-building financial instruments can better target future funding, with the EIB's new Tracker tool designed to address longstanding challenges in monitoring the location and allocation of climate funds.

In terms of due process, it is clear from the issues that were discussed in our previous suggestions that there are severe problems with following due process in many realms of policymaking. In our 4.2 discussion paper we already noted this trend:

“Across the case studies, similar patterns emerge: restricted access to information, weak public participation, and disregard for consent rights. Timely accessibility to governmental data was problematic in among others Morocco and Serbia. Public participation was shortcoming in Serbia (case study 12), Romania (case study 2), Portugal (case study 1), Morocco (case study 8 & 11), Egypt (case study 8). The land of the Saharawi was being offered to investors without their consent, ignoring the internationally recognised status of Western Sahara.” (Van den Berg et al., 2026)

This all comes together perhaps most strikingly in the recent Sustainability Omnibus, where a severe lack of transparency and a disregard for due process under the Aarhus convention (UNECE, 1998) resulted in institutional backtracking on the green transition. To prevent further backtracking, it is essential that EU and national policymakers strive for full transparency and commit to due process requirements. This in the first place requires institutions to adhere to existing legal and policy frameworks. Next a greater public availability of data and information will enhance public participation and public control over decision making. To achieve greater transparency data should be published on among others the distribution of climate finance, introducing tracking tools and requiring public land registries throughout the EU. Moreover, compliance mechanisms for the EU and its member states need to be established to ensure EU and international climate and human rights law is adhered to. Cases such as the Western Sahara, where transition policies have been used to legitimise illegal occupation require a unified response from the international community, no international recognition should be given to renewable energy projects on occupied territory.

## Discussion and Conclusions

The current political climate in Europe looks unfavourable for transformative change and with rising global tensions we seem to be moving backwards instead of forwards in bringing about a green and just transition. The Earth's climate, however, will not wait for more favourable times. The geophysical processes that have been set in motion are moving forward, so long as we continue to live beyond the Earth's boundaries. To heed this challenge policymakers will need to radically change legal, institutional and policy frameworks, recognising the magnitude of the challenge that is ahead of us. In this synthesis paper we have sought to give a starting point for this task by giving seven suggestions for improving policy frameworks in Europe across three dimensions (table 1). These suggestions certainly are neither exhaustive nor comprehensive but

are the central lessons that can be drawn from our work on EU and national policy frameworks for the green transition in Europe.

Dimension	Suggestion
Policy Quality	Suggestion 1: Comprehensive socioecological transformation with a stronger emphasis on environmental and social objectives
	Suggestion 2: Plan for more than extraction; detailed timescales for the social and environmental transition
	Suggestion 3: Organise the green transition: Increase capacity and funding for the green transition
Policy Effects	Suggestion 4: Provide for comprehensive impact assessments that recognise non-economic effects and impacts
	Suggestion 5: Reduce negative social and environmental effects and conflicts
Stakeholder participation	Suggestion 6: Strengthen processes of consultation, codesign, co-decision and co-ownership and allow for alternative forms of participation and governance
	Suggestion 7: Enhance transparency and due process in climate policymaking

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## Annex

### Annex 1: Table of GreenPaths Case Studies

GreenPaths Case Studies
Case study 1: Lithium Mining and the 'Green Sacrificial Logics' of the Energy Transition in Barroso, Portugal.
Case study 2: Europe's Yellowstone? An analysis of the social impacts of forest conservation in Romania
Case study 3: Just Transition Agreements – Coal mine and thermal power plant closures in the region of El Bierzo-Laciana (Spain)
Case study 4: Assessing the Impacts of the Common Agricultural Policy (CAP) in Land Use in Slovenia, Croatia and Serbia
Case study 5: Green Industrial Policy and Ecological Transformation in Latin America: A Transformative Perspective
Case study 6: Green Industrial Policy in Southeast Asia: Developmental States, Export-Oriented Manufacturing, and the Paradox of 'Green' Transitions
Case study 7: The Paradoxes of Green Industrial Policy in Southern Africa
Case study 8: Green Industrial Policy in North Africa: Between Energy Sovereignty, Authoritarian Governance and Neocolonial Extraction
Case study 9: Climate finance and its distribution in the EU
Case study 10: Effects of green transition policy interventions on environmental sustainability and social wellbeing in EU countries and in 24 selected countries in the Global South
Case study 11: The European Hydrogen Economy: A Carrier for the Green and Just Transition?
Case study 12: Mining Lithium in Serbia
Case study 13: Green transformation of tourism industry – Case of Croatian urban tourist destinations
Case study 14: Energy poverty in Central and South-Eastern Europe
Case study 15: Public food procurement as a lever to foster the just and green transition – Dordogne case study

## Annex 2: Templates Synthesis

### Template synthesis 4.4: Political economy (TNI)

**Main question:** How does the political economy of the green transition affect (problems with) policy coherence in Europe?

**Sub-questions:**

1. How does the political economy of Europe (EU + MS) influence the political objectives of the green transition?
2. How does the political economy of Europe (EU + MS) influence the policymaking (eg. instruments employed, enforcement) in the green transition?
3. How does the political economy of Europe (EU + MS) influence the stakeholders involved in (governing) the green transition?

**Resources:**

Main resources: 4.3 report on the political economy of the green transition; 4.2 report on policy coherence in European and National policy frameworks

**Supplementary resources:**

Questionnaires, Templates, case studies

Template synthesis 4.4: Policy quality (IPE + UvA)

**Main question:** How can the European legal and institutional frameworks for policymaking for the green transition improve the quality of policymaking?

**Sub-questions:**

1. How can the policy integration and consistency of European legal and institutional frameworks be improved? (IPE)

This question asks whether EU and national frameworks can be improved by integrating (often sectoral) policymaking on key challenges (such as food security and environmental justice) and whether policies and in particular their goals can be made more consistent.

2. How can the timescale and long-term planning of European legal and institutional frameworks be improved? (UvA – Monika)

What are the ways in which policy frameworks can better make long-term planning of just green transitions?

3. How can European legal and institutional frameworks benefit from better coordination, enforcement, monitoring and reporting? (UvA – Aleksa)

This question focuses on the ways that institutional capacities influence green transitions by looking at the ways in which coordination, enforcement, monitoring and reporting can be improved.

**Resources:**

Main resources: 4.2 report on policy coherence in European and National policy frameworks; Templates; Case Study Recommendations

**Supplementary resources:**

4.3 report on the political economy of the green transition, Questionnaires

#### Template synthesis 4.4: Policy Effects (CES)

**Main question:** How can the European legal and institutional frameworks for policymaking for the green transition improve the (assessment of) effectiveness of policymaking?

**Sub-questions:**

1. How can the economic, social and environmental impacts (and their assessment) of European legal and institutional frameworks be improved?

This question asks in what ways legal and institutional policy frameworks can better assess and mitigate/ promote economic, social and environmental impacts. Are there clear ways in which legal and institutional frameworks for policymaking are missing or treating these impacts?

2. How can European legal and institutional frameworks prevent conflicts (legal, political, institutional etc.)?

What are the ways in which policy frameworks can better address and resolve potential conflicts that may result from policymaking?

**Resources:**

Main resources: 4.2 report on policy coherence in European and National policy frameworks; Templates; Case Study Recommendations

**Supplementary resources:**

4.3 report on the political economy of the green transition, Questionnaires

#### Template synthesis 4.4: Stakeholder Participation (FoEE)

**Main question:** How can stakeholders become more involved in European legal and institutional frameworks for policymaking for the green transition?

**Sub-questions:**

1. How can regional and local governments be ore involved in European legal and institutional frameworks for policymaking for the green transition?

This question asks in what ways legal and institutional policy frameworks can better assess and mitigate/ promote economic, social and environmental impacts. Are there clear ways in which legal and institutional frameworks for policymaking are missing or treating these impacts?

2. How can European legal and institutional frameworks reach and involve more stakeholders in policymaking for the green transition?

What are the ways in which policy frameworks can encourage public participation by a wider range of stakeholders. Here it is particularly interesting to see how vulnerable and marginalized communities can be better integrated and represented in policy-frameworks.

3. How can transparency and due process be reinforced in European legal and institutional frameworks for policymaking for the green transition?

This question seeks to ask how legal and institutional frameworks can enhance transparency and (democratic) due process in European legal and institutional frameworks. What are the most important ways in which these values can be enhanced to encourage public scrutiny and participation?

**Resources:**

**Main resources:** 4.2 report on policy coherence in European and National policy frameworks; Templates; Case Study Recommendations

**Supplementary resources:** 4.3 report on the political economy of the green transition, Questionnaires

