



# Civil Society & the National Recovery and Resilience Plans: A Reality Check

An analysis of the involvement of Civil Society Organisations in consultation processes on the National Recovery and Resilience Plans (NRRPs), and in their monitoring and implementation



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*Levegő Munkacsoport*

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Report study by Valentina Caimi (LinkinEurope) and Fintan Farrell (Independent Expert Social Inclusion) with support from the Task Force on National Recovery and Resilience Plans in Civil Society Europe and inputs from a broad range of civil society actors

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# I. Executive Summary

This study has been commissioned by Civil Society Europe to two independent experts and has three main objectives:

- to carry out a final assessment of consultation mechanisms for the preparation of the National Recovery and Resilience Plans (NRRPs) from the perspective of civil society organisations (CSOs) as compared to the official presentation
- to highlight the involvement of CSOs in the mechanisms for oversight of implementation and monitoring the plans
- to provide recommendations on ways to improve engagement of CSOs in the implementation and monitoring of the plans.

The present study was preceded by a study from the same authors, on the involvement of CSOs in the preparation of the plans, carried out in November-December 2020, coupled with a guidance note for CSOs on how to engage with national authorities during the preparation of the plans.

The follow-up study covers 11 Member States: BE, DK, EL, ES, FR, HU, IT, LT, PL, PT and RO. It has three sections: an introduction to the Recovery and Resilience Facility and its national plans; an analysis of the text of the 11 national plans relevant for the involvement of CSOs in the preparation, implementation and monitoring of the plans, accompanied by the views of national CSOs which contributed to this study with written inputs or by participating in an interview;

an overview of lessons learned from the consultation process and a proposal of recommendations to the EU institutions, Member States and civil society, on how to improve CSOs engagement in the implementation and monitoring of the plans.

The methodology used for this study is based on:

- desk research, analysis of the sections of the plans relevant for the involvement of CSOs in the preparation, implementation and monitoring of the plans and drafting of country fiches
- a survey sent to CSOs across the EU
- semi-structured interviews to representatives of key CSOs
- review of the country fiches and written input by the members of Civil Society Europe and their national members
- discussion of the key findings, draft report and draft recommendations with the Task Force on National Recovery and Resilience Plans in Civil Society Europe.

This study has some limitations, as it was conducted in a very short time frame (August-September 2021) and with limited resources. It is also based on the views expressed by the respondents and the interviewees. As not all the sectors of CSOs gave an input concerning the plans of the countries analysed, the analysis of the content of the plans and the findings of this report should not be considered exhaustive and comprehensive.

Compared with the first study that was published in December 2020, it emerges that between January to April 2021,

CSOs were more involved in consultations by the respective governments. This testifies that the first study, the resolution of the European Economic and Social Committee, and the advocacy activities of national NGOs had a positive influence.

The main lessons learned from the consultation process can be summarised as follows:

- civil dialogue channels developed around the EU Semester and ESIF were in general not used to consult CSOs on the preparation of the plans
- practices & principles deriving from the European Code of Conduct on Partnership, such as early involvement, timely sharing of information, representativeness and transparency, were not reflected in consultations
- most of CSOs that were involved in consultations were of the view that they were mainly a tick box exercise instead of meaningful consultations, with little information shared before the meetings or requests to provide inputs or comments on prepared drafts and with little time at disposal
- not all CSO sectors were involved or were involved to the same extent: environmental NGOs were more involved, social NGOs managed to influence the plans in some countries, NGOs representing youth were little involved despite the calls of the European Commission, and cultural NGOs seem to be the ones which had the least influence
- social partners were more and better consulted than CSOs
- CSO sectoral & cross-sectoral alliances were more successful in getting their voice heard than individual NGOs not belonging to any networks or alliances.

All 11 NRRPs analysed have a section on consultations, except for the Italian one. At the same time, very few (HU, LT, PL and PT plans) give account of how stakeholders' contributions, including those from CSOs, were used in the development of the plans.

Member States consulted stakeholders, including CSOs, in different ways. In BE, FR, EL, PL and PT, CSOs were mainly consulted through existing consultative bodies. In some countries sectoral consultations were organised by different Ministries (ES, HU, IT, LT, PL, and PT).

From the analysis of the plans, it can be concluded that CSOs' involvement in NRRPs implementation is not specified or it is described in a very vague manner, with the exception of the Belgian plan. The plans from BE, EL, ES, FR and IT foresee specific measures addressed to CSOs, but implementation mechanisms are not well specified, it seems they still have to be defined. When it comes to monitoring, only FR, PL, PT and RO plans explicitly foresee CSO representatives in Monitoring Committees.

However, on a more positive note, CSO respondents from some countries saw their proposals and input reflected in the plans, even if they were not consulted but sent spontaneous contributions.

The study concludes with recommendations to the EU institutions, Member States and CSOs on how to improve civil society engagement in NRRPs preparation, monitoring and implementation.

## II. Introduction

### Aim and Objectives of the Study

This study report was prepared for Civil Society Europe and was developed in the period August-September 2021. It aims to analyse the involvement of Civil Society Organisations (CSOs) in the consultation processes on the National Recovery and Resilience Plans (hereinafter NRRPs), and in their monitoring and implementation.

The study had **three key objectives**:

- to make a final assessment of consultation mechanisms for the preparation of the NRRPs from the perspective of civil society as compared to the official presentation
- to highlight the involvement of civil society in the mechanisms for oversight of implementation and monitoring the Plans
- to provide recommendations on ways to improve engagement of civil society in the implementation and monitoring of the Plans.

The key target audience of the report are EU and national decision-makers and CSOs.

This study is a follow-up of the study conducted on behalf of Civil Society Europe and the European Centre for Not-for-Profit Law in November-December 2020 on the involvement of CSOs in the preparation of the plans [1], accompanied by a guidance note for CSOs on how to engage with national authorities during the preparation of the plans. [2]

The present study, firstly, analyses the text in the NRRPs from 11 Member States on the consultation processes put in place for their preparation, as well as the content of the plans concerning the involvement of CSOs in implementation and monitoring.

Secondly, it summarises the perception of the CSOs which contributed to the study about civil society's involvement in the preparatory stage and concerning the state of the art of their engagement in the implementation and monitoring phases.

Finally, it concludes with some lessons learned from the consultation process and puts forward recommendations to the EU institutions, the Member States and civil society on how to improve CSOs engagement in the monitoring and implementation phases.

This study also points out where improvements can be seen in CSOs involvement in the period from January to April 2021, and where the situation did not change.

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[1] Civil Society Europe, European Centre for Not-for-Profit Law (December 2020), Participation of civil society organisations in the preparation of the EU National Recovery and Resilience Plans, available at [CSE-ECNL-Participation-of-CSOs-in-the-preparation-of-the-EU-NRRPs\\_spread.pdf](https://civilsocietyeurope.eu/wp-content/uploads/2021/01/Participation-of-CSOs-in-the-preparation-of-the-EU-NRRPs_spread.pdf) (civilsocietyeurope.eu)

[2] [https://civilsocietyeurope.eu/wp-content/uploads/2021/01/Guidance-Note-for-CSOs-to-engage-with-the-National-Recovery-and-Resilience-Plans\\_updated-1.pdf](https://civilsocietyeurope.eu/wp-content/uploads/2021/01/Guidance-Note-for-CSOs-to-engage-with-the-National-Recovery-and-Resilience-Plans_updated-1.pdf)

# What are the National Recovery and Resilience Plans?

The European Commission proposed the Recovery and Resilience Facility (RRF) on 27 May 2020 as the centrepiece of NextGenerationEU, a temporary recovery instrument that allows the Commission to raise funds to help repair the immediate economic and social damage brought about by the coronavirus pandemic. The RRF is also closely aligned with the Commission's priorities ensuring in the long-term a sustainable and inclusive recovery that promotes the green and digital transitions. On 17 December 2020, the Council of the European Union (EU) adopted the next long-term EU budget for the period 2021-2027. With this decision, all the conditions were fulfilled for the next Multiannual Financial Framework (MFF) for 2021-2027 to be in place as of 1 January 2021. As a result, €1.074 trillion [in 2018 prices] will become available for beneficiaries of EU funding during the next seven years. [3]

The RRF, which is a key element of the MFF, will make €672.5 billion in loans and grants available to support reforms and investments undertaken by Member States. The aim is to mitigate the economic and social impact of the coronavirus pandemic and make European economies and societies more sustainable, resilient and better prepared for the challenges and opportunities of the green and digital transitions.

Regulation (EU) 2021/241 of the European Parliament and the Council of the European Union establishing the Recovery and Resilience Facility (hereinafter RRF Regulation) was published in the Official Journal on 18 February 2021.

To benefit from the support of RRF, Member States prepared National Recovery and Resilience Plans (NRRPs) that set out a coherent package of reforms and public investment projects, to be implemented by 2026. Each Plan is expected to contribute to the four dimensions outlined in the 2021 Annual Sustainable Growth Strategy, which launched this year's European Semester cycle:

- Environmental sustainability
- Productivity
- Fairness
- Macroeconomic stability.

Member States were expected to submit their NRRPs at the latest by 30 April 2021. The deadline for final payment will be the end of 2026. Presently all NRRPs have been approved with the exception of Bulgaria, Hungary, Netherlands and Poland, where negotiations on the Plans still continue. According to article 18(4)(q) of the RRF Regulation, 'The recovery and resilience plan shall be duly reasoned and substantiated. It shall in particular set out the following elements:

*(q) for the preparation and, where available, for the implementation of the recovery and resilience plan, a summary of the consultation process, conducted in accordance with the national legal framework, of local and regional authorities, social partners, civil society organisations, youth organisations and other relevant stakeholders, and how the input of the stakeholders is reflected in the recovery and resilience plan'.*

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[[3] [https://ec.europa.eu/commission/presscorner/detail/en/IP\\_20\\_246](https://ec.europa.eu/commission/presscorner/detail/en/IP_20_246)



### III. Methodology

This study report was written by Valentina Caimi (LinkinEurope) and Fintan Farrell (Independent Expert Social Inclusion) with support from the Task Force on National Recovery and Resilience Plans in Civil Society Europe and inputs from a broad range of civil society actors.

The methodology used for this study is based on:

- desk research, analysis of the sections of the plans relevant for the involvement of CSOs in the preparation, implementation and monitoring of the plans and drafting of country fiches
- a survey sent to CSOs across the EU
- semi-structured interviews to representatives of key CSOs
- review of the country fiches and written input by the members of Civil Society Europe and their national members
- discussion of the key findings, draft report and draft recommendations with the Task Force on National Recovery and Resilience Plans in Civil Society Europe.

Given the limited time and resources for this report, the decision was made to select the same countries that were the subject of the first report for detailed attention. The authors of the report first made an analysis and a summary of the text in the plans of the selected countries, that relates to the consultation of civil society and their engagement in the implementation and monitoring of the plans. These texts were then sent to civil society representatives, connected to Civil Society Europe, in the countries concerned, asking that they give feedback on the text based on their experience of the consultation and their knowledge of proposed engagement of civil

society in the implementation and monitoring of the Plans. The feedback was received in written responses and/or through interviews. The list of organisations who contributed in this way, can be seen in appendix one.

In addition, a short questionnaire on the consultation process (see appendix two) was more openly shared with civil society organisations. 28 responses to the questionnaire were received (see appendix three) and this information was integrated into the report, it included information from countries that were not selected for more detailed attention. The authors of the report then drafted a report on the experience of civil society engagement in the consultation and follow up, based on the feedback received.

Based on this, the authors assessed the engagement of civil society in the consultation process and drafted recommendations to the European Commission, the European Parliament, the Council of the European Union, Member States and civil society organisations, in relation to future engagement of civil society in the implementation, monitoring and evaluation of the NRRPs. The draft report and in particular the recommendations were then presented and discussed with the Task Force on National Recovery and Resilience Plans in Civil Society Europe (see appendix four) and the final version drafted by the authors on the basis of that discussion.

This report is based on the views expressed by the respondents and the interviewees, which were collected in a very short timeframe. Not all the sectors of CSOs gave an input concerning the plans of the countries analysed.

## IV. Country Fiches

The following country fiches first present an analysis of what is written in the NRRPs in relation to the consultation of stakeholders, in particular civil society representatives, and the proposals for engagement of civil society in the implementation and monitoring of the Plans. Then follows an assessment from the perspective of civil society on what is written in their NRRP and their experience of the consultation.

### Belgium

#### *What the NRRP reports about the consultation process of stakeholders, including CSOs*

The Belgian Recovery and Resilience Plan foresees a section devoted to the consultation process [4]. At federal level, consultations took place throughout the NRRP development process with the Central Economic Council (CCE), which brings together the social partners, and the Federal Council for Sustainable Development (CFDD), that gathers the social partners and other stakeholders (including environmental NGOs, development NGOs, scientists, consumers and youth). These consultations covered the whole plan and its projects. In addition, the Cabinets in charge of the investment and reform projects consulted the stakeholders relevant to their competences, including the National Council for persons with disabilities. A cross-cutting consultation process was set up to ensure regular dialogue and early involvement, allowing contributions to the components of the plan and the consolidated plan.

The key steps were as follows:

- This continuous dialogue started as early as November 2020 with own-initiative opinions from the CCE and CFDD on the main themes of the plan. These own-initiative opinions fed into the discussions in the inter-federal working groups in November and December 2020.
- The strategic orientations of the plan were then discussed during hearings with the Councils which submitted their opinions on the strategic directions in February 2021.
- The Councils submitted the opinions on the projects of investment and reform in March 2021.
- The consolidated plan was presented in April 2021.

Moreover, a range of bodies and administrations, including the Institute for Gender Equality, were asked to produce an analysis of the impact that the NRRP would have on different dimensions.

#### **Region of Flanders:**

The Flemish contribution to the national plan was discussed with the Flemish Parliament, the social partners and stakeholders. In December 2020, the Flemish government, in cooperation with the Flemish-European Liaison Agency (VLEVA), organised a webinar on the concrete implementation of the Flemish Resilience Recovery Plan and the link to European funding. The aim was to bring together all stakeholders and inform them about how the investment plan would be deployed in the coming months. All Flemish ministers presented their projects. In total, 198 pre-submitted questions were addressed by the ministers, either during the webinar or afterwards by the ministers' offices.

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[4] Belgium NRRP, pp. 612-617, see: <https://dermine.belgium.be/sites/default/files/articles/FR%20-%20Plan%20national%20pour%20la%20reprise%20et%20la%20re%CC%81silience.pdf>

598 people registered for the webinar and around 400 participants attended the live webinar.

### ***Region of Wallonia:***

The Minister-President of the Walloon Government requested the opinion of the Economic, Social and Environmental Council of Wallonia (CESE – gathering employers, trade unions and environmental organisations) in February 2021 on the Walloon projects selected in the plan. CESE adopted its opinion on 22 March 2021.

CESE Wallonia noted that the priorities selected by the Walloon Government for inclusion in the plan corresponded to a large extent to the 11 priority axes it proposed for Wallonia's recovery phase, in line with the objectives of sustainable development and the European Green Deal. It also carried out a specific analysis of the projects. Following the final prioritisation of Walloon investment and reform projects, the updated documents were again sent to CESE and the Inspectorate of Finance. In addition, on several occasions the Walloon Parliament asked questions to the Walloon government on the process of drawing up the plan. Finally, in the section of the plan on synergies with other initiatives, it is stated that the Wallonian contribution to the plan is the first step in the implementation of 'Get up Wallonia', a vision and an action plan to face the economic and health crises, developed in consultation with civil society.

### ***Brussels Capital-Region:***

The consultation process was organised around the GO4Brussels 2030 Strategy, the political strategic plan of the government of the Brussels-Capital Region. This strategy has been developed with a broad consultation with Brupartners,

a consultative body which gathers representatives of organisations representing employers, employers of the non-profit sector, and workers in the region.

The objectives of this strategy were adapted to take into account the recovery projects agreed by the Brussels Region and the contribution of the Region to the plan. Brupartners gave two contributions, in January 2021 on Brussels' contribution to the first draft plan and in February 2021 in the framework of the consultation on the shared priorities of the GO4Brussels 2030 Strategy and the draft plan.

The draft plan sent to the European Commission was also sent to Brupartners at the beginning of April 2021. This consultation process was formalised in a Social Summit which took place on 24 February 2021, in order to validate the adapted content of the GO4Brussels 2030 Strategy and the first Brussels' contribution to the national plan. This consultation process continues, as each Minister/Secretary of State responsible for one or more projects organises the consultation process to take into account, as much as possible, the comments by the social partners.

### ***Wallonia-Brussels Federation:***

Each Minister organised consultations with key actors in the framework of its competencies and in relation to the reforms and investments in which they are involved. These consultations regarded the general objectives of the plan, the challenges, the modalities of implementation (axes, calls for projects, implementation timetable, etc.) and to receive the opinions of stakeholders. The Parliament of the Wallonia-Brussels Federation has been involved too.

### ***German-speaking Community:***

Social partners were regularly consulted in the framework of the Economic and Social Committee. For the development and finalisation of projects to be included in the plan, the Community consulted with local actors, including schools and teachers, social housing organisations, etc.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

For each component of the plan, it is specified how it will be implemented and the target group(s). Civil society organisations will be involved in the implementation of the following components:

- Component 1.1 Renovation of buildings (including of social housing): the reform project has been developed by a working group that includes civil society representatives.[5]
- Component 1.3 Climate and environment: a Flanders-wide campaign on green-blue veining and softening will be implemented in collaboration with civil society organisations.[6]
- Component 2.3 Optical fibre, 5G and new technologies: civil society organisations, civic organisations and citizens will be involved in its implementation.[7]
- Component 4.3 Training and employment for vulnerable groups: civil society organisations are involved in its implementation.[8]

- Component 5.2 Support to economic activity: Flanders has partnered with a number of civil society organisations through an open call (Call Entrepreneurship and Innovation Accelerator) to reduce the link between knowledge providers and businesses and accelerate the introduction of new innovations in the field. [9]
- Component 5.3 Circular economy: the governance of the component sees the active participation of private actors, not for profit, civil society organisations and citizens. [10]

For each reform and investment financed by the RRF, the different agencies/ministries responsible for their implementation will rely on their respective control systems.[11] There is no mention of the involvement of stakeholders, including civil society organisations, in the monitoring of the implementation of the plan.

### ***Feedback from CSOs about consultation process***

The Belgian Federation of Philanthropic Foundations was not directly involved in the consultations, as CSOs were selected on the basis of the two established consultative bodies. No open invitation was sent to individual CSOs. They are not aware that foundations and associations are explicitly mentioned in the final plan.

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[5] Belgium NRPP, p. 53

[6] Belgium NRPP, p. 138

[7] Belgium NRPP, p. 237

[8] Belgium NRRP, pp. 392-394

[9] Belgium NRRP, p. 496

[10] Belgium NRRP, pp. 537; 539; 551; 559

[11] Belgium NRPP, p. 618,



They obtained a meeting with the cabinet of the responsible minister shortly after the plan was finalised. The cabinet insisted that the involvement of civil society in the implementation of the plan would occur at the regional level or directly with the competent ministries (education, environment etc.) and not at the Federal level.

### **Feedback from CSOs about involvement in implementation and monitoring**

No specific input was received on this point.

## **Denmark**

### **What the NRRP reports about the consultation process of stakeholders, including CSOs**

The Denmark's Recovery and Resilience Plan NRRP- accelerating the green transition describes the consultation of stakeholders in just over one page [12]. It states that the Plan, *"consists of components made in agreements between the government and a broad majority of the Danish parliament"*. It adds that *"Stakeholders have been consulted during the preparatory process through each individual component- especially in relation to the recommendations of the climate partnerships and the green restart teams"*.

Two stakeholders, climate partnerships and green restart teams played a central role in the consultation on the Plan. The Government established thirteen climate partnerships in November 2019.

These partnerships were made up of enterprises and trade unions with the specific purpose to "deliver recommendations on how to deal with climate change and realise a green transition". The partnerships were monitored by a "green business forum" comprised of government representatives, enterprises, trade unions, scientists and green NGOs. The eight green restart teams were formed in August 2020 to provide recommendations on ensuring a green restart of Danish exports after the COVID-19 pandemic. These teams were led by CEOs and chairs of large companies and included representatives from enterprises and trade unions.

The legislative elements of the Plan were negotiated between the Government and a majority of the Danish Parliament and used the *"usual thorough process of consulting stakeholders as well as hearing local and regional authorities, social partners, civil society organizations, youth organizations, and other relevant stakeholders, during the legislative procedure"*.

In addition, the Danish Ministry of Finance was in contact with stakeholders who provided ideas for the Plan and stakeholders have also taken the initiative to address the Ministry with ideas. Electrification of road transport, energy renovations of public and private buildings, investments in wind power, carbon capture and storage, and investments in digitalization including digitalization of the healthcare sector were influenced by these consultations.

Dialogue meetings were also arranged by the Danish Ministry of Finance and the Commission's Representation in Denmark in which large numbers of people took part representing a broad variety of stakeholders.

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[12] Denmark Recovery and Resilience Plan (NRRP)

An example was given of a meeting organised on February 26, where approximately 200 stakeholders attended. The Plan does not provide any breakdown on the type of civil society organisations that engaged in the consultation.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The section on consultation mentions that, *“Stakeholders will also play a central role in the implementation of many aspects of the RRP. Many of the components in the Danish RRP are in the form of funds for which enterprises, households, citizens and organisations can apply”* and that, *“for other funds, the specific implementation has not yet been decided. The application of the funds will be discussed in a partnership with civil society, key stakeholders etc”*. The Ministry of Finance will oversee coordination, monitoring and reporting on the plan’s implementation. There is no mention of a role for civil society in the monitoring of the plan.

### ***Feedback from CSOs about consultation process***

The National Union of Students in Denmark (DSF) and the Danish Youth Council (DUF) report no participation nor opportunity to participate in any consultation on the Plans. They have expressed strong dissatisfaction with the consultation process. This despite the emphasis on the importance of consulting youth organisations in relation to the plans.

### ***Feedback from CSOs about involvement in implementation and monitoring***

No comments were received on the proposed implementation and monitoring arrangements in the Plan.

## **France**

### ***What the NRRP reports about the consultation process of stakeholders, including CSOs***

The France Recovery and Resilience Plan devotes one section to the consultation of stakeholders [13]. It states that the development of the NRPP was based on consultation with all stakeholders, which was conducted by the Ministry of the Economy, Finance and Recovery under the aegis of the Minister. It brought together, among others, employers' organisations and trade unions, professional federations and companies on the measures aimed at companies and supporting employment, economists and institutional partners, NGOs and think tanks, in particular on the response to the climate challenge. The Parliament was fully involved in the development of the plan.

The consultation process was mainly organised around **three axes**:

- Consultation of local and regional authorities: (a) in the framework of the State-Region Interfund Committees, namely to determine the best articulation of the measures of the plan with other EU funds; (b) in meetings involving all the directors-general of the regions' departments, with the Association of French Regions, the General Secretariat

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[13] France Recovery and Resilience Plan (NRRP)

- for European Affairs and the National Agency for Territorial Cohesion (ANCT), focusing on the division of responsibilities between the various European sources of funding.
- Consultation of the social partners on the broad lines of the NRRP: in the context of a social dialogue committee for European and international issues (CDSEI) on 17 December 2020; the first part of the NRRP containing the fiches informally sent to the European Commission was transmitted to the members of the CDSEI on 23 December; on 5 February to discuss the elements of the NRRP already transmitted and to make a general progress report.
- Consultation of the Economic, Social and Environmental Council (EESC), which includes representatives of CSOs: on the informal version of the plan sent to the European Commission, on four occasions (15 December 2020, 19 January, 8 February and 22 March 2021).

Oral and/or written consultations were also carried out:

- at European level, with the French delegation to the Committee of the Regions on 3 February 2021, with the representative of the European Economic and Social Council on 15 January 2021;
- at the international level with the UN Special Rapporteur on Human Rights and Extreme Poverty on 8 January 2021.

The plan does not provide information about the contribution of the different stakeholders to the development of the plan.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The plan does not mention the role of the different stakeholders, including civil society, in each component of the plan. It mentions civil society concerning the implementation of component 4 “green energies and technologies”, whose elaboration of acceleration strategies should be based also on a broad consultation of interested parties, including civil society.

The plan also mentions: “The governance of the recovery plan also reflects the inclusiveness of all stakeholders in the monitoring and implementation of the plan at both national and local levels, with the same concern for efficiency”. At national level, the national committee for monitoring the recovery, chaired by the Prime Minister, includes members of parliament, social partners, representatives of local authorities, NGOs and civil society, economists and government departments. It ensures the proper implementation of the plan's budget and its economic, social and environmental effectiveness. It ensures the sectoral and territorial balance of the plan.

At local level, each region organises a regional monitoring committee which includes, in particular, State services, representatives of local authorities and local social partners (civil society is not mentioned). It informs all local actors of the implementation of the plan; it monitors the progress of the projects in the territories; it identifies possible blockages and tries to resolve them at its level or, if it does not succeed, it reports them to the national authorities.[14]

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[14] ] France NRRP, p. 729

## **Feedback from CSOs about consultation process**

SOLIDAR's members from France (La Ligue de l'Enseignement and Ceméa) report that the majority of French CSOs did not have a direct voice in the process of drafting the national plan. The "Mouvement Associatif" - which brings together more than 700,000 organisations - confirmed that there were no general and collective consultations. They are usually consulted by the public authorities, but were not consulted on any of the measures of the plan. There were consultations in the framework of the social dialogue, most likely with employers' representatives. It seems that consultations on a sectorial level, for instance of youth organisations on recovery measures for youth, were more numerous.

CFADS (French social action and development Committee) reports that they did not participate in the consultation meetings, however their proposals on climate change, social protection, a new economy and civil society participation were included in the plan. The plan contains measures that specifically target CSOs, which are also eligible for funding.

## **Feedback from CSOs about involvement in implementation and monitoring**

No specific feedback was received on this point.

# **Greece**

## **What the NRRP reports about the consultation process of stakeholders, including CSOs**

The Greek NRRP, 'Greece 2.0 National Recovery and Resilience Plan' dedicates 5 pages to the consultation process [15]. The Plan states that the, 'consultation process on the National Recovery and Resilience Plan has been very transparent and has started from the early stages of preparation of the Plan involving the widest possible scope of participants'. To coordinate the designing of the Plan, a Steering Committee was established in July 2020 comprising, the Alternate Minister for Finance, the Deputy Minister for Government Coordination, the Secretary General for Public Investments and the Growth, the Chief Economic Adviser to the Prime Minister and the Head of the Council of Economic Advisors, and the Ministry of Finance.

The Plan describes **two main phases** to the consultation process:

- Prior to the submission of the draft national plan (between July 2020 and Nov 2020): During this time written contributions were invited and workshops were held with industry, key social partners and other stakeholders in order to incorporate in the national draft proposal their views and recommendations. No list is indicated of who took part in this part of the consultation. Prior to the consultation and the pandemic, the 'Pissarides Committee' (high level academic committee) was appointed by the Greek Prime Minister with the aim to 'submit a long-term strategy for the growth of the Greek economy'. This committee

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[15] Greece Recovery and Resilience Plan (NRRP)



- presented its interim report to the Steering Committee of the NRRP, for them to use as a guide in the drafting of the Plan. In August 2020, the Steering Committee invited contributions from social partners, economic associations, NGOs, and federation of municipalities, (24 organisations, the list is given and includes the World-Wide Fund For Nature - WWF). In addition, separate workshops were held in the drafting period between the members of the Steering Committee and key economic stakeholders.
- Following submission of the draft Plan (Nov 2020): the draft Plan was made public (on the Ministry of Finance's website). There were **two elements** to this part of the consultation. A) The Economic and Social Committee of Greece/ESC which includes, the Consumers and Environmental protection organisations, the National Confederation of Persons with Disabilities and Gender equality organisations, were invited to send comments by December 2020. B) At the same time, through the official government consultation portal ([www.opengov.gr](http://www.opengov.gr)) a public consultation was organised where citizens and organisations were invited to post their comments and proposals. In addition, meetings on specific aspects/components of the Plan were held with selective stakeholders and Governors of the Regions and Mayors. The Plan indicates that those suggestions that complied with the Regulation's eligibility criteria, *'were either included in the Plan or helpful in fine-tuning certain reforms and/or investments'*. Examples are given of the influence
  - of the consultation on the Plan, including examples for increasing access for persons with disability to the physical and digital world, investment for the digital transformation of the social welfare system, reforms of the Primary Health Care system and the National Public Health Prevention programs, increased budget for flood protection and early warning system, has increased.

After the Plan was redrafted, following the consultation and negotiations with the European Commission the Plan was discussed in April with the members of the competent parliamentary committees (Standing Committee on Economic Affairs, Standing Committee on Social Affairs, Standing Committee on Production and Trade and Special Standing Committee on European affairs) and the Greek MEPs. Also, in April a web conference was held with the Central Union of Municipalities of Greece, focusing mainly on the Plan's implementation.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The RRF Coordination Agency (RRFA), a new agency, established in the Ministry of Finance to serve as the responsible body for the efficient use of the EU recovery funds, has the overall responsibility for the implementation of the NRRP. There is no role for civil society envisaged in the Monitoring of the Plan. However, it is envisaged that further consultation with key stakeholders will be held to *'further engage them in the implementation phase'* and *'a series of public events are planned to get people more involved and, thus, increase ownership of the Plan'*.

## **Feedback from CSOs about consultation process**

The National Confederation of Disabled People (NCDP) of Greece was engaged in the consultation process. Broadly, they accept that the consultation process as outlined in the Plan reflects the reality of the consultation. They stress that only the strategic directions of the NRRP were under public consultation.

They submitted their final proposals via the “OpenGov.gr” platform. They highlight that about 45 comments/observations/proposals submitted by 37 natural and legal persons and/or bodies were received as part of the national public consultation.

The Economic and Social Council of Greece (ESC) sent its draft opinion on the draft plan to all their member organisations, asking for their positions on the Strategic Directions of the NRRP and their detailed proposals on the individual Pillars/Outlines of Action. Therefore, the Opinion, which the ESC of Greece sent to the Deputy Minister of Finance on December 22, 2020, included the proposals of social partners, farmers, local government and many of the civil society organisations that are members of the Committee, such as, the National Confederation of Disabled People of Greece (NCDP), the Supreme Confederation of Multi-Child Parents of Greece, Environmental Organizations and Organizations promoting Gender Equality.

The ESC of Greece was established in 1993 as a consultative body, providing a formal social dialogue platform on social and economic policy. The ESC represents the interests of both Social Partners and Civil Society Organisations.

In addition, the Greek General Confederation of Workers submitted comments on the Strategic Guidelines of the NRRP to the Deputy Minister of Finance.

Furthermore, some Civil Society Organisations participated in the consultation process on their own initiative. For instance, NDCP, organised a tele-meeting with the Secretary-General for Public Investments and NSRF (Ministry of Development and Investments) and the Chairman of the Council of Economic Experts (Ministry of Finance). The main aim of this meeting was to receive information about the actions included in the National R&R Plan. It is important to note that Civil Society Organizations are not recognised by the Greek state as a ‘Social Partner’. However, there are several exceptions. For instance, according to the Law 4488/2017 (article 68, par.1) because of the ratification of the UN Convention on the Rights of Persons with Disabilities (Law 4074/2012), the Greek Government should consult with the representative organizations of persons with disabilities in the law-making process.

The absence of the Government’s response to the views submitted by stakeholders during the consultation process was a serious/essential constraint on the development of a meaningful social dialogue on such critical matters. The NCDP indicates that it is hard to see the impact of the consultation on the final Plan. The NCDP, based on the provisions of the UN Convention on the Rights of Persons with Disabilities, which Greece ratified in 2012, underlined that persons with disabilities must be able to benefit from all the actions of the national R&R plan, including those aiming at the general population.

Additionally, considering both the impact of the socio-economic crisis and the current health crisis on persons with disabilities, NCDP highlighted that in parallel with disability mainstreaming, actions that target persons with disabilities included in the “National Action Plan for the Rights of Persons with Disabilities” were also required. Regarding the disability mainstreaming, the proposals of NCDP were not included in the final text of the R&R plan. However, some actions targeted at persons with disabilities included in the “National Action Plan for the Rights of Persons with Disabilities” were also included in the national plan.

### ***Feedback from CSOs about involvement in implementation and monitoring***

The NCDP reports that there are measures in the national R&P plan that are specifically civil society organisations and that civil society organisations can be eligible for funding. They report that there is only one action that clearly involves social partners (and not civil society organisations in general) in the national R&R plan. This action concerns the reform of the existing apprenticeship system of the Greek Manpower Organization (OAED) to be aligned with the real needs of the modern labour market. Therefore, the Social Partners and Employers will contribute to the revision of the apprenticeship system curricula. The NCDP does expect that there will be a role for civil society in the implementation, evaluation and monitoring of the Plan.

## **Hungary**

### ***What the NRRP reports about the consultation process of stakeholders, including CSOs***

The version of the Hungarian Recovery and Resilience Plan available at the time of writing this report, includes 8.5 pages on consultation in relation to the plan [16]. These pages largely include measures to give information about the Recovery and Resilience Plans. The Hungarian Plan is still under assessment by the European Commission.

A first phase of consultation was described as ‘partnership in preparation’ and was limited to a minimal press communication. A second stage was described as ‘partnership in planning’. In December 2020 a brief draft (13 pages) of the Hungarian Recovery and Adaptation Plan was published on the government’s website, with a call for comments. The Government also wrote to stakeholders, including civil society, and invited suggestions on the draft plan by 31 January 2021. A third stage was described as ‘partnership in implementation’ and had the intention to ‘publicise the developments under the Plan, with the main objective of maintaining transparency and informing the general public.

On 22 March, a parliamentary debate took place, on issues related to the programming of EU funds. Information on the development of the component parts were also included on the Governments website and these were removed when a detailed draft of the NRRP, was published in April.

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[16] Hungary Recovery and Resilience Plan (NRRP)

467 partners were directly invited to provide their views on the plan, including representatives of:

- higher education institutions, research institutions, scientific interest organisations
- county governments and county assemblies
- associations of municipalities
- regional development councils
- trade unions
- professional interest organisations, chambers
- professional and social consultation forums, councils
- social interest organisations, including those representing women and national minorities,
- organisations of persons with disabilities and youth organisations
- churches.

The Plan is not clear on the timetable for this consultation. It is indicated that comments will be recorded and visible on the website and forwarded to the persons responsible for the design of the particular component, relevant to the comment. The Plan indicates that 88 organisations submitted comments on the draft Plan. In addition, there were responses from 7 cities, one municipality and 5 county municipalities.

The Plan outlines seven consultation events that have been held:

- November 2021- Conference with the theme: Hungary's Recovery Plan
- February 2021- Roundtable on cultural and creative industries in rural development
- February 2021 - National Economic and Rural Development Conference and Economic and Social Council meeting

- March 2021- Consultation on the 2021-2027 programme period
- March 2021- National Sustainable Development Council workshop on EU Instrument for Recovery
- April 2021- National Association of Municipalities, meeting on the Plan
- April 2021- Consultation with the Hungarian Association of Nature Conservationists representatives on Sustainability for 2021-2027

The Plan identifies issues raised through this consultation process and describes some changes as a result of the consultation, with 'the inclusion of energy efficiency in building' being described as a most significant change.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The Plan states that 'during the implementation of each project there will be the opportunity to involve relevant stakeholders and municipalities. It is not clear what role there will be for civil society in the monitoring of the Plan.

### ***Feedback from CSOs about consultation process***

Philanthropy Advocacy (Dafne & EFC), from Hungarian Donors Forum (Effekteam) indicates that CSOs were generally very dissatisfied with the consultation process on NRRP. In February this year, 60 organisations sent a letter to the Secretary of State responsible for EU development affairs asking for more openness, inclusion and transparency. [17]

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[17] <https://civilizacio.net/hu/hirek-jegyzetek/nylt-levl-a-trsadalmi-dr-gosthzy-szabolcseurpai-unis-fejlesztsekr-felels-llamtitkr-rszre>



At the time, only the 13-page summary of the NRRP was publicly available with very little tangible content (e.g. it lacked action plans and funding allocations of each intervention area) which made meaningful engagement impossible. No response was received to the joint letter.

When the detailed NRRP of more than 400 pages was published in mid-April, very little time (less than 2 weeks) remained for analysis and comments. Despite the time-frame, several umbrella organisations provided opinions in their areas, It seems there was no feedback provided on these comments. However, this opportunity for consultation was compromised when after a consultation with the European Commission, significant changes were made to the draft NRRP, after the submission deadline of 30 April. In the new version large parts of the previous plans were deleted as the government decided not to use the refundable (loan) part of the fund. There was no opportunity for consultation on this new version of the Plan. Civil society organisations recognise that some of their proposals, or part of their proposals, were included in the draft Plan, but with the changing versions of the Plan it is not clear what has been kept and what has changed.

MTVSZ - Friends of the Earth Hungary, reported that the Plan's drafting process, affecting decisions of environmental relevance, is subject to the Aarhus Convention, and that the public consultation did not meet the legal requirements, as there was no public and predictable timetable for planning and consultation and no timeframe for expressing views on the various drafts released.

MTVSZ described the consultation process as 'opaque' and indicated a lack of clarity in the process, including the timeline, and several different public drafts, forced both the planners and the stakeholders to write and rewrite their inputs in a rush.

MTVSZ recognised that 467 partners were selected based on the proposals of line ministries, including higher education institutions, science and research organisations, county-level governments, alliances of local governments, development councils of prioritized regions, unions, chambers, various negotiation forums and advisory councils, civil advocacy organisations (women's, ethnic minorities, disabled, youth), and churches. These entities received direct invitation letters from the Government in mid-December 2020 to submit their position regarding the NRRP, by 31 January 2021 by email or online. At that time there was a 13-page summary of the NRRP.

MTVSZ asserted that more substantial input from civil society stakeholders could have improved the Plan's resilience to crises, its environmental performance, and its social acceptance. MTVSZ's comments on the climate-energy and conservation aspects of the Recovery Plan and its components can be found in the reference below. [18]

Ökotárs - Hungarian Environmental Partnership Foundation, confirmed that the main and mostly only way civil society could contribute or comment to the draft plans was through an online form. They described the summary of the consultation in the plan as exaggerating the inclusiveness and representativeness of the consultations.

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[18] <https://mtvsz.hu/energiafordulat>

While the Plan provides that the process was open and broad, in reality the chance to contribute was only available to the chosen few. In their opinion there was little or no response to the comments and proposals sent through the online form. In addition, they reiterate that as the draft plan was fundamentally changed shortly before submission, there was no chance to review the new version.

Clean Action Group (CAAG, a member organisation of CAN Europe and European Environmental Bureau) reported that it prepared, with the help of other NGOs, more than 260 concrete recommendations for the enabling condition of the NRRP and submitted them to the Hungarian government. However, no response has been received, and the recommendations have not been reflected in the final NRRP. In the opinion of the NGOs involved, without the implementation of these recommendations EU money will be used inefficiently and even widely misused – as it has occurred in the past.

The European Commission has informed CAAG that it takes these recommendations very seriously in the course of assessing the NRRP. They also reported that several members of the European Parliament have discussed these recommendations with representatives of the Commission, asking that these recommendations should be taken into account.

The Hungarian Chamber of Commerce and Industry asserted that they had opportunities to engage in the consultation on the Plan. It pointed out that submissions were invited from the most relevant business organisations, trade unions,

local and regional authorities, researchers and civil society organisations.

The National Association of Large Families reported that they had an opportunity to respond to parts of the Plan through the open online platform which enabled all parties interested to voice their opinion.

### ***Feedback from CSOs about involvement in implementation and monitoring***

The Hungarian Chamber of Commerce and Industry recognised that the NRRP contained a detailed plan for communication to the society but not for an active monitoring. Philanthropy Advocacy (Dafne & EFC), from Hungarian Donors Forum (Effekteam) point to the work of 13 member organisations of the Civilisation coalition who made a quick analysis of the publicly available plan in April from the point of view of civil society involvement in implementation, and found that the NRRP foresees very little in this regard [19].

MTVSZ - Friends of the Earth Hungary: pointed to the planned measures of 'public consultation' in the implementation of the Plan, which amount to information rather than participation or partnership.

They highlighted that the proposals run contrary to the EU's country-specific recommendations for Hungary, which called for 'effective involvement of social partners and stakeholders in the policy-making process. MTVSZ recommended that the monitoring committees of the operational programmes of cohesion funds be involved in the drafting of implementation documents and calls for proposals for the monitoring of

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[19] <https://civilizacio.net/hu/hirek-jegyzetek/segtenek-a-civilek-de-a-kormny-a-helyrelltsi-tervben-sem-szmol-velk>

the implementation of the Plan.

Organisations are aware that a monitoring committee has been / will be set up and certain organisations have been invited there but do not know on what basis they have been selected. MTVSZ welcomes the government's decision to set up a monitoring committee.

They believe it is essential that interested social partners are given a role in the implementation of the NRRP programmes and in monitoring progress. Contributing to environmental objectives and minimising negative impacts on the environment is a key aspect of EU regional policy and the European framework for NRRPs. They proposed that representatives of environmental and nature conservation NGOs be included in the Monitoring Committee along a transparent selection/election process.

Clean Air Action Group, stated that in the present circumstances, meaningful public participation cannot take place concerning EU funding. They say the main reason is that NGOs which criticise any of the government's measures do not receive any public funding, and generally very little funding from companies who may fear retaliation. Furthermore, they state that, the overwhelming majority of the media is dominated by the government or persons close to the government, and this part of the media has been constantly spreading the government messages.

For example, this dominant part of the media, communicates that the European Commission and the European Parliament would not like to have the NRRP approved

because they oppose the Hungarian government's policies. By contrast the Commission and the Parliament have made it clear that the obstacle to approving the Plan is the high corruption risk in Hungary.

## Italy

### *What the NRRP reports about the consultation process of stakeholders, including CSOs*

Italy's Recovery and Resilience Plan, #NextGenerationItalia does not dedicate a specific section to the consultation process. In the introduction, it just mentions that the Plan was discussed with local and regional authorities, civil society actors and national political parties [20].

### *Involvement of civil society organisations in the implementation and monitoring of the Plan*

Civil society organisations are key actors and beneficiaries of mission 5 'Inclusion and cohesion', which is divided into three components: labour market policies; social infrastructures, families, communities and third sector; special measures for territorial cohesion.

In the definition and execution of the projects with a social and territorial value of this mission, the municipalities are the protagonists, and in particular the metropolitan areas, where the conditions of social distress and vulnerability are more widespread. The involvement of local authorities is fundamental to ensure the financing of the new services provided, which will have to be strengthened in the

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[20] Italy Recovery and Resilience Plan (NRRP)

course of the state budget planning for the next few years. Public action will be able to draw on the contribution of the third sector. The plan encourages co-design and co-planning of services and the development of synergies between social enterprises, volunteers and the administration.

The second component 'social infrastructures, families, communities and third sector' is very relevant [21] and has the following objectives:

- strengthening the role of territorial social services as a resilience tool, aiming at the definition of personalised models for the care of families, young people, the elderly, and people with disabilities
- improving the protection system and inclusion actions in favour of people in conditions of extreme marginalisation (e.g. homeless people) and housing deprivation through a wider range of facilities and services, including temporary ones
- integrating national policies and investments to ensure a multi-pronged approach to both the availability of more affordable public and private housing, and urban and territorial regeneration
- recognising the role of sport in social inclusion and integration as a means of combating the marginalisation of individuals and communities.

In line with the investments described in the Plan, it is foreseen to accelerate the implementation of the third sector reform, as several implementation decrees are missing and to evaluate the impact of the reform on the whole territory.

The third component 'special measures for territorial cohesion' is also very relevant.[22] It has the following objectives:

- Strengthening of the National Strategy for Inland Areas, through measures to support the improvement of the levels and quality of education, health and social services
- Economic and social valorisation of assets confiscated from mafia
- Strengthening of tools to combat school drop-outs and socio-educational services for minors
- Reactivation of economic development through the improvement of service infrastructures in the so-called 'special economic areas', geographic areas in the South of Italy with an advantageous economic legislation.

In the context of the third component, a specific measure intends to combat educational poverty in the southern regions by strengthening the socio-educational services for minors, by financing third sector initiatives, with specific reference to care services in the 0-6 age bracket and to those aimed at combating school drop-out and improving the educational offer in the 5-10 and 11-17 age bracket. The measure intends to activate specific projects carried out by Third Sector entities (up to 2,000) aimed at involving up to 50,000 minors in situations of hardship or at risk of deviance. [23]

The contribution of the third sector is also mentioned in relation to the valorisation of assets confiscated from mafia. [24]

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[21] Italy NRPP, pp. 208-217

[22] Italy NRPP, p. 218

[23] Italy NRPP, p. 220

[24] Italy NRPP, p. 221



Civil society organisations are not involved in the monitoring of the implementation of the plan. [25]

### **Feedback from CSOs about consultation process**

The feedback received from Caritas Italy is that a real consultation process specifically devoted to the NRPP did not take place. Caritas Italy published two reports on the NRPP, the first one in April 2021 and the second one in June 2021. The last report provides that consultation processes launched by Italian institutions are often lacking in terms of:

- timely transmission of information and access to information
- enough time to analyse and comment on main preparatory documents;
- provision of channels through which partners can ask questions, provide contributions and be informed of the way their proposals have been taken into account;
- dissemination of the results of the consultations.

In particular, it is underlined that the mechanisms of institutional governance foreseen for the implementation of the plan do not take into account that both the Third Sector Code and the Constitutional Court have acknowledged the general interest mission of civil society organisations, including in co-planning and co-design processes, which seem not to be reflected in the plan.

The dossier also contains recommendations on how to set up a model of governance inspired by the European Code of Conduct on Partnership, which includes:

- the transparent and timely provision of monitoring data, as detailed as possible and not aggregated;
- going beyond a quantitative data supply only (often limited to funded projects, resources committed, and projects completed);
- the definition of how to use the data produced by Third Sector subjects, who must not and can replace institutional data, but make a timely contribution to monitoring and reshaping of interventions;
- the need to define methodologies of impact assessment of the funded projects;
- participatory evaluation of administrative processes (quality of calls, methods of control and monitoring, etc.);
- the development of joint training pathways addressing jointly the public administration and civil society organisations to develop processes to reinforce administrative capacity, including the structured dialogue with civil society organisations and other actors which participate in the Partnership Agreements of the European Structural and Investment Funds. [26]

ARCI reported that despite the long tradition of social dialogue and the improving situation with the civil society organisations' involvement in the government's decision-making procedures, a lack of participation in the preparation of the NRRP was registered. Both the Italian governments which dealt with the drafting of the Plan – in February 2021, a new government had to be formed following the fall of the previous one – did not open any formal consultation with civil society.

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[25] Italy NRPP, pp. 238-240

[26] Caritas Italy (June 2021), Dossier no. 67 on the NRRP, p. 5

In particular, the intermediate social bodies have rightly called for a thorough confrontation with the social, productive and political forces of the country on the NRRP, but none of this happened. Therefore, even in the context of the Italian recovery, the space for participation has been annihilated, despite the great effort that CSOs put into collaboration with public institutions to maintain a decent provision of welfare during the period of the pandemic crisis.

This has been confirmed also by Higher Education student union UDU. UDU reported that they presented several times their position to improve the Italian Higher Education system, which suffers from a still too low graduation rate, the need for a reform of qualifying degrees, grants system, and to address the gap between universities in the south and those in the north of the country. These positions were submitted by the organisation, as well as through the National Student Council (CNSU), the highest university students' representative body in the country. However, since the political crisis in early 2021 that led to the formation of the new government, the drafting of the NRRP (which was the centre of the political crisis) happened behind closed doors without any consultations of the stakeholders.

Confcooperative confirmed that an open consultation specifically devoted to the NRRP did not take place. The government and the relevant ministries consulted social and economic actors to collect ideas for the plan in the framework of the governance structures that engage with stakeholders set up for other processes. Civil society organisations and organisations representing the social economy, such as the Third Sector Forum and the Cooperative

Alliance, showed a lot of proactivity. They sent spontaneous contributions to the Presidency of the Council of Ministers, the Ministry for Economy and Finance and other relevant ministries. They do not see their proposals reflected in the content of the plan. In addition, the plan foresees a role for CSOs and the social economy in component 5 on social inclusion, but not in the other components.

This confirms a common perception among decision-makers that relegates the social economy and part of the third sector to charities or at best to providers of social care and welfare services and does not consider them as entrepreneurial and economic actors.

However, it is important to acknowledge that there was a change in the Italian government four months before the deadline for submissions of NRRPs, so the new government had a lot of time pressure and was forced to take very fast decisions. At the same time, a weakness of civil society and of the social economy is that it is not uncommon that in addition to the proposals and positions sent by civil society platforms or alliances, institutions also receive many proposals from individual member organisations. In this way, it is difficult for institutions to identify common and priority proposals.

## **Feedback from CSOs about involvement in implementation and monitoring**

A general remark included in the report from Caritas Italy is that the modalities by which the NRPP will be implemented are still not very well defined and that this aspect is still work in progress [27]. This statement reveals that important national civil society organisations do not know what their role in the implementation and monitoring of the plan could be.

In its June dossier, Caritas Italy offers a first and provisional, though very interesting assessment of the NRPP. Although the overall assessment of the plan can be considered rather positive, the dossier also highlights weaknesses, areas for improvement and important dimensions that are missing from the plan. Below we include a short summary of the main points.

In addition to component five described in the previous section, the following positive aspects are highlighted:

- The reforms and the 6 components of the NRRP have three cross-cutting dimensions: they all have to produce a positive impact on youth, women and territorial disparities, especially between the north and the south of the country.
- Measures to promote youth's potential: Mission 4 intervenes in the whole cycle of education and research, focusing on promoting curricula in knowledge-intensive sectors, improving basic skills and reduce school drop-out rates, reducing the gap between education and work, facilitating access to university education, with new scholarships, and opportunities for young researchers.

- Mission 1 includes digitisation measures inter alia, to complete the connectivity of schools. The investments and reforms on ecological transition in Mission 2 contribute to the creation of youth employment in all sectors of the European Green Deal.
- Measures to promote gender equality and increase women's participation in the labour market: Mission 1 aims to ensure equal opportunities both in participation in the labour and in career development. Mission 4, through the Day Care Plan, aims to increase the rate of day-care centres, which was only 14.1 per cent in 2018, and to strengthen early childhood education and care (ECEC) services (3-6 years old) and the extension of full-time education at school, to provide support for working parents. The mission also invests in STEM skills among female high school students to improve their job prospects. In Mission 5 there is a specific investment to support female entrepreneurship. The introduction of a national certification system for gender equality aims to accompany enterprises in reducing gender gaps in all areas most critical for the professional development of women, and strengthen wage transparency. In Mission 6, the strengthening of proximity services and support services for home care contributes to reducing the burden of care activities, which are provided in the family mainly by women.
- Measures to decrease regional disparities, in particular between north and south, represent about 40% of the total allocation for the plan and include: a plan for ECEC social infrastructures, an extraordinary programme of interventions to develop assets confiscated to mafia, in order to develop

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[27] Caritas Italy (June 2021), Dossier no. 67 on the NRRP, p. 5

- public social housing, regenerate urban areas, and improve social, cultural and neighbourhood services. A national action plan against undeclared work is also envisaged.

The main weaknesses identified in the plan are the following:

- While there is great satisfaction that the plan has taken up the demand of most CSOs working with elderly people in need of care to reform the services and support system for them, there are also concerns that this reform is effectively implemented and in a way that guarantees quality services and not based on the lowest price.
- It is acknowledged that the plan allocates considerable resources to tackle homelessness and that this starts from the need of providing them an accommodation, there is concern that the solutions put forward only concern temporary housing, in stark contrast with the Housing First approaches that are spread in Europe and in Italy, too.
- Despite the exceptional opportunity the plan offers for social housing and sustainable urban development interventions, the quality of the proposals in the plan suffers from the inadequacy of the instruments put in place over the last decade and the lack of clear policy direction in these fields, mainly due to an inadequate time schedule for their implementation.
- One of the most important gaps in the plan is the lack of attention to inequalities. While important attention is paid to specific vulnerable groups, there is no overall attention to this dimension. In particular, there are no measures foreseen to tackle the inequalities that will inevitably be aggravated by the

- digital and green transitions, if not coupled with corrective interventions.
- The plan puts forward a very narrow interpretation and vision of the concept and the policies for sustainable development.[28]

Caritas Italy's dossier includes the assessment of the President of Legambiente, one of the most important national environmental NGOs from an environmental perspective:

*"In the NRRP we find some innovative and useful measures, in the production of renewable energies, in local mobility, in the redevelopment of buildings and in spatial planning, alongside ambiguous measures, such as investment in hydrogen or in water resources or in the reclamation of industrial sites; others are insufficient, such as 110%, which will produce limited environmental results and exclude the suburbs, or for cycling or hydrogeological safety or purification.*

*Other measures are grossly unbalanced, such as those benefiting high-speed rail rather than regional and commuter rail; and others are wrong, such as the scarcity of resources on renewable electricity or investment in methane buses, or dusting off old projects such as hydrogeological instability. Then there are some oversights such as agroecology and the rehabilitation of intensive livestock farms.*

*All this in a very "timid" framework as regards combating climate change. The risk of transforming the ecological transition into green washing is real. But the main vice is to see ecological transition as a technological process isolated from social processes.*

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[28] Caritas Italy (June 2021), Dossier no. 67 on the NRRP, p. 6



*Both when phenomena such as energy poverty are excluded from the horizon of interventions to upgrade the energy efficiency of buildings, or when in the construction of kindergartens or urban regeneration environmental and energy standards are forgotten. Just as there is no positive reference to the creation of quality green jobs. In spite of the EU's binding indications on the 'just ecological transition', this is not reflected in the Plan." [29]*

Confcooperative confirmed that there is a strong governmental component in steering the implementation of the plan. Regions will also play an important role, especially in the matters in which they have competencies assigned to them by the Italian Constitution, such as in health and social policies. Some Regions have launched calls for ideas and projects. This is an opportunity for civil society organisations and the social economy to contribute with ideas and project proposals.

In the plan it is written that stakeholders - not only representatives of regional and local authorities, but also of social and economic actors - will be associated. However, the modalities of stakeholder involvement are not defined in the plan and not yet known.

## Lithuania

### *What the NRRP reports about the consultation process of stakeholders, including CSOs*

The Lithuanian 'Economic and Recovery Resilience Plan, Next Generation Lithuania' has three pages describing the consultation of stakeholders. [30]

It states that, "stakeholder involvement in the preparation and discussion of the NCL Plan is a prerequisite for good governance" and that the preparation of the plan has "involved various formats of cooperation with social and economic partners, local and regional authorities, civil society and youth organisations and other public interest groups".

The consultation was organised around **four levels:**

- Consultations at national level. Between 23 February and 1 March, 6 national public consultations were held on the Plan, with each consultation involving between 40 to 200 partners and experts in the field, including employer organisations, trade unions, local authorities and non-governmental organisations. The consultation was broadcast live on social media platforms.
- Separate ministerial consultations by the ministries in charge of areas of their responsibility within the Plan, generated 40 individual consultations with stakeholders in their areas of responsibility.
- In April, when the draft Plan was available, an electronic written consultation was launched, giving all groups or individuals the opportunity to submit their comments and proposals. About 700 participants engaged in this written consultation and the Ministries produced some 270 responses to queries raised from various organisations and individuals.
- In April, a roundtable discussion on the plan was organised with experts in the public policy fields, academics and business representatives.

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[29] Caritas Italy (June 2021), Dossier no. 67 on the NRRP, p. 37.

[30] Lithuanian NRRP, PP, 361-364

In addition, the draft Plan was regularly discussed in the national Parliament.

The section on consultation provides information on the impact of the consultations under **three headings**:

1. Taken into account.
2. Partially taken into account.
3. Not taken into account.

In total, 37% of the requests were taken into account, 40% partially and 23% not taken into account. It is difficult to get a picture of the type of civil society actors who engaged and which actors engaged in the consultation were most effective in having their views taken into account.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The section on consultation states that, *“the ministries that prepared the Plan will seek to involve partners in the implementation process, developing and refining the various measures included in the plan and monitoring the plan progress in implementation”*. There is also the commitment to inform the public and stakeholder groups on the implementation of the Plan.

The Ministry of Finance and the Central Project Management Authority for Cohesion Policy programmes will monitor the Plan, with line ministries responsible for the implementation of the relevant components

### ***Feedback from CSOs about consultation process***

EAPN Lithuania reported that while the description of the consultation process is accurate, the reality from the perspective of civil society is that it does not catch the complexity of what really happened. From their perspective, a key influencing factor in relation to the consultation was that there was a change of Government in December, with all the shift in key personnel and priorities that accompanies such a change. It meant that the development of the programme for government and the consultation on the NR R P were intertwined and this is particularly the case for the first two levels of the consultation described in the Plan.

These consultations were over a short period and based on presentations which included the NRRP as an element. This also made it difficult to know what was accepted, as it could be in the NRRP or it could be in the programme for government. There was also a sense that the new Government, arriving at mid-point in the development of the Plan, could claim that they didn't want to revisit all of what was already in train.

There was public discourse over the consultations on the Plan. An article printed on 14 April on the internet portal '15min', showed cooperation between over a hundred NGOs, local government representatives and business associations who expressed their disappointment that they had not seen a draft of the plan and felt that the time left would not enable them to have a meaningful input to the Plan. [31]

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[31] <https://www.15min.lt/en/article/feature/ngos-feel-excluded-from-the-eur-2-2-bn-economic-recovery-plan-1184-1486678>

After publication of the draft plan, social partners and NGOs challenged the opinion of the Government in relation to the extent of the consultation that took place as reflected in an article uploaded on 3 May on the internet portal 'DELFI'.<sup>[32]</sup>

According to civil society representatives, the first time there was detailed information available on the Plan was April, and civil society had only a week to respond to the 200-page document. The timetable was externally driven to comply with EU deadlines, and it was difficult to make a meaningful consultation in that time frame. For some sections, such as for social affairs, there was not so much content, so it was possible to respond. EAPN Lithuania argued that civil society organisations were invited to take part in the round table discussions in April but these were short events, and served more as a space to ask questions than a qualitative consultation.

Following the amount of inputs received the deadline was pro-longed to deal with the inputs received. Some changes were made but it was hard to track the changes back to inputs from civil society. There are positive elements in the Plan that can be 'hooks' for the future work of civil society but many of these were present from the start and it is hard to attribute them to the consultation.

### ***Feedback from CSOs about involvement in implementation and monitoring***

There is very little in the Plan about the involvement of CSOs in the implementation and monitoring of the Plan, according to the responses from civil society.

The process to date has tended to dampen the interest of CSOs for further engagement, which would be a lost opportunity for all sides, according to EAPN Lithuania.

The experience of CSOs (Trade Unions, Social Organisations, Business sector organisations) of the process to date was reflected in a joint letter they sent to the Government, where they called for *'the establishment of a monitoring mechanism with equal participation of the social and economic partners'*.<sup>[33]</sup>

From the exchanges, it can be seen that, some confidence building measures will be needed on the side of the Government to regenerate interest and involvement of CSOs in the implementation and monitoring process.

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[32] <https://www.delfi.lt/news/ringas/lit/gaja-savele-trys-netiesos-lydejusios-naujos-kartos-lietuva-plano-pristatyma.d?id=87002165>

[33] <https://www.lps.lt/5860-2/>

# Poland

## *What the NRRP reports about the consultation process of stakeholders, including CSOs*

The Polish NRRP 'National Plan for Reconstruction and Enhancement of Resilience' devotes 8 pages to the consultation of stakeholders [34]. The consultation began with a conference attended by the Prime Minister on the 26 February 2021 and lasted until 2 April 2021. The launch of the public consultations was announced in a national newspaper and on key government websites.

The consultation process was mainly organised around **three axes**:

1) **Online:** The draft Plan, together with an online comment form, was made available on governments websites and comments on the whole plan or individual components could be submitted through the website.

5,275 comments were submitted and a breakdown of submission received were given as follows:

- Public Offices (different government levels): 39%
- Associations and organisations: 34%
- Poland2050: 14.5%
- Entrepreneurs: 6.5%
- Individuals: 2.5%
- State-owned companies: 2%
- Education, higher education: 1.5%
- Other: 0.5%

2) **Debates:** Three debates were organised, devoted to particular NIP components with the participation of

representatives of relevant ministries, experts from the world of science, social and economic partners, and local government officials:

- 2 March 2021 meeting on the components "Green energy and reduction of energy consumption" and "Green, intelligent mobility"
- 4 March 2021 meeting concerning the component "Efficiency, accessibility and quality of the health care system",
- 9 March 2021 meeting concerning the components "Resilience and competitiveness of the economy" and "Digital Transformation".

Due to COVID-19, the debates were organised in an online format. In total about 20000 participants took part in these debates.

3) **Public Hearings:** Prepared in cooperation with social and economic partners and the National Federation of Non-Governmental Organisations (OFOP). They were initiated and held under the patronage of the Subcommittee for Partnership Development, functioning within the Committee for the Partnership Agreement for the years 2014-2020. Five hearings were held:

- Economic resilience and competitiveness - 22 March 2021,
- Digital transformation - 23 March 2021,
- Efficiency, accessibility and quality of the health system - 24 March 2021,
- Green energy and reduction of energy consumption - 29 March 2021,
- Green, intelligent mobility - 30 March 2021

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[34] Poland NRRP, p. 474



The hearings were attended by representatives of the minister responsible for regional development and ministers responsible for the preparation of each component of the Plan. About 600 people participated in the hearings which were held online and over 220 people submitted comments and remarks on the draft, from representatives of local governments, social and economic partners, non-governmental organisations, other institutions and individuals. Other elements of the consultation included:

- The draft document together with a form for comments was submitted to the opinion of the Joint Commission of the Government and Local Self-Government and was the subject of 3 meetings of their Infrastructure, Local Development, Regional Policy and Environment Team, as well as a plenary meeting of the Commission. This resulted in 520 comments from local authorities.
- The draft Plan was the subject of a meeting of the Subcommittee on Partnership Development, acting within the Committee for the Partnership Agreement 2014-2020. The members of the Subcommittee include representatives of social partners, economic partners, non-governmental organisations, regional governments and government administration.
- The draft Plan was also the subject of the meeting of the Entrepreneurship Council to the President of the Republic of Poland.
- The draft Plan was also discussed at a meeting of the Inter-ministerial Team for Europe 2020 Strategy, which enabled representatives of social and socio-economic partners and civil society organisations to stress their key concerns in relation to the plans.

- There were also consultations with health resorts and spas on the draft plan.
- Consultations also took place with the Council for Social Dialogue and the Council for Public Benefit Activities

The Plan seeks to summarize the key points coming from these consultations and interestingly has a section on the main changes to the Plan resulting from the public consultation. It would seem that environmental NGOs and to a lesser extent social NGOs did succeed to have some of their ideas integrated into the Plan.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The coordination of the implementation of the NRRP is the responsibility of the Minister in charge of regional development, while the coordination of the particular reforms and investments, is the responsibility of the ministers concerned. A particular role is given to the Polish regions in implementing all measures and reforms. An example of wider partnership involving representatives of universities, regional training institutions, regional labour agencies, entrepreneurial agencies and employer organisations, as well as key regional and national stakeholders, is given in relation to investments for the development of modern vocational education, higher education and lifelong learning.

### ***Feedback from CSOs about consultation process***

EAPN Poland reported that the consultation process of the Plan was fundamentally different from the consultation process of the National Reform Programme in the past years.

The latter document was consulted mainly within the framework of the permanent Interdepartmental Team for Europe 2020, where representation of non-governmental organisations is ensured, including those representing the sector of social organisations (eg. EAPN Poland, WRZOS).

In the case of the NRRP, the role of the Team was minimal, and only one meeting was held on the Plan during the public consultation period (on 24 March 2021). Having said this, it does not follow that the Plan was not subject to a broad consultation process in which NGOs also participated. The main initiative was the organisation of five hearings by OFOP (the main federation of Polish NGOs) with government representatives as listeners in March 2021.

They then responded in reverse hearings to the organisations' comments. Both events took place at the end of March 2021 (the reverse hearings, however, lasted longer). However, the draft Plan was prepared much earlier - a call for project proposals for the Plan was organised in July and August 2020, with 1,200 proposals submitted. This part of the process was mainly dominated by input from ministries, regional and local governments and employer organisations.

The feedback received from the Foundation of Social and Economic Initiatives (FISE) is that consultations were more a tick-box exercise and it is not sure if the remarks and input that were given to the institutions were/will be taken into consideration. The consultation process was not very transparent, for example it was not possible to find information about the involvement of the Council for Social Dialogue and the Council for Public Benefit Activities: which remarks did they make?

Who did participate? There is no information about the outcomes of the consultation process.

The Polish Green Network's reported that the first version of the NRRP, presented to the public between February and March, was greatly at odds with the required ambition to address the climate crisis, or to be in line with the stated EU climate goals. They further state that the plan which was sent to the European Commission and published at the end of April does not contain any estimates of the extent to which implementing the NRRP would reduce GHG emissions and contribute to the achievement of the EU's climate goals. However, they did note that there are several important, positive changes compared to the original document, which make the plan "greener".

### ***Feedback from CSOs about involvement in implementation and monitoring***

EAPN Poland reported that the main Polish federation of non-governmental organisations (OFOP) formulated several demands concerning the implementation of the Plan and the Monitoring Committee (contribution of 10 May 2021). The original draft of the Plan dated February 2021 provided for the establishment of such a committee, but it was to be composed exclusively of representatives of the government and implementing institutions. The OFOP proposed that the committee should be composed of 5 groups in equal numbers of representatives: government, local government, social and economic partners, civil society, and the world of science.

In the case of civil society, these were to be persons indicated by representatives of federations, coalitions and networks of national NGOs operating in the areas of the Plan. In the final version of the draft of the Plan of April 2021, it was written that the committee would also consist of representatives from representative nationwide social organisations indicated by the non-governmental side of the Council for Public Benefit Activity (main body representing the Polish NGO sector).

Therefore, it can be considered that the demands of the organisations concerning the composition of the committee have been fulfilled, although without specifying that the representation of particular groups will be equal.

Regarding scrutiny of funds disbursed under the Plan, this is to be performed by the Monitoring Committee. According to the Polish Green Network's, originally, it was meant to include only the representatives of government administration, yet – following public hearings – the new version already includes social partners: local governments, entrepreneurs and NGOs. However, in their opinion, the number and manner of electing representatives of NGOs remains unknown. In their opinion, to ensure full transparency of the disbursement of funds under the plan, the NGO side should have a majority in the Monitoring Committee, and its representatives should be autonomously elected by their respective circles.

## Portugal

### *What the NRRP reports about the consultation process of stakeholders, including CSOs*

The Portuguese NRRP 'Recovery Portugal – Building the Future for Recovery and Resilience' has a five page section outlining the involvement of partners in the preparation of the plan [35].

The Plan builds on previous work that aimed at preparing a strategy for the decade (2030 Strategy) to establish a medium-term path for the country's economic, social and environmental development. It states that this Strategy was *'the result of an extensive consultation, which began at the end of 2017, and involved consultations with economic and social partners, academia, civil society and regional actors, as well as the consultation of all political parties with parliamentary seats'*.

The Covid-19 pandemic necessitated a revisiting of this work and led to a new document "Strategic vision for the economic recovery plan for Portugal 2020-2030". This document was presented in July 2020 and was the object of a wide national debate, through a participatory public consultation process with more than 1,100 contributions.

The draft Plan was the subject of a Parliamentary debate. A 'collaborative dialogue with the European Commission followed, which led to the publication of a draft NRRP. The draft NRRP was the subject of a consultation that ran from 15 February to 1 March 2021.

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[35] Portugal Recovery and Resilience Plan (NRRP)

This consultation had three strands:

1) A Public Consultation that generated 1,700 written contributions, including 32 contributions from Third Sector organisations.

2) A series of consultations with key relevant stakeholders, including:

- The Economic and Social Council
- The Territorial Coordination Council
- The National Council for the Environment and Sustainable Development
- The National Council for Social Economy
- The National Health Council
- The Advisory Council of the Commission for Citizenship and Gender Equality
- The Higher Education Coordinating Council
- The National Education Council and the Council of Schools.

3) A series of seminars on the various topics covered by the draft Plan, with the presence of the relevant Ministers, involving civil society. This included:

- Seminar on Forests
- Seminar on Combating Poverty and New Social Responses
- Seminar to debate on a closer and more resilient SNS
- Seminar on Housing
- Seminar on Qualifications
- Seminar on Digital Transition
- Seminar on Water Resources
- Seminar for debate on Climate, Energy and Mobility
- Seminar for debate on Bioeconomy
- Seminar on Infrastructure
- Seminar on Industry and Innovation.

The Plan outlines the main concerns identified for the consultation and the adjustments of the draft Plan to take account of the inputs from the Consultation. Of particular note, two components were added: on cultural activities, and on the sea and the blue economy.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The Plan states that implementation of the NRRP will require 'a well-functioning governance model, which ensures a high degree of coordination between the various actors'. The strategic level of political coordination will be ensured by an Interministerial Commission, chaired by the Prime Minister. A National Monitoring Commission, including representatives from social and economic partners and relevant personalities from civil society will be the main forum for institutional partnership and will be responsible for '*monitoring the implementation of the Plan and its results, promoting its appropriate dissemination among citizens, companies and other organisations, as well as analysing possible issues affecting its performance and proposing recommendations*'.

The monitoring of the implementation of the Plan will be accessible to all citizens through the Transparency Portal that will centralize information on European funds, integrating all the systems and regimes applied in Portugal. This will cover, as one of its central priorities, the NRRP advertising all reforms and investments contracted and the evolution of their implementation.



### ***Feedback from CSOs about consultation process***

EAPN Portugal reported that they participated in the public consultation held in July 2020 for the document "Strategic vision for the economic recovery plan for Portugal 2020-2030". They sent their priorities for key areas like the fight against poverty. When the Government presented a first draft of the NRRP in October 2020 EAPN Portugal issued an assessment in which they highlighted the importance given in the draft Plan to proposals for investments into emergency, vulnerability and temporary housing, in line with principle 19 of the EPSR on "Housing and assistance for the homeless".

EAPN Portugal also participated in the consultation of the Plan that was held in February 2021. They were one of the entities invited for the seminar debate on Combating Poverty and New Social Responses, at which they could present shortly their comments and main inputs for the Plan. EAPN Portugal also sought to cooperate with the Intermunicipal Communities (*Comunidades Inter Municipais*) and with the Regional Development Coordination Committees to strengthen the impact of the plan from a social perspective as well as to demonstrate their willingness to collaborate in relation to the implementation of the Plan.

Through this EAPN Portugal was invited to join the Monitoring Commission of the Regional Plan for Spatial Planning in the Center Region and also to participate in the debate and programming workshop(s) of the NORTE 2030 initiative.

EAPN Portugal, recognised the difficulties for civil society organisations to engage in this kind of processes. A clear space for organisations like EAPN to participate in this kind of complex processes is still lacking.

It also takes time, effort and capacity building for civil society organisations to be able to engage effectively with the complex language, documents and budgets involved.

### ***Feedback from CSOs about involvement in implementation and monitoring***

EAPN Portugal reported that it did not have clear information concerning the involvement of CSOs in the implementation and monitoring of the NRRP. They recognised the importance of the National Monitoring Commission, that should have involved CSOs but so far it is not clear how this will work or if it has already started its work. For EAPN it is important to know what kind of participation is promoted, and what instruments will be used to monitor the implementation of the Plan. For civil society organisations it is essential that there is a focus on the quality of the participation processes.

# Romania

## *What the NRRP reports about the consultation process of stakeholders, including CSOs*

The Romanian National Recovery and Resilience Plan, 'Funds for a Romania modern and reformed' has seven pages to describe the consultation process.[36]

The Plan states that, 'the preparation of the NRRP was based on an extensive consultation process, unprecedented in the field of European funds'. The consultation process was coordinated by the Ministry of European Investment and Projects, as coordinator and responsible for the process of drafting and negotiating the NRRP with the European Commission.

The first proposed version of the NRRP was published for consultation on 26.11.2020. However, in January 2021, the Government restarted the consultation process by presenting a more coherent, comprehensive and interinstitutional approach based on the Country Specific Recommendations of the European Semester: Mechanism for the elaboration of the Romanian Government's position on the National Recovery and Resilience Plan. The consultation had **three axes**:

**1) Inter-ministerial consultations:** 20 inter-ministerial consultations were organised between 1-22 February in 10 working groups. The topics covered were:

- Transport
- Environment, climate change, energy efficiency
- Development of urban localities
- Improving the built environment

- Health
- Education
- Business environment, entrepreneurship
- Research, innovation, digitisation
- Agriculture and rural development
- Crisis resilience

**2) Thematic public consultations:** where 'representatives of local and regional authorities, civil society (including youth organisations), social partners and economic actors', were invited to participate. These consultations were organised in a hybrid system respecting rules imposed by the pandemic situation. **12 thematic public consultation events** took place, in which the following topics were discussed:

- How do we support the New Generation? Policies for children and young people, formal and non-formal education opportunities (8 February 2021)
- How do we stimulate grassroots development? Rural development debate (8 February 2021)
- How do we develop smart and sustainable cities? Debate with the Association of Romanian Municipalities (9 February 2021)
- How do we harness the resources of the business environment? Debate on economic competitiveness and digitalisation (9 February 2021)
- Resources for modernisation in regions and counties, Debate with the National Union of County Councils (10 February 2021)
- Public debate with the Association of Cities of Romania (10 February 2021)
- Civil Society Involvement, How do we use the experience of NGOs in developing NRRP? (10 February 2021)

[36] Romania Recovery and Resilience Plan (NRRP)

- How do we generate real change for the most vulnerable? Debate on anti-poverty solutions in the NRRP (11 February 2021)
- How do we reduce the rural-urban gap? Debate with the Association of Romanian Municipalities (11 February 2021)
- Green transition (12 February 2021)
- Priorities of social dialogue partners (12 February 2021)
- Transition to health services and infrastructure (16 February 2021)

3) **Open online public consultation:** A standard online form to propose reforms and investments in the NRRP was available.

1939 reform and investment proposals were received, of which 1709 were via the online form. The difference of 230 is represented by proposals received from line ministries. The Plan indicates that these proposals influenced many of the investments and reforms present in the NRRP today, especially in relation to the environment, administrative reform, civil society components and the social component, without giving concrete examples.

### ***Involvement of civil society organisations in the implementation and monitoring of the plan***

The Plan indicates that a Monitoring Committee will be organized having as members NGOs selected through an open call, based on their representativeness, alongside with trade unions and employers' associations, as well as associative structures of local public administration (National Union of County Councils, the Association of Municipalities in Romania, the association of Romanian Cities,

the Association of Romanian Communes, as well as other associative forms of general interest). They would follow the same mechanism as for the European Structural and Investment Funds.

### ***Feedback from CSOs about consultation process***

Civil Society Development Foundation (CSDF) reported that part of the consultation process focused on the CSOs role and involvement in the NRRP, several ministers attending the live streamed event.

As a result of this and of follow up discussions, CSDF highlighted that NGOs are generally mentioned as potential beneficiaries in different reforms/investments included in the NRRP and specifically, there are 3 investments priorities that should benefit the sector. A fund of 35 million euro, within the reform of the public administration, can be used to increase the capacity of civil society organisations to foster active citizenship, professional involvement in the planning of public policies on social rights covered by the NRRP and monitoring related reforms, including support of coalition building analysis and research for 15 collaborative projects, as well as 50 partnerships between local government authorities and NGOs. A fund of 12 million euro is also foreseen to support the digital transformation of non-governmental organisations and to increase digital literacy among employees. This should cover 200 grants to NGOs for investments in digital infrastructure, digital skills of staff and volunteers, customer relationship management structures and equipment. The creation of a digital resource centre is also foreseen.

However, CSDF reported that while the Government supported these projects which were supposed to receive more funding, the discussions with the European Commission were difficult and tensed. It seems that the Commission considered these proposals as not very relevant, and was opposed to targeting these initiatives specifically to civil society organisations, considering that they were covered by European Social Fund or other funding schemes. Finally, the proposals were accepted, although with lower funding, at a high political level. The fact that other adopted plans also included funding benefitting civil society helped. For CSDF, this raises questions as to the recognition of the role of civil society organisations in the implementation of the NRRPs by the European Commission.

The National Alliance of Student Organizations (ANOSR) reported that there was no transparent calendar regarding when the Plan would be published for consultation, who would write the Plan, how much time it would be available for the public consultation to take place, or whether CSOs would have a meaningful role in the elaboration phase. They reminded us that the first plan was published for consultation on 26.11.2020 and the proposals had to be submitted by the 31st of December. They say that, though several proposals were submitted, the Government didn't publish the proposals received (not even the number of proposals), the list of who contributed, or whether they accepted any contribution from the consultation process and in which way.

The Government announced in January that the Plan would be rewritten. This is when the **'consultation with three axes'** started. ANOSR, remarked that:

- The first axis, as described in the Plan, was a solely intergovernmental process of writing the Plan, and did not include any involvement of stakeholders/civil society organisations.
- The second axis meant an open consultation on different topics with anyone who wished to attend. These events lacked an agenda, and had no clear guidelines. They were 2-hour meetings where several general issues were raised by the public (especially NGOs), without a clear idea of how the comments might impact on the Plan.
- The third axis included the possibility of sending proposals to the Government. The Government didn't publish the proposals, did not list who made proposals, and there was no information on whether contributions were accepted or not and why.

Despite what they considered a poor consultation process, ANOSR reported that when the version to be sent to the European Commission was published, some of their more important proposals in the field of higher education were included in the Plan. They said that the Plan includes some measures for the offshore wind sector, mostly in terms of drawing up a legislative framework and strategy for this sector, but does not include concrete projects to be implemented. They pointed out that the format to submit proposals was difficult and that the general public could have found it difficult to give their input.

Timis County Youth Foundation (FITT) reported that they could engage in the consultation on the Plan.

They explain that they were fully involved by the Ministry of Youth and Sport in Romania in the development of the first version of the Plan and took part in the first meeting with the European Commission on the topic "Youth". For the second version they had a lead role in writing the chapter on Youth, however, it was decided by the Romanian Government that the chapter for Youth had to be withdrawn from the Romanian Plan, without explanation.

Fundatia Corona says they were consulted on part of the Plan, through two umbrella organisations they participate in, working on a proposal for social services. They say that only a small part of the proposals seems to be reflected in the final Plan.

The Policy Center for Roma and Minorities in Romania reported that there were public consultations (done mostly online) and actors were encouraged to send inputs. However, they say the Roma civil society was not well represented, and that there are very few people within their organisations who understand these processes, and these people are also the ones busy delivering services and support on the ground. They say what is needed is more resources, more training, more transparency, and a coordination unit at both national and EU level.

### ***Feedback from CSOs about involvement in implementation and monitoring***

ANOSR argued that there hasn't been any implementation or monitoring procedure going on to date. They reported that several CSOs (including ANOSR) asked for a clear proposal on how CSOs would be involved in the implementation and monitoring processes, but so far, no specific answer was given by the Government, only general promises.



# Spain

## *What the NRRP reports about the consultation process of stakeholders, including CSOs*

Spain's Recovery and Resilience Plan devotes six pages to the consultation process [37]. The government launched a broad consultative process, in which social agents have a relevant role, both in the definition of reforms and investments, as well as in the implementation of the plan itself. Different spaces for consultation were defined, to gather the proposals and opinions of all the relevant actors;

- a) the social partners
- b) the Autonomous Regions,
- c) Local Authorities,
- d) parliamentary forces,
- e) institutions and organisations representing each sector involved,
- f) the potential beneficiary companies of the Plan, and
- g) the citizens as a whole.

Although not explicit, it is clear from the analysis of the text of the plan that civil society organisations took part in the consultation process in **three ways**:

- In the context of the sectoral consultations, 'High level Fora and Consulting Councils', organised by the competent Ministries, such as the meeting with environmental groups convened by the Ministry of Ecological Transition and Demographic Challenge in February 2021, and the consultative forum on long-term care and social services in March 2021, convened by the Ministry for Social Rights and Agenda 2030.

- By responding to the calls for expression of interest published by the different Ministries and addressed to the productive sector, aimed at taking into account the diversity and characteristics of the initiatives of the economic actors in the definition of the strategic lines of action of the plan.
- In the framework of the public consultations on reforms, to gather the opinion of citizens, organisations and associations on all regulatory projects that have been or will be developed within the plan. These public consultations are governed by Spanish administrative law and are used at two stages, prior to the drafting of a new law and to obtain the opinion of citizens with legitimate rights and interests affected by a draft regulation, plan, procedure or administrative instrument.

## *Involvement of civil society organisations in the implementation and monitoring of the plan*

In the plan there is a section about its governance. It is important that a governance structure is in place to ensure (i) a participatory process to incorporate the proposals of the main economic, social and political actors, (ii) cooperation and coordination between different levels of government and administration, and (iii) the designation of a managing authority in accordance with the requirements of the Recovery and Resilience Facility.

The governance structure also foresees a Technical Committee, comprising 20 members of the public administration and chaired by the General Secretariat for European Funds, which will provide

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[37] Spain NRRP, p. 195

technical and legal support to the Ministerial Commission, in order to bring together all the intelligence and capacities available in the General State Administration. This Committee could rely on external advice, be it from the private sector, civil society, universities, etc.[38]

To ensure smooth and regular collaboration between the government and the other actors involved in the implementation of the plan, a large number of fora or high-level consultative councils have been created or activated in relation to the main sectors involved in the plan: digital transformation, energy transition, science and innovation, water, mobility, industry, tourism, demographic challenge, culture, etc. These fora serve as spaces for information, advice and monitoring of the programmes and projects in which the ministerial departments are involved at the highest level, together with representatives of the private sector, social agents, and civil society.

In the same vein, there will also be the possibility of creating working or advisory groups of a flexible, sectoral or cross-cutting nature, in order to increase intelligence and expertise in a bottom-up approach to public policies, to improve the design and implementation of projects or support to the competent bodies in a transparent and participatory way.

The purpose of these working groups is to advise the Technical Committee when it deems it necessary. They will be composed of external experts, whether from the private sector, NGOs, universities, etc., with sufficient knowledge in the area to be addressed. [39]

In the section about gender equality, it is written that all fora and consultative bodies involved in the implementation and monitoring of the plan shall seek the participation of organisations or persons with expertise in the gender dimension of sectoral areas. In addition, where appropriate, the participation of civil society representatives will be sought to facilitate the consideration of the needs and interests of persons with disabilities or at risk of social exclusion. [40]

There is no mention in the plan of the involvement of civil society organisations in the control of the plan. [41]

### ***Feedback from CSOs about consultation process***

The Spanish Volunteering Platform (Plataforma del Voluntariado, member of the European Centre for Volunteering) commented that they do not have additional information than that indicated above about this point. There is limited information on the participation of trade unions and employers in the specific "Mesa de Dialogo " (Dialogue Platform) of the Plan, which met about 6 times until the submission of the Plan. In the plan it is mentioned that in the 27 consultative Councils and Sectorial Forums that took place that associations participated, but there is no evidence about this. Criteria for representativeness are not described, making it impossible to know if the third sector participated in all of them or just in some. [42]

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[38] Spain NRRP, p. 188

[39] Spain NRRP, p. 191

[40] Spain NRRP, p. 108

[41] Spain NRRP, p. 201-217

[42] Spain NRRP, p. 195-197

Philanthropy Advocacy (Dafne & EFC) member in Spain, Spanish Association of Foundations (AEF) reported that where the NRRP mentions “Social dialogue” or “social agents” (diálogo social/agentes sociales) at page 195 it is referring to employers’ association (patronales) and trade unions (sindicatos). They report that the dialogue and most part of the meetings, or fora were held with representatives of employer’s or trade unions and not with CSOs.

Significant open calls were launched from the respective Ministries, but they were meaningful only for the sectoral involvement in the different areas of the plan, rather than for the overall plan. They concluded that their sector has not felt enough listened to in relation to the NRRP but that the Government seems more sensitive in the ongoing consultation process of España 2050 strategy: <https://www.espana2050.com/>

Debt Observatory in the Globalisation reported that it was not consulted. Some large NGOs were invited by the Ministries, but no information is available on how they were chosen. It also argued that their proposals were not included in the plan [43]. They worked in alliance with other civil society organisations and were able to engage with members of the Catalan and Spanish Parliaments. CSOs can be beneficiaries of funds.

CREUP reported that they were not involved in the preparation of the plan and their proposals were not included. All funding seems to be allocated to public institutions.

CANAE has participated in one of these consultations through POI (Plataforma de la Infancia. After this consultation, some proposals and conclusions were drafted and sent to the Government. Additionally, the Catalan Federation of Music Association informed that it was not consulted, as well as the Spanish Confederation of Music Associations.

European Roma Grassroots Organisation Network (ERGO) members in Spain reported that their members did not manage to submit an input to the NRRP. They had the impression that only selected stakeholders were directly consulted, while the information on the process was not transparent and accessible. While an impressive list of actors is included in the NRRP as having been consulted, they say that there was no public consultation open to all during the drafting process.

### ***Feedback from CSOs about involvement in implementation and monitoring***

The Spanish Volunteering Platform (Plataforma del Voluntariado) reported it has even less information about this point than in relation to the consultation processes. In addition, CERMI, the Spanish Committee of Representatives of Persons with Disabilities, denounced the exclusion of the third sector from European funding for the development of artificial intelligence and other digital technologies.

The Spanish Association of Foundations (AEF) expects to be part of at least one consultative council.

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[43] <https://odg.cat/es/campana/next-generation-eu/>

They said that while, it has been recognised that the Third Sector is carrying a high number of activities that are at the core of the objectives of Next Generation EU, they say they had to remind different public Administrations that future public tenders/calls need to mention specifically that “not for profit/Third Sector” organisations can be eligible.

This would clearly state that NPO/CSO can benefit from funds, without prejudice if they are, or are not, a Small or Medium sized Enterprise (SME). However, they do not know if any of the Ministries or Autonomous Regions will launch public tenders specifically for CSO’s. AEF is also organising a kind of “technical office” to give support to members to analyse public calls/tenders that are launched in the next months. Regarding monitoring of the NRRP they say that CSOs are not mentioned as far as they know.

# Information from other Countries

## Austria

The Austrian National Youth Council was involved in consultations on part of the Austrian NRRP. They informed that they were invited by the office of the responsible ministry and that they also formally submitted a position paper to the process. They are aware of one digital meeting that was held after the consultation meetings where the government plans were presented, but not the final text. No response to the suggestions brought up by civil-society representatives was given. They are unaware of proposals for involving civil society in the implementation and monitoring of the Plan.

## Bulgaria

A25 Cultural Foundation reported that there was a lack of transparency in the consultation process and they didn't have any chance to make any proposals or participate in any way in the NRRP preparation. There was no public announcement or discussion about the "Culture" section of the NRRP. They understand that some cultural practitioners may have participated, with the team in the Ministry of Culture, in the preparation, but there is no official information. To them, it remains unclear if and how any consultation process with civil society organisations happened.

They state that civil society organisations are eligible for funding, specially by the programmes of the National Culture Fund, whose budget is expected to be increased to support a variety of funding programmes. For them, it is still not clear if civil society

organisations will be engaged with implementation and monitoring. They hope this may become clear when implementation of the Plan starts. The Economic Policy Institute and the Green Policy Institute in Bulgaria in their assessment of the third version of the Bulgarian Plan reported that the third draft of the NRRP showed some improvements and seems to be better organised.

However, their assessment is that this version of the Plan did not solve the main problems, seen already in the first draft, thus is not going to contribute to the post-COVID 19 recovery as much as needed.

They report also, that after the first draft was published there was only one formal round of public consultations within which only written opinions were collected. There were no formal meetings, round tables or whatsoever neither during this formal round of consultations, nor after the next two versions were presented. Any kind of further dialogue has been rejected so far. They also reported that there was no response from the institutions whether they took or rejected the inputs from NGOs and other stakeholders, and why.

## Croatia

The Centre for Peace Studies was not involved in the consultation. They are of the opinion that the summary of the consultation process in the Croatian Plan is not entirely correct, as the civil society and interested public were just informed and not really consulted about the content of the Plan. They remind that on 19 March 2021, Green Action/Friends of the Earth Croatia issued a statement informing the public that 40 days



prior to the deadline of submission of the Plan, the Government had still not published the NRRP. Already in October 2020 more than 80 CSOs, energy agencies, institutions and businesses signed the Demands for Green Recovery and Development.

The Centre for Peace Studies stated that the Government gave the first information about the NRRP to the social partners for the session of Economic and Social Committee on March 29 2021. On 1 April 2021, the 80-page Summary of the Draft Plan was published and presented to the public at the session of the Government. This document contains the list of the reforms and investments and general overview of how the 6,3 billion EUR in non-refundable grants and 3,6 billion EUR in loans will be distributed. In their opinion, it was impossible to fully understand what exactly certain reforms and investments entail, as no detailed descriptions were published.

They also reported that, on 13 April, the Prime Minister presented the same information on the Draft Plan to the Parliament, which received wide criticism by the opposition on the fact they were not given the full Draft NRRP. On the same day, Green Action/FoE Croatia, the Society for Sustainable Development (DOOR) and the Center for Peace Studies (CPS) held an action and a press conference to point out the lack of public participation in drafting the Plan. On 15 April 2021, the summary Draft Plan was presented to the members of the Council for Civil Society Development, an advisory body to the Government. Almost all CSO representatives strongly criticized the procedure and stated that they could not comment on the content of the Plan, as the full text was not available prior to the session.

Some of the representatives of the Government claimed that the approach of CSO representatives was not constructive.

The full draft plan was brought and published at the Government session on 29 April 2021 and it was sent to the European Commission. IN the opinion of the Centre for Peace Studies, no public consultation or a meaningful participation of the civil society or the public was held.

On the NRRP there are no measures that target only civil society organizations, although they are included as possible target groups in several measures of the Plan. The Centre for Peace studies is unaware of proposals for involving civil society in implementation and monitoring of the Plan.

## Czechia

The Association for International Affairs (AMO) reported that they were not involved in the consultation on their NRRP. They followed the drafting of the plan in its later stages, as part of their work on the Green Recovery Tracker. However, they stated that they did not come forward with specific proposals until a late stage in which they criticised the inadequate funding of 'green' projects.

The Czech member of ERGO stated that there was no clear process with input opportunities. However, their members pro-actively contacted the Ministry of Industry, who was in charge of drafting the NRRP, with a view to discuss how to best mainstream the national Roma Strategy, adopted in May 2021, into the Plan.

They also provided input through the Governmental Office for Roma Minority Affairs, who is cooperating with the drafting Ministry. However, they saw no follow-up to their proposals, and the national Roma Strategy is not even mentioned in the final NRRP.

AMO stated that along with colleagues in the civil society, they heavily criticised the draft monitoring & evaluation mechanism which would have amounted to a 'power grab' by a single ministry. They stated that in the final version of the Plan, these proposals were charmed and that the end proposal should result in more inclusive procedures.

The Student Chamber of the Council of the Higher Education Institutions (SK RVŠ) were not consulted on the Plan and were unaware of the process or criteria for involving organisations in the consultation.

## Estonia

Eesti Üliõpilaskondade Liit (EÜL) -Federation of Estonian Student Unions- have been consulted on the whole of the Estonian Plan. They reported that strategic stakeholders and partners received a letter from the Estonian Ministry of Finance on 20 May with a possibility to give written feedback on the draft Plan until 4 June. However, their proposals were not included in the Plan. They are unaware of proposals for involving civil society in implementation and monitoring of the Plan.

## Germany

The German members of ERGO reported that they were able to provide input in relation to the German Plan to the Federal Cabinet Committee dedicated to the prevention of racism and right-wing extremism.

However, they reported that while the involvement of civil society overall was quite well covered in the plan, the voices of organisations representing vulnerable groups, as well as issues such as discrimination were not reflected in the plan.

The German Red Cross did not see proposals for involving civil society in implementation and monitoring the Plan. They described the whole process as untransparent.

## Ireland

Pavee Point Traveller & Roma Centre reported that they were involved in the consultation on the whole Irish NRRP. There is only a brief reference to consultation in the plan to say that 'it was informed by a public consultation process'. Pavee Point explained that the Irish government advertised a consultation phase via a call for submissions and Pavee Point submitted their comments to that process. But they stated that there was no direct contact or explanation about the process and relevance of the European Semester.

They further stated that they could not identify anything from their submission that was taken up in the final Plan. In their opinion the overall plan lacked any significant reference to Travellers, Roma or other minority ethnic groups and lacked ambition in light of the overall EU social inclusion, equality and anti-racism agenda. For them this is all the more significant given the disproportionate impact of COVID-19 on these individuals and communities and the growing levels of racism in Europe. Pavee Point has worked with other civil society actors to try to influence the Plan. Pavee Point could not see proposals to involve civil society in implementation and monitoring of the Plans.

To them this seemed contrary to the commitments in commitments such as; the EU Framework for Roma equality, inclusion and participation, European Social Pillar, SDGs, Child & Youth Guarantee, or the Anti-Racism Action Plan.

## Latvia

The Civic Alliance-Latvia (CAL) was proactive in calling for a consultation process on the Latvian NRRP. In October 2020 they called on their Minister of Finance to provide information on whether and how Latvian civil society would be involved in the process of developing the Plan, which was a mandatory requirement set by the European Commission [44]. However, from the publicly available information at that time, there was no indication that Latvia's government planned to consult with civil society.

CAL reported that on October 13, they had received a response letter from the Ministry of Finance - Ministry that explained, in accordance with the tasks given by the Cabinet of Ministers, the draft RRF plan had to be submitted to the Cabinet of Ministers for consideration by the end of October and after the preparation of the draft plan, discussions with partners would be provided, in order to be able to start negotiations with the European Commission (EC) and jointly obtain the best offer for submission to the EC.

CAL informed that after (November 2020), The Ministry of Finance (MoF), in cooperation with line ministries started a consultation process. As cooperation with the non-governmental sector plays an important role

in the project development process, the MoF invited representatives of non-governmental organizations to participate in the meeting on the development and possible content of the Plan. The meetings took place on the MS Teams platform in November.

In December there were thematic discussions organised by the Ministry of Finance, that also took place remotely, to discuss with the social and cooperation partners (civil society) the planned reforms under the NRRP; on climate, health, digitalisation, economy and productivity, reducing inequalities and the rule of law. Another round of thematic discussions took place in March.

The working group for the development of the Plan, in which the Council for the Implementation of the Memorandum of Cooperation between NGOs and the Cabinet of Ministers, delegated Kristīne Zonberga, Director of the CAL as the representative from civil society. In addition, CAL reported that civil society organisations submitted opinions on the draft plan. Although the consultation process was not launched in time according to CAL and there was a difficult start, CAL welcomed the final result.

CAL reported that on April 27, the government approved the NRRP for submission to the European Commission. The Plan included proposals made by CSOs to reduce inequalities and ensure equal treatment of access to investment, as well as compliance with the principles of socially responsible procurement. According to CAL, decision-makers included the principles required by NGOs in the Plan:

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[44] [https://nvo.lv/uploads/vestule\\_fm\\_plans.pdf](https://nvo.lv/uploads/vestule_fm_plans.pdf)

Equal approach to investment for all: to include associations and foundations as recipients of RRF investments, ensuring equal treatment of different sectors and economic actors. The final version of the Plan also includes direct investments in the non-profit sector - associations and foundations, social enterprises in the components of digitization and inequality reduction.

CAL has called for the inclusion of CSOs as an equal strategic partner of the government in all subsequent steps and processes related to the further clarification, discussion and implementation of the ANM.

Green Liberty, confirmed that the Latvian Draft Plan as first published in January 2021, following public consultations at the end of 2020 was 'a shopping list' of measures from different ministries intended to fill the holes in the state budget rather than a thoughtful, unified, strategic plan to transform the economy, making it more resilient and climate neutral. Public participation was limited and the first draft plan received wide criticism from many stakeholders, including NGOs, business associations, and local municipalities. Environmental NGOs expressed their concerns as well as sent several letters to the government and to the European Commission.

As a result of this pressure, the government organized a series of public consultations and significantly redrafted the plan excluding sections e.g. on gasification of the transport sector, reforestation measures (nature conservation organizations expressed their concerns about the possible significant harm).

The new Latvian Plan, in their opinion, while still not containing enough ambitious reform elements is significantly improved and could be described as a step in the right direction in terms of contributing to the green transition.

However, they note that climate governance of the package remains unclear as the Plan does not foresee any mechanisms for how the climate targets will be assessed and supervised. The Northern Dimension Partnership on Culture (NDPC) reported that they were not involved in the consultation process, nor are they part of alliances that were consulted.

The Latvijas Jaunatnes padome (The National Youth Council of Latvia) informs that they were part of the consultation for a section of the Plan. At a meeting they had with the Ministry of Education and Science, they added an item to the agenda on the NRRP. They were not contacted by the Ministry responsible for the overall Plan.

They considered that their proposals were not included in the Plan. They were part of wider alliances and were aware that some civil society organisations did influence the final Plan and succeeded to get commitments to include civil society in the implementation and monitoring of the Plan.

## **Luxembourg**

Fondation de Luxembourg was not consulted on the Luxembourg NRRP nor were they aware of proposals for involving civil society in the implementation and monitoring of the Plan.

## Malta

ARC Research & Consultancy Ltd (advocating for the cultural and creative sector) reported that they were not involved in the consultation on the Plan. The Maltese Plan states that in the development of the plan for Malta, 'meetings with relevant stakeholders were also held on various topics including economic growth, agriculture and rural development, fisheries and maritime, digital and green transitions, environment, transport, social cohesion, education and health as well as Gozo's territorial needs.' It is not clear who the stakeholders engaged were as there is no list in the Plan. The Malta Council for Social and Economic Development (MCSED) is believed to have been consulted on the Plan. They were unaware of proposals to involve civil society organisations in implementation and monitoring the Plan.

## Slovakia

The Slovak Environmental Organisations (zelený reštart) reported that the engagement of stakeholders in the preparation of the Plan did not meet requirements of the Aarhus Convention. They say the Plan was/is in the spotlight thanks to NGOs, some politicians and media. Since May 2020 their initiative of climate-oriented NGOs has been proposing content input relevant for the Plan, based on the diverse expertise of their members. Since October, they have been explicitly requesting a standard participation process, together with a wider platform of NGOs and the Government Plenipotentiary for Civil Society. They did succeed to have several high-level meetings with ministers and/or state secretaries of practically all relevant ministries, including the Minister of Finance in charge of the Plan.

However, in their opinion, there was no real consultation process and engagement of all stakeholders, including municipalities, academia and government institutions was chaotic and non-transparent. A draft of the NRRP was sent for first revision to the European Commission with little, if any, engagement beyond the Ministry of Finance team. Their request for information was denied but a draft was leaked by the media a few days later. The draft Plan was published on 8 March 2021.

The Ministry of Finance organised a public online presentation with Q&A, which was tagged as "consultations". According to zelený reštart the only standardised procedure has been an official commenting process, followed by online hearings to discuss the comments, which is prescribed by the Slovak legislation. Such a procedure was conducted in late March - April. They report that several of their comments have been incorporated or partially incorporated, however none of the really fundamental ones, which was as they expected at such a late stage. Zelený reštart described their NRRP as an untapped opportunity based on outdated climate change targets.

Higher Education student union ŠRVŠ reported that the NRRP drafting process was marked by several leaks of the different versions and prioritisation of the allocation of funds according to the parliamentary strength of the government's coalition parties. Stakeholders had the opportunity to participate only: through a Q&A session, through a general meeting with many stakeholders (to which initially neither rectors nor students were invited, and whose general discussion did not allow to thoroughly discuss the topics), and by sending comments to the published version



of the plan, with a two-week deadline.

ŠRVŠ submitted five comments, calling for: a reform of the residency permit process for international students and adjusting the proposed scholarship scheme; renovation of Higher Education Institutions' buildings and student accommodation; including Higher Education students in the mental health reform, adding support centres at higher education institutions to the plan; including Higher Education teachers in the plan to upgrade teachers' qualification; a complete redoing of the proposed reform of Higher Education governance, since it tried to do all major reforms of Higher Education (changes in accreditation, financing and governance structures) at once without leaving time for discussion and implementation.

In September 2020, ŠRVŠ reached out to the Ministry of Education and the Ministry of Finance, requesting to be involved in the process, but it has not received a response ever since. Furthermore, ŠRVŠ reported that there has been no stakeholder or civil society involvement since June 2021, when the plan was approved by the European Commission.

## Slovenia

Društvo Asociacija (arts and culture organisation) reported that they were not involved in the consultation on the NRRP. They informed that there were gatherings organised by the government on this topic, but they were mainly presentations. The invited organisations did not receive any material, so it was impossible to have a concrete discussion. They do not recognise proposals in the plan that would link to their priorities.

The Slovenian environmental organisation Umanotera reported that no formal dialogue took place and no consultation avenue was established. In their view, the claims of the Slovenian government that some 2000 plus stakeholders have been consulted, are extremely misleading as these were largely participants in online presentations of the plans with one directional information flow. They further reported that, after insisting several times, they managed to obtain two meetings with the managing authority, but their inputs were not included and they received no feedback in any form.

## Sweden

BirdLife Sweden informed that they were not involved in the consultation process. They are unaware of any proper consultation procedure on the Plan. They understand, the funding is ear-marked for public authorities and business companies. They asked the government how they could take part in the process, and proposed measures that they thought were important to prioritise. The answer they got was that "the dialogue happens within the existing EU process".

# V. Lessons Learned and Recommendations

## Lessons learned from the consultation process

- Compared to December 2020 when the first study of Civil Society Europe was released, more involvement of CSOs in the consultations launched for the preparation of the plans can be observed. Thus, the first version of this study, the European Economic and Social Committee's resolution of 25 February 2021 and the pressure put by CSOs themselves on governments seem to have had a somewhat positive impact. It is interesting to note that the responses received from countries that were not part of the first study, in general, reported less engagement in consultations. However, civil society is composed of diverse sectors and not all sectors were involved or were involved to the same extent (e.g. the cultural sector seems to be the one which has been involved the least). It can also be argued that in many cases not all the main organisations from the same sector were involved.
- Civil society organisations have clearly demonstrated the capacity to engage constructively in such processes. What is needed are clearer consultation structures, timetables, and resources, to be invested to strengthen the involvement of independent value based civil society organisations in these processes. This would allow to gain maximum benefit from the knowledge, expertise and perspectives they can bring.
- Channels that had been developed for dialogue with civil society in relation to the EU Semester (economic and social processes) and EU Funding programmes, were not used automatically for the consultation on the plans, and important principles such as the 'Partnership Principle in European Structural and Investment Funds Regulations' were not embedded in the Regulation for the Recovery and Resilience Facility. This made the engagement of civil society in the consultations less automatic or required. However, from the subsequent guidance and actions, it seems clear that this lacuna resulted from crisis responses rather than a shift in policy.
- Even where civil society did partake in consultation it is important to note that, in several cases consultations were regarded as a tick-box exercise or just gave the possibility to react to draft versions of the plans rather than a real input in the elaboration of the plans. Practices and principles that derive from the European Code of Conduct on Partnership, such as early involvement, timely sharing of information, representativeness, and transparency, were not reflected in the consultations for the preparation of NRRPs.
- It is also worth noting that overall social partners had more opportunities to be consulted than civil society. This confirms that in European processes that are very much decentralised to the national level, once again social dialogue benefits from more privileged channels than civil dialogue. Social partners are generally considered more important actors than CSOs, despite having different and complementary roles and expertise.

- Within value based civil society there is a diversity of fields of interest. Given the high attention to environmental issues, it is not surprising that environmental NGOs may have had more access to the consultations. Social NGOs, in some countries, seemed to be able to generate pressure to be engaged in the consultations. There was a clear call from the European Commission to engage youth organisations in the consultation of the plans, yet our findings show that in many countries this was not the case. Also, from our findings it is clear that, arts and cultural NGOs, did not or had great difficulties to participate in the consultation processes in many countries, although these organisations were strongly impacted by measures taken to limit the spread of the COVID-19 pandemic.
- It emerges from our findings that civil society sectoral alliances, or cross sector alliances, had more success engaging in the consultations. The existence of structures such as National Economic and Social Councils, also facilitated the engagement of civil society in the consultations in some countries. However, it is noted that for these structures to be able to provide a genuine consultation process, the representatives of civil society in these structures need to be independently selected by the relevant civil society organisations themselves, and this is not always the case.
- As well as working through dialogue channels, or requests for engagement in meetings, or making written submissions, it is important that civil society works in the public sphere, to inform the public of the potential of the plans, their engagement, and their proposals and to bring pressure for more transparent and public engagement in the consultation process.
- Among the 11 NRRPs that have been analysed, very few give a clear account of how the contributions from the different stakeholders including civil society were taken into account, despite this is clearly stated in article 18(4)(q) of the RRF Regulation. It is also important to highlight that the Italian plan does not have a section devoted to the consultation with stakeholders, as required by the regulation.
- It is not enough that the European Commission requires consultations of civil society in the preparation of the plans if concrete guidance is not provided on how to do it in practice. It would be extremely useful if the European Commission could give a clear indication of what is meant by meaningful consultation of civil society. In addition setting specific standards for meaningful consultation and reporting thereof would also be appropriate, as national governments can interpret it in very different ways. This would avoid the consultation process becoming a tick-box exercise.

- While the subject of this report is the consultation processes and not so much the content of NRRPs, civil society in some countries did report improvements and more balanced economic, social and environmental proposals in the final plans. However, overall, there was a sense that the lessons of the economic and social crises, which were highlighted all the more by the COVID-19 pandemic, in relation to social standards, inequalities, and regional disparities were not adequately addressed in the plans. It was also the case that many in civil society believed the actions in the plans fell short of the ambition needed to address the environmental crisis or the targets set by the EU in this regard.

# Recommendations

## To the European Commission:

1) Where the description of consultation processes was missing, poor or not complete, request additional information to the Member State in question and issue guidelines and recommendations on how such involvement could be improved, even if the NRRP has been approved. As the 11 NRRPs analysed fall short of reporting how the feedback from stakeholders was integrated (or not) in the plans, require the concerned Member State to supplement this information, as set out in article 18(4)(q) of the RRF Regulation.

2) Clarify how NRPPs, the European Semester, EU cohesion policies, and relevant national policies, are linked and establish coordinated mechanisms and structures in which CSOs and other stakeholders can give their own input in the implementation and monitoring of the different processes, to develop synergies and avoid duplication.

3) While monitoring the preparation of cohesion policy Partnership Agreements and Operational Programmes for the 2021-2027 programming period, require Member States to clearly spell out the synergies between NRRPs and EU funds, as well as the links and synergies with national budgets and among their different governance structures, by highlighting the role and space assigned to CSOs in those structures.

4) Ensure that monitoring of the implementation of the plans is done in a rigorous way, so that funding disbursed is effectively used to meet the priorities, actions and expected results declared in the plans and agreed with the European Commission. Ensure that CSOs and all relevant stakeholders are included in the monitoring and that media independence is guaranteed. Take measures to ensure that all CSOs have appropriate access to media in all Member States. Work together with the concerned public authorities and CSOs to ensure a true representativeness of civil society in dialogue channels, as in some Member States there is a real issue of CSO representativeness.

5) Include specific indicators to monitor the involvement of CSOs in the implementation and monitoring of NRRPs in the delegated acts adopted in compliance with article 29.4 of RRF Regulation [45]. Involvement of specialised CSOs should also be on the basis of the methodology developed to report on social expenditure under the RRF. Do not limit the reporting of social expenditure to gender equality, children and youth, as mentioned in the regulation. BY contrast ensure that it considers the impact on older people, people with disabilities, LGBTI people, people experiencing poverty and social exclusion, homeless people, people with a migrant background, ethnic or racial minorities, etc. to make sure that expenditure addresses the diverse and intersecting needs and experiences of all people.

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[45] Article 29.4 empowers the Commission to adopt delegated acts to (a) set out the common indicators to be used for reporting on the progress and for the purpose of monitoring and evaluation of the Facility towards the achievement of the general and specific objectives; and (b) define a methodology for reporting social expenditure, including on children and the youth, under the Facility.



Adopt a more holistic approach in line with the rights set in all 20 principles in the European Pillar of Social Rights and the indicators set in the revised Social Scoreboard. In the future, avoid launching consultations with a short duration of 3 or 4 weeks during the summer, as it happened with the consultation on the delegated acts, significantly reducing the capacity of CSOs and other stakeholders to provide input.

6) Monitor that Member States ensure adequate and effective technical assistance both to strengthen the administrative capacity of civil servants, namely in regions where there has been a notorious low absorption of EU funds, and to organise capacity-building of CSOs on how to develop and implement projects and to engage in the implementation and monitoring of the plans. Ensure that European CSOs and their national member organisation do have the financial resources necessary for meaningful public participation.

7) As in many Member States that will receive consistent resources from RRF there is a high risk of incurring fraud, corruption, and infiltration of mafia forces, monitor that the control mechanisms and structures put in place by governments to prevent this, do not result in an excessive bureaucratisation of processes. Excessive bureaucratisation would inevitably lead to lengthy processes, delays in payment, more complexity and red tape instead of simplification, and to excluding small and medium entities from the industry, civil society and the social economy from participating in projects. Member States concerned to amend the legislation to ensure rule of law and sound public finances.

By contrast, ensuring the participation of CSOs and social partners in monitoring processes and structures would also help in combating these phenomena. At the same time, a precondition of EU funding must be the implementation of the anti-corruption recommendations of the European Commission (especially in the Country-Specific Recommendations and the Rule of Law Report) and GRECO, taking into account also the recommendations of Transparency International and other CSOs fighting against fraud, corruption and tax evasion).

8) Issue guidelines on how Member States could involve CSOs in an effective way in the monitoring of NRRPs. This should be done by valuing both their specific expertise in some thematic areas (e.g. environment and climate change, social and employment policies, culture, health, education etc.) and the expertise in mainstreaming the social and environmental dimensions in all the components of the plans. Specific focus should be paid to monitor that the green and digital transitions do not produce or increase existing socio-economic inequalities. Ensure that monitoring of plans' implementation embeds the gender and inter-generational dimensions, to make sure that the projects and the reforms implemented promote gender equality and positive impact for all generations, namely youth and the elderly.

9) Require Member States to ensure full transparency about the projects that are or will be funded.

10) In the review report on the implementation of the RRF that will have to be submitted to the European Parliament and the Council of the European Union by

31 July 2022 (article 16.2 of RRF Regulation), give an overview of which (and in which proportion) different economic and social actors, including CSOs, are beneficiaries of the funds. Give also a clear account of which actors are involved in the monitoring of the plans. If CSOs are de facto excluded or play a very marginal role, issue recommendations to the concerned Member States to address this situation.

### **To the European Parliament:**

1) Improve the preparation of the delegated acts laid down in article 29.4 of the RRF Regulation to ensure better alignment with the rights set in all 20 principles of the European Pillar of Social Rights and the indicators set in the revised Social Scoreboard. Do not limit reporting on social expenditure to gender equality, children and youth, as mentioned in the regulation. Instead, ensure that it also considers the impact on older people, people with disabilities, LGBTI people, people experiencing poverty and social exclusion, homeless people, people with a migrant background, ethnic or racial minorities, etc.

2) In the context of the Recovery and Resilience Dialogues set out in article 26 of the RRF Regulation, invite on a regular basis the European Commission, Member States, other EU institutions, such as the Committee of the Regions and the European Economic and Social Committee, as well as relevant stakeholders, including CSOs, to discuss implementation and monitoring of the plans. Ensure that the involvement of local and regional authorities,

CSOs and social partners in the implementation and monitoring of the plans is regularly discussed.

3) Hear Member States representatives responsible for NRRP, any other relevant institutions and stakeholders to discuss their implementation, including by the means of the Committee on Petitions.

4) Organise an annual hearing of the Budgetary Control Committee to discuss implementation of NRPP, with direct testimonies from representatives of Member States, regional and local authorities, social partners, CSOs, businesses, social economy enterprises, and any other relevant actors.

### **To the Council of the EU and Member States:**

1) Improve the preparation of the delegated acts laid down in article 29.4 of the RRF Regulation to ensure better alignment with the rights set in all 20 principles of the European Pillar of Social Rights and the indicators set in the revised Social Scoreboard. Do not limit reporting on social expenditure to gender equality, children and youth, as mentioned in the regulation. Instead, ensure that it also considers the impact on older people, people with disabilities, LGBTI people, people experiencing poverty and social exclusion, homeless people, people with a migrant background, ethnic or racial minorities, etc

2) Promote exchange of good practices about CSO engagement across Member States, in line with article 18.5 of RRF regulation. Where relevant, request technical support under the Technical Support Instrument to structure stakeholders' engagement in the NRRPs. [46]

3) A strong involvement of key Council formations (such as Environment, Education, youth, culture and sport etc.), the Employment and the Social Protection Committees and Council's working parties in the follow up of the implementation, monitoring and evaluation of the Recovery and Resilience Facility will be essential to ensure a more balanced result from this unprecedented investment.

4) Ensure that lead Ministries involve relevant other Ministries, such as those in charge of employment, social inclusion, youth, gender equality, environment and culture, across the whole NRRP cycle.

5) Ensure that CSO has access as beneficiary to the funds arising from NRRPs, whatever the form used to disburse funding (e.g. public procurement, public-private partnerships, grants, etc.).

6) Ensure that a timely and efficient use of the NRPP funds do not go to the detriment of the functions of political-administrative control, including dialogue with social partners and CSO, of how funds are spent and implemented.

7) Ensure adequate and effective technical assistance both to strengthen the administrative capacity of civil servants, namely in regions where there has been a notorious low absorption of EU funds, and to organise capacity building of civil society organisations on how to develop and implement projects.

8) Ensure that in the monitoring committees of EU funds, the two-thirds majority of the members are representatives of organisations and institutions independent of the government.

9) In reporting to the European Commission, include relevant information about stakeholders' involvement, including CSOs, in the implementation and monitoring of the plans.

## To Civil Society:

1) It is clear that larger organisations, or networks are more likely to have the resources or the specialists to be able to follow these large processes or to be engaged in such consultations. Engagement and supporting networks, sectoral or cross sectoral platforms or campaigns, are an important way to strengthen the voice and impact of organised value-based civil society. Platforms should highlight their membership in their submissions to reinforce their collective engagement and level of representativeness and strengthen the case for engaging with their proposals.

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[46] In order to receive technical support, a member state should submit a request to the Commission by 31 October of a calendar year, identifying the policy areas they will focus on. For the purposes of democratic accountability and visibility, Parliament obtained to receive annual implementation reports from the Commission as the Council. A single online public repository will provide information on the actions under TSI.

2) When organisations who are part of wider networks or platforms make their own contributions, they should complement and reinforce the contributions and positions of the Platform of which they are members, deepen and bring their specific expertise to aspects of the proposals, or when necessary, point to areas of disagreement and explain their positions. This would allow channelling CSOs contributions to institutions and authorities in a more efficient and effective way, by avoiding overwhelming institutions with an excessive number of contributions in a tight timeframe.

3) In addition to structured consultations, civil society should support open public calls for submissions, to enable new voices to be heard, new ideas to be raised and to engage a more general public.

4) As it is likely that such consultations will always be subject to time constraints, civil society needs to have their analysis, ideas and concrete proposals, on their key areas of interest and expertise, ready and updated, to be able to be effective when these opportunities occur and to respond timely to draft proposals.

## VI. APPENDICES

### Appendix 1: List of organisations interviewed or providing written response to the draft report

- Bulgaria:** Economic Policy Institute and Green Policy Institute
- Denmark:** The National Union of Students in Denmark (DSF), FIC
- France:** Ligue de l'Enseignement, Ceméa
- Greece:** The National Confederation of Disabled People (NCDP)
- Hungary:** Philanthropy Advocacy (Dafne & EFC),  
Hungarian Donors Forum (Effekteam)  
Friends of the Earth Hungary (MTVSZ)  
Ökotárs - Hungarian Environmental Partnership Foundation  
Clean Air Action Group
- Italy:** Caritas Italy  
Confcooperative  
ARCI  
UDU
- Latvia:** Civic Alliance Latvia  
Green Liberty
- Lithuania:** EAPN Lithuania
- Poland:** EAPN Poland  
Foundation for Social and Economic Initiatives (FISE)  
Alliance of Associations Polish Green Network
- Portugal:** EAPN Portugal
- Romania:** The National Alliance of Student Organizations (ANOSR)  
Bankwatch  
Fundatia pentru Dezvoltarea Societatii Civile (FDSC)
- Slovenia:** Umanotera
- Slovakia:** Zelený restart  
ŠRVŠ
- Spain:** Plataforma del Voluntariado  
CERMI  
Spanish Association of Foundations  
CANAE (Confederación Estatal de Asociaciones de Estudiantes)
- European:** European Roma Grassroots Organisation Network (ERGO)



## Appendix 2: Questionnaire used to request information from civil society organisations

### **Clarity of consultation Process and transparency.**

1) Has your organisation been involved or consulted in the preparation of the NRRP?

- Yes
- No

2) Were you consulted on the whole draft plan or part of it?

- The whole of the plan
- Only part of the plan
- I was not consulted

3) Is the summary of the consultation process in the (draft) plan of your country correct?

- Yes
- No
- I do not know
- Please explain

### **Selection of stakeholders**

4) How were civil society organisations selected?

- Please explain

### **Consideration of your proposals by the Government**

5) Have your proposals been included in the final plans?

- Yes
- No
- I do not know
- Please explain

### **Campaigning on civil society participation**

6) Have you worked in alliance with other civil society organisations or with other stakeholders? For instance, social partners, social economy actors, local authorities?

- Yes
- No
- Not applicable

7) Were you able to engage with members of the Parliament?

- Yes
- No
- Not applicable
- Please explain your answers

## **Support for civil society**

8) Are there measures in your country NRRP which target specifically civil society organisations?

- Yes
- No
- I do not know

9) Are civil society organisations eligible for funding?

- Yes
- No
- I do not know
- Please explain your answers

## **Public Participation in monitoring and implementation**

10) Does the NRRP include proposals for involving civil society in implementation and monitoring? for instance through a monitoring Committee

- Yes
- No
- I do not know

11) Have you made a proposal to involve civil society and/or for a transparent process?

- Yes
- No
- Not applicable
- Please explain your answers

## Appendix 3: Responses to the Questionnaire

<b>Austria:</b>	Austrian National Youth Council
<b>Belgium:</b>	Belgian Federation of Philanthropic Foundations
<b>Bulgaria:</b>	A25 Cultural Foundation
<b>Croatia:</b>	Centre for Peace Studies
<b>Czechia:</b>	Student Chamber of the Council of the Higher Education Institutions (SK RVŠ) Association for International Affairs AMO
<b>Denmark:</b>	National Union of Students in Denmark (DSF)
<b>Estonia:</b>	Eesti Üliõpilaskondade Liit
<b>France:</b>	CFADS
<b>Germany:</b>	German Red Cross
<b>Greece:</b>	National Confederation of Disabled People (NCDP) of Greece
<b>Hungary:</b>	Ökotárs - Hungarian Environmental Partnership Foundation MTVSZ - National Society of Conservationists, Friends of the Earth Hungary Hungarian Chamber of Commerce and Industry National Association of Large Families
<b>Ireland:</b>	Pavee Point Traveller & Roma Centre
<b>Latvia:</b>	Latvijas Jaunatnes padome (The National Youth Council of Latvia) Northern Dimension Partnership on Culture (NDPC)
<b>Luxembourg:</b>	Fondation de Luxembourg
<b>Malta:</b>	ARC Research & Consultancy Ltd
<b>Portugal:</b>	EAPN Portugal
<b>Romania:</b>	Fundatia Corona FITT (Timis County Youth Foundation)
<b>Slovenia:</b>	Društvo Asociacija
<b>Spain:</b>	CREUP Observatori del Deute en la Globalitzacio Federació Catalana de Societats Musicals (Catalan Federation of Music Associations)
<b>Sweden:</b>	BirdLife Sweden

## Appendix 4: Members of the Task Force on National Recovery and Resilience Plans in Civil Society Europe

Ioannis Vardakastanis, *CSE Steering Committee Chair*

Tere Badia and Gabriele Rosana, *Culture Action Europe*

Haydn Hammersley, *European Disability Forum*

Sara Fasoli, *European Volunteer Centre*

Hanna Hanses, *Philanthropy Europe Association PHILEA*

Jessica Nguyen and Katja Reuter, *Social Platform*

Enrico Tormen, *Eurochild*

Barbara Mariani, *European Environmental Bureau*

Anelia Stefanova, *Bankwatch*

Isabelle Trichet, *Climate Action Network*

Andras Lukacs, *Clean Air Action Group*

Matteo Vespa, *European Students' Union*

Jessica Fiorelli, *Lifelong Learning Platform*

Elisa Gambardella, *Solidar Foundation*

Ivana Rosenzweigova, *European Centre for Nonprofit Law*

Shannon Pfohman, *Caritas Europa*

Mary Collins, *European Women Lobby*

Eleonora Murru and Ettore Bucci, *OBESSU*

## Appendix 5: Resources

- Belgium's Recovery and Resilience Plan, available at: <https://dermine.belgium.be/sites/default/files/articles/FR%20-%20Plan%20national%20pour%20la%20reprise%20et%20la%20re%CC%81silience.pdf>
- Caritas Italiana (June 2021), Dossier no. 67, Avere cura di una repubblica imperfetta. Contributo al PNRR, percorso di riflessione, analisi e proposta, available at: [https://www.caritas.it/pls/caritasitaliana/V3\\_S2EW\\_CONSULTAZIONE.mostra\\_pagina?id\\_pagina=9523&rifi=guest&rifp=guest](https://www.caritas.it/pls/caritasitaliana/V3_S2EW_CONSULTAZIONE.mostra_pagina?id_pagina=9523&rifi=guest&rifp=guest)
- Civil Society Europe, European Centre for Not-for-Profit Law (December 2020), Participation of civil society organisations in the preparation of the EU National Recovery and Resilience Plans, available at [https://civilsocietyeurope.eu/wp-content/uploads/2021/01/CSE-ECNL-Participation-of-CSOs-in-the-preparation-of-the-EU-NRRPs\\_spread.pdf](https://civilsocietyeurope.eu/wp-content/uploads/2021/01/CSE-ECNL-Participation-of-CSOs-in-the-preparation-of-the-EU-NRRPs_spread.pdf)
- Denmark's Recovery and Resilience Plan - accelerating the green transition, available at: [https://fm.dk/media/18771/denmarks-recovery-and-resilience-plan-accelerating-the-green-transition\\_web.pdf](https://fm.dk/media/18771/denmarks-recovery-and-resilience-plan-accelerating-the-green-transition_web.pdf)
- European Committee of the Regions (2021), Regional and local authorities and the Recovery and Resilience Plans
- European Economic and Social Committee, Resolution. "Involvement of Organised Civil Society in the National Recovery and Resilience Plans - What works and what does not?", 25 February 2021
- European Students' Union, Organising Bureau of European School Student Unions, Lifelong Learning Platform, Civil Society Europe, "NextGenerationEU must involve all stakeholders! So far, it has not", available at: <https://www.esu-online.org/wp-content/uploads/2021/06/Statement-NG-EU-May-2021-1.pdf>
- France's Recovery and Resilience Plan, available at: [https://www.economie.gouv.fr/files/files/directions\\_services/plan-de-relance/PNRR%20Francais.pdf](https://www.economie.gouv.fr/files/files/directions_services/plan-de-relance/PNRR%20Francais.pdf)



- Greece's Recovery and Resilience Plan, available at: [https://primeminister.gr/wp-content/uploads/2021/03/Greece-2\\_0-April-2021.pdf](https://primeminister.gr/wp-content/uploads/2021/03/Greece-2_0-April-2021.pdf)
- Hungary's Recovery and Resilience Plan, available at: [https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility/recovery-and-resilience-plan-hungary\\_en](https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility/recovery-and-resilience-plan-hungary_en)
- Italy's Recovery and Resilience Plan, #NextGenerationItalia, available at: <https://www.governo.it/sites/governo.it/files/PNRR.pdf>
- Lithuania's Recovery and Resilience Plan, available at: <https://finmin.lrv.lt/uploads/finmin/documents/files/Naujos%20kartos%20Lietuva%20planas.pdf>
- Poland's Recovery and Resilience Plan, 'National Plan for Reconstruction and Enhancement of Resilience', available at: <https://www.gov.pl/web/planodbudowy/kpoyyslany-do-komisji-europejskiej>
- Portugal's Recovery and Resilience Plan, 'Recovery Portugal – Building the Future for Recovery and Resilience', available at: <https://www.portugal.gov.pt/download-ficheiros/ficheiro.aspx?v=%3d%3dBQAAAB%2bLCAAAAAAABAAzNDQzNgYA62SpeQUAAAA%3d>
- Regulation EU 2021/241 of 12 February 2021 of the European Parliament and of the Council establishing the Recovery and Resilience Facility
- Romania's Recovery and Resilience Plan, 'Funds for a Romania modern and reformed', available at: <https://mfe.gov.ro/pnrr/>
- Spain's Recovery and Resilience Plan, available at : [https://ec.europa.eu/info/files/spains-recovery-and-resilience-plan\\_en](https://ec.europa.eu/info/files/spains-recovery-and-resilience-plan_en)



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