Ref. Ares(2026)6908566 - 10/07/2026

DeCrises

D1.1 A map of MLG with recommendations for just and inclusive climate and digital transitions in the EU

30/04/2026

Authors: Stefan Ewert, Vineta Kleinberga, Giga Mukutadze, Md Mashiur Rahman, Farid Karimi, Katrin Buchmann

Funded by
the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Research Executive Agency. Neither the European Union nor the granting authority can be held responsible for them.

Prepared under contract from the European Commission
Grant agreement No. 101177807
HORIZON Research and Innovation Actions

Project acronym:	**DeCrises**
Project full title:	**EU Decarbonisation in Times of Crises: Exploring Social Innovations and Enhancing an Equitable Twin Transition**
Project duration:	1 April 2025 - 31 March 2028
Project coordinator:	University of Jyväskylä (JYU)
Call:	HORIZON-CL2-2024-DEMOCRACY-01
Deliverable title:	A map of MLG with recommendations for just and inclusive climate and digital transitions in the EU
Deliverable n°:	D1
WP responsible:	WP1
Nature of the deliverable:	OTHER
Dissemination level:	Public
Lead partner:	UG
Recommended citation:	Ewert, S; Kleinberga, V; Mukutadze, G; Rahman, M; Karimi, F; Buchmann, K. (2026). **A map of MLG with recommendations for just and inclusive climate and digital transitions in the EU**. DeCrises project deliverable D1.1.



Due date of deliverable: April 30th 2026
Actual submission date: April 30th 2026

Deliverable status:

Version	Status	Date	Author(s)
1.0	Final	30 April 2026	Stefan Ewert, Vineta Kleinberga, Giga Mukutadze, Md Mashiur Rahman, Farid Karimi, Katrin Buchmann
2.0	Revised/Final	10 July 2026	Stefan Ewert, Vineta Kleinberga, Farid Karimi

Table of contents

Executive summary 4
List of abbreviations 5
1 Introduction 8
2 Finland 11
2.1 Climate transition and MLG challenges in Finland 12
2.2 Digital transition and MLG challenges in Finland 23
3 Latvia 32
Climate transition and MLG challenges in Latvia 33
3.2 Digital transition and MLG challenges in Latvia 42
4 Norway 49
4.1 Climate transition and MLG challenge in Norway 50
4.2 Digital transition and MLG challenges in Norway 57
5 Poland 64
5.1 Climate transition and MLG challenges in Poland 65
5.2 Digital transition and MLG challenges in Poland 73
6 Concluding remarks 80
7 Acknowledgements 80

Executive summary

Objectives and Approach

This deliverable maps the multilevel governance (MLG) gaps that emerge in the EU's climate and digital transitions, with the aim of identifying where social innovation could meaningfully improve governance outcomes. It analyses how strategic agenda-setting, decision-making and legal authority, policy instruments, implementation capacity, and coordination unfold across governance levels, from the supranational (EU/EEA/EFTA) to the national, regional, municipal, and civil society levels, across four country cases: Finland, Latvia, Norway, and Poland.

The deliverable adopts a mapping approach focused on tracing structural and recurring governance gaps that constrain the effective implementation of the EU's twin transition. Methodologically, EU infringement proceedings are used as a central analytical category, treated not merely as indicators of legal non-compliance but as signals of systemic governance stress within multilevel systems.

Key Findings

Across all four countries, the mapping reveals a consistent pattern: strategic authority and legal control are concentrated at EU and national levels, while implementation responsibilities, conflict management, and legitimacy burdens are pushed downward to regions, municipalities, and civil society. Coordination tends to rely on compliance mechanisms rather than early dialogue, and participation is typically late, reactive, or reduced to formal consultation. Country-specific challenges reflect these dynamics in distinct ways: Finland's functional centralisation creates governance vulnerabilities for autonomous regions; Latvia's political fragmentation and capacity constraints translate into delayed transposition and weak subnational integration; Norway's EEA position creates structural asymmetry between binding obligations and absent agenda-setting power; and Poland's centralised control and regulatory instability coexist with high subnational exposure, particularly in coal regions.

Main Recommendations

Despite country-specific differences, several recommendations apply broadly across member states and governance levels. At the **EU level**, governance incentives should reward models that institutionalise early, bottom-up involvement of municipalities and civil society, including during directive design, impact assessment, and implementation support, rather than relying solely on infringement-driven enforcement. At the **national level**, transposition and strategy-setting processes should be opened to structured subnational and civil society input ahead of finalisation, moving beyond one-off consultations toward iterative, deliberative engagement. **Regional and municipal levels** should be supported with capacity-building resources and positioned as active co-designers rather than mere implementers, including through participatory planning instruments and social innovation pilots. At the **community and civil society level**, engagement should shift from reactive, ex-post contestation toward recognised governance roles embedded throughout the policy lifecycle. Across all levels, the core implication is that improving MLG does not require new institutions: it depends on using existing frameworks — consultations, planning requirements, funding instruments, advisory bodies — as genuine spaces for coordination, co-creation, and learning rather than procedural compliance.

List of abbreviations

ACER	Agency for the Cooperation of Energy Regulators
AI	Artificial intelligence
AI Act	EU Artificial Intelligence Act (Regulation 2024/1689)
CERT.LV	Latvia's national Computer Emergency Response Team
CDSMD	Copyright in the Digital Single Market Directive (Directive 2019/790)
COREPER	Committee of Permanent Representatives (in the EU Council)
DDC	Development Decision Conditions (Poland; local spatial planning instrument)
DESI	Digital Economy and Society Index
DGA	Data Governance Act (Regulation 2022/868)
DigDir	Norwegian Digitalisation Agency (Digitaliseringsdirektoratet)
DMA	Digital Markets Act (Regulation 2022/1925)
DORA	Digital Operational Resilience Act (Regulation 2022/2554)
DSA	Digital Services Act (Regulation 2022/2065)
DSM	Digital Single Market
DVI	Data State Inspectorate (Latvia; Datu valsts inspekcija)
EAIB	European Artificial Intelligence Board
EBDS	European Board for Digital Services
EC	European Commission
ECJ	European Court of Justice
EEA	European Economic Area
EECC	European Electronic Communications Code (Directive 2018/1972)
EED	Energy Efficiency Directive (Directive 2012/27/EU, recast 2023/1791)
EFTA	European Free Trade Association
EIA	Environmental Impact Assessment

EPBD	Energy Performance of Buildings Directive (Directive 2010/31/EU, recast 2024/1275)
ERA	Energy Regulatory Office (Poland; Urząd Regulacji Energetyki)
ESA	EFTA Surveillance Authority
ETS	Emissions Trading System
ETS2	EU Emissions Trading System 2 (covering buildings and road transport)
EU	European Union
GHG	Greenhouse gas
ICT	Information and communications technology
JTF	Just Transition Fund
KPO	Krajowy Plan Odbudowy (Poland's National Recovery and Resilience Plan)
LBAS	Latvian Free Trade Union Confederation (Latvijas Brīvo arodbiedrību savienība)
LDDK	Latvian Employers' Confederation (Latvijas Darba devēju konfederācija)
LLPA	Latvian Large Cities Association (Latvijas Lielo pilsētu asociācija)
LPS	Latvian Association of Local and Regional Governments (Latvijas Pašvaldību savienība)
LSDP	Local Spatial Development Plan (Poland)
MILA	Latvian AI Association (Mākslīgā intelekta Latvijas asociācija)
MLG	Multilevel governance
NECP	National Energy and Climate Plan
NGO	Non-governmental organisation
NIS1	Network and Information Security Directive (Directive 2016/1148)
NIS2	Network and Information Security Directive 2 (Directive 2022/2555)
NKom	Norwegian Communications Authority (Nasjonal kommunikasjonsmyndighet)
NSM	Norwegian National Security Authority (Nasjonal sikkerhetsmyndighet)
NVE	Norwegian Water Resources and Energy Directorate (Norges vassdrags- og energidirektorat)
OIK	Obligatory electricity purchase scheme (Latvia; Obligātā iepirkuma komponente) – subject of a major policy scandal regarding renewable energy
PEP	Polish Energy Policy (Polityka energetyczna Polski)
PSI	Public Sector Information (refers to the PSI/Open Data Directive, Directive 2019/1024)
PTAC	Consumer Rights Protection Centre (Latvia; Patērētāju tiesību aizsardzības centrs)

RED	Renewable Energy Directive
REDII	Renewable Energy Directive II (Directive 2018/2001)
REDIII	Renewable Energy Directive III (Directive 2023/2413)
RES	Renewable energy sources
RIS3	Regional Innovation Strategy for Smart Specialisation
SME	Small and medium-sized enterprise
TAP	Legal Acts Portal (Latvia; Tiesību aktu portāls)
TEM	Ministry of Economic Affairs and Employment (Finland; Työ- ja elinkeinoministeriö)
TJTP	Territorial Just Transition Plan
UODO	Office for Personal Data Protection (Poland; Urząd Ochrony Danych Osobowych)
VARAM	Ministry of Smart Administration and Regional Development (Latvia; Viedās administrācijas un reģionālās attīstības ministrija)
WP	Work Package
YM	Ministry of the Environment (Finland; Ympäristöministeriö)

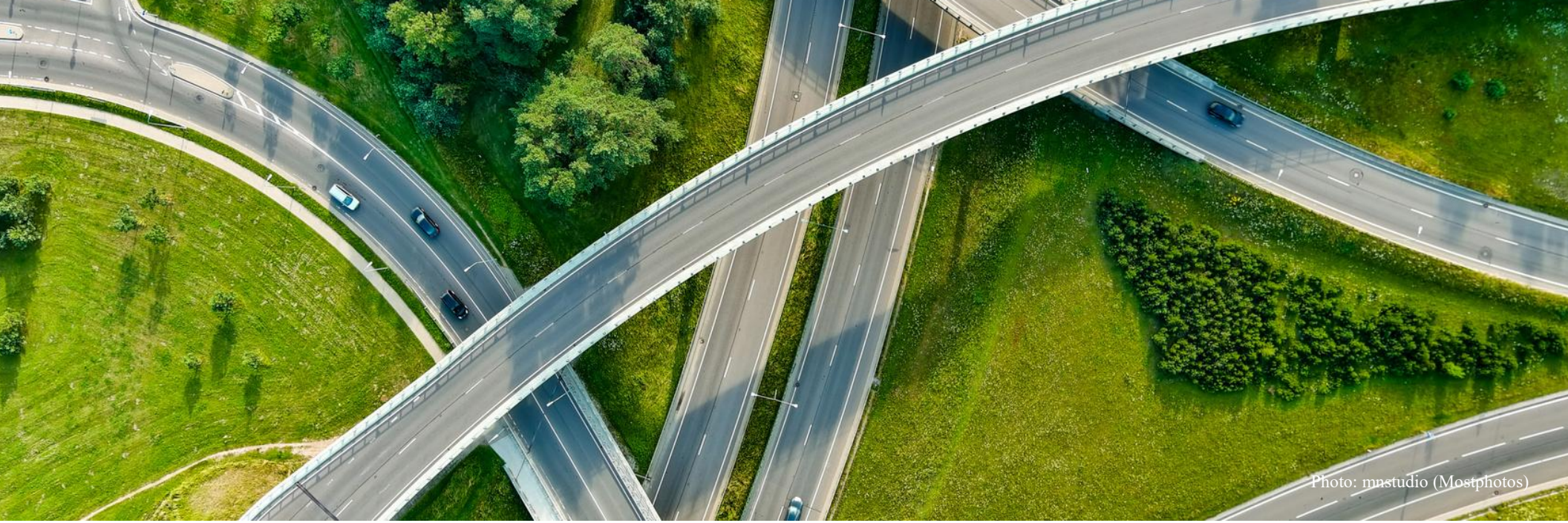


Photo: mnstudio (Mostphotos)

1 Introduction

This deliverable maps the multilevel governance (MLG) gaps that emerge in the EU's climate and digital transitions, with the aim of identifying where greater public deliberation and social innovation could meaningfully improve governance outcomes. It does so by analysing how strategic agenda-setting, decision-making and legal authority, policy instruments and incentives, implementation capacity, as well as coordination and participation unfold across governance levels-- from the supranational (European Union (EU), European Economic Area (EEA)/ European Free Trade Association (EFTA)) to national, regional, municipal, and community/civil society levels-- in four country cases, analysed in DeCrises: Finland, Latvia, Norway and Poland. For each country, both the climate and digital transitions are examined.
We adopt a mapping approach. The analytical focus is on tracing structural and recurring governance gaps that constrain the effective implementation of the EU's twin transition. These mapped gaps form the empirical basis for identifying spaces where enhanced public deliberation, bottom-up engagement, and social innovation could strengthen MLG in future transition processes

This work is structured around the objective to examine top-down and bottom-up processes shaping the climate and digital transitions. From a top-down perspective, the analysis maps how EU-level climate and digital policies are translated into national legal frameworks and administrative practices, and how these, in turn, are (or are not) reflected in implementation at regional, sub-regional, and local levels. This includes identifying

where responsibilities are concentrated, fragmented, or left ambiguous across levels, and where coordination mechanisms fail to connect with different stakeholders. From a bottom-up perspective, the deliverable maps how regions, municipalities, local communities, and civil-society actors engage with these transitions. Attention is paid to both micro-level dynamics, such as incremental changes in local governance or service provision, and macro-level dynamics, such as attempts by subnational actors to influence national strategies, legal transposition, or EU-driven reforms. The mapping exercise identifies whether and how bottom-up involvement enters governance processes, and where it is structurally delayed, marginalised, or reduced to conflict management rather than co-creation.

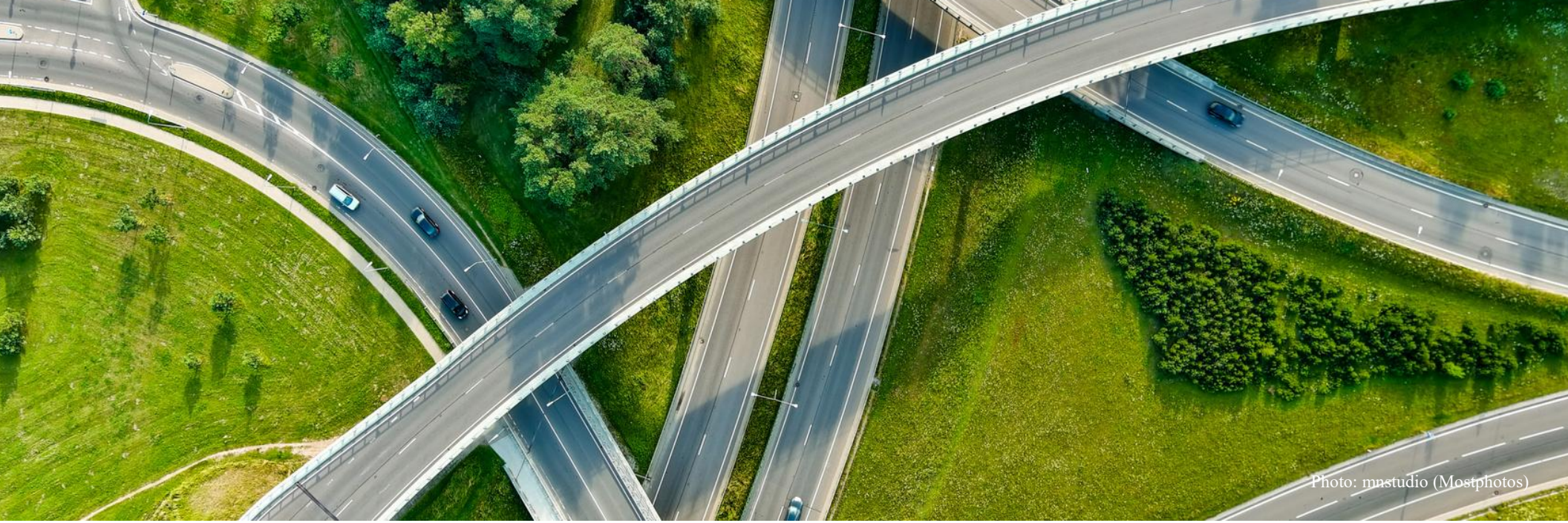
Methodology

For the examination of the top-down, the bottom-up and the cross-border processes of digital and climate transitions, we focused on the transposition process of EU regulations to the national, sub-national and local levels and vice versa. The methodology we used in this report is based on comparative legal-policy mapping and diagnostic multilevel governance analysis, using EU infringement proceedings as indicators of implementation and coordination gaps in the twin transition. We published a background report on the DeCrises-website with detailed information and references for both transition processes in DeCrises four case countries. The tables in this document summarise these analyses.

We argue that social innovations in the twin transition arise especially in fields where MLG processes create challenges. For the systematic analysis of challenges, we address policies and transposition processes where the EU has started infringement proceedings. Infringement proceedings are particularly well suited for examining both top-down and bottom-up dynamics in the EU's MLG architecture. At the top-down level, the proceedings constitute the EU's principal sanctioning instrument. From a bottom-up perspective, infringement data capture how local and regional political contexts actively shape compliance outcomes. Looking at infringement proceedings in the digital and climate transition in the four case countries allows for a systematic comparative analysis of the top-down and bottom-up interaction between the EU, national, regional, subregional, and local levels at precisely those points where difficulties in MLG have been identified.

By mapping how infringement procedures unfold across governance levels, we identify recurring patterns of exclusion, late involvement, and fragmented responsibility that limit the transformative potential of climate and digital policies. At the end of each map, recommendations are provided aimed at strengthening early-stage coordination, improving the integration of subnational actors, and rebalancing top-down compliance with bottom-up engagement.

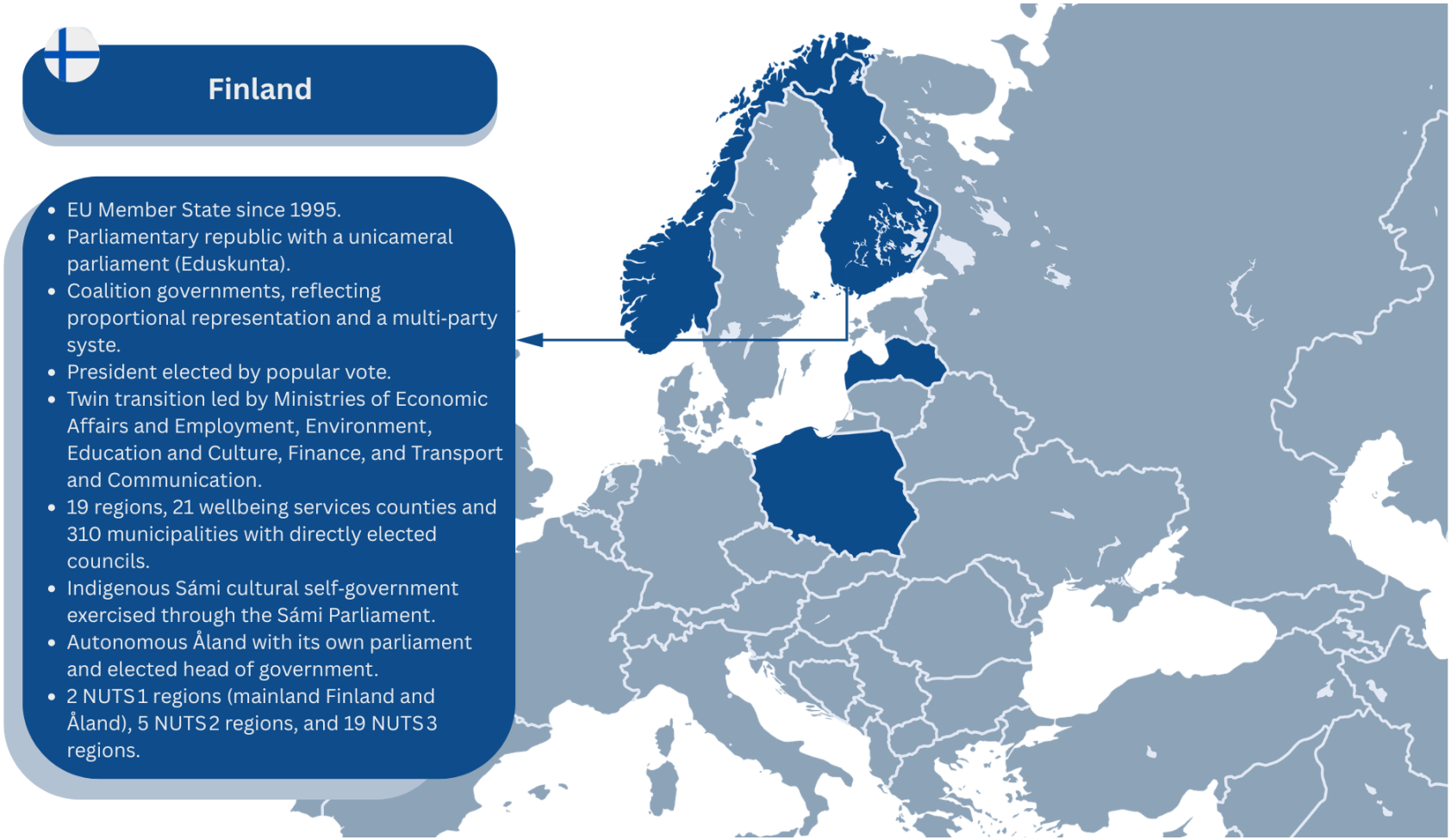
D1.1 serves as a diagnostic mapping exercise, which lays out the groundwork for subsequent work in DeCrises on how public deliberation and social innovation can be mobilised to address MLG gaps and enable more inclusive and just twin transition in the future.



How to read the mapping matrices

The tables provide a structured overview of each of the four countries' multilevel climate and digitalisation governance systems by mapping key governance dimensions across the levels relevant to policymaking: EU, national, regional, municipal, and community and civil society. The tables capture analytically distinct dimensions through which climate and digitalisation governance is exercised in practice, including strategic authority and policy orientation; formal legal and decision-making power; policy instruments and resources; implementation capacity; and coordination, participation, and inclusion. Cells summarise specific features, bottlenecks, and coordination challenges observed at a given governance level, indicating where decision-making power is concentrated, how responsibilities are distributed, and where bottom-up input is enabled or constrained. The final row synthesises evidence from EU infringement procedures as cross-cutting indicators of multilevel governance stress, highlighting both structural challenges and potential spaces for governance and social innovation. The tables can be read horizontally to assess how different governance dimensions unfold across levels, and vertically to identify where constraints, exclusions, or imbalances in authority and capacity are concentrated within the multilevel system.

2 Finland


Finland
EU Member State since 1995.
Parliamentary republic with a unicameral parliament (Eduskunta).
Coalition governments, reflecting proportional representation and a multi-party syste.
President elected by popular vote.
Twin transition led by Ministries of Economic Affairs and Employment, Environment, Education and Culture, Finance, and Transport and Communication.
19 regions, 21 wellbeing services counties and 310 municipalities with directly elected councils.
Indigenous Sámi cultural self-government exercised through the Sámi Parliament.
Autonomous Åland with its own parliament and elected head of government.
2 NUTS1 regions (mainland Finland and Åland), 5 NUTS2 regions, and 19 NUTS3 regions.

2.1 Climate transition and MLG challenges in Finland

Climate transition and MLG challenges in Finland						
		GOVERNANCE LEVEL				
		EU	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	Sets the overarching climate and environmental obligations, steering policy across all levels of governance. Binding directives and regulations- especially the Renewable Energy Directive (RED) and the Emissions Trading System (ETS) - shape Finland's national priorities and heavily influence Åland's choices despite its own	Holds final authority over EU-related strategic orientation, as EU policy is constitutionally treated as part of foreign policy - an exclusive national competence. National institutions, including the President, Supreme Court, and ministries, review Åland's legislation for compatibility with EU law and the Finnish Constitution, thereby shaping subnational climate strategy. At the same time,	Regional development institutions facilitate the green transition primarily through economic, institutional, and strategic coordination functions. Regional councils play a key strategic role in integrating national and EU climate objectives into regional development, spatial planning, and land-use governance, as well as in coordinating regional climate and energy strategies and administering EU cohesion funding. The role of the new Supervisory Agency is to ensure that the implementation of climate and environmental policy is	Enjoys extensive fiscal and political autonomy, giving them potential influence over local environmental planning, yet explicit climate-strategy roles are only partially articulated in the documents. They were required to prepare and continuously monitor climate plans from January 2023, positioning them within local climate	No formal climate-specific strategic authority is described for civil society actors in the document; however, NGOs, local stakeholders, and Sámi institutions can still shape climate orientation through consultation, advocacy, and scrutiny. The Climate Act also provides NGOs with a channel to challenge government climate decisions, reinforcing their indirect influence

Climate transition and MLG challenges in Finland						
		environmental competences. As a result, Åland's climate autonomy is constrained, often requiring policy adjustments; by 2019, it accounted for roughly half of Finland's environmental infringement cases.	the national government defines binding climate goals through the Reformed Climate Act, which sets the overall policy direction, including carbon neutrality by 2035 and emission reduction targets for 2030, 2040, and 2050.	legally sound, predictable, and socially legitimate through regulatory and supervisory instruments. The new Regional Economic Development Centers, in turn, function as active implementers of green transition by promoting sustainable economic transformation, supporting investments, and channelling funding to regional climate- and innovation-related initiatives. 21 wellbeing services counties created in 2023, lack taxing power and play an implementation role in climate policy. Åland, by contrast, holds legislative authority in areas like land and water use, yet its climate strategy remains tightly bounded by national oversight and binding EU rules. Despite broad autonomy in sectors	governance, although this obligation was later repealed in late 2024.	on strategic direction.

Climate transition and MLG challenges in Finland						
				such as education and culture, Åland's environmental governance is closely scrutinised and has been linked to a disproportionately large share of Finland's environmental infringement cases.		
	Decision-making power & legal authority	Exercises binding regulatory authority through directives and regulations, thereby constraining national climate and energy law across areas such as renewable energy, emissions, forestry, transport, and permitting. These rules not only shape legislative and implementation choices but can	National institutions - the Parliament, government, President, Supreme Court, and key ministries - hold the decisive legal authority over climate policy and EU-related matters, from target-setting to legislative reform and the transposition of EU rules. They also review Åland's laws for compliance with the Constitution and EU obligations and	Counties have limited authority and no defined climate competences. Åland holds legislative powers in several environmental areas but lacks final decision-making due to national and EU oversight, including its inability to appear before the European Court of Justice (ECJ). Regional State Administrative Agencies and Centres for Economic Development, Transport and the Environment have been central to permitting and implementation, though responsibilities -	Possess strong general autonomy, although no explicit climate-specific legal authority is formally identified in the documents. In practice, they exercise significant influence through spatial and land-use planning, including decisions on detailed plans that can enable or block wind energy projects, as well as	No formal legal authority in climate governance is attributed to civil society; however, its legal influence is growing through litigation and advocacy. NGOs can challenge government climate decisions and have brought cases - such as legal actions over the adequacy of climate reporting - thereby exerting indirect pressure on governance and accountability.

Climate transition and MLG challenges in Finland						
		also indirectly override Åland's autonomy through infringement procedures and compliance pressure.	can annul them if necessary, giving the state final control over subnational legal outcomes.	especially for renewable-energy permitting - are increasingly being consolidated under national supervision.	through building-related implementation and responsibilities linked to the Climate Act.	
	Policy instruments, resources & incentives	EU tools include REDIII, ETS, and sustainability criteria that shape Finnish climate and energy choices, especially forestry and transport. Compliance is reinforced through infringement procedures, which act as indirect but powerful incentives for alignment.	Controls key governance resources, including funding for counties that lack taxing power, and manages the transposition of EU directives. It can also impose "form-legislation" on Åland, extending national laws to the autonomous region. Finland further steers climate action through instruments such as the Climate Act, annual Climate Reports, carbon roadmaps, sectoral transition plans,	Counties rely entirely on national allocations rather than local taxation, which limits their independent control over climate-related resources, and no specific climate policy instruments are described at that level. Åland's ability to deploy policy instruments is also constrained by limited administrative capacity, with only a small staff responsible for drafting all legislation, including EU transposition, which affects its effectiveness in implementing climate measures.	Municipalities have high fiscal and political autonomy, but no clearly defined climate-specific policy instruments are formally documented. In practice, they use key local tools such as land-use planning, renewable energy siting, and (previously mandated) municipal climate plans, while also benefiting from incentives like property tax	No formal climate-related policy instruments or incentives are attributed to civil society; however, NGOs, energy associations, and local actors influence governance through consultation, public advocacy, litigation, and participation in expert and advisory processes, with emerging roles for initiatives such as energy communities within the broader

Climate transition and MLG challenges in Finland						
			the coal phase-out decision, and ongoing reforms to renewable-energy permitting.		revenues from wind power; however, some of these climate-related duties have been later relaxed or repealed.	policy environment.
	Implementation capacity	Monitors implementation through infringement procedures and formal compliance assessments. This is particularly evident in areas such as RED, ETS, and permitting rules, where infringement risks and compliance deadlines drive timely and aligned implementation.	The national government possesses strong administrative capacity and acts as the key intermediary between the EU and subnational levels, including supervising Åland's implementation of climate-relevant directives. National ministries—particularly the Ministry of Economic Affairs and Employment (TEM) and the Ministry of Environment (YM)—lead implementation,	Counties' climate-related implementation capacity remains undefined, while Åland's limited administrative resources have contributed to repeated delays in transposing environmental directives and to Finland's infringement record. To address wider coordination and permitting challenges, Finland is creating a centralized one-stop-shop authority for renewable-energy permitting in 2026, aiming to strengthen implementation by reducing fragmentation across regional bodies.	Municipalities have high autonomy, but no clearly defined climate-specific implementation responsibilities are formally identified. In practice, they possess meaningful implementation capacity in areas such as land-use planning and local climate measures, although this capacity is uneven, with some municipalities lacking resources while	No formal implementation role is attributed to civil society actors; however, they contribute indirectly through monitoring, legal challenges, and public pressure. While NGOs and local actors play an important role in scrutiny and accountability, their participation in implementation remains limited and largely indirect rather than constituting primary responsibility.

Climate transition and MLG challenges in Finland						
			supported by agencies and expert bodies such as Motiva and Sitra, which contribute to modelling and transition processes.		others actively use planning, housing, and wind energy policies to advance climate goals.	
	Coordination, participation & inclusion	Coordination occurs through EU-level processes, including consultation, reporting, and infringement procedures, often mediated via Finland's Permanent Representation. These mechanisms create top-down pressure for compliance while still allowing some national adaptation, but limited understanding of Åland's	The national government acts as the central coordinator for all EU–domestic interactions, with all communication required to pass through Helsinki, even in cases concerning only Åland. It also structures internal coordination through legal requirements such as the Climate Act, which mandates formal opinions from bodies including the Sámi Parliament, the Skolt Village Assembly, the Finnish Climate	Åland engages in coordination through the Åland Delegation and its representative in Finland's Permanent Representation, and can at times voice differing views in COREPER, though it cannot defend itself before the ECJ. Counties have no defined climate-specific coordination role, while regional and supra-municipal bodies contribute mainly through implementation-focused coordination, especially in permitting. Sámi institutions are formally included in national climate consultations,	No formal climate-specific coordination or participatory mechanisms are explicitly described for municipalities; however, they are involved in planning, consultation, and implementation processes, particularly in areas such as wind energy siting, building and energy measures, and responses to draft legislation, giving them a practical - if not	Stakeholder participation primarily through formal consultations, expert bodies, municipal planning duties, and appeal rights, rather than through separate community-level deliberative mechanisms. Consultations involve NGOs, municipal associations, energy companies, local authorities, municipalities, expert bodies, and Sami institutions, with NGOs also

Climate transition and MLG challenges in Finland						
		autonomy within EU institutions can complicate coordination dynamics and contribute to tensions.	Change Panel, and the Sámi Climate Council.	adding another layer to domestic coordination.	formally defined role in coordination.	granted appeal rights.
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES		The EU initiates infringement procedures formally against Finland, even when issues concern only Åland, reflecting limited awareness of Åland's autonomy that complicates enforcement. This pressure underscores compliance with climate and environmental obligations, particularly where Finnish implementation	Finland receives all infringement notices and frequently aligns with the European Commission rather than Åland, determining the acceptability of Åland's transposition and potentially annulling its laws accordingly. For instance, "Finland itself in these cases sided with the European Commission, not with Åland." This dynamic contributed to litigation, as Finland's climate report lacked sufficient	Åland accounts for a disproportionate share of Finland's environmental infringements due to limited administrative capacity and complex oversight, including the country's longest case (water directive, 2003–2021), and cannot defend itself before the ECJ. By 2019, Åland was responsible for half of all of Finland's infringement cases. Regional implementation structures, marked by weak coordination and fragmentation, exacerbate these compliance issues.	Municipalities have no described role in infringement procedures. Municipal obligations under climate planning and implementation, however, create potential sites of compliance failure if local follow-through proves weak.	Civil society has no described role in infringement procedures. However, Greenpeace and a Finnish NGO initiated legal action against the state over its climate report, demonstrating civil society's capacity to trigger scrutiny when climate governance appears inadequate.

Climate transition and MLG challenges in Finland					
	is delayed or insufficient.	specificity, revealing a mismatch between legal targets and actual reporting or implementation.			

Space for increased public participation and social innovation

Finland's climate transition is shaped by EU law that sets binding climate objectives and compliance mechanisms across all levels, with Finland treating EU policy as an exclusive national competence and thus acting as the central gatekeeper for strategy, transposition, funding, and oversight. Within this structure, Åland's constitutional autonomy is constrained by national review and limited capacity, while wellbeing counties play marginal implementation roles, municipalities exercise de facto influence without clear mandates, and civil society shapes outcomes indirectly through consultation, advocacy, and litigation.

Rather than proposing institutional restructuring or legal reform, the recommendations focus on public deliberation and social innovation as pragmatic governance resources that can mitigate capacity gaps, improve coordination, and enhance democratic legitimacy across levels. They identify spaces where participatory practices can rebalance power, support compliance, and enable a more inclusive and resilient climate transition within existing constitutional and political constraints.

1) EU Level

- Create structured opportunities for regional authorities, municipalities, and civil society (including Åland) to contribute during agenda-setting and impact assessment phases of EU climate directives (e.g. RED, ETS).
- Allocate targeted EU funding for participatory pilots, living labs, and co-design initiatives addressing implementation bottlenecks (e.g. permitting, reporting, sustainability criteria).
- Encourage EU institutions to produce accessible, citizen-facing explanations of climate directives (e.g. RED III, ETS reforms) and their local implications, in cooperation with regional and civil society actors.

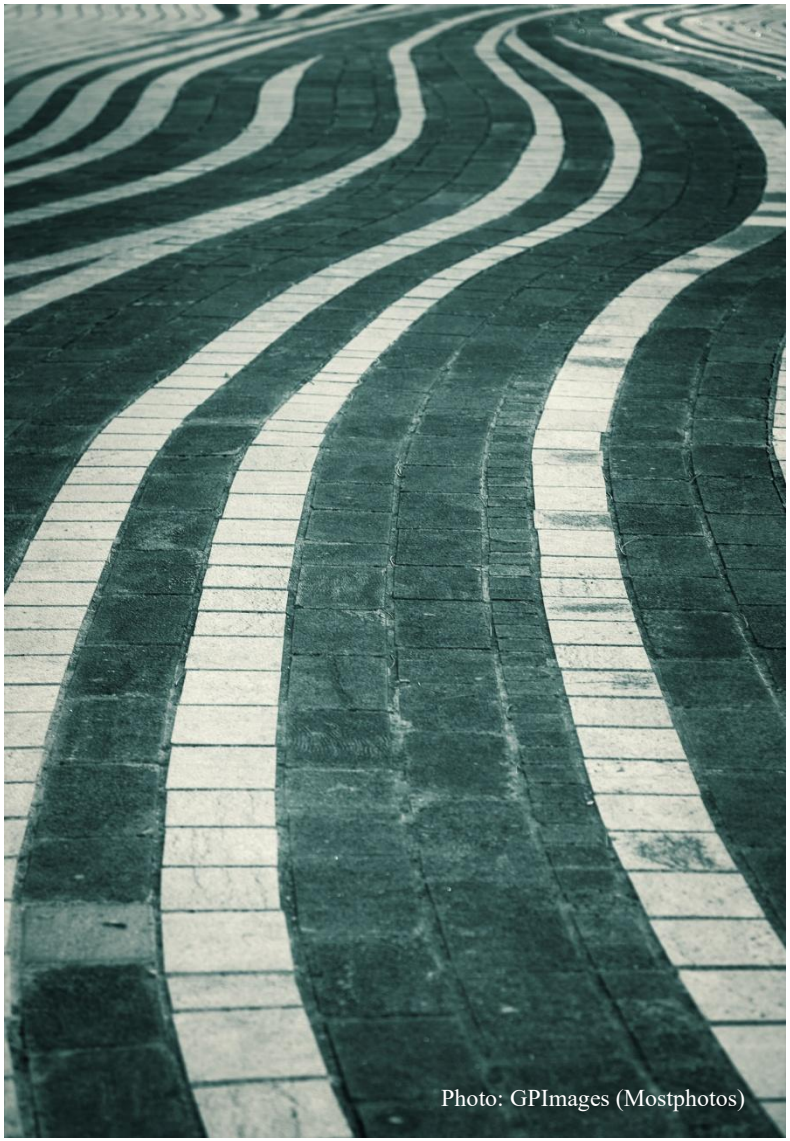


Photo: GPImages (Mostphotos)

2) National Level

- Introduce formal consultation phases with regional authorities, municipalities, and civil society before Finland finalises positions on EU climate legislation and transposition strategies.
- Complement the Climate Act's legally binding targets (2035 carbon neutrality; 2030–2050 milestones) with deliberative forums that allow societal actors to discuss feasibility, trade-offs, and sectoral impacts.
- Establish multi-actor platforms involving ministries, Ålandic institutions, municipalities, expert bodies, and civil society to co-design EU transposition timelines and implementation approaches.
- Strengthen the role of mandated consultees (e.g. Sámi Parliament, Climate Change Panel, Sámi Climate Council) by enabling iterative dialogue and public feedback rather than one-off opinions.

3) Regional Level

- Develop regional working groups in Åland that bring together civil servants, permit authorities, sectoral actors, and civil society to co-design transposition and implementation pathways.
- Strengthen opportunities for early-stage public input in environmental and renewable energy permitting, especially as responsibilities become more centralised or consolidated.
- Introduce structured participatory functions for counties, such as hosting deliberative forums, stakeholder dialogues, and citizen panels on climate-relevant implementation issues (e.g. health, adaptation, resilience).
- Facilitate exchanges between Åland, counties, Centres for Economic Development, Transport and the Environment, and Regional State Administrative Agencies focused on participatory practices and implementation of innovation.

4) Municipal Level

- Expand early-stage citizen and stakeholder involvement in zoning, detailed land-use plans, and siting decisions for renewable energy (especially wind power).
- Encourage municipalities to voluntarily maintain or revive climate plans through participatory processes (public hearings, co-design workshops, citizen panels).
- Establish standing local forums bringing together residents, businesses, planners, and civil society to discuss climate-relevant planning, building regulations, and energy projects.
- Provide platforms for small and resource-constrained municipalities to collaborate, share tools, and test low-cost participatory approaches to climate action.

5) Community/Civil Society Level

- Move from sporadic consultation toward recurring, structured engagement with NGOs, local associations, energy communities, and Sámi institutions in climate-related policymaking.
- Create collaborative platforms where NGOs, expert bodies, municipalities, and agencies co-design solutions to climate challenges.
- Provide institutional support (e.g. access to data, reporting tools) that enable NGOs and local actors to systematically scrutinise climate targets, plans, and reports.
- Actively encourage community energy projects, cooperative models, and local climate initiatives by aligning regulatory frameworks and funding opportunities.

2.2 Digital transition and MLG challenges in Finland

Digital transition and MLG challenges in Finland						
		GOVERNANCE LEVEL				
		EU	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	Sets the overarching strategic direction for digitalisation through directives on copyright (CDSMD), audiovisual media, open data/PSI, digital content/services, company law digitalisation, and cybersecurity (NIS2). EU law defines the core objectives: harmonised digital markets, data openness, cybersecurity, and platform regulation.	Ministry of Economic Affairs and Employment (TEM) leads digital economy and innovation policy, while Traficom (Finnish Transport and Communications Agency) is responsible for cybersecurity. Roles reinforced by national frameworks such as the Artificial Intelligence Programme of Finland and the government's Digital Strategy (Digi Finland), which promote innovation, secure digital services,	Wellbeing services counties have no strategic digitalisation mandate, but they are major implementers of sectoral digitalisation in health, social welfare, and rescue services following the 2023 reform. Regional Councils (maakuntaliitot) are the key regional strategic actors in the digital transition through their statutory roles in regional development strategies and	Municipalities are strategic actors mainly in open data and digital service provision. They are responsible for large datasets, digital public services, and local cybersecurity preparedness. They also articulate strategic concerns (e.g., costs, security risks, data protection) during consultations.	Finnish innovation in the European data strategy: the MyData concept (citizen-led data management). Civil society organisations participate in consultations on digital legislation (e.g., CDSMD), raising concerns about transparency, user rights, and freedom of expression. No formal strategic authority.

Digital transition and MLG challenges in Finland						
			and data-driven public administration. EU digital directives are coordinated by key ministries - especially Education and Culture, Finance, and Transport and Communications —through inter-ministerial working groups, though strategic direction has sometimes shifted, as seen in the more minimalist transposition of the CDSMD.	smart specialisation priorities. State regional administration (AVIs; reorganised nationally from 2026) primarily affects the digital transition indirectly through supervision, permits, and oversight of legality and rights. Åland has autonomy in several legal fields and provides its own strategic positions on digital directives (e.g., CDSMD), especially where Swedish-languag e access and cultural rights are implicated.		
	Decision-making power	Issues binding directives requiring national	Holds final legal authority over transposition.	No digital-specific	No legislative authority, but municipalities are legally responsible for	No formal authority; indirect

Digital transition and MLG challenges in Finland						
	& legal authority	transposition (CDSMD, PSI, NIS2, Digital Content Directive, Company Law Digitalisation Directive). Can refer Finland to the ECJ for non-compliance.	Ministries draft laws; Parliament and Constitutional Law Committee review constitutionality. National authorities decide how EU digital rules apply to municipalities and counties.	legal authority for counties, except Åland: it has legislative powers in some digital-relevant fields (e.g., media, culture) and issues formal legal opinions on digital directives. However, national authorities can annul Åland laws if deemed incompatible with EU law.	implementing open data obligations, cybersecurity duties (NIS2-related), and digital service provision.	influence through consultations, lobbying, and public critique (e.g., CDSMD drafting). Strong NGOs, e.g. Electronic Frontier Finland (Effi, active role in the CDSMD consultation) and Wikimedia Finland.
	Policy instruments, resources & incentives	Largely enforcement- and compliance-driven incentive structure with limited direct implementation funding, partly balanced by programmes such as Digital Europe (2021–2027, €7.5 billion) and Horizon Europe, (competitive	Led by ministries and central agencies, which develop legislation, issue guidance, and build core digital infrastructures such as open data portals and interoperability platforms. They also set binding obligations for municipalities and	No digital-specific instruments for counties. Åland: uses its administrative resources to comment on national drafts (e.g., CDSMD) but has limited capacity.	State transfer payment system (valtionosuusjärjestelmä) formally supports municipalities in carrying out nationally mandated tasks, but it only partly covers digitalisation costs. Local authorities often bear most expenses for IT systems, APIs, data management, and cybersecurity, while open data obligations	Provide expertise, research, advocacy, and consultation inputs. Influence depends on national willingness to integrate feedback; resources are limited.

Digital transition and MLG challenges in Finland						
		project-based funding).	wellbeing services counties, including NIS2 reporting and PSI/open-data requirements. Regional state authorities focus on implementation, supervision, and enforcement.		may reduce revenues: financial pressure for municipalities despite strong central coordination.	
	Implementation capacity	Monitors implementation through infringement procedures and ECJ referrals.	Generally strong capacity (DESI Index: Finland takes first place 2022 and 2025); Strong administrative capacity but struggles with legally and technically complex directives (e.g. CDSMD delays, inconsistencies). Capacity challenged by constitutional review and shifting policy approaches.	Highly uneven. Åland is structurally overstretched, often resorting to "form legislation." Wellbeing services counties are significant implementers of digital solutions in health, social, and rescue services. Digitalisation policy authority and regulatory weight remain concentrated at the state and regional state	Must implement open data requirements, digital service obligations, and cybersecurity measures. Many municipalities report insufficient resources, outdated systems, and high compliance costs.	High specialised expertise (e.g. copyright, digital rights) but fragmented and not systematically integrated into implementation.

Digital transition and MLG challenges in Finland						
				levels, with notable disparities in capacity and clarity across territories.		
	Coordination, participation & inclusion	Coordinates through formal infringement processes and structured dialogue. Provides consultation mechanisms but often with incomplete guidance or late clarification. Limited sensitivity to subnational diversity (e.g. Åland's autonomy).	Central coordinator between EU and subnational levels. Coordination is hierarchical and filtered through Helsinki. Consultations exist but are often poorly timed or ineffective.	Communication largely mediated by national government. Åland participates via formal comments and delegations, but expert input is frequently ignored. Counties report unclear coordination across supervisory bodies.	Formally consulted but often lack sufficient information to assess impacts. Kuntaliitto (Association of Finnish Local and Regional Authorities): coordinates national consultations and issues statements on EU directives Coordination challenges between municipalities due to divergent capacities.	High participation in consultations (e.g. CDSMD), contributing extensive feedback. Influence on final outcomes is inconsistent, revealing a democratic gap.
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES		Initiates infringement cases across multiple digital directives (CDSMD, PSI, Digital Content Directive,	Receives all infringement notices, responsible for correcting transposition failures. National drafting delays	No role in infringement procedures for counties. Åland: provides comments on digital directives but cannot defend	No direct role, but municipalities are heavily affected by national transposition failures (e.g., PSI obligations, cybersecurity duties). Their limited capacity	No formal role in infringement procedures, though civil society critiques (e.g., CDSMD) highlight

Digital transition and MLG challenges in Finland					
	Company Law Digitalisation, NIS2,). Refers Finland to ECJ when transposition is late or incorrect.	(e.g., CDSMD) and constitutional conflicts create prolonged infringement exposure.	itself before the ECJ. Its feedback on CDSMD was ignored, contributing indirectly to Finland's infringement case.	can indirectly contribute to implementation gaps.	governance weaknesses.

Space for increased public participation and social innovation

Across governance levels, the EU sets the overarching regulatory and policy direction through binding digital directives and enforces compliance primarily through infringement procedures, while Finnish government acts as a central gatekeeper translating these obligations downward. Subnational actors—from autonomous regions such as Åland to municipalities and civil society—carry substantial implementation and legitimacy burdens but remain structurally constrained by limited capacity, uneven resources, restricted access to decision-making, and largely advisory roles in shaping policy outcomes.

By embedding public participation and social innovation across governance levels, Finland can move from a predominantly hierarchical model of digital regulation toward a more reflexive and socially responsive digital transition that better aligns regulatory obligations with lived experiences, cultural diversity, and local implementation realities.


Photo: EC - Audiovisual Service

1) EU Level

- Introduce deliberative impact assessments for major digital directives (e.g. copyright, cybersecurity, data governance), explicitly analysing effects on autonomous regions and local implementers.
- Complement infringement-driven enforcement with learning-oriented implementation support, including peer-learning networks and advisory mechanisms for small or capacity-constrained jurisdictions.
- Create flexibility clauses or co-regulatory spaces within directives to allow experimental or socially innovative implementation models at subnational levels.

2) National level

- Establish permanent national digital deliberation forums that bring together ministries, municipalities, the Sami parliament, Åland, civil society, and technical experts early in the drafting phase - not only during formal consultations.
- Move from minimalist transposition toward reflexive law-making, using social impact hearings, citizens' panels, and expert dialogues to anticipate constitutional, cultural, and implementation risks. This builds on existing consultative institutions, such as the Sámi Parliament, whose mandate and negotiation role should also be systematically utilised in the digital transition.
- Create national social innovation programmes focused on digital governance (e.g. open data, platform regulation, cybersecurity), supporting bottom-up experimentation and scaling successful practices.
- Strengthen transparency by publishing clear explanatory narratives alongside digital legislation, clarifying trade-offs between EU obligations, constitutional principles, and societal values.

3) Regional / Sub-national Level

- Institutionalise co-creation and deliberation platforms in Åland involving citizens, cultural institutions, media actors, and digital professionals to articulate region-specific priorities.
- Provide targeted capacity-building support (legal, technical, administrative) for autonomous, Sami indigenous and regional actors facing structurally complex EU digital legislation. For Sami institutions whose authority is primarily consultative and focused on language/culture self-government rather than general legislation, support should prioritise resources for early-stage legal analysis, consultation preparedness, and rights-impact assessment.
- Formalise early-warning advisory channels through which Åland, the Sámi Parliament, and other subnational actors can flag competence, interpretive, and fundamental-rights risks (including language and cultural implications) before national drafts are finalised.
- Encourage place-based digital social innovation pilots (e.g. language-accessible digital services, not least for the Sami population, participatory media governance) that can inform national and EU-level learning.

4) Municipal level

- Establish municipal digital innovation labs where residents, civil servants, NGOs, and local tech actors co-design solutions to open data, digital services, and cybersecurity challenges.
- Building on Finnish experience with participatory democracy at local level, use participatory budgeting or deliberative mini publics to prioritise local digital investments, ensuring democratic legitimacy for costly infrastructure and data governance choices.
- Develop inter-municipal collaboration platforms to share solutions, reduce duplication, and collectively deliberate on implementation dilemmas arising from EU and national mandates.
- Support citizen feedback and co-monitoring mechanisms (e.g. data quality audits, service usability panels) as part of open data and digital service governance.

5) Community/Civil Society Level

- Shift from ad hoc consultations to continuous deliberative engagement, enabling civil society to participate throughout the policy lifecycle—from agenda-setting to evaluation.
- Fund independent knowledge intermediaries (NGOs, research institutes, civic tech organisations) to translate complex digital legislation into accessible public debates.
- Support community-led digital rights innovation, such as tools for monitoring platform accountability, data protection practices, and freedom of expression impacts.
- Encourage cross-level alliances between civil society, municipalities, and Åland actors to amplify bottom-up concerns in national and EU digital governance arenas.

3 Latvia


Latvia
EU Member State since 2004.
Parliamentary republic with a unicameral parliament (Saeima).
Coalition governments, reflecting the proportional electoral system and multi-party parliament.
Parliamentary elected President with representative functions.
Twin transition led by Ministry of Climate and Energy and Ministry of Smart Administration and Regional Development.
43 local governments ((36 municipalities and 7 state cities) with directly elected councils.
Single NUTS2 region, subdivided into 5 NUTS3 planning regions.

3.1 Climate transition and MLG challenges in Latvia

Climate transition and MLG challenges in Latvia						
	GOVERNANCE LEVEL					
	EU	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**	
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	Provides a strong top-down policy orientation through EU climate law, targets, and strategies (e.g. Fit for 55, REDIII), creating external pressure for domestic action.	Central strategic authority – with Ministry of Climate and Energy taking the leading role - but marked by weak policy coherence: National Energy and Climate Plan (NECP) lacks quantified pathways and interim targets. State Audit Office and EC warn Latvia is unlikely to meet NECP targets without further measures. Repeated political blockages of Climate Law	Planning regions do not have legally binding climate-strategy powers; mostly act as coordinators between municipalities.	Strategic engagement uneven: Riga exercises greater strategic agency, while most municipalities play a secondary role, implementing rather than shaping national objectives. Municipal strategies do not meaningfully feed back into national target-setting.	No formal role in strategic orientation; communities. Participation occurs reactively (during conflicts) rather than proactively (during strategy formation), reinforcing legitimacy deficits rather than strategic ownership.

Climate transition and MLG challenges in Latvia						
			have prevented consolidation of climate objectives, limiting shared policy ownership across levels.			
	Decision-making power & legal authority	Sets binding legal frameworks and compliance mechanisms; enforcement through infringement procedures (e.g. (REDII, REDIII, ETS2, EPBD, EED) has become the de facto governance tool	Holds formal decision-making power for transposition and implementation, but fragmented responsibilities between ministries (Climate and Energy, Economics, Transport, Agriculture) and parliamentary veto dynamics delay decisions. Repeated failures to transpose REDII/REDIII and ETS2 on time have turned decision-making	Have no decision-making power in climate or energy law.	Decision-making power constrained. Municipalities retain spatial planning powers but lose decision rights once energy projects are classified as "national significance" (>50 MW). Courts and legislative amendments have further constrained municipal veto power, especially concerning wind projects, reinforcing centralisation. Municipalities are excluded even where infringements concern permitting and implementation, sectors that materially	Lacks formal decision-making authority; engagement occurs mainly through ex post legal contestation rather than co-decision or deliberation.

Climate transition and MLG challenges in Latvia						
			bottlenecks into recurring infringement risk		affect them but are decided nationally.	
	Policy instruments, resources & incentives	Provides extensive funding instruments and regulatory incentives, but their impact depends on national co-financing and instrument choice.	Instrument design reflects top-down priorities: historical policy failures (e.g. OIK) reduced trust, while current incentives favour low-conflict, household-level measures over systemic transformation.	Do not manage climate-related funding streams. Role is limited to project coordination. EU and national climate funds flow directly to ministries or municipalities.	Resource-constrained; limited fiscal autonomy restricts municipalities' ability to steer or co-finance climate measures, even where local willingness exists.	Access to instruments and resources remains marginal. Energy communities faced delayed and fragmented legal transposition, which has been explicitly flagged in infringement contexts. High upfront costs, administrative burdens, and lack of tailored financing instruments limit collective action.
	Implementation capacity	Promotes faster implementation through regulatory acceleration (e.g. REDIII).	Implementation bottlenecks dominate: grid constraints, slow EIAs, administrative overload, and repeated	Almost no operational role in renewable energy implementation.	Implementation capacity fragmented after territorial reform; municipalities are involved late and have limited influence over energy project design or sequencing.	Communities are typically engaged only at late implementation stages, transforming participation into

Climate transition and MLG challenges in Latvia						
			institutional reorganisations weaken delivery and learning over time. Implementation delays identified in infringement cases point to structural administrative overload rather than isolated project failures.			resistance rather than co-production.
	Coordination, participation & inclusion	Coordination primarily occurs through legal oversight and compliance, rather than inclusive, multi-actor deliberation.	Weak vertical and horizontal coordination; poor coordination across ministries; formal consultative bodies exist but have limited influence, reducing meaningful participation by sub-national actors. The State Audit Office has linked infringement	Structurally excluded from coordination processes.	Consulted but not fully integrated into multilevel decision processes; participation often lacks impact on outcomes. Associations (LPS, LLPA) comment on draft laws but lack voting power in EU-related coordination bodies. Despite being affected by infringements (e.g. permitting delays), municipalities have no formal role in resolving them,	Participation is fragmented and shaped by mistrust; limited early engagement and past policy failures (e.g. OIK) undermine confidence in public institutions and deliberative processes. Civil society engagement occurs through conflict rather than structured channels.

Climate transition and MLG challenges in Latvia						
			risk to unclear division of responsibilities between ministries and inactive coordination bodies (National Energy and Climate Council).		reinforcing symbolic inclusion.	Participatory bodies like Residents' Councils exist but their efficiency depends on individual willingness and resources.
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES		Infringement proceedings against Latvia across multiple directives (REDII, REDIII, EED, EPBD, Electricity Market Design, EU-ETS2, ETS aviation). The Commission issues formal notices, reasoned opinions, and - where unresolved - referrals to the ECJ. Partial closures occur once Latvia	Fragmented ministerial responsibilities, coalition instability, and active parliamentary obstruction (opposition walk-outs denying quorum for the Climate Law in January 2025 and for ETS2 amendments in October 2025) block timely transposition. The Ministry of Climate and Energy (created 2023) and the	No formal role in infringement proceedings or their resolution; planning regions lack legal competences in energy and climate law. Their absence from transposition and implementation chains means they neither contribute to compliance failures nor to remedies. The abolition of district-level governance since 2009 has	Indirectly implicated in REDII/REDIII infringements through permitting bottlenecks: divergent spatial planning rules across merged municipalities slowed renewable energy project approvals, a problem REDIII explicitly sought to address. Courts struck down municipal wind farm bans (e.g. Tukums in 2021), and national law progressively curtailed municipal discretion over projects above 50 MW. Municipalities have no formal	No active role in formal infringement processes; Delayed transposition of energy community provisions (REDII, Electricity Market Design Directive) directly harmed community actors: the legal framework for citizen energy communities remained weak and fragmented until December 2024. Public

Climate transition and MLG challenges in Latvia					
	demonstrates credible transposition steps; several cases remain active due to repeated political blockages at national level.	Ministry of Economics retain overlapping competences, weakening implementation governance. Partial solutions include Electricity Market Law amendments (2022) and Energy Law revisions (July 2024), but comprehensive transposition of REDII/REDIII and EU-ETS2 remains incomplete. The State Audit Office has flagged systemic governance deficiencies as a root cause of infringement risk.	removed an intermediate tier that could otherwise have bridged national–municipal coordination gaps relevant to permitting delays flagged in REDIII infringements.	standing in infringement resolution processes; LPS/LLPA can comment on draft transposition laws but lack decision-making power. Compensation legislation (2023, revised 2024) for municipalities hosting wind farms represents a partial remedy improving local political acceptance of renewable energy projects.	distrust stemming from the OIK scandal creates societal resistance that compounds national-level political resistance to transposition. Approximately half of completed onshore wind EIAs face citizen opposition, exacerbating implementation delays that underlie REDII/REDIII non-compliance.



Space for increased public participation and social innovation

Latvia's climate transition is characterised by strong EU-driven obligations and national-level control, while shared ownership and early coordination remain weak. Subnational actors—particularly municipalities and civil society actors—carry significant implementation and acceptance burdens but are involved late and with limited influence, turning participation into conflict management rather than co-creation.

The key challenge for just twin transitions is not insufficient participation per se, but governance arrangements that limit early involvement, shared decision-making, and collective ownership. Social innovation becomes especially relevant where new forms of collaboration, learning, and co-production can help bridge gaps between policy objectives, implementation capacities, and societal expectations. Re-orienting MLG toward a more bottom-up logic therefore requires creating spaces where diverse actors can jointly shape transition pathways, rather than merely responding to predefined solutions.

1) EU level
   - Strengthen incentives for early, bottom-up participation in EU climate implementation, for example by explicitly rewarding governance models that institutionalise community and municipal involvement at pre-permitting and strategy-revision stages.
   - Promote social innovation as a governance resource, not only as a policy outcome, by supporting EU-level learning and exchange on participatory and community-based governance models in climate transitions.
   - Support cross-national learning on participatory and community-based approaches, enabling municipalities and civil-society actors to exchange experiences on how social innovation can enhance fairness, legitimacy, and effectiveness in climate and digital transitions.

2) National level
   - Open national strategy-setting and transposition processes to structured bottom-up input, ensuring that municipalities, civil society, communities and under-represented groups can shape priorities and trade-offs ex ante (e.g. during NECP revisions), not only comment on finished drafts.
   - Reform coordination mechanisms to link participation to influence, by moving beyond consultative councils toward arrangements where deliberation feeds directly into decision-making and legal drafting.
   - Use social innovation to bridge policy silos, fostering collaboration between climate, digitalisation, social policy, and territorial development actors in order to address distributional impacts and promote inclusive transition outcomes.

3) Regional (planning regions) level
   - Pilot region-based social innovation hubs that connect local initiatives, municipalities, and national authorities, strengthening horizontal learning and vertical integration without requiring formal legal competences.

4) Municipal level
   - Position municipalities as key laboratories for just twin transitions, where social innovation can emerge through co-production, participatory design, and locally grounded experimentation.
   - Institutionalise early and meaningful community involvement in project design, particularly for infrastructure and renewable energy projects, shifting participation upstream from conflict management toward co-production.
   - Empower municipalities to support and scale community-based innovations, for example through small-scale funding, facilitation, or administrative support that lowers barriers for citizen-led initiatives.

5) Community / civil-society level
   - Recognise civil-society organisations, communities and under-represented groups as agents of change, not only as consultees, by embedding them in governance arrangements for planning, implementation, and evaluation of transition measures.
   - Shift community engagement from ex post contestation to recognised governance roles, such as standing local climate forums or energy communities linked to municipal decision pathways.
   - Support social innovation that builds trust and ownership, prioritising collective, place-based initiatives that reconnect citizens with public institutions and long-term transition goals.

3.2 Digital transition and MLG challenges in Latvia

Digital transition and MLG challenges in Latvia						
		GOVERNANCE LEVEL				
		EU	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	Provides a strong top-down policy orientation through NIS2 (2022/2555), Data Governance Act (2022/868), Open Data Directive (2019/1024), DORA (2022/2556), EU AI Act, EECC, and Copyright DSM Directives (2019/789/790), creating external pressure for domestic action.	VARAM (Ministry of Smart Administration and Regional Development) as lead ministry for AI Act transposition, authority for the Data Governance Act, and information point for government data access since 2023. LV regarded as EU implementation frontrunner, designating authorities for DGA, Data Act, and AI Act simultaneously. Nevertheless, Latvia's 5. National Open Government Action Plan (2022–2025) acknowledges persistent gaps in institutional data sharing.	Planning regions hold no formal authority in digitalisation but are required to produce regional Open Data Policy Papers. Sub-regional actors structurally absent from national digital policymaking bodies and have no role in any of the digital transition strategies.	Municipalities exercise limited strategic agency in digitalisation, function primarily as implementers and service delivery actors.	No formal role in digital strategy orientation. The Latvian AI Association (MILA) participates in the AI Centre as an industry actor. Latvian citizens are mostly unaware of or under-informed about digital governance tools, limiting demand-side pressure for reform. At the same time, a digital democracy initiative (established by

Digital transition and MLG challenges in Latvia						
						an NGO) manabalss.lv enhances public participation by allowing citizens to initiate law proposals.
	Decision-making power & legal authority	Legislative authority through directives and regulations. Latvia was taken to the ECJ and fined for EECC non-transposition (judgment March 2024). The Open Data Directive creates legally enforceable obligations on public bodies at all levels to publish data, giving the Directive a direct sub-national reach.	Formal transposition authority: VARAM, Ministry of Economics. Sector agencies (CERT.LV, DVI, PTAC) hold designated regulatory roles. Presidential veto of the initial EECC transposition delayed implementation; a required secondary law on user data retention missed. Law adopted with 9 months delay - Saeima's legislative pace serves as a digital infringement risk.	Planning regions hold no legal authority in digital or cybersecurity law. They are absent from formal transposition and implementation chains.	Municipalities subject to NIS2 as operators of public digital (Compliance with cybersecurity obligations. LPS has the opportunity to provide its input to Latvia's transposition of EU digital acts through the official TAP portal (Legal Acts Portal). LPS objected successfully to mandatory placement of municipal information	No formal decision-making power in digital governance. Copyright Directive consultations received input from LDDK (employers) and LBAS (trade unions) but not from community actors. DORA transposition was conducted without any public consultation. NGOs have the opportunity to provide input to Latvia's

Digital transition and MLG challenges in Latvia						
					systems in certified data centres.	transposition of EU digital acts through the TAP portal. A digital democracy initiative manabalss.lv allows 10 000 citizens to initiate law proposals to be discussed in the parliament.
	Policy instruments, resources & incentives	Binding regulations (DGA), minimum-harmonisation directives (NIS2, Open Data), and financial instruments (Digital Europe Programme etc.). NIS2 mandates proactive obligations: risk management.	VARAM as single information point for government data access. Latvia's State Audit Office (2022) identified data unavailability/lack of synchronization as governance problem. April 2025: Foundation of AI Centre as regulatory unit but start of its work is delayed and there are transparency concerns.	Planning regions hold no dedicated digital funding streams and manage no cybersecurity or data policy instruments. Role is limited to project coordination.	Rising compliance costs from NIS2 (cybersecurity infrastructure, certified data centres, staff training) without dedicated national co-financing (LPS). Only few Latvian municipalities have developed active digital strategies.	AI Centre's regulatory sandbox with opportunities for innovation but accountability concerns regarding personal data exemptions and the absence of civil society representation in its governance structure. Digital democracy

Digital transition and MLG challenges in Latvia						
						initiative manabalss.lv enhances public participation by allowing citizens to initiate law proposals.
	Implementation capacity	Implementation through ENISA, national CSIRTs networks, NIS2 peer reviews/risk assessments, and the Open Data Maturity Report (annual benchmarking).	CERT.LV as Latvia's national CSIRT, operates under the Ministry of Defence. Latvia as a relative frontrunner in designating competent authorities across DGA, Data Act, and AI Act simultaneously. Nevertheless: delays in. EECC and DORA implementation/transposition	Planning regions have no implementation role in cybersecurity or digital infrastructure.	Municipalities must implement NIS2-compliant cybersecurity for their IT systems but face financial and capacity barriers; mandatory certified data centres were a specific concern raised by LPS.	Civil society faces structural implementation barriers in Latvia's digital governance.
	Coordination, participation & inclusion	Coordination at EU level occurs through the NIS2 Cooperation Group, EU-CyCLONe for cybersecurity crisis management, and	The Information Society Council (chaired by Prime Minister) is the main coordination body, formally including open data topics. Coordination between VARAM, ministries, and	Planning regions are structurally excluded from digital coordination processes.	Municipalities engage through LPS on digital transposition laws but lack voting rights in inter-	Formal participation occurs via the TAP portal. Civil society organisations participated in

Digital transition and MLG challenges in Latvia						
		infringement proceedings as an enforcement mechanism.	agencies is inter-institutional but does not structurally include municipalities or civil society.		ministerial coordination bodies. Formal participation occurs via the TAP portal.	Copyright Directive consultations. A digital democracy initiative manabalss.lv allows 10 000 citizens to initiate law proposals to be discussed in the parliament.
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES		Initiated infringement proceedings against Latvia across six digital directives/regulations: NIS2, Open Data/PSI Directive, Data Governance Act, EECC, DORA, and both Copyright Directives (2019/789 and 790). Latvia was referred to the ECJ for EECC (judgment and fines, March 2024) and for the Open Data Directive (February 2023,). In NIS2 and DGA cases, Latvia was among a large group of 19+	National level is the primary site of digital infringement failures. Key patterns: (1) delayed transposition (DORA: 9 months late; EECC: 1.5 years late); (2) incomplete transposition (EECC: required secondary law on data retention never enacted); (3) constitutional procedural delay (presidential veto of EECC); (4) insufficient enforcement capacity (DGA). Solutions pursued: VARAM designated as single information point (2023); AI Centre established with regulatory sandbox (2025); DORA finally adopted September 2025; President	Planning regions play no formal role in digital infringement proceedings or their resolution.	Municipalities are subject to NIS2 compliance obligations, making them potential contributors to infringement risk. Some LPS objections were incorporated, partially addressing the implementation gap that could have caused infringement via municipal	Civil society is absent from formal digital infringement proceedings.

Digital transition and MLG challenges in Latvia					
	member states in infringement, suggesting systemic issues with directive complexity in addition to national implementation gaps.	proposed revised data sharing law to counter "data feudalism" (June 2025). Fragmented inter-ministerial coordination between VARAM and Ministry of Economics remains a structural bottleneck.		non-compliance.	

Space for increased public participation and social innovation

Latvia's digital transition is shaped by EU regulatory pressure and a centralised national governance model, with VARAM acting as the primary gatekeeper for transposition and coordination. Municipalities and communities bear growing compliance and implementation responsibilities—especially under NIS2 and open data rules—yet remain marginal in strategic decision-making.

The central opportunity for increased public participation and social innovation lies in redesigning how actors are connected, rather than in creating additional participatory venues. Making MLG more bottom-up in Latvia depends on embedding participation into decision-making, resource allocation, and implementation sequencing, thereby enabling genuine policy ownership and responsible decision-making

1) EU level
   - Strengthen incentives for early, meaningful participation in digital governance implementation – for example by rewarding transposition models that institutionalise municipal and civil society involvement at pre-consultation stages.
   - Support the establishment of EU-level learning communities on participatory digital governance, including cybersecurity capacity-building for small and medium-sized municipalities.

2) National level
   - Open digital transposition processes to structured subnational and civil society input at an early stage.
   - National funding and technical support programmes for municipalities to meet NIS2 and future digital compliance obligations.
   - Resolve the inter-ministerial coordination deficit between VARAM and the Ministry of Economics, including through a clear division of competences for AI governance.

3) Regional (planning regions) level

- Pilot region-based social innovation hubs that connect local initiatives, municipalities, and national authorities, strengthening horizontal learning and vertical integration without requiring formal legal competences.

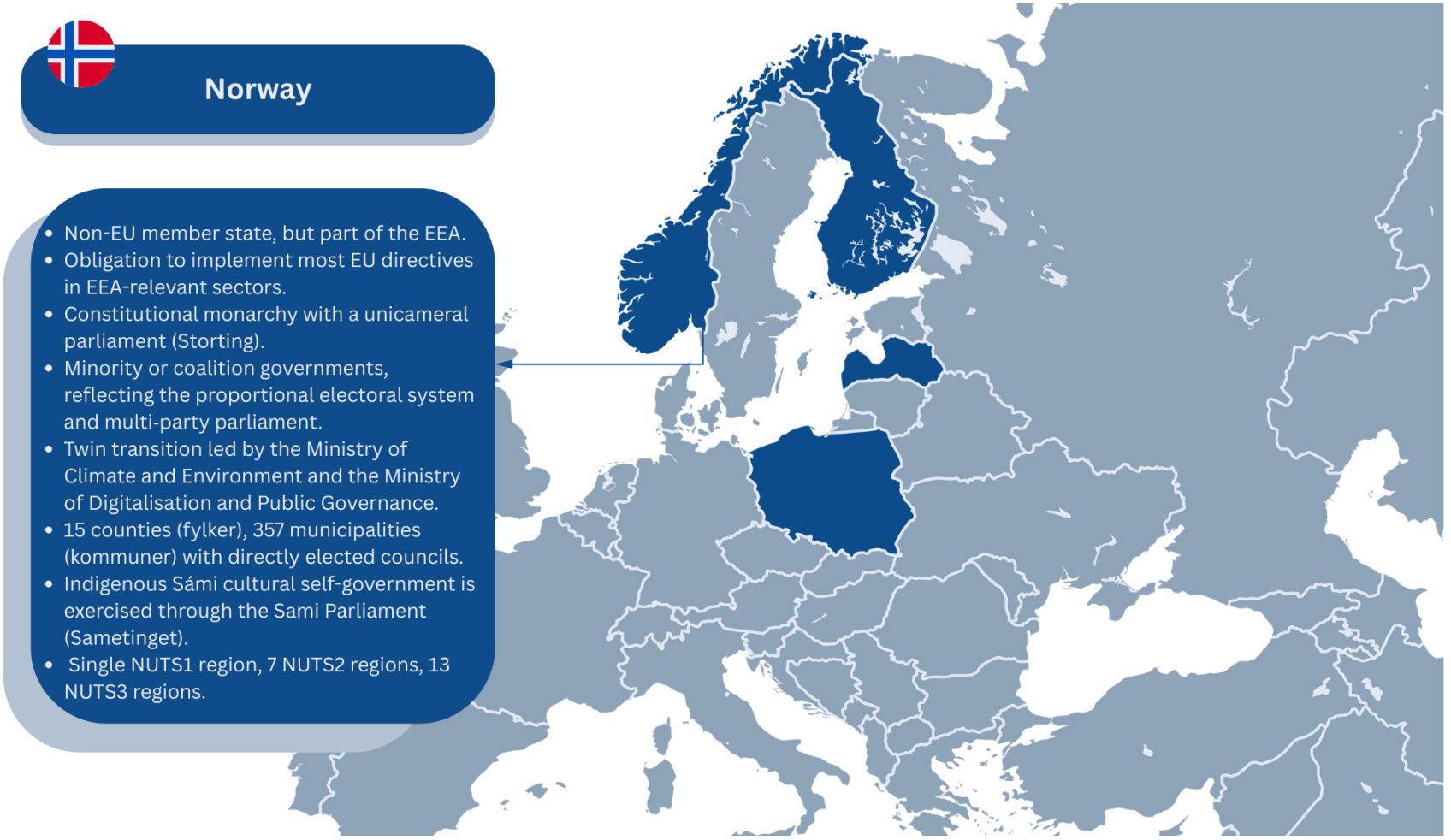
4) Municipal level

- Institutionalise early and meaningful municipal involvement in digital transposition processes.
- Empower municipalities to contribute to and use open data strategically, including through dedicated digital capacity-building support.

5) Community / civil-society level

- Support social innovation that builds trust and ownership, prioritising collective, place-based initiatives that reconnect citizens with public institutions and long-term transition goals.

4 Norway


Norway
Non-EU member state, but part of the EEA.
Obligation to implement most EU directives in EEA-relevant sectors.
Constitutional monarchy with a unicameral parliament (Storting).
Minority or coalition governments, reflecting the proportional electoral system and multi-party parliament.
Twin transition led by the Ministry of Climate and Environment and the Ministry of Digitalisation and Public Governance.
15 counties (fylker), 357 municipalities (kommuner) with directly elected councils.
Indigenous Sámi cultural self-government is exercised through the Sami Parliament (Sametinget).
Single NUTS1 region, 7 NUTS2 regions, 13 NUTS3 regions.

4.1 Climate transition and MLG challenge in Norway

Climate transition and MLG challenge in Norway						
		GOVERNANCE LEVEL				
		EU/EEA/EFTA	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	Norway's EEA membership binds it to EU climate and energy directives (REDII, EPBD, Energy Efficiency Directive). EU institutions use REDII obligations to exert strategic pressure on domestic energy expansion.	As a non-EU member Norway does not hold formal power to influence EU strategy and policy orientation. The Ministry of Energy and its Water Resources and Energy Directorate (NVE) hold primary licensing authority for all renewable energy. National strategy is dominated by Norway's unique position (hydropower and fossil fuel export economy). Climate Change Act and emission reduction targets	County Councils (*fylkesting*) and County Governors (*fylkesmann*) are consulted on EIAs and hold formal authority on cultural heritage. NVE report (2020) recommended bundling wind-concession processing at regional level. In practice, regional actors function as hearing parties rather than strategic authorities.	Municipalities are key owners of hydropower companies (e.g. Oslo). Wind-power municipalities oscillated between economic incentive and landscape resistance; few 'pro-wind' municipalities remain. Since July 2023 municipalities have a formal statutory veto on onshore wind through the Planning and Building Act.	Environmental NGOs have become influential veto players. Allemannsretten (The Right of Public Access) and place-identity are key drivers of civil society resistance.

Climate transition and MLG challenge in Norway						
			reviewed every five years. Coalition collapse (Jan 2025) over REDII/EPBD transposition exposed deep national disagreements on EU alignment.			
	Decision-making power & legal authority	EU sets binding targets via REDII; EFTA Court oversees enforcement. EEA/EFTA architecture:	NVE holds licensing authority under the Energy Act; Ministry of Energy is appeal body (parent organisation appeals its own directorate). 2021 Supreme Court ruling (*Fosen*): wind farms violating Sami reindeer herding rights are unconstitutional. Longest non-compliance with court order in Norwegian history. Norway no vote in EU lawmaking	County Councils file formal objections; County Governors oversee environmental compliance. Their formal objections can trigger ministry-level review.	2008–2019: municipalities formally reduced to 'hearing party' status yet informally held near-veto power. Since July 2023: statutory veto restored; zoning plan approval required before NVE licence application.	No formal decision-making power. Town-hall meetings used to assess project controversy. Loser-pays principle in Norway financially deters citizens from legal challenges against energy companies.

Climate transition and MLG challenge in Norway						
			but full obligation compliance. ACER membership (2018) integrates Norway into cross-border electricity market regulation.			
	Policy instruments, resources & incentives	EU RED/REDII created the framework for the Norway-Sweden green certificate market. EPBD and Energy Efficiency Directive impose building energy requirements.	Green electricity certificates (2012–2021): joint market with Sweden; subsidised renewables. Resource rent tax on onshore wind profits (partly to host municipalities). Hydropower taxed at 45%. Enova: state enterprise providing subsidies and incentives for renewable energy and energy efficiency.	No dedicated regional policy instruments for climate/energy. Regions receive revenue from wind/hydro taxes but do not control them.	Property tax (up to 0.7% of plant value annually) is the primary municipal income from wind power. Hydropower (Waterfall Rights Act): mandatory local benefit fund and subsidised electricity sales to host municipalities.	Energy communities (prosumer/'plus-customer' scheme) expanded Oct 2023 to housing cooperatives; solar sharing rules. Energy community framework rules by government.
	Implementation capacity	EFTA Court oversight is weaker	Average 5.5 years for initial NVE	Limited capacity: County	Capacity constraint: poor	Interest and protest groups influenced

Climate transition and MLG challenge in Norway						
		than ECJ on citizen procedural protections; Norway's ACER membership integrates it into EU electricity market coordination.	decision; 11 years including appeals. 80% of windpower decisions appealed. Coalition collapsed Jan 2025 over directive disputes.	Governors often file objections that NVE overrules. Thematic Conflict assessments introduced 2005, abolished 2016.	rural municipalities with wind resources most frequently targeted; lack staff and legal resources to engage effectively.	NVE licensing successfully.
	Coordination, participation & inclusion	Coordination via EEA Agreement: Norway implements EU directives but has no formal vote. ACER coordinates cross-border electricity markets. EU–Norway tensions high (2024–2025) over interconnector non-renewal and REDII non-transposition.	Ministry of Energy NVE dominates. National Framework for wind power (2017–2019): extensive public consultation but no meaningful integration of local concerns; withdrawn under protest. Wind policy shaped by energy authorities, developers, and climate NGOs; local governments and citizens treated as 'hearing actors' not co-designers.	County Councils and Governors participate in EIA and appeals but lack formal coordination role in policy design. NVE (2020) recommended bundling concession processing regionally; not yet fully implemented.	Municipality's participation criticised for lack of formal power. Compensation agreements lack standardisation; foreign ownership undermines local benefit-sharing agreements.	EIA Directive provides formal public hearing rights; but loser-pays principle and EFTA Court limitations reduce effective citizen legal recourse. Post-licensing silencing of dissent documented: community norms suppress continued opposition after wind farms built.

Climate transition and MLG challenge in Norway					
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES	REDII (2018/2001): Norway's Clean Energy Package transposition incomplete. Energy Act amended early 2025 to partly transpose REDII, but still compliance deficits. EPBD (2010/31/EU): Directive only transposed into Norwegian law in 2023. EFTA Surveillance Authority (ESA) issued a reasoned opinion to Norway as early as July 2011 for failing to implement the energy performance certificate obligation. 'Norway Price' electricity subsidy (June 2025): ESA Package Meeting Nov 2025 notes complaint that the scheme may be incompatible with the Third Electricity Directive.	REDII transposition: Centre Party declared 'indefinite infringement' for EED and EPBD – the first government in Norwegian history to publicly announce it will not comply with EEA obligations. National-level sovereignty argument used to justify non-transposition. EPBD: repeatedly delayed; only the 2010 version transposed in 2023; EIA / Scope 3: Supreme Court April 2025 ruled Ministry of Energy violated law by approving three oil fields without Scope 3 EIA.	No formal role in ESA/EFTA infringement proceedings. County governors filed formal objections in wind-power EIA processes that were overruled by NVE and Ministry – reflects the same procedural gap as the Scope 3 EIA infringement: environmental authorities formally consulted but substantively marginalised. No specific information found on regional-level contributions to infringement risk or resolution beyond the EIA dimension.	No formal role in ESA proceedings. Municipalities bear indirect costs of infringement disputes: EPBD imposes building renovation obligations on municipal housing stock; REDII permitting acceleration pressures local planning capacities.	Citizens bear direct costs of infringement disputes: quadrupled household electricity prices (2012–2024) partly driven by interconnectors at the heart of the ACER/REDII controversy; 'Norway Price' subsidy (June 2025) partially mitigates this for households.

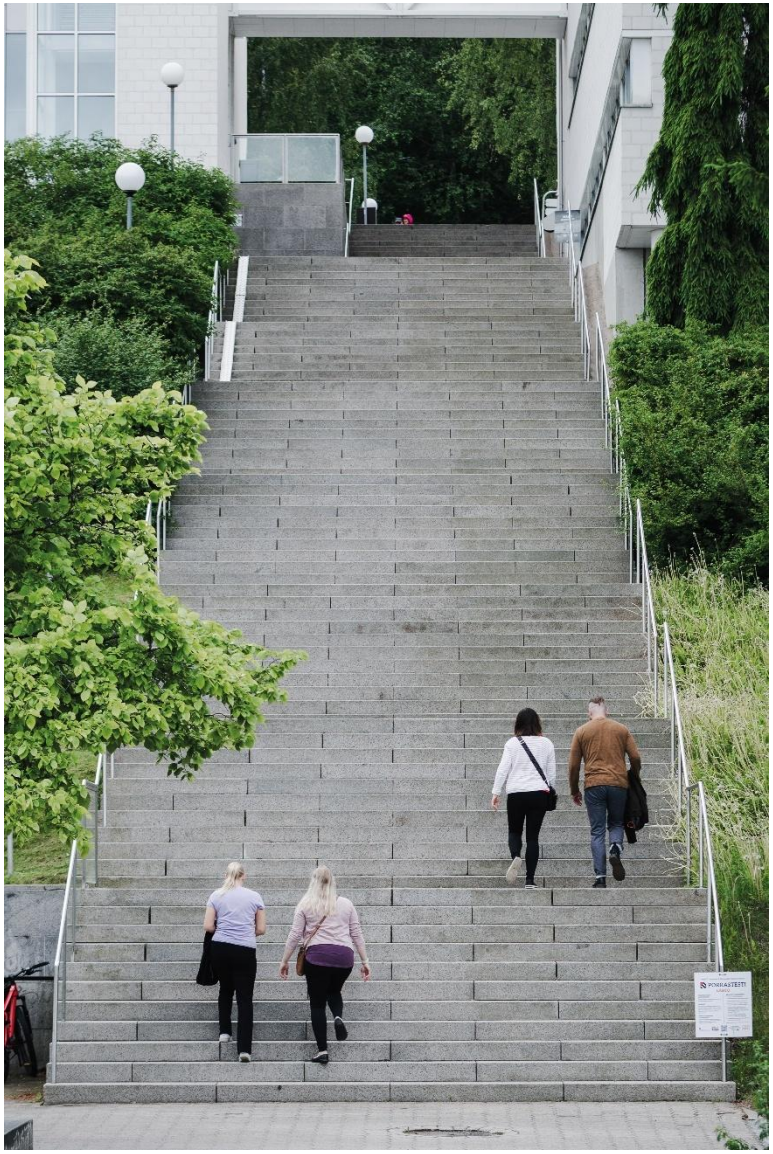
Space for increased public participation and social innovation

Norway's infringement dynamic is structurally distinct from EU member states. ESA proceedings move slower than ECJ; political sovereignty claims are domestically legitimate arguments without EU membership loyalty obligations; bottom-up judicial enforcement by NGOs has proven more effective than top-down ESA enforcement in producing compliance.

Norway's climate transition governance reflects a structurally asymmetrical MLG system in which EU climate obligations apply through the EEA without corresponding agenda-setting power, concentrating authority at the national level. Municipalities and communities carry substantial territorial, social, and political costs—especially for renewable energy—while formal participation rights and coordination mechanisms remain limited and uneven. Creating stronger spaces for public deliberation and social innovation is essential to bridge the gap between centralised decisions and local legitimacy.

1) EU level
- Strengthen procedural protections for Norwegian citizens under the EEA/EFTA framework.

2) National level
- Standardise post-licence municipal consultation rights and turbine modification limits.
- Establish transparent, legally binding compensation schemes for wind-host municipalities equivalent to the Waterfall Rights Act hydropower model.
- Fully transpose REDII and EPBD to avoid indefinite infringement, while publicly communicating the domestic rationale – not just 'EU obligations'.



3) Regional level

- Pilot region-based social innovation hubs that connect local initiatives, municipalities, and national authorities, strengthening horizontal learning and vertical integration without requiring formal legal competences.

4) Municipal level

- The statutory veto (since July 2023) must be accompanied by genuine post-licence participation rights covering turbine height, capacity changes, and construction plans.
- Extend mandatory benefit-sharing (resource rent tax) to full project lifecycle; close the 'grey legal area' on compensation agreements by legislating minimum standards. Capacity-build smaller coastal municipalities to engage effectively in NVE processes.

5) Community / civil-society level

- Support social innovation that builds trust and ownership, prioritising collective, place-based initiatives that reconnect citizens with public institutions and long-term transition goals.

4.2 Digital transition and MLG challenges in Norway

Digital transition and MLG challenges in Norway						
		GOVERNANCE LEVEL				
		EU/EEA/EFTA	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	EU regulations (DSA, DMA, AI Act) apply directly in EEA via Joint Committee decisions without national transposition legislation; directives (NIS1/NIS2, Open Data, DSM Copyright) require national enactment. ESA (not EC) oversees EEA compliance; EFTA Court adjudicates. Norway has no formal vote in EU digital lawmaking. DSA applicable to all digital services in the EEA from January 2024.	Norwegian Digitalisation Agency (Digdir) as primary tool of the Norwegian government for digitalisation of its public sector (subordinate to the Ministry of Digitalisation and Public Governance.) "AI Norway" as new national arena for innovative and responsible use of AI. Responsible for AI Act, DSA, DMA transpositions. Norwegian Communications Authority (NKom): AI supervisory body (Feb 2025); also, DSA platform oversight. Norwegian National Security Authority (NSM): oversees Digital	No regional digital regulatory authority exists in Norway; counties act as hearing parties, not decision-makers.	Municipalities have no formal decision-making power in digital policy; they are implementation obligees subject to national law and EU regulations. Strong statements in NIS consultation processes.	Datatilsynet regulatory sandbox (since 2020): citizens and companies test AI-based data uses; produced legal clarity that existing law requires legislative amendment for public-sector AI repurposing.

Digital transition and MLG challenges in Norway						
			Security Act implementation.			
	Decision-making power & legal authority	EU instruments applicable in Norway: AI Act (risk-based regulation), DSA (platform liability), DMA (gatekeeper obligations), Open Data Directive (dynamic data APIs), NIS1/NIS2 (cybersecurity requirements). Digital Europe Programme: Norway participates in data spaces and cybersecurity capacity-building initiatives. Norway is excluded from EU Commission enforcement of DMA and from the European Board for Digital Services (EBDS) – enforcement falls to ESA/EFTA Court, with slower and more limited scope.	DigDir central e-government infrastructure. DigDir provides guidance and support schemes; Datatilsynet AI sandbox since 2020. Digital Security Act (Oct 2025): first cross-sector cybersecurity obligation in Norway. DORA Act: Norwegian transposition of EU Digital Operational Resilience Act for financial sector. GDPR implemented in Norway via Personopplysningsloven (2018): cross-cutting data protection framework underpinning all digital governance. Interministerial DMA/DSA Working Group (led by Ministry of Local Government and Regional Development): coordinates EEA incorporation of DMA/DSA and develops EFTA positions.	No dedicated regional digitalisation funding exists; counties rely on national DigDir programmes. Example DigiViken (51 municipalities): pooled ICT procurement and joint lobbying instrument.	Municipalities with local strategies and participation in AI consortia, example: Stavanger participates in AI4Cities initiative.	AI Norway (DigDir, March 2025): public–private consultancy hub linking businesses and public sector. No consumer-facing digital ombudsman or digital rights centre comparable to some EU member states.

Digital transition and MLG challenges in Norway						
	Policy instruments, resources & incentives	EEA integration: EU digital single market rules apply but ECJ enforcement does not. EFTA Court oversight slower and more limited in scope. ESA monitoring compliance of the Digital Security Act. Norway excluded from European Board for Digital Services (EBDS) and DMA High-Level Group – the key EU-level enforcement coordination bodies. DIGITAL Programme: Norway participates as funding and capacity-building instrument.	Significant transposition delays across all major directives: NIS1 (2016) fully in force Oct 2025; Open Data Directive (2019) still not enacted early 2026; AI Act draft published June 2025; DMA draft published May 2025. Legislative uncertainty creates compliance vacuum. DORA (July 2025) and Digital Security Act (Oct 2025) represent two on-time or near-time transpositions – exceptions in an otherwise delayed landscape. DMA/DSA interministerial working group and EFTA ECASIS task force: Norway-led coordination mechanism for addressing two-pillar challenges of DMA/DSA EEA incorporation.	Limited capacity: county authorities rely on national DigDir guidance No regional digital competence centres etc.	Persistent capacity and funding gaps at municipal level across all directives; very large disparities in capacity between Oslo and small rural municipalities.	Datatilsynet AI sandbox: productive but identified need for new national legislation – a gap not yet closed as of 2026. Civil society has limited formal implementation capacity; relies on consultation submissions and Datatilsynet complaints.
	Implementation capacity	Norway participates in EU digital governance bodies: EAIB (AI Act), NIS Cooperation Group (cybersecurity), but	DigDir coordinates across ministries but Ministry of Digitalisation and Public Governance (since Jan 2024) only recently has unified	No regional digitalisation councils or regional innovation hubs with formal	Municipal participation via Storkommune-gruppa (10 largest cities),	No structured multi-stakeholder platform for digital governance

Digital transition and MLG challenges in Norway						
		without formal voting rights. EEA Joint Committee decisions incorporate EU digital acts. Norway excluded from European Board for Digital Services (EBDS) and DMA High-Level Group – key bodies for coordinating enforcement of DSA and DMA in EU.	ownership of digital policy. Structural cause of fragmentation: Norway's model of individual ministerial responsibility produces strongly sectorised policymaking.	coordination mandate, but best practise examples like DigiViken.	individual consultation submissions, inter-municipal networks. Small municipalities systematically under-represented.	comparable to EU Digital Services Coordinators.
	Coordination, participation & inclusion	Norway participates in EU digital governance bodies: EAIB (AI Act), NIS Cooperation Group (cybersecurity), but without formal voting rights. ESA (not EC) is Norway's enforcement body for EEA digital obligations.	Systematic transposition delays, one reason: fragmented governance of digital policy until 2023. Two recent on-time transpositions: DORA (July 2025) and Digital Security Act/NIS1 (Oct 2025)	County-level actors face downstream compliance burdens from national delays. No specific information found on regional-level contributions to infringement risk or resolution.	Municipal sector is the primary site of implementation bottlenecks. No formal role in ESA proceedings; municipalities cannot enforce EU digital rights independently (MLG gap)	Unlike in climate transition case, no significant NGO-driven digital rights litigation in Norway.
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES		EU infringement packages do not directly apply to Norway. NIS1 (Directive	Systematic transposition lag is Norway's primary digital infringement pattern: NIS1 (9-year lag), Open Data	No formal role in infringement proceedings. No specific information	No specific information found on municipal level contributions	Citizens/civil society largely invisible in infringement resolution.

Digital transition and MLG challenges in Norway					
	2016/1148): ESA brought action before EFTA Court. Norway implemented via Digitalsikkerhetsloven Oct 2025, but ESA not formally notified. Open Data Directive (2019/1024): transposition formally delayed since 2023; still not enacted early 2026; DSM Copyright Directive (2019/790): incorporated into EEA Agreement but data-mining legislation still pending 2026.	Directive (6+ year lag ongoing), DSM data mining (partial, pending 2026), DSA (2.5-year lag), DMA (4+ year lag). Structural cause: Norway had no cross-sectoral digital security law before NIS1; each directive requires building from scratch. No 'indefinite infringement' declaration as in climate – delays are bureaucratic/institutional, not political-sovereignty motivated.	found on regional-level contributions to infringement risk or resolution.	to infringement risk or resolution.	Unlike in climate law, no significant NGO-driven digital rights litigation in Norway.


Photo: University of Jyväskylä

Space for increased public participation and social innovation

In digital transition, Norway's digital infringement dynamic centres on systematic transposition lag driven by institutional fragmentation and municipal unfunded mandates, not political sovereignty disputes (unlike in the climate transition). ESA proceedings are the primary enforcement mechanism; domestic civil-society litigation plays a minimal role in digital compliance.

The central opportunity for increased public participation and social innovation lies in redesigning how actors are connected, rather than in creating additional participatory venues. Making MLG more bottom-up in Norway depends on embedding participation into decision-making, resource allocation, and implementation sequencing, thereby enabling genuine policy ownership and responsible decision-making.

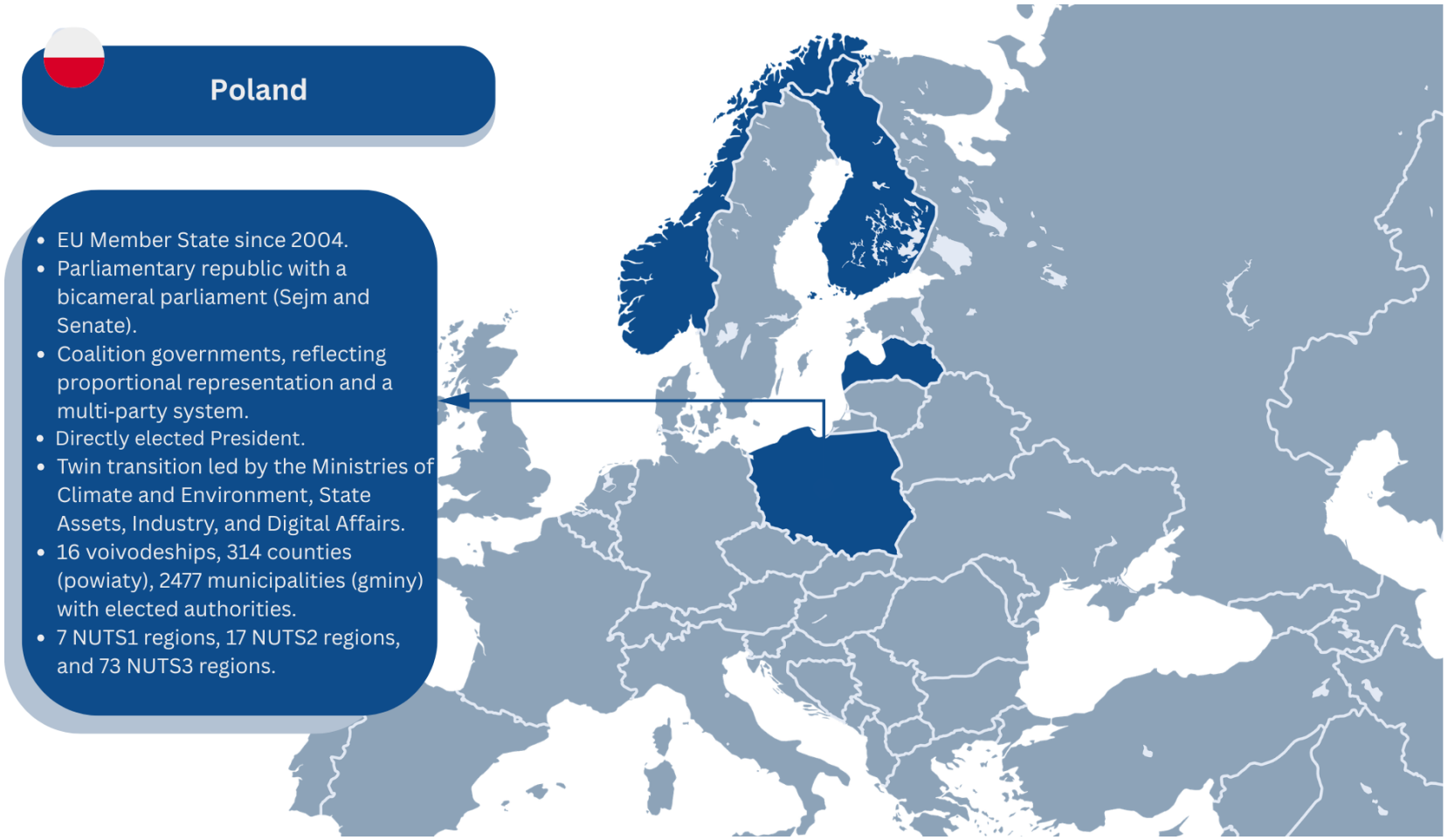
1) EU level
   - Establish formal EEA participation rights in EU digital governance bodies (EAIB, NIS Cooperation Group) beyond observer status.

2) National level
   - Establish a binding multi-year digital transposition calendar with hard deadlines and public accountability.
   - Create a mandatory compensation mechanism (similar to the Waterfall Rights Act model for hydropower) that funds municipalities for EEA digital obligations imposed on them.
   - Resolve the legal vacuum for public-sector AI data repurposing urgently through targeted legislation. Strengthen DigDir's coordination mandate.

3) Regional level
   - Pilot region-based social innovation hubs that connect local initiatives, municipalities, and national authorities, strengthening horizontal learning and vertical integration without requiring formal legal competences.

4) Municipal level
   - Provide standardised national AI competence packages and shared risk-classification tools for high-risk AI systems in public services.
   - Adopt a differentiated fine regime under the AI Act and NIS2 that accounts for widely varying municipal sizes, focussed on the different possibilities for participation (rural vs. urban municipalities).
5) Community / civil-society level
- Support social innovation that builds trust and ownership, prioritising collective, place-based initiatives that reconnect citizens with public institutions and long-term transition goals.

5 Poland


Poland
EU Member State since 2004.
Parliamentary republic with a bicameral parliament (Sejm and Senate).
Coalition governments, reflecting proportional representation and a multi-party system.
Directly elected President.
Twin transition led by the Ministries of Climate and Environment, State Assets, Industry, and Digital Affairs.
16 voivodeships, 314 counties (powiaty), 2477 municipalities (gminy) with elected authorities.
7 NUTS1 regions, 17 NUTS2 regions, and 73 NUTS3 regions.

5.1 Climate transition and MLG challenges in Poland

Climate transition and MLG challenges in Poland						
		GOVERNANCE LEVEL				
		EU	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	Provides a strong top-down policy orientation through EU climate law, targets, and strategies (e.g. Fit for 55, REDIII, 2030 RES share, emissions reductions, etc.), creating external pressure for domestic action.	Central authority in Poland for determining policy orientation. Policy development has been regarded as inconsistent, with delayed and outdated long-term strategies and unambitious GHG reduction targets. Poland remains among the EU's lowest in RES share while being responsible for a significant share of EU emissions. It is the only EU Member State that has not committed to climate neutrality by 2050. The national level has demonstrated tendencies toward	Regions (voivodeships) do not have legally binding climate-strategy powers and have limited autonomy. They prepare regional development strategies but do not set energy policy. Regional authorities actively resist centralisation and advocate subsidiarity. Their role is mostly planning, spatial development, and implementing EU-funded projects rather than shaping	Municipalities shape local spatial planning, which is crucial for RES deployment. They issue development conditions and environmental decisions. Their strategic orientation varies widely, and local opposition can block or delay projects. The environmental decisions are mostly issued by the mayor and can be appealed by neighbours or NGOs. Municipalities are actively trying to be more involved	No formal role in strategic orientation; However, together with municipalities, they are trying to get more involved in the development of the TJTPs, especially in coal regions. Civil society influences strategic orientation indirectly through pressure, litigation, and local acceptance. For instance, civil society played a role in tightening

Climate transition and MLG challenges in Poland						
			centralisation, limiting the ability of regions to shape cohesion policy programmes. Coal-sector influence continues to weaken overall policy coherence.	national climate direction.	in policy development. E.g., 36 local municipalities and civil society groups in coal regions signed a letter urging the Polish government to involve them in the development of Territorial Just Transition Plans (TJTPs).	biomass co-firing rules.
	Decision-making power & legal authority	Sets binding legal frameworks and compliance mechanisms; Enforcement through infringement procedures (e.g. REDII, EPBD, EED) has become the de facto governance tool.	Holds formal decision-making power for transposition and implementation. Ministry of Climate and Environment, Ministry of State Assets, and Ministry of Industry) are in charge of energy policy. National level controls energy law, RES Act, permitting rules, grid regulation, and licensing.	Manage regional environmental protection offices (Regional Directors for Environmental Protection) which issue some environmental decisions. They also manage spatial planning at the regional scale but cannot override national energy law.	Has a strong legal authority over land-use and environmental decisions. These decisions can make, delay or break RES projects through planning or permitting procedures. The environmental assessment required for renewable energy projects is usually	Lacks formal decision-making authority. However, civil society has strong procedural rights. For example, NGOs can appeal environmental decisions and construction permits. Additionally, local residents can challenge projects and cause delays.

Climate transition and MLG challenges in Poland						
			Furthermore, national law determines auction schemes, grid priority, and environmental requirements.		provided by the mayor of the municipality in question or the Regional Director for Environmental Protection.	
	Policy instruments, resources & incentives	Provides extensive funding instruments and regulatory incentives (Cohesion Policy, Just Transition Fund, etc.) but their impact depends on national co-financing and instrument choice.	Controls RES auctions, licensing, grid connection rules, and direct-line regulations. The RES Act includes multiple subsidy schemes. Imposes windfall taxes in crisis situations, etc.	Manages EU funds and regional operational programmes. Poland receives €3.85 billion from the JTF for coal regions (e.g. Silesia), aimed at economic diversification and reskilling. However, local governments and civil society have repeatedly complained about insufficient inclusion in planning processes. Therefore, regions have limited ability to create independent incentives.	Municipalities play a crucial role in implementing the EU's Just Transition Fund (JTF), particularly in coal-dependent regions. Oftentimes they lead initiatives. Municipalities implement local planning instruments, can support district heating modernisation, and may run local grant schemes for prosumers. Their main instrument is spatial planning.	Civil society plays a crucial role in implementing the EU's Just Transition Fund (JTF), particularly in coal-dependent regions. Oftentimes they lead initiatives. Civil society participates in benefit-sharing schemes (e.g., 10% of wind farm capacity allocated to residents as virtual prosumers). They also actively use advocacy, monitoring, and litigation as informal instruments.

Climate transition and MLG challenges in Poland						
	Implementation capacity	Promotes faster implementation through regulatory acceleration (e.g. REDIII). The EU has high capacity to monitor compliance, fund projects, and enforce rules; however, relies on national and subnational actors for implementation. Uses infringement procedures when implementation fails.	Implementation capacity is uneven. There are major bottlenecks: grid constraints, slow permitting, regulatory instability, and political interference. National agencies (Energy Regulatory Office (ERA), ministries) have technical capacity but face political pressure and coordination problems.	The regional level has moderate capacity and is dependent on EU funds. Regional environmental authorities can be understaffed, which slows environmental decisions. Moreover, capacity varies across voivodeships.	Implementation is constrained; municipalities often face low capacity, especially smaller ones. Permitting can take 18 months when environmental assessments are required. Local opposition and administrative overload slow implementation. There have been some decentralisation attempts. For instance, while maintaining the "10H rule" (Distance Act), the draft adds flexibility by allowing municipalities to decide wind farm locations through local spatial plans.	Capacity varies widely. Some NGOs are highly professional and active in litigation. They are actively involved in both planning and implementation. Their participation is especially visible in coal regions, where they advocate for inclusive governance and locally tailored transition strategies. Communities can facilitate or obstruct implementation depending on acceptance.

Climate transition and MLG challenges in Poland						
	Coordination, participation & inclusion	Coordination primarily occurs through legal oversight and compliance, rather than inclusive, multi-actor deliberation.	Coordination is fragmented across ministries (Climate, State Assets, Industry). There are the long-term strategic incoherence and political conflict. Inclusion of stakeholders is inconsistent; miners' unions have disproportionate influence. While local and regional actors increasingly engage in climate governance (especially via EU funding mechanisms), national-level resistance, coal dependence, and legal disputes with the EU continue to constrain an effective and coordinated energy transition.	Coordinates EU funds and regional strategies. Participates in Just Transition planning in coal regions. Limited influence over national decisions. Cross-border cooperation (e.g. Euroregions) and regional industrial transformation (e.g. Silesia) highlight the importance of regional actors, though coordination remains uneven.	Municipalities are key actors in local participation processes. Must conduct environmental consultations. Local communities can appeal decisions, which creates a de facto participation mechanism.	Active in appeals, monitoring, and advocacy. New wind farm rules create formal participation through virtual prosumer schemes. Civil society pressure influenced biomass policy tightening.

Climate transition and MLG challenges in Poland					
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES	Infringement proceedings against Poland across multiple directives (REDII, EPBD, EED). The Commission issues formal notices, reasoned opinions, and - where unresolved - referrals to the ECJ. Infringements often reveal structural governance weaknesses in Poland (e.g., slow transposition, weak environmental enforcement).	Primary target of infringement procedures. Challenges arise from delayed transposition, political resistance to EU climate rules, and regulatory instability. National ministries must respond, adjust laws, and coordinate with the European Commission.	Indirect role. They rarely interact directly with the Commission but must adjust practices when national law changes after infringement cases.	Indirectly affected. Poor local permitting, weak environmental decisions, or inadequate public participation can trigger national-level infringements. Municipalities must adapt procedures when national law is amended in response to EU pressure.	Often initiators of complaints that lead to infringement procedures. NGOs monitor compliance and submit evidence to the Commission. Civil society thus acts as a watchdog and catalyst for EU enforcement.

Space for increased public participation and social innovation

Poland's climate transition governance is shaped by strong EU pressure and highly centralised national authority, while persistent policy instability, sectoral vetoes, and delayed transposition weaken coordination across levels. Municipalities, regions, and civil society are actively involved in implementation and opposition, yet remain structurally constrained in shaping strategy, contributing to recurring infringements.

Strengthening Poland's green transition requires improving how existing institutions coordinate, rather than creating new ones. Making MLG more coherent depends on embedding long-term planning, administrative capacity, and meaningful participation into decision-making so that responsibilities are aligned and the transition becomes collectively owned.

1) EU level

- Strengthen incentives for early, bottom-up participation in EU climate implementation, for example by explicitly rewarding governance models that institutionalise community and municipal involvement at pre-permitting and strategy-revision stages.
- Use infringement procedures to strengthen participatory governance – when addressing structural governance failures (e.g., environmental assessments, delayed transposition), pair enforcement with requirements for open consultations, public access to information, and inclusive decision-making.
- Promote participatory long-term planning - require Poland's climate and energy strategies to include structured, meaningful stakeholder involvement, including local governments, civil society, and communities, rather than top-down drafting.
- Provide technical assistance to regions and municipalities to develop participatory tools, digital engagement platforms, and community-driven innovation initiatives.

2) National level

- Stabilise long-term energy and climate strategies by institutionalising mandatory, well-designed public consultations and social dialogue, reducing the influence of short-term political cycles and sectoral lobbying.
- Make permitting and regulatory processes more transparent and participatory - simplify procedures while ensuring early public access to information, clear communication of timelines, and opportunities for communities to shape local energy and infrastructure decisions.
- Increase regulatory predictability through open dialogue - engage investors, local authorities, and civil society in co-designing support schemes and regulatory changes to avoid abrupt shifts and build shared ownership of reforms.
- Empower ERA and other regulators to conduct open hearings, publish accessible data, and involve stakeholders in oversight processes.

3) Regional level (voivodeships):

- Use regional planning as a participatory coordination tool: Integrate RES zones, grid corridors, and just transition priorities through inclusive regional consultations that bring together municipalities, communities, and local industries.
- Build regional capacity for participatory assessments: Strengthen Regional Directorates for Environmental Protection not only technically but also in their ability to run transparent, participatory environmental assessment processes.
- Use EU funds to support social innovation - prioritise projects that foster community energy, local digital participation tools, and collaborative planning rather than isolated technical investments.

4) Municipal level

- Make spatial planning participatory and community-driven: use LSDPs and DDCs to co-design suitable areas for RES with residents, reducing conflict and appeals by involving communities early.
- Increase transparency in local permitting: standardise procedures and publish clear, accessible information so residents understand how decisions are made and can contribute constructively.
- Engage communities as partners, not obstacles: use consultations to identify concerns, co-create benefit-sharing models (e.g., virtual prosumers, community energy), and build trust around local projects.
- Develop local heat transition plans with citizen input: in coal-dependent municipalities, involve residents, housing cooperatives, and local businesses in shaping heating modernisation pathways.

5) Community/civil society

- Strengthen watchdog and monitoring roles: continue using legal avenues to challenge weak environmental decisions and non-compliance but complement litigation with constructive engagement in planning and strategy processes.
- Use new participation mechanisms strategically: leverage virtual prosumer schemes and community energy models to build local ownership of RES projects.
- Contribute to long-term vision, not only case-by-case opposition: engage in national and regional consultations on PEP, NECP, spatial planning, and just transition strategies, bringing local knowledge and social justice concerns into high-level frameworks.
- Build coalitions across levels: form alliances with municipalities, regional authorities, and expert organisations to address systemic issues, permitting quality, grid access, biomass sustainability, rather than isolated projects.

5.2 Digital transition and MLG challenges in Poland

Digital transition and MLG challenges in Poland						
		GOVERNANCE LEVEL				
		EU	**National**	**Regional (Sub-national/Supra-municipal)**	**Municipal**	**Community/ Civil society**
DIMENSION OF MULTILEVEL GOVERNANCE	*Strategic authority & policy orientation*	Provides a strong top-down policy orientation through EU digital laws, targets, and strategies (such as AI Act, Digital Markets Act, Digital Services Act, Data Governance Act, NIS2 Directive, etc.), creating external pressure for domestic action.	Central authority in Poland regarding determining policy orientation for digitalisation, cybersecurity, broadband expansion, and public sector digital transformation. However, strategic coherence is uneven: long term planning is fragmented across ministries, and political turnover disrupts continuity. The primary institution responsible for	Regions (voivodeships) have limited strategic authority. They integrate digitalisation goals into regional development strategies and manage EU funds for broadband, e-government, and digital skills. They do not set national digital policy but can influence regional priorities.	Responsible for local digital public services, smart city initiatives, and digital inclusion programmes. Their strategic orientation varies widely depending on resources and political leadership. Municipalities are key implementers of digital infrastructure deployment. Major cities (Warsaw, Kraków, Wrocław, Poznań) have	No formal role in strategic orientation. However, they shape digital policy orientation through advocacy on privacy, digital rights, transparency, and access to information. Civil society also influences debates on digital education, cybersecurity awareness, and platform accountability.

Digital transition and MLG challenges in Poland						
			AI policy is the Ministry of Digitalisation.		well-defined smart city strategies.	
	Decision-making power & legal authority	Sets binding legal frameworks and compliance mechanisms; enforcement through infringement procedures (e.g. Digital Services Act, NIS2 Directive)	Legal authority is centralised. National level controls telecom regulation, cybersecurity law, digital public administration, and data governance. National regulators oversee telecom operators, digital platforms, and cybersecurity obligations.	Limited legal authority. Regions can regulate digital aspects of regional development plans and manage EU funded digital projects but cannot legislate on digital markets or data governance.	Municipalities hold legal authority over local infrastructure permits. They manage local data systems and digital public services but operate within national legal frameworks.	No formal legal authority but strong procedural rights in transparency, data protection, and digital rights. NGOs can challenge unlawful data practices or insufficient cybersecurity measures.
	Policy instruments, resources & incentives	Provides extensive funding instruments and regulatory incentives, sets standards and certification schemes.	Krajowy Plan Odbudowy (KPO) – National Recovery Plan – includes a substantial digital component (approximately 2 billion euros for broadband, cybersecurity, and e-	Manage EU funds for regional broadband rollout, digital skills, and e government projects. Provide co-financing and coordinate regional digital innovation hubs. Regional Innovation	Use local budgets and EU funded programmes to implement digital public services, smart city solutions, and digital inclusion initiatives. Municipalities	Use advocacy, watchdog activities, digital literacy programmes, and public campaigns to influence digital policy. Civil society organisations often fill gaps in digital education

Digital transition and MLG challenges in Poland						
			government): most important funding instrument for the current digital transformation at the national level. Controls funding for broadband, digital public services, cybersecurity infrastructure, and digital skills programmes. National strategies determine incentives for private sector digitalisation and innovation.	Strategies (RIS3) are mandatory for each Voivodeship; many Voivodeships have identified digitalization and AI as regional priorities in their RIS3 plans for 2021–2027	play a key role in local infrastructure planning and permitting.	and cybersecurity awareness. A prominent role for data protection authorities (the UODO - Office for Personal Data Protection); close cooperation with civil society actors.
	Implementation capacity	The EU has a high capacity to monitor compliance, fund digitalisation, and enforce rules. Relies on national and subnational actors for implementation. Uses infringement procedures when implementation is weak.	Implementation capacity is uneven. Fragmentation across ministries and agencies slows digital reforms. Administrative bottlenecks and political interference can	The regions are dependent on EU funds. Regional authorities often lack specialised digital expertise, which leads to uneven implementation across voivodeships.	Often low capacity, especially in smaller municipalities. Digitalisation requires technical expertise and stable funding, both of which vary widely.	Capacity varies. Some NGOs are highly professional (digital rights, cybersecurity), while others are small and local. Civil society can support implementation through training

Digital transition and MLG challenges in Poland						
			delay transposition of EU digital laws. Recent example: Poland has not transposed the NIS2 Directive into national law by the October 2024 deadline		Local administrative overload can slow digital infrastructure deployment. Major cities (Warsaw, Kraków, Wrocław, Poznań) have devoted digital departments for implementation of their smart city strategies.	and awareness campaigns.
	Coordination, participation & inclusion	Coordinates digital policy through directives, regulations, and funding conditionality. Encourages stakeholder participation in consultations. Uses infringement procedures when coordination fails.	Coordination is fragmented across ministries and agencies. Stakeholder inclusion is inconsistent; some sectors (e.g., telecoms) are well organised, while others lack structured dialogue. National-regional coordination is often weak. Since	Regions coordinate EU funds and regional digital strategies. Participate in national digitalisation programmes but have limited influence over national decisions.	Key actors in local participation processes. Must coordinate with telecom operators, regional authorities, and national regulators. In several Polish cities, participatory budgeting is now conducted	Active in digital rights, privacy, and transparency advocacy. Participate in consultations and public debates. Emerging community networks for rural broadband coverage.

Digital transition and MLG challenges in Poland						
			2024: Ministry of Digitalisation as a Coordination Body		digitally, with a significant expansion of e-participation platforms at the local level.	
INFRINGEMENT PROCEDURES AS INDICATORS OF MULTILEVEL GOVERNANCE CHALLENGES		Infringement proceedings against Poland across multiple directives (e.g. eIDAS/eGovernment, NIS2 Directive). Poland has not transposed the NIS2 Directive into national law by the October 2024 deadline. The Commission issues formal notices, reasoned opinions, and where unresolved referrals to the ECJ. Fewer infringement proceedings against Poland in the digital sector than in the climate sector.	National level is the primary target of digital related infringements. Challenges arise from delayed transposition of EU digital laws, insufficient cybersecurity implementation, and regulatory fragmentation. National ministries must respond, adjust laws, and coordinate with the Commission. Poland's general performance in terms of addressing infringement issues has been uneven.	Regions have indirect role. They rarely interact directly with the Commission but must adjust practices when national law changes after infringement cases.	Indirectly affected. Poor local implementation of digital public services, weak cybersecurity, or delays in infrastructure deployment can contribute to national level infringements. Municipalities must adapt procedures when national law is amended in response to EU pressure.	Often initiators of complaints that lead to infringement procedures. NGOs monitor compliance and submit evidence to the Commission. Therefore, civil society acts as a watchdog and catalyst for EU enforcement.



Space for increased public participation and social innovation

Poland's digital transition reflects a hierarchical MLG structure in which EU digital regulation and national ministries dominate agenda-setting, while implementation responsibilities are dispersed across regions and municipalities. Capacity asymmetries, fragmented coordination, and delayed transposition—most notably under NIS2—expose a persistent gap between regulatory ambition and operational readiness at the local level.

Accelerating Poland's digital transition requires improving coordination and administrative capacity rather than creating new structures. Making MLG more effective depends on embedding interoperability, stable long-term planning, and meaningful stakeholder engagement into decision-making so that digital reforms are implemented consistently and shared across institutions.

1) EU level

- Strengthen incentives for early, meaningful participation in digital governance implementation – for example by rewarding transposition models that institutionalise municipal and civil society involvement at pre-consultation stages.
- Use infringement procedures to strengthen inclusive governance: when addressing delays in transposing digital directives, pair enforcement with requirements for transparent consultation, public communication, and stakeholder involvement in implementation.
- Support capacity-building at subnational levels. Provide targeted assistance to regional and municipal administrations.

2) National level

- Create a stable, cross-ministerial digital governance structure: establish a single coordinating body for digital policy with clear authority.

- Improve regulatory predictability: avoid abrupt legal changes that undermine investor confidence in telecoms, data infrastructure, and digital services. Ensure transparent consultation processes.
- Accelerate EU-law transposition with stakeholder involvement: strengthen legal-drafting capacity while involving affected groups such as municipalities, SMEs, and digital-rights NGOs in shaping how EU digital laws are implemented in practice.
- Invest in citizen-centred digital public administration: modernise public services using user-experience research, participatory design, and open feedback loops to ensure accessibility and trust.
- Strengthen national–regional–local coordination. Provide clear guidance and templates for municipalities and regions.

3) Regional level (Voivodeships)

- Integrate digitalisation into regional development strategies. Use regional planning tools to align digital infrastructure, skills programmes, and innovation hubs with national and EU priorities.
- Regions need digital experts to manage EU funds, cybersecurity, and digital public services.
- Coordinate broadband deployment through collaborative platforms: facilitate cooperation between municipalities, telecom operators, and communities to avoid fragmented rollouts and ensure local needs shape infrastructure planning.
- Use EU funds to support social digital innovation: prioritise projects that enhance digital inclusion, community-based innovation, and interoperable public-service platforms rather than isolated technical upgrades.

4) Municipal level

- Professionalise local digital administration. Invest in staff training, shared services, and digital project management.
- Make local digital-infrastructure permitting transparent and participatory: Standardise procedures and communicate them clearly to residents, enabling constructive dialogue around fibre networks, telecom masts, and smart-city systems.
- Promote digital inclusion and local digital services. Develop accessible e-government services and digital literacy programmes to reduce inequalities between municipalities.
- Engage communities early. Use transparent consultations to reduce resistance to digital infrastructure.

5) Community/civil society

- Promote digital literacy and inclusion. NGOs can fill gaps in digital education, especially in smaller municipalities with limited capacity.
- Participate in national and regional consultations. Engage in shaping digital strategies.
- Build coalitions across governance levels. Collaborate with municipalities, regions, and expert organisations to address systemic digital challenges.

6 Concluding remarks

The mapping reveals a set of recurring MLG challenges shared by both the climate and digital transitions. Strategic authority and legal control are largely concentrated at the EU and national levels, while implementation, legitimacy, and conflict management are pushed downward to regions, municipalities, and civil society. This produces persistent mismatches between authority, capacity, and accountability, with coordination often relying on compliance rather than early dialogue, learning, or joint problem-solving, and participation tending to be late or reactive rather than co-creative.

Furthermore, the mapping highlights important country-specific challenges. Finland combines strong administrative capacity with functional centralisation of EU affairs which, however, creates particular vulnerabilities for politically or culturally autonomous regions. Latvia illustrates how political fragmentation, trust deficits, and capacity constraints at the national level translate into delayed transposition and weak subnational integration. Norway's EEA position creates a structurally asymmetric situation in which binding EU obligations apply to Norway without corresponding agenda-setting power, amplifying tensions around sovereignty and local consent. Poland shows how centralised control, sectoral vetoes, and regulatory instability can coexist with high subnational exposure, particularly in coal regions and large municipalities.

Despite these differences, many findings—late involvement of local actors, uneven municipal capacity, limited regional roles, and reliance on compliance-driven coordination—can be generalised across the EU and EEA. They reflect systemic features of EU MLG in policy areas characterised by high complexity, rapid regulatory expansion, and cross-sectoral impacts: conditions that increasingly define both climate and digital transitions across Europe. The main implication is that improving MLG does not require new institutions or additional legislation. Instead, it depends on using existing frameworks differently by embedding coordination, early engagement, co-creation, and social innovation into current instruments. Many governance instruments already exist—consultations, planning requirements, funding conditionalities, advisory bodies, regional and municipal networks—but they are often treated as procedural obligations rather than as spaces for coordination, co-creation, and learning. Shifting from procedural compliance to collaborative governance within these existing structures offers a feasible path toward a more effective and inclusive twin transition.

The DeCrises project will continue to explore MLG challenges in its future deliverables by examining the factors that promote or hinder actor effectiveness at each governance level and across levels, with a particular focus on civil society and community involvement, and on social innovation through in-depth analysis of the four case countries.

7 Acknowledgements

The authors thank Dr Alexandra Korcheva and Beatris Ivanova (Pensoft), Prof Tapio Litmanen, and Reetta Kalliola (University of Jyväskylä), as well as the project partners at IMP-PAN, LUT University, and the Western Norway Research Institute, for their valuable contributions to the preparation of this deliverable.

Some of the authors used AI-based tools to improve the language and clarity of this deliverable. These tools were used solely to improve readability and did not contribute to the analysis, interpretation, or substantive content. All final content remains the responsibility of the authors