

3. IMPLEMENTATION

3.1 Work packages, activities, resources and timing

WORK PACKAGES

Work Package 1

Work Package 4: Climate

Activities

Explain the work carried out for each work package during the reporting period, giving details of the work carried out by each participant involved. Please summarise in a few sentences what was done in the previous period, when applicable.

Explain the reasons for deviations from Annex 1 of the Grant Agreement, the consequences and the proposed corrective actions.

Include explanations for tasks not fully implemented, critical objectives not fully achieved and/or not being on schedule. Explain also the impact on other tasks, on the available resources and the planning. Where necessary, make reference to the deliverables in the report text. In case of major deviations from on the planned budget, please refer to section 4.3.

Focus only on the **main results** as well as important **lessons learned**. The technical details should be provided in the deliverables.

Additionally, for Operating Grants, report under Work Package 1 on changes in your organisation's capacity (if any) to become a more efficient stakeholder in the EU's policy process. Report on the proposed actions and their status to develop the organisation, widen the grassroots or members base, diversify and sustain the organisation's fundraising strategy and the strategy to reduce your dependence on LIFE operating grants.

The activities under the climate topic in 2024 reflected the increasing importance of climate considerations at legislative, litigation and climate assessments' level. Within the subtopic of climate assessments, our work in 2024 aimed to raise the awareness of an effective practical application of the climate assessments of plans, programmes and projects (SEA, EIA) applying up-to-date EU climate policy for climate mainstreaming. With continued research, dissemination of this research and following advocacy we continue to contribute to this problem and apply pressure where it is due to effectively address the climate urgency declared by the European Parliament and considering climatic factors in SEA and EIA to be paramount for reaching the national and EU goals for 2030 and beyond.

Under the climate litigation and advocacy subtopic the activities in 2024 empowered J&E members and the NGOs and citizens supported by them to bring more climate cases to different national fora and/or courts and the European Commission. In 2024, J&E continued to monitor the climate legislation in order to ensure a better implementation of EU climate policies and the EU Climate Law on a national level with new climate laws discussed and the existing ones amended.

T.4.1 Climate assessments: implemented

The planned outputs within this task built upon J&E work in 2023 and earlier included:

- Analytical paper of legal practices in assessment of climatic factors: "Assessing the impact of climatic factors in SEA and EIA" (9 participating member organizations from Austria, Bulgaria, Croatia, Czechia, Estonia, Hungary, Romania, Slovenia and Spain, 24 pages):  
<https://justiceandenvironment.org/wp-content/uploads/2025/03/LEGAL-PRACTICES-IN-ASSESSMENT-OF-CLIMATIC-FACTORS-in-EIA-and-SEA.pdf>

Links in member states to Analytical Paper: !!!

- PIC - Slovenia: <https://pic.si/wp-content/uploads/LEGAL-PRACTICES-IN-ASSESSMENT-OF-CLIMATIC-FACTORS-in-EIA-and-SEA.pdf>
- Higher level national advocacy has been provided related to the assessment of climatic factors in SEA and EIA by J&E member organizations, with special focus on EU parliamentary elections in 2024:

Bulgaria: <https://www.bluelink.net/dokumenti/pravosadie-i-okolna-sreda-i-blulink-prizovaha-za-po-kategorichni-merki-za-klimata-i-prirod> - letter to the party candidates for the EP elections

<https://www.bluelink.net/novini/evropejski-pravni-eksperti-prizovaha-balgarskite-partii-za-po-efektivni-merki-za-klimata-i-pr> - news about the letter to the party candidates for the EP elections

<https://www.bluelink.net/dokumenti/pismo-na-blulink-i-pravosadie-i-okolna-sreda-do-balgarskite-deputati-v-ep.html> Letter to the elected Bulgarian MEPs

<https://www.bluelink.net/novini/evropejski-eksperti-deputatite-v-ep-tryabva-da-rabotyat-za-po-spravedlivi-klimatichni-politik> - news about our letter to the elected Bulgarian MEPs

Slovenia:

Letter to the Slovenian political parties participating in EU elections, regarding climatic factors in SEA legislation and practice and other environmental topics - <https://pic.si/wp-content/uploads/EU-election-letters-Slovenian-political-parties-pre-elections.pdf>

Letter to the newly elected Slovenian MEPs regarding SEA climatic factors in SEA legislation and practice and other environmental topics - <https://pic.si/wp-content/uploads/EU-elections-letter-Slovenian-MEPs-post-elections.pdf>

#### ALL COUNTRIES (can be beyond MEP letters)

- 5 initiated/continued legal procedures (there were 3 planned procedures in the proposal):

J&E member organizations initiated or continued legal or administrative cases on national level relying on climate protection, with these specific cases in 2024:

- EELC continued work in Estonia on and oil shell plant case, which targeted the project and infrastructure, which conflicts with international agreements, namely the Paris Agreement and the Sustainable Development Goals, and with EU law (especially the Green Deal). There was a claim filed in June 2024 by Fridays for Future Estonia with the support of EELC, to stop the operation of the plant, which was granted an integrated permit to the new state-owned Enefit280-2 shale oil plant.
- EMLA in Hungary supported the Great Lakes and Wetlands Association in challenging the integrated EIA and IED permit issued in early May 2024 for a plant in Acs Hungary, which will produce 100,000 tonnes of cathode powder per year. The challenge was based on several arguments, including air, ground and water pollution, but also the total GHG emissions which were not properly assessed within the permit. Because the appeal was dismissed on procedural grounds, and the plaintiff is considering an extraordinary appeal to the Curia for a review of the decision.
- EMLA in Hungary offered legal consultancy in the environmental review procedure for the extension of the environmental permit of a coal-fired power plant.  
<https://www.greenpeace.org/hungary/sajtokozlemeny/11043/a-greenpeace-a-birosagon-semmisitene-meg-a-matrai-eromu-kornyezetvedelmi-engedelyet/>
- BWA continued work in Romania with the Climate Litigation Network. In August 2024 the Network sent an Amicus brief to the Romanian High Court asking to intervene in the case drawing from international precedents in climate litigation. On the 31.10 during the first hearing of the appeal only the CLN amicus brief was discussed and the court asked for clarifications regarding their legal standing. The Court did not decide yet.
- PIC in Slovenia continued to act as a side intervenor in Slovenian SEA for NECP in 2024, where it specifically targeted unsatisfactory assessment of climate and other environmental factors.  
<https://pic.si/wp-content/uploads/Side-intervenors-NECP-Slovenia-comments-on-SEA.pdf> and  
<https://pic.si/wp-content/uploads/Stranski-udelezenci-OP-sprejemljivost-vplivov-26032024.pdf>

J&E members participated in the preparation process of climate relevant strategies:

- PIC participated as side intervenor in SEA procedure for the Slovenian NECP.
- EELC participated in Estonian NECP engagement seminar
- BWR participated in public consultations on NECP update 2024
- BlueLink participated in the public consultations of the NECP update in 2024
- BWR participated in Romania's Energy Strategy 2025 - 2035
- IIDMA participated in Spain's NECP renewal

#### - OTHER MEMBERS?

#### T.4.2 Climate litigation and advocacy: implemented

The planned outputs for the tasks under this subtopic have been built upon the work in 2023 and extended with climate litigation related to spatial planning. As a network of environmental lawyers, we consider climate litigation as a tool in climate protection to legally force the governments or private companies, banks, and funds to act responsibly on climate issues. J&E has been working on climate litigation and advocacy since 2020. In 2024 J&E has continued this work to support and analyse any legal actions and court cases initiated mostly by national level NGOs and the general public.

The planned immediate outputs for 2024 included:

- J&E climate case study collection has been completed with 1-3 new climate cases
- J&E CJEU / ECHR case law collection has been revised and developed
- Options for spatial plan review cases have been explored in at least 3 Member States

As a result of our work all three outputs have been produced. Please, see below the short descriptions.

· The 2024 J&E climate case study collection features climate cases from Austria, Estonia, Czechia and Hungary. It contains updates of 4 cases presented in the 2023 study and 2 new climate cases. The new cases include the 'first Austrian generational lawsuit', of twelve children and adolescents who complained that certain parts of Sec. 3(2) Climate Protection Act would violate their constitutionally guaranteed right to safeguard the best interests of the child and intergenerational justice, and the legal challenge of the integrated EIA and IED permit of a Chinese-owned company for the construction of a plant in Ács, Hungary, which will produce 100,000 tonnes of cathode powder per year initiated by a national environmental NGO, the Great Lakes and Wetlands Association, represented by J&E Hungary. See below the link:

<https://justiceandenvironment.org/wp-content/uploads/2025/03/Climate-Litigation-Case-Study-Collection-2024.pdf>

· The 2024 J&E CJEU/ECHR case law collection has been revised and updated with new case law. In particular, we included three landmark climate litigation cases of the Grand Chamber of the European Court of Human Rights (ECtHR).

**Verein KlimaSeniorinnen Schweiz and Others v. Switzerland** concerned a complaint by four women and a Swiss association, Verein KlimaSeniorinnen Schweiz, whose members are concerned about the consequences of global warming on their living conditions and health and the ECtHR found that the Swiss Confederation had failed to comply with its duties ("positive obligations") under the Convention concerning climate change.

**The case Carême v. France** concerned a complaint by a former inhabitant and mayor of the municipality of Grande-Synthe, who submits that France has taken insufficient steps to prevent global warming and that this failure entails a violation of the right to life and the right to respect for private and family life. The Court declared the application inadmissible.

The case **Duarte Agostinho and Others v. Portugal and 32 Others** concerned the current and future severe effects of climate change, which the applicants attribute to the respondent States, and which they claim impact their lives, well-being, mental health and the peaceful enjoyment of their homes. The ECtHR declared inadmissible the applications lodged against Portugal and the other States on the issue of climate change.

See below the link:

<https://justiceandenvironment.org/wp-content/uploads/2025/03/Case-study-collection-2024-CJEU-ECtHR.pdf>

· In the 2024 study on legislation and litigation for the integration of climate aspects in spatial planning we have explored the existing legislation and litigation relevant to bringing forward climate arguments in spatial planning in five EU countries: Austria, Bulgaria, Estonia, Hungary and Slovenia. Its findings will provide basis for further exploration of the options to improve the legislation, administrative practice and litigation in EU Member States based on climate-relevant argumentation with a focus on challenging spatial planning decisions. See the link:

<https://justiceandenvironment.org/wp-content/uploads/2025/03/Climate-in-spatial-planning-study-2024.pdf>

[Links to national websites](#) with examples of advocacy actions

#### T.4.3 Monitoring climate legislation: implemented

The work in 2024 under this subtopic consisted of advocacy for increased transparency and public participation in legislative and climate policy processes (e.g. of the NECP revision phase), and monitoring the amendments of existing climate acts, drafting of new climate acts and other strategic documents. The capacity building and awareness raising of CSOs regarding climate regulations and policies has been also part of our work.

The planned immediate outputs for 2024 included:

- Analytical paper on the state-of-play regarding the National Climate Laws [https://justiceandenvironment.org/wp-content/uploads/2025/03/JE\\_Monitoring-report\\_Climate-Framework-Laws\\_final.pdf](https://justiceandenvironment.org/wp-content/uploads/2025/03/JE_Monitoring-report_Climate-Framework-Laws_final.pdf)
- Position paper on the operation of the EU Governance Regulation, especially transparency and public participation in the NECP revision phase <https://justiceandenvironment.org/wp-content/uploads/2024/06/JE-NECP-position-paper.pdf>
- Advocacy action by J&E experts in 10 different Member States regarding the implementation of EU climate legislation and policies

[1] megjegyzést írt: To ask the members.  
@petek.aljosa@gmail.com  
\_Assigned to petek.aljosa@gmail.com\_

[2R1] megjegyzést írt: focus on advocacy

[3R1] megjegyzést írt: Yes.

<https://docs.google.com/document/d/16rXmcMc-nYJ28B5EczoEW1dyuEHikOJqUCO5-tYiBA/edit?usp=sharing>

- At least one 1 input material regarding climate acts and policies on national level

As a result of our work all four outputs have been produced. Please, see below the short descriptions.

- Analytical paper on the state-of-play regarding the National Climate Laws

The paper continued our research of the state of climate legislation in the EU and its Member States. In 2024 we monitored the adoption of new and/or amendments of existing National Climate Acts in J&E countries. This collection provides an update on national climate framework acts in Austria, Bulgaria, Czechia, Estonia, Hungary and Slovenia as part of the global trend of adopting climate change framework laws.

[https://justiceandenvironment.org/wp-content/uploads/2025/03/JE\\_Monitoring-report\\_Climate-Framework-Laws\\_final.pdf](https://justiceandenvironment.org/wp-content/uploads/2025/03/JE_Monitoring-report_Climate-Framework-Laws_final.pdf)

- Position paper on the operation of the EU Governance Regulation, especially transparency and public participation in the NECP revision phase

The paper provides recommendations for improvements for Member States for transparency and public participation in the NECP revision phase, e.g. the need to carry out Strategic Environmental Assessment in the NECP revision process.

[/https://justiceandenvironment.org/wp-content/uploads/2024/06/JE-NECP-position-paper.pdf](https://justiceandenvironment.org/wp-content/uploads/2024/06/JE-NECP-position-paper.pdf)

- Advocacy action by J&E experts in 10 different Member States regarding the implementation of EU climate legislation and policies

J&E member organizations in 10 countries performed 20 advocacy actions regarding the implementation of EU climate legislation and policies in various fields, from NECP renewal processes, to RED III and other renewables legislation, national climate acts transposing various EU acts etc.. Short descriptions of advocacy actions are gathered here:

<https://docs.google.com/document/d/16rXmcMc-nYJ28B5EczoEW1dyuEHikOJqUCO5-tYiBA/edit?usp=sharing>

- At least one 1 input material regarding climate acts and policies on national level
  - PIC Climate law letter to the European Commission regarding national Climate law draft: <https://pic.si/wp-content/uploads/EC-letter-on-fossil-subsidies.pdf>
  - EELC Estonian feedback on Climate Act draft: [https://media.voog.com/0000/0042/0647/files/EKO%20seisukoht%20kliimaseaduse%20v%C3%A4ljalat%C3%B6%C3%B6tamiskavatsuse%20kohta\\_25.10.2023.pdf](https://media.voog.com/0000/0042/0647/files/EKO%20seisukoht%20kliimaseaduse%20v%C3%A4ljalat%C3%B6%C3%B6tamiskavatsuse%20kohta_25.10.2023.pdf) and [https://media.voog.com/0000/0042/0647/files/5921%20EKO%20ettepanekud%20riigieelarve%20tulude%20suurendamiseks%20\\_keskkonnataja%20maksab\\_%20p%C3%B5him%C3%B5tte%20%C3%A4biva%20rakendamise%20abil.pdf](https://media.voog.com/0000/0042/0647/files/5921%20EKO%20ettepanekud%20riigieelarve%20tulude%20suurendamiseks%20_keskkonnataja%20maksab_%20p%C3%B5him%C3%B5tte%20%C3%A4biva%20rakendamise%20abil.pdf)
  - OKOBURO Austrian statement on Climate Act draft: [https://www.oekobuero.at/files/1219/ob\\_stn\\_wr\\_kg.pdf](https://www.oekobuero.at/files/1219/ob_stn_wr_kg.pdf)  
ANYONE ELSE?

Other issues

*Mention and explain unexpected events and adjustments that had to be made. Explain impact on other tasks, available resources and planning/timing. In case of major deviations from the planned budget, please refer to section 4.3.*

Insert text

Milestones and deliverables (outputs/outcomes)

See Technical Report (Part A).