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Participative environmental policy integration in the Irish energy sector

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ABSTRACT

This article explores the implications of participation for Environmental Policy Integration (EPI), through the window of Irish energy policy, employing concepts of ‘energy democracy’ and ‘energy citizenship’. Our analysis of a consultation process on energy policy identifies distinctive narratives, with different idealisations of energy citizens. We distil the implications of consequent, emergent institutional innovations examining imagined citizens, communication, participation and decision-making linked to policy. We adapt and operationalise the analytical framework of discursive institutionalism (Schmidt, 2008), using explanatory factors for EPI (Runhaar et al., 2017). Relocating the specific consultation in the wider process preceding and following its outcomes we examine the degree, and conditions under which participation advances EPI in the sector. We suggest that energy citizenship constructs and processes of energy democratisation remain highly contingent on context. Nevertheless, ‘principled priority’ (Lafferty and Hovden, 2003) though often involving trade-offs in practice, ought not be decoupled from processes of democratisation that may underpin its sustainability.

1. Introduction

Governments increasingly stress the importance of participation in energy policy as part of a transition to a low-carbon society (EC, 2011; European Parliament, 2016). While the extent to which society should be included in forming energy policy and its implementation, is highly contested, there is broad agreement that energy policy can no longer be the exclusive concern of public institutions and utilities. This has provided the stimulus for an emergent discourse around the relationship between citizens and the energy system, centred on the concept of ‘energy democracy’ (Burke and Stephens, 2018).

Energy democracy emerges due to increased urgency regarding climate change and growing societal demand for accountability and democratization in the energy sector, previously regarded as not requiring public involvement (Szulecki, 2018). In the transition debate, there are two competing narratives. The first, labelled techno-economic, denotes an economic perspective that sees society as a source of consumer demand. The second, labelled energy democracy, challenges the techno-economic narrative, emphasizing inclusion of the public as stakeholders. The activist interpretation of energy democracy is often opposed to the liberal, constitutionalist and representative practices of democratic polities favouring ‘the active processual involvement and engagement of citizens in deliberation as subjects and political agents’

(Szulecki, 2018, p.28). As such, individuals have a crucial role to play, not just as consumers but also as citizens indirectly by accepting, supporting or resisting changes and thus influencing other policy actors or directly by consenting or refusing policy options in democratic decision-making processes (Defila et al., 2017). There is also a tension between individualist and communitarian versions of energy democracy, the liberal prosumer (producer-consumer) vs. collective forms of production and participatory governance. Energy democracy has several relevant characteristics:

- 1 it can be normative (the goal of decarbonisation and energy transformation), or descriptive (with respect to examples of decentralized, civil society initiatives) (Szulecki, 2018);
- 2 it can be multi-scale connecting the individual citizen with the national polity at all levels of governance (*ibid.*);
- 3 energy democracy is a form of sociotechnical governance and a political claim informing its constituting element of energy citizenship (Burke and Stephens, 2018).

Energy citizenship conjoins rights and responsibilities, underpinned by sustainability principles of participation, local action, equity, justice and the remediation of poverty facilitated by procedural mechanisms supporting the co-production of responses to contemporary challenges

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(Devine-Wright 2007). Energy citizens are ‘products of a scholarly symbolic fabrication of new collectives’ and the ‘public perception of these phenomena is still being formed’ (Vihalemm and Keller, 2016). A key question then is ‘what kind citizen are (energy) citizens invited to be?’ (Escobar, 2017). Is it citizens as occasional voters and/or members of interest groups and decision-making is confined to politicians and experts through ‘representative democracy’ (p.440)? Is it ‘collective association, collaboration, struggle and civic education’ where citizens participate in ‘planning, coordinating and enacting collective futures’ (pp.418–423) through civic and official processes? Alternatively, is the emphasis on ‘discursive participation’ (pp.424–8) where deliberative citizens represent diversity, rather than a specific social group? We suggest that energy citizenship is best approached as a discursive field that actors are attempting to shape in accordance with their interests.

Although governments have the final responsibility to make policy decisions, participatory democracy may contribute to better informed, more acceptable outcomes (Knudsen and Lafferty, 2016, p. 361). The new emphasis on public participation in the energy policy process has important implications for Environmental Policy Integration (EPI), or the incorporation of environmental concerns into sectoral policies outside the traditional environmental policy domain (Runhaar et al., 2014). EPI is normally conceived in state-centric terms but little attention has been given to exogenous participation in policy-making (Chaney, 2016).

Processes of policy formation and implementation are rarely achieved through consensual means and change is more often as a result of dynamic contradictions, competing ideologies and active agents (Warren et al., 2016). While energy democratization might well provide opportunities to advance EPI, it may also pose challenges where democracy and sustainability collide (Lafferty and Hovden, 2003). Despite the urgency surrounding the necessity for an energy transition, elements such as renewables deployment may be frustrated, delayed or prevented through existing democratic procedures (Burke and Stephens, 2018).

We explore what participation means for EPI, and how EPI may be enabled or transformed. We filter this through an example of public participation in policy formation, the consultation process on the *Green Paper on Energy Policy in Ireland* (DCENR, 2014).¹ This offers an opportunity to study how energy policies are shaped by multiple actors as the arena expands beyond the limits of public institutions, and understand the implications of this process for EPI. While the consultation on the Green Paper centred on outputs, the impact of enhanced participation on EPI extends through all stages of the policy cycle and alters the conditions in which it unfolds.

2. Theoretical framework

Two broad approaches have been adopted to EPI, characterised respectively as ‘principled priority’ and ‘positive approaches’ (Persson, 2007). The first provides a *normative* orientation to the process of policy-making for sustainable development, giving EPI priority over other objectives (Lafferty and Hovden, 2003). The second focuses on the *positive* question of how EPI is conceptualised and implemented in everyday political and policy settings (Persson, 2007).

The original formulation of ‘principled priority’ stresses that ‘the ultimate trade off attaching to EPI is that between existing democratic norms and procedures on the one hand, and the goals and the operational necessities of sustainable development’ (Lafferty and Hovden, 2003). Nevertheless, principled priority will have to be determined through ‘the appropriate decision-making procedures in order to establish legitimacy’ (Oberthür, 2009) and differs depending on domain e.g., climate change and biodiversity might create critical environmental parameters for renewable energy policy (Knudsen, 2009). The

only requirement of EPI as ‘first principle’ is to guarantee that ‘every effort is made to assess the impacts of policies’ and to limit or qualify those impacts that represent unacceptable risks (Knudsen and Lafferty, 2016, p.355).

Alternatively, EPI is rooted in notions of a rational process dissolving contradictions, reducing redundancies and exploiting synergies between policies (Persson, 2007). We have been tasked with addressing three degrees of policy integration viz., coordination (i.e., avoidance of contradictions), harmonisation (i.e., environmental and sectorial objectives accorded equal value), prioritisation (i.e., environmental objectives seen as a guiding principle) (Persson et al. 2018, this issue, p.3). EPI is about much more than rational decision-making, consisting of context specific interpretations involving a large number of actors continually reframing problem definitions and understanding (Hogl and Nordbeck et al., 2012). EPI involves ‘an internal process of establishing and enacting specific activities’ and an ‘external framing process of communicating those efforts to a public or constituent groups’ (Haywood et al., 2014).

2.1. EPI and participation

Recognising that EPI is inescapably political opens up potential for a constitutive, constructive and proactive role for citizens advancing an integrated approach to sustainability. Although some have challenged the idea that EPI requires strong participation (Humphreys, 2016), there has been little attention to ‘the constitutive nature of public participation exercises and how discursive structures and practices construct both social issues and social subjects’ (Carvalho et al., 2016). Energy transitions are strongly influenced by the interplay of interests, institutions and ideas (Warren et al., 2016), where: interests are a proxy for an actor oriented approach; institutions are the arrangements that govern and shape the policy process; and, ideas refer to the shared concepts and categories through which meaning is given, rather than shared interests or goals (Hajer, 1993). The importance of context is highlighted by participative EPI where the inclusion of citizens can also contribute to the framing and structuring new institutional arrangements (Chaney, 2016).

2.2. Discursive institutionalism and the factors influencing EPI

Discursive institutionalism transcends, but includes, institutionalist, political and social learning perspectives, characterised as a triad between ‘coordinative discourse’, ‘communicative discourse’ and formal institutional context (Schmidt, 2008). The institutional context equates to the institutional contours of the polity; coordinative discourse is located in the ‘policy sphere’ where policy actors attempt to stabilise a mainstream policy narrative; and communicative discourse occurs in the political sphere consisting of the presentation, deliberation and legitimisation of political ideas to the public. Energy citizenship is thus an incipient coordinative discourse, through which a variety of actors attempt to stabilise a mainstream narrative of an energy transition, and the centre of a discursive opportunity creating possibilities for participation, as diverse actors attempt to communicate their preferred meanings. This suggests that, [1] varieties of participation are not solely conceptual, but also contextually orchestrated constructions amenable to re-construction; [2] these constructions are productive, regarding models of participation or imagined energy citizens; and [3] these are not merely discursive spaces, but materially consequential interventions with respect to continuity and change (Chilvers and Longhurst, 2016). Discursive institutionalism provides an effective way of situating the evolving institutional context of energy citizenship, its meaning, role and relationship to the factors influencing EPI in the energy sector (Runhaar et al., 2017).

Derived from the drivers and barriers identified by Runhaar et al, we can discern a set of factors, internal and external to the policy process shaping EPI in Irish energy policy. Internal factors refer to the

¹ Henceforth, ‘Green Paper’

normative commitments, procedural tools, organisational structures, provisions for de-/centralised decision-making, and the problem/policy-framing underpinning EPI. External factors include: institutional capacity; political conditions; timing; and, problem characteristics (e.g., conflict potential, spatial and temporal fit between the problem and the institution pursuing EPI) (Runhaar et al., 2017). Some factors are pre-existing (inputs to consultation processes), whereas others represent outcomes, shaping subsequent iterations of policy narratives relevant to EPI.

2.3. Placing the factors for EPI in context

Irish climate law has evolved over the same timeframe as Irish energy policy (i.e., 2007–2015) (Torney, 2017). The Climate Action and Low Carbon Development Act (2015)² enshrines the national transition objective: ‘to transition to a low-carbon, climate resilient and environmentally sustainable Ireland’ and contains many of the provisions conducive to EPI within and across sectors (Runhaar et al., 2017). It lays the foundation for the National Mitigation Plan (NMP), the National Adaptation Framework (NAF) and the formation of a Climate Change Advisory Council. The Act focuses on mitigation and adaptation, but also biodiversity (conservation of natural habitats for wild fauna and flora) and procedural mechanisms for evaluating trade-offs, while recognising the need to take advantage of environmentally sustainable economic opportunities.³

Beyond the policy process, factors like: institutional capacity, political conditions, timing and problem characteristics help to contextualise the factors influencing EPI.

Institutional capacity: Fiscal retrenchment driven by the global economic crises post-2007, saw the dissolution or re-alignment of many existing mechanisms for participation in relation to sustainability. For example, the National Economic and Social Council (NESC), a deliberative body which advises the Prime Minister on strategic policy issues subsumed the functions of the Sustainable Development Council (SDC) in 2012.

Political conditions: Earlier attempts to reframe energy policy in climate change legislation failed with collapse of the centre-right/green government (Fianna Fáil–Greens–Progressive Democrats) in 2011 (Torney, 2017). The 2011 election returned a government comprised of the centre-right Fine Gael, centre-left Labour and a combination of independent members of parliament governing from 2011 to 2016. The subsequent election returned a minority government comprising Fine Gael and independents with a “confidence and supply” arrangement with the main opposition, resulting in a weak government.

Timing: The consultative process described here takes place against the backdrop of international developments such as COP 21, SDG’s and the contestation of national energy policy within society.

Problem Characteristics: Energy citizenship appears in the Green paper (DCENR, 2014) and is subsequently identified as a (NESC, 2014) challenge for policy ‘to design a framework to balance procedural and distributive justice nationally while allowing a degree of flexibility at local level’. Consultation leading to the 2007 White Paper received 100 submissions, whereas the 2014 Green Paper attracted 1251 submissions. This change emerges against unprecedented opposition to large-scale wind-farms and the upgrading of energy infrastructure in 2013–2014. This also extended to social innovations claiming a new role in energy policy e.g., the People’s Energy Charter demanding ‘the right to comprehensively participate in our national energy future so that it is not left wide open to developers to capitalise on it’,⁴ and the Community Energy Proclamation embracing, but reframing energy

citizenship as ‘a transition to a clean, secure energy future for our citizens in an Ireland where communities -whether organised as co-operatives, voluntary associations or individual citizens – are active participants in energy planning, conservation, energy generation and energy distribution or “community energy”’.⁵

3. Methods

Irish energy policy has followed a similar trajectory to elsewhere in being framed, first within the narrative of a sustainable energy future (DCMNR, 2007) and subsequently within the narrative of low carbon energy (DCENR, 2015a). Although the objectives of Irish energy policy – competitiveness, security of supply and sustainability – remained intact, the documents construct different types of citizen participation. The framing of the citizen addressed in 2007 (DCMNR, 2007) invoked a social contract between a passive citizen and the state, whereas in 2015 (DCENR, 2015a) the active, energy citizen is prioritised.

The ways in which institutions engage their publics as ‘consumers, clients or citizens depends partly on the context and the problem in question’ (Fung, 2006). Varieties of participation range from information provision, communicative influence, consultation and advice, co-governance and direct authority (Fung, 2006). Despite the growing popularity of deliberative fora most participation continues to be through self-selected written submissions in consultation processes (Carvalho et al., 2016). While the developments adumbrated here involve mandatory consultation we focus on the *Green Paper* (DCENR, 2014), because it provides a window on how a framework to guide Irish energy policy was constructed placing the citizen at the centre of the energy transition (DCENR, 2015a).

The 2014 Green Paper sets out a number of priorities, on which the views of interested parties were solicited. Priority One: ‘Empowering Energy Citizens’ states that, ‘the involvement of Irish citizens in choosing the appropriate pathway for energy policy is essential in enabling Ireland to realise its potential to be a low-carbon, inclusive, competitive and secure energy society’ (DCENR, 2014). This is one moment, in the constitution, consultation, contestation and construction of EPI in energy policy. The process included an invitation for written submissions and the staging of a number of regional and thematic information seminars.⁶ All of the submissions are publicly available in original form,⁷ and therefore amenable to analysis. Our focus is on the framing of the energy citizen in terms of the orientation (knowledge, meaning and expected roles) of different collective actors with regards to participation (Goulden et al., 2014). The consultation provides an opportunity to reconstruct the normative and sociological energy citizen, but also the constitutive institutional conditions and practices constructed in the process.

There were 1241 submissions in total comprising 821 duplicates, with 19 variants and 420 unique submissions (DCENR, 2015b). Of the unique submissions, 212 related specifically to ‘Empowering Energy Citizens’. We interpreted duplicate submissions as evidence of orchestration to prioritise specific narratives. The submissions were thematically analysed, with the material coded using the ‘template method’ (Walker et al., 2014). This involves an initial template consisting of a list of themes identified in the textual data. The initial list identified a range of perspectives on energy citizenship from a first reading of the submissions, supplemented by the summary of the seminars. The template was subsequently refined and developed during coding.

This review suggested a number of distinctive narratives on energy citizenship, and groupings supporting these narratives. We treat these as discourse coalitions, ‘the ensemble of a set of story lines, the actors

² The 2015 Act

³ Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), and Appropriate Assessment (AA) Natura Impact Statements are all referenced in the Act.

⁴ <https://energycharter.wordpress.com/2014/03/11/call-for-comprehensive-public-participation-in-national-energy-plans-press-release-march-11-2014/>

⁵ http://www.foe.ie/documents/community_energy_proclamation/

⁶ https://www.dcae.gov.ie/documents/Green%20Paper%20consultation%20process_summary%20of%20responses.pdf

⁷ <https://www.dcae.gov.ie/en-ie/energy/consultations/Pages/Green-Paper-on-Energy-Policy-in-Ireland.aspx>

Table 1
Discourse coalitions evident within the consultation process.

Discourse Coalitions	Actor Constellation	Narrative	Energy Citizenship Framing	Institutional Implications for EPI
Paternalist	Energy firms Govt. departments Public agencies Business Trades union Academia Energy firms	Persuasion on the 'correct' course of action determined by elites.	Citizens as ill-informed public requiring education, information & persuasion. Responsibility to be 'good' citizens.	Elite, centralised, top-down communication and decision. No participation beyond legally mandated process. Implementation through information and education.
Majoritarian	Public agencies Consultants Energy firms	'Correct' course of action, determined by elites legitimated by national public opinion polls over project-specific opposition.	Elite participation supported by majority public opinion Right of "silent majority" to be heard. Responsibility of 'minority' to be compliant citizens.	Elite, centralised, top-down communication and decision. No participation beyond legally mandated process. Implementation: compliance with majority will. De-centralised communication via market mechanisms and consumer choice. Support for consumer panels. Implementation: devolved to consumers.
Consumerist	Govt. departments Public agencies Business Academia Individuals	Consumption & purchasing power of citizen-consumers.	Citizens as consumers Transactional consumer rights & responsibilities.	De-centralised, bottom-up communication through legal provision. Lacks participative vision earlier in policy cycle. Formal public participation through enactment & enhancement of existing regulatory mechanisms.
Constitutionalist	Communities Protest groups	Legal right to input on energy project initiation.	Citizens with legally mandated rights Right of community consent/ dissent.	Decentralised, bottom-up communication
Communitarian	Political parties Individuals Communities Environmental NGOs	Citizenship anchored in community membership.	Citizens as communities Citizens/ communities entitled to involvement in, & benefit from, energy projects. Citizens / communities as prosumers.	<i>De-facto/ aspirational de-jure</i> , local veto on national policy. Locally beneficial participation (<i>incl.</i> , ownership) in energy projects. Implementation: partially devolved to communities.
Deliberative	Co-operatives, <i>incl.</i> energy co-operatives Individuals Communities Environmental NGOs Political parties	Citizens must participate in national energy policy formation & implementation	Engaged citizens capable of problem-identification and problem-solving through deliberation. Rights & responsibilities of citizens / communities to participate throughout the energy policy process <i>incl.</i> implementation at all levels of governance and practice.	Decentralised, bottom-up communication. Involvement in all stages of policy cycle. Inclusive bottom-up approach requiring mechanisms for communication & co-ordination with national level.

that utter these story lines and the practices that conform to these story lines, all organised around a discourse' (Hajer 1993, p. 47). As coding advanced, relationships and hierarchies emerged, crystallising in six distinctive coalitions. Our categorization proceeds through an inductive-deductive loop i.e., empirically derived classifications have been cross-referenced with the theoretical concepts to sharpen their contours. In particular, we adapt a framework for understanding the institutional possibilities for participation (Fung, 2006), shaped by the questions: Who participates? How do participants communicate and make decisions together? How are discussions linked with public policy and action?

4. Results

We identified six discourse coalitions, which we labelled as: paternalist; majoritarian; consumerist; constitutionalist; communitarian; and deliberative are presented in Table 1. The first three columns correspond to discourse coalitions, actor constellations and narratives (Hajer, 1993), column four focuses on how coalitions frame energy citizenship based on: who participates (Fung, 2006) and what kind of citizens participants are invited to be (Escobar, 2017; Fung, 2006). The last column considers; how and where participants communicate and make decisions and how this is linked with public policy and action (Escobar, 2017; Fung, 2006).

4.1. Discourse coalitions

Paternalists hold that people are ill-informed but that given sufficient information and education they will become “good” energy citizens. One hydrogen company suggested that “average citizens require clear, concise and centralised information presented in a media-friendly way” while another firm argued for a position ‘where the State is deciding and the citizen needs to be informed and persuaded’. Energy citizenship is equated with activating contributions to an energy transition in a manner determined by a restrictive policy community consisting of business, policy and scientific elites. Effectively this means no change to the institutional status quo and, by corollary, no role for citizens beyond acquiescence and behaviour change to align with government policy.

Majoritarians invoke perceived popular support for renewable energy at national level to overrule the local concerns at project implementation stage. In one example of a coordinated response twelve representatives of wind power interests quoted an opinion poll saying “... 80% of the Irish public are in favour of wind power” and the “... Green Paper represents a call to action for this majority of Irish citizens”. Energy citizenship is limited here to participation through existing channels and democratic will is reflected through polling rather than inclusive processes. Here, EPI requires education and persuasion so that citizens are supportive of the environmental objectives of particular sectoral interests.

Consumerists frame energy citizenship in terms of peoples’ role as consumers. This is reflected by Royal Institute of the Architects of Ireland which supported empowering citizens, but in a very particular formulation wherein: “consumers must be informed. The primary mechanism is smart meters ... with real time information available to the consumer”. Where consumerists indicated a preferred institutional interface between policy and energy citizenship it was confined to participation in consumer panels. While the agenda-setting and policy process remain centralised, outcomes and implementation are dependent on the de-centralised, often domestic choices of individuals. Rights are primarily statutory consumer rights, whereas responsibilities are enlarged to include active consumerism.

Constitutionalists argue for a legalistic approach, e.g., the appeal to the Aarhus Convention⁸ by the Royal Town Planning Institute -

Ireland that “any changes to the development management process for energy-related projects must allow adequate time for meaningful consultation and engagement between the applicant and the public”. This overlaps with the paternalist and majoritarian narratives, characterising energy citizenship in terms of the *status quo* (or minor adjustments thereof) through the enhancement of existing, though frequently re-active formal, legal, consultative, channels, rather than a more pro-active role for citizens in a future energy system.

Communitarians see spilt incentives as a barrier to renewable energy e.g., those paying in terms of impact rarely benefit from projects. The Irish Bioenergy Association, for example, suggests that “nothing empowers citizens more than being part owner of energy supply and delivery”. Interestingly, the prosumer is characterised as a collective, rather than an individual construct, e.g., 570 submissions claiming that “all the people of Ireland should be enabled to become active ‘energy citizens’ – to generate energy locally, to save energy collectively and to save money on energy bills”. This is in fact part of an orchestrated campaign by the Environmental Pillar⁹ and Friends of the Earth Ireland, which also structured the deliberative narrative. The Environmental Pillar argue that “to ensure meaningful public participation, individuals and organisations must be given [...] a platform to engage with decision makers in addition to the written response e.g. workshops, debates, online surveys education and awareness events and media coverage across all counties of Ireland”.

Deliberative discourses emphasise a constructive role for energy citizens actively shaping the energy system, beyond information-sharing or simply supplying consent. Transitions Ireland and Northern Ireland argue that the future: “must originate at community scale, feeding into local authority, regional and national plans” including “facilitated conversations in every town so that all considerations for national energy policy can be explored”. Good Energies Alliance Ireland¹⁰ accentuate this position, suggesting “a national conversation needs to take place on Ireland’s ambition for deep decarbonisation”. The Green Party, although just another interest group in this process, were influential in their suggestion that “we should learn lessons from the recent Constitutional Convention ... and other democratic reform groups”.

4.2. Outcomes from the consultation process

Paternalist, majoritarian and consumerist constructions of energy citizens have sought to activate citizens through learning, behaviour change and active consumption in pursuit of objectives set by policy-makers and industry stakeholders’. They favour a centralised top-down model, with information, education and market-based instruments as the preferred tools for ensuring public compliance with policy objectives entailing minimal organisational change.

Constitutionalists, communitarians and deliberative democrats construct energy citizenship, with varying degrees of continuity and change, in different modes of participation e.g., constitutionalist enhancements of statutory and formal inclusion processes; communitarian emphases on participation in local projects, planning and procedures; and the appeal to deliberative innovation at multiple levels of governance. Communitarian and deliberative narratives emphasise institutional innovations that allow for horizontal and diagonal (cross-scale, horizontal) coordination of EPI (Mullally and Dunphy, 2015). Rather than representing an incidental output of a consultative process, the recognition of communities as collective energy citizens and the creation of a deliberative forum, was the substantive outcome of a strategic campaign from below.¹¹

Far from settling on a common framing of energy citizenship, the

⁹ <https://environmentalpillar.ie/who-we-are/>

¹⁰ <https://goodenergiesalliance.com/about-us-2/>

¹¹ <https://www.foe.ie/news/2014/07/22/your-chance-to-input-to-the-governments-consultation-on-the-green-paper-on-energy-thanks-to-the-environmental-pillar/>

⁸ <http://ec.europa.eu/environment/aarhus/>

Table 2
Making the policy process conducive to EPI.

Internal factors	Form of Participation	Degree of integration			Examples
		C	H	P	
Normative commitments	Representative			☑	(a) National Transition Objective
Procedural tools	Representative, Expert & Consultative		☑	☑	(a) NMP annual statement and 5 year revisions
	Representative, Expert & Consultative		☑	☑	(a) SEA and AA
Organisational structure and incentives	Representative			☑	(a) Creation of DCCAE
	Expert	☑	☑	☑	(a) Establishment of Climate Change Advisory Council
De-/centralized decision-making	Representative	☑	☑	☑	(a) National Mitigation Plan High-Level Steering Group
	Representative & Expert	☑		☑	(a) Role for Local Government
Problem and Policy Framing	Representative & Expert	☑	☑		(a) National Planning Framework
	Representative			☑	Problem Framing (a) From sustainable energy to transition to a low-carbon, climate resilient and environmentally sustainable Ireland
	Representative, Consultative & Participative	☑			Policy Framing (a) Prioritization of Energy Citizens
	Representative, Consultative & Participative	☑			(a) Energy citizens as individual and collective
	Deliberative	☑		☑	(a) NEF → National Dialogue for Climate Change.

Legend: C: Coordination; H: Harmonisation; P: Prioritisation.

consultation process has extended its scope of inclusion while foregrounding collective action. While our analysis provides valuable insights into the relationship between coordinative discourse and the formal institutional contours of the polity, it doesn't adequately account for is political communication, completing the triad of discursive institutionalism (Schmidt, 2008).

5. Discussion

To appreciate the broader significance of our analysis we have operationalised discursive institutionalism sharpened by the explanatory factors for EPI. We relocate the specific consultation in the context of the policy process that preceded, and followed, its outcomes. We begin with *internal* factors that help to reframe EPI and the institutional conditions for its realisation including: the form of participation and degree of integration with specific examples (Table 2). We then extend our analysis to *external* factors that exert an influence on the framing of specific institutional innovations. Many of the factors external to the policy process correlate with the internal factors, but are outcomes of political negotiation, rather than policy outputs *per se*.

5.1. Internal factors

The normative orientation and legislative provisions for EPI were established by the 2015 Act (a)¹². Although primarily shaped through a representative process, citizens exerted communicative influence on the framing and scope of inclusion of participants in the Climate Change Advisory Council (Torney, 2017). While the Act failed to recognise the potential contribution of bottom-up governance (Fox and Rau, 2017), the consultation substantially expanded the framing of, and institutional provisions for, energy citizenship (DCENR, 2015a).

Building on the Act, the subsequent policy framework clarifies the tools for EPI including annual statements and 5-year reviews of the NMP (b), as well as Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) (c) via the Natura Impact Statement with built-in provision for public consultation.

In terms of EPI, a shift is required from a sectoral emphasis to where horizontal policy coordination compliments vertical policy coherence supported by effective institutional structures e.g., when energy is located in a powerful ministry with established horizontal connections

rather than an environmental department (Pardoe et al., 2017). From an organisational perspective, the Department of Communications, Energy and Natural Resources (DCNER) was reconfigured as the Department of Communications, Climate Action and Environment (DCCAE)(d) in 2016. In 2016, the Climate Change Advisory Council (CCAC) (e) was established to advise the government, the Minister for Communications, Climate Action and Environment and relevant sectoral Ministers in relation to the development of national mitigation plans and adaptation frameworks. The National Mitigation Plan provided for the creation of a high-level steering group (f) to drive its implementation (DCCAE, 2017).

In terms of de/centralised decision making, Local Authorities (g) are 'well placed to assess, exploit and support opportunities within their administrative areas, in cooperation with each other and with national bodies, and through the involvement and support of local communities' (DCCAE, 2017, p.29). This, however, is placed within the larger context of the development of a new National Planning Framework (h) to coordinate key areas such as housing, jobs, health, transport, environment, energy and communications into an overall coherent strategy.

The National Transition Objective reframes the *problem* of sustainable energy as the challenge of transitioning to a low-carbon, climate resilient, environmentally sustainable Ireland (i). We also discern a related shift in policy framing. The Green Paper identifies empowering energy citizens as "Priority One" (j), the consequent White Paper, recognises that 'the transition will see the energy system change from one that is almost exclusively Government and utility led, to one where citizens and communities will increasingly be participants in renewable energy generation, distribution and energy efficiency' (DCENR, 2015a, p.41). This is a significant extension of the individualised citizen-consumer framing of energy citizenship to recognise collective action rooted in community (k). It formally acknowledges 'citizen and community desire to be consulted on, and participate in, Ireland's energy transition' signalling 'the need to develop mechanisms and instruments to make this happen' (p.45), including the National Energy Forum (NEF) (l).

5.2. External factors

Institutional capacity is enhanced through organisational realignment after the general election in 2016 e.g., DCCAE (Government of Ireland, 2016). The NEF was also subsequently reframed as the National Dialogue on Climate Action to create *inter-alia*: awareness, engagement

¹² Labels (a) to (l) in the text cross reference to entries in Table 2

and motivation to act in relation to the challenges presented by climate change; structures and information flows to discuss, deliberate and maximise consensus to enable and empower appropriate action; appropriate networks for people to consider evidence-based inputs on climate and energy policy; regular input into the prioritisation and implementation of policy which can be reported and monitored at multiple levels of governance.¹³ Another mechanism arising from the Programme for Government, the Citizens' Assembly, was 'established to consider some of the most important issues facing Ireland's future', including climate change, which in their deliberations reiterated the centrality of citizens and communities in Irish energy policy.¹⁴

5.3. Reflecting on the influence of participation on degrees of EPI

Although 'a strong presupposition in favour of environmental concerns vis-à-vis other sectoral concerns cannot be converted to an "extra-democratic" mandate', it may well be possible that the mandate for sustainability is considerably strengthened in the realm of existing sectoral policy interests (Lafferty and Hovden, 2003, p.10). In this case, climate mitigation *within* energy policy is given precedence by various discourse coalitions, but biodiversity also featured prominently. EPI in the energy domain is far more than just climate policy integration – as with any other policy area it addresses the full range of environmental impacts. As EPI progresses in the sector, and attempts to bring the mitigation and adaptation policy closer together unfold, issues relating to land-use, biodiversity and flooding are likely to increase in significance.

An unexpected outcome of our analysis is that prioritisation has featured strongly, with coordination and harmonisation appearing to a lesser, though still significant, degree. This may be attributed to a context where EPI in energy policy is a relatively recent phenomenon. A focus on the consultation process alone, while highlighting the institutional implications for EPI, may well have obscured other relevant aspects of the larger discursive institutionalisation process. Nevertheless, it has foregrounded the importance of the contestation of participative EPI. Coordination, harmonization and prioritisation are all processes that can be advanced or reversed under democratic conditions. It is important, therefore to acknowledge 'a need for greater interaction among governments at all levels, citizens and stakeholders as well as a need for greater deliberation and dialogue among competing interests as an essential mode of interaction' (Knudsen and Lafferty, 2016, p.359).

6. Conclusion

When we began this journey we were ostensibly, perhaps naïvely focused on a relationship between energy democratisation and participative EPI in the energy sector, carried in the concept of energy citizenship. We don't claim to substantially advance the theoretical discussion on energy citizenship, but we do instantiate and illustrate the application and [re-]construction of the concept in context. The focus on the Green Paper consultation is productive, *empirically* insofar as it is a policy window for participants to shape the discourse, and *methodologically* as a window of opportunity for analysts to reconstruct the framing of participative EPI in relation to wider processes. The added value of our adaption of participative EPI lies in the nuance of how socially constructed innovations can enhance the institutional conditions for EPI.

Participative EPI is not exclusive to activist constructions, but transcends and potentially includes; representative, participative and deliberative modes of citizenship in more or less inclusive forms. These

range from expert participation to more collaborative governance forms, though never quite extending to direct authority. Participation at its best 'operates in synergy with representation and administration to yield more desirable practices and outcomes of collective decision-making and action' (Fung, 2006). While it is important to recognise the distinctiveness energy citizenship constructions uncovered here, different ways of understanding energy democratisation can 'overlap and be enacted in complementary ways by combining and sequencing their constitutive practices' (Escobar 2017, p. 431). Different forms of participation perform different functions and in combination may offer new options for realising democratic goods (Escobar, 2017). Thus, consultation may not be *mere* consultation, but a mechanism through which other forms of participation are socially [re-] constructed, institutionally constituted and conducive to prioritisation, harmonisation and coordination.

Participative EPI does not resolve the persistent dilemma of environmental integration in relation to policy outcomes, but even prioritisation depends on adequate democratic parameters. What we contribute is an appreciation of the framing and consequential institutionalisation of EPI, that remembers the frequently overlooked part of the equation in relation to principled priority (Lafferty and Hovden, 2003) – sustainable processes of democratisation are integral to EPI (Escobar, 2017). Participative EPI is not so much a measure of the contribution of participation to EPI, but an emphasis on 'the quality and direction of the differences which are made, and how they are attained' (Gaventa and Barrett, 2012), or in our case how energy citizenship is emerging, which may in turn influence how democratic institutions deliver.

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¹³ <https://www.dcae.gov.ie/en-ie/climate-action/topics/climate-action-at-a-national-level/national-dialogue-on-climate-action/Pages/default.aspx>

¹⁴ <https://www.citizensassembly.ie/en/About-the-Citizens-Assembly/>

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