Citizen Participation in Policymaking: A Comparative Analysis of Administrative Procedures and Their Implications for System Design

Gabriela Savova
PhD Candidate in Public Administration, Sofia University "St. Kliment Ohridski"
Bulgaria, gabriela_savova@yahoo.com

Abstract

Citizen participation has become a central element of contemporary governance, widely promoted as a mechanism for enhancing transparency, legitimacy, and trust in public institutions. However, existing research and policy frameworks primarily focus on the presence of participatory mechanisms, rather than their functional role within policymaking processes. This paper addresses this gap by examining how citizen participation is embedded within formal policy procedures, with a particular focus on its relationship to policy uptake and accountability.

The study adopts a qualitative comparative research design based on desk analysis of selected European Union and Central and Eastern European countries. It draws on legal frameworks, official consultation platforms, and reports from international organisations to analyse how participation is structured, positioned within the policy cycle, and connected to decision-making processes. The analysis is guided by a structured analytical framework focusing on dimensions such as legal embedding, procedural integration, input structure, feedback mechanisms, and traceability.

The findings show that while participation is widely institutionalised across countries, it remains largely concentrated at the consultation stage and is only weakly integrated into policymaking procedures. Input is often unstructured, feedback mechanisms are limited, and traceability between citizen contributions and policy decisions is generally low. As a result, the influence of participation on policy outcomes remains constrained.

The paper develops a typology of participation systems based on their level of procedural integration and uptake potential, and demonstrates that more advanced digital participation platforms can support improved structuring and transparency of participation. However, their effectiveness depends on their integration into formal administrative processes.

This study represents the first analytical stage of a broader research agenda aimed at developing a hybrid civic participation model and a comprehensive framework for evaluating participatory systems. In this context, the analysis provides a procedural foundation for subsequent design-oriented and empirical work focused on integrating participation more effectively into policymaking processes.

Points for Practitioners

Most administrations already have participation mechanisms in place (OECD, 2020[1]; European Commission, 2023). The problem is not their absence, but their position: consultation typically enters the policy process too late, in a form too unstructured to be analytically useful, and without any obligation to visibly respond to what citizens said. The result is participation that satisfies legal requirements without influencing outcomes (OECD, 2017)[2] – and that citizens increasingly recognise as such.

Three shifts in administrative practice would make a measurable difference. Opening consultation before an internal draft is finalised – even informally – allows citizen input to shape the problem definition rather than just react to a predetermined solution; early-stage engagement is particularly important because it is at this point that the range of policy options remains genuinely open (Fung, 2006)[3]. Introducing structured input formats, such as linking submissions to specific policy questions or draft provisions, reduces the processing burden on officials and makes contributions comparable and usable within analytical workflows (OECD, 2018)[4]. Establishing a visible response obligation – not a general summary, but a clear record of which inputs were considered, accepted, or rejected and why – transforms participation from a one-way channel into an accountable process, strengthening transparency and institutional trust (European Commission, 2021)[5].

None of these require new legislation or new platforms. They require a deliberate decision to treat participation as a component of policy production rather than as a procedural step that precedes it (Schmidt, 2013[6]; Meyer & Rowan, 1977). Administrations that make this shift will find that participation generates better policy inputs, reduces downstream contestation, and strengthens rather than merely performs democratic legitimacy (Moore, 1995[7]; Fung, 2015).

Key words

citizen participation, policymaking, policy procedures, System design, administrative Procedure

Introduction

[1] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.; European Commission. (2023). Rule of law report. https://commission.europa.eu/
[2] OECD. (2017). Regulatory policy outlook. OECD Publishing.
[3] Fung, A. (2006). Varieties of participation in complex governance. Public Administration Review, 66(s1), 66–75.
[4] OECD. (2018). Regulatory impact assessment best practices. OECD Publishing.
[5] European Commission. (2021). Better regulation guidelines. https://commission.europa.eu/
[6] Schmidt, V. A. (2013). Democracy and legitimacy in the European Union revisited. Political Studies, 61(1), 2–22.; Meyer, J. W., & Rowan, B. (1977). Institutionalized organizations: Formal structure as myth and ceremony. American Journal of Sociology, 83(2), 340–363.
[7] Moore, M. H. (1995). Creating public value: Strategic management in government. Harvard University Press.; Fung, A. (2015). Putting the public back into governance: The challenges of citizen participation and its future. Public Administration Review, 75(4), 513–522.

Citizen participation has become a central element of contemporary governance, widely promoted as a mechanism for enhancing transparency, legitimacy, and trust in public institutions (OECD, 2020[8]; European Commission, 2023).[1] Across Europe, governments have introduced a range of participatory instruments, including public consultations, digital platforms, and regulatory impact assessment procedures – developments reflecting a broader shift towards more open and inclusive forms of policymaking associated with participatory and deliberative democratic theory (Pateman, 1970[9];[2] Habermas, 1996[10]).

However, existing research and policy frameworks have primarily focused on the presence of participatory mechanisms rather than their functional role within the policy process. Indicators commonly measure whether participation is legally guaranteed or institutionally available, but rarely assess how citizen input is processed within administrative systems or whether it influences policy outcomes (OECD, 2020; World Bank, 2022).[4][11] This gap is not merely empirical but conceptual: participation is typically analysed as a democratic mechanism or institutional innovation rather than as a component of policymaking procedures. As Arnstein (1969)[5][12] argued, the existence of participatory mechanisms does not necessarily imply meaningful influence, particularly when power over decisions remains unchanged. The central limitation of existing approaches is therefore not only that they underestimate policy uptake, but that they mislocate the problem – treating weak participation as a failure of design or access, rather than as a predictable outcome of how administrative systems are structured. The effectiveness of participation cannot be explained solely by its design as a democratic instrument; it must be understood in relation to the internal logic of administrative processes through which policies are developed, analysed, and decided.

This paper addresses this gap by shifting the analytical focus from participation as a mechanism of engagement to participation as a procedural component of policymaking systems. Rather than treating participation as a standalone activity, the study examines its position within the policy cycle, the way it is structured and processed, and its connection to decision-making and accountability mechanisms. Particular attention is given to the procedural conditions under which participation can lead to observable policy uptake, building on work linking participatory governance to institutional design and decision-making processes (Fung, 2006[13]; Smith, 2009[7][14]). From this perspective, weak policy uptake is not an incidental failure but a predictable outcome of institutional arrangements in which participation is formally present but not functionally integrated into decision-making procedures.

---

[8] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.; European Commission. (2023). Rule of law report. https://commission.europa.eu/
[9] Pateman, C. (1970). Participation and democratic theory. Cambridge University Press.
[10] Habermas, J. (1996). Between facts and norms: Contributions to a discourse theory of law and democracy. MIT Press.
[11] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.; World Bank. (2022). Worldwide governance indicators. World Bank.
[12] Arnstein, S. R. (1969). A ladder of citizen participation. Journal of the American Institute of Planners, 35(4), 216–224.
[13] Fung, A. (2006). Varieties of participation in complex governance. Public Administration Review, 66(s1), 66–75.
[14] Smith, G. (2009). Democratic innovations: Designing institutions for citizen participation. Cambridge University Press.

The analysis focuses on a comparative set of EU and Central and Eastern European countries, where participatory requirements are shaped by shared regulatory frameworks, including consultation standards and impact assessment practices promoted through the EU Better Regulation agenda (European Commission, 2021)[15]. This shared institutional context makes the region particularly suitable for examining variation in how participation is operationalised under similar formal conditions. The study adopts a qualitative comparative design based on desk research, drawing on legal documents, official consultation portals, and reports from international organisations. The analysis is guided by a structured framework covering key dimensions: legal embedding, stage of participation, input structure, feedback mechanisms, and integration with policy processes.

The central argument is that the existence of participatory mechanisms does not guarantee their effective integration into policymaking. The paper contributes to the literature by introducing a procedural perspective that connects participation to policy uptake and accountability, and by providing a comparative analysis of how this relationship varies across cases. It represents the first stage of a broader research agenda that develops a comprehensive framework for evaluating participatory governance across five dimensions: rights and civic space, participation capacity, deliberation quality, policy uptake and accountability, and public value outcomes (Moore, 1995[16]; Meynhardt, 2009[17]). The present study focuses primarily on the dimension of policy uptake, while laying the groundwork for subsequent empirical and design-oriented work. In this context, the broader research agenda aims to develop a hybrid civic participation model – understood in two senses: the combination of digital and analogue participation channels, and more fundamentally, the systematic integration of participatory mechanisms into formal policymaking procedures across the full policy cycle.

The paper proceeds as follows: Section 1 reviews existing literature; Section 2 presents the analytical framework; Section 3 describes the methodology; Section 4 provides the comparative analysis and typology; Section 5 concludes with implications for research and practice.

1. Literature Review

1.1 Participation in Governance

Citizen participation has been extensively theorised within both participatory and deliberative democratic traditions. Arnstein's (1969)[18] ladder conceptualises participation in terms of degrees of power, implying that meaningful participation requires the capacity to affect decisions rather than merely to express preferences – systems characterised by consultation without observable influence fall within the lower, symbolic levels of her framework. Pateman (1970)[19] similarly links participation to democratic responsiveness, suggesting that increased participation

[15] European Commission. (2021). Better regulation guidelines. https://commission.europa.eu/
[16] Moore, M. H. (1995). Creating public value: Strategic management in government. Harvard University Press.
[17] Meynhardt, T. (2009). Public value inside: What is public value creation? International Journal of Public Administration, 32(3–4), 192–219.
[18] Arnstein, S. R. (1969). A ladder of citizen participation. Journal of the American Institute of Planners, 35(4), 216–224.
[19] Pateman, C. (1970). Participation and democratic theory. Cambridge University Press.

should enhance institutional capacity to respond to citizen preferences. Deliberative democratic theory further develops this expectation by emphasising the role of inclusive and reasoned engagement in shaping legitimate outcomes (Habermas, 1996[320]).

More recent work shifts attention to institutional design. Fung (2006)[21] and Smith (2009)[22] argue that the effectiveness of participation depends on how participatory mechanisms are structured and embedded within decision-making processes. Fung's framework in particular highlights the importance of who participates, how participation is organised, and how it connects to authority and decision-making outcomes. Taken together, these approaches generate a clear expectation: where participatory mechanisms are institutionalised and designed to enable input, they should contribute – at least to some degree – to shaping policy outcomes.

1.2 Participation in Public Administration

Within public administration, participation has increasingly been institutionalised through formal procedures and regulatory frameworks. A key mechanism linking participation to policymaking is Regulatory Impact Assessment (RIA), which integrates consultation into structured policy analysis (OECD, 2018[623]). At the European level, the Better Regulation agenda further reinforces consultation as a procedural requirement, while national platforms such as Strategy.bg and the European Commission's Have Your Say provide centralised spaces for collecting public input (European Commission, 2021[24]).

Digital participation platforms further illustrate attempts to operationalise participation within governance systems. Open-source solutions such as CONSUL Democracy and Decidim provide structured environments for consultation, deliberation, and process tracking, supporting features such as proposal submission, participatory budgeting, and feedback mechanisms. These functionalities can enhance transparency and traceability, but their effectiveness ultimately depends on integration into formal administrative procedures – a condition that existing national systems frequently fail to meet (OECD, 2020[25]).

1.3 What Existing Research Measures – and What It Misses

A substantial body of research evaluates participation through comparative indicators, focusing primarily on formal conditions and institutional availability. Measures of civic space and participation rights, such as those produced by Freedom House and the V-Dem Institute, assess the legal and political environment for participation, while the United Nations E-Participation Index focuses on the availability of digital tools and engagement mechanisms

[20] Habermas, J. (1996). Between facts and norms: Contributions to a discourse theory of law and democracy. MIT Press.
[21] Fung, A. (2006). Varieties of participation in complex governance. Public Administration Review, 66(s1), 66–75.
[22] Smith, G. (2009). Democratic innovations: Designing institutions for citizen participation. Cambridge University Press.
[23] OECD. (2018). Regulatory impact assessment best practices. OECD Publishing.
[24] European Commission. (2021). Better regulation guidelines. https://commission.europa.eu/
[25] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.

(United Nations, 2022[26]). Similarly, OECD frameworks assess the existence and design of consultation practices within regulatory governance (OECD, 2020[27]). While these approaches provide valuable comparative insights, they are limited to measuring whether participation is possible rather than whether it is effective.

Conceptual frameworks share a similar limitation. Fung's (2006)[28] democracy cube offers a powerful tool for analysing participation in terms of who participates, how it is organised, and how it relates to authority. However, it does not specify how participatory input is operationally integrated into administrative workflows – particularly within procedures such as legislative drafting, coordination, and impact assessment.

1.4 The Gap

The combined effect of these limitations is a persistent disconnect between theoretical expectations and empirical realities. While participatory and deliberative theories emphasise influence, responsiveness, and the capacity of participation to shape decisions (Arnstein, 1969[29]; Fung, 2006[30]), empirical systems frequently exhibit weak links between participation and policy outcomes. This disconnect is not only empirical but conceptual: participation is most often analysed as a democratic mechanism rather than as a process embedded within administrative procedures. As a result, the internal dynamics through which administrations process, filter, and incorporate participatory input remain under-theorised.

Without this perspective, the gap between the institutionalisation of participation and its limited policy impact remains difficult to explain. This paper addresses the gap by introducing a procedural perspective that focuses on how participatory input is structured, processed, and linked to decision-making within administrative systems – shifting the analytical question from whether participation exists to whether it is functionally integrated into policymaking and capable of generating observable policy uptake.

2. Analytical Framework

2.1 Core Concept

"This paper approaches citizen participation not as an isolated activity, but as a procedural element embedded within formal policymaking processes. Rather than focusing on whether participatory mechanisms exist, the analysis examines how participation is positioned, structured, and operationalised within administrative systems — and whether it is connected to the workflows through which policies are actually produced. This perspective builds on governance approaches emphasising institutional integration of participation (Fung, 2006)[31] and reflects New Public

[26] United Nations. (2022). E-government survey 2022: The future of digital government. United Nations.
[27] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.
[28] Fung, *Varieties of participation*, 66–75.
[29] Arnstein, S. R. (1969). A ladder of citizen participation. Journal of the American Institute of Planners, 35(4), 216–224.
[30] Fung, *Varieties of participation*, 66–75.
[31] Fung, *Varieties of participation*, 66–75.

Governance frameworks in which the effectiveness of participation depends on its alignment with administrative workflows rather than on its formal availability alone (Osborne, 2010)."

2.2 Analytical Dimensions

2.2.1 Legal Embedding

The first dimension examines whether and how participation is anchored in formal legal frameworks, including consultation requirements, regulatory obligations, and procedural rules that define when and how public input must be collected. Legal embedding determines the formal status of participation within the administrative system and reflects broader conditions of civic space and participation rights (Freedom House, 2023[32];[2] V-Dem Institute, 2023[33]). However, the existence of legal provisions does not in itself ensure that participation is meaningful or influential in practice – a distinction that is central to this paper's argument.

2.2.2 Procedural Integration

The second dimension examines at which stage of the policy cycle participation is introduced – during problem definition and policy design, or only after a draft has already been prepared. This timing is critical: early-stage engagement enables citizens to influence problem framing and the range of policy options considered, while late-stage consultation limits participation to commenting on predefined solutions. Procedural integration therefore serves as a key indicator of the potential impact of participation on policy outcomes (Fung, 2006).

2.2.3 Input Structure

This dimension examines how citizen input is collected and organised, differentiating between structured input – such as standardised forms or guided submissions aligned to specific policy questions – and unstructured free-text contributions. Input structure is directly linked to administrative capacity: structured input facilitates processing, comparison, and integration into policy analysis, while unstructured input increases the burden on administrative actors and limits its usability within bureaucratic workflows. This represents a key but often overlooked interface between participatory design and administrative practice.

A related but distinct dimension concerns the form through which participation is conducted – whether through digital platforms, public hearings, or deliberative forums – which shapes both the inclusiveness of the process and the quality of input generated. While this dimension falls outside the analytical scope of the present study, it forms a central component of the broader research agenda

2.2.4 Feedback and Traceability

[32] Freedom House. (2023). Freedom in the world. https://freedomhouse.org/
[33] V-Dem Institute. (2023). Varieties of democracy report. https://www.v-dem.net/

This dimension assesses whether administrations provide feedback on citizen input and whether contributions can be traced to specific policy decisions or justifications. Strong feedback and traceability mechanisms enhance transparency, accountability, and trust, while their absence weakens the perceived value of participation and undermines the responsiveness principles central to democratic governance (OECD, 2020[34]). Without traceability, participation cannot be verified as influential, regardless of its formal presence.

2.2.5 Institutional Ownership

This dimension examines which administrative actors are responsible for organising participation and processing input. In many systems, responsibilities are divided between central coordination – such as platform management – and sectoral actors such as line ministries. Where responsibility is fragmented, practices tend to be uneven and procedural coherence weakens, even when central platforms create the appearance of a unified system.

2.2.6 Integration with Policy Procedures

The final dimension examines the extent to which participation is functionally connected to formal policy processes such as regulatory impact assessment, legislative drafting, and strategic planning. This is the most demanding dimension: it asks not whether participation exists alongside policymaking, but whether a clear procedural pathway exists through which citizen input is processed, assessed, and linked to drafting, analysis, and decision documents within the policy cycle. Weak integration results in participation being treated as a formal requirement rather than as a substantive input into policy development (OECD, 2018[35]), producing the pattern of formal compliance without policy uptake that this study identifies across multiple cases.

2.3 The Framework in Relation to Participatory Governance

The seven dimensions are not independent checklists but interacting components of a system. Weaknesses in one element – particularly input structure or traceability – constrain the effectiveness of the others. A legally embedded, well-timed consultation that generates unstructured input and provides no feedback will produce low policy uptake regardless of its formal quality. Conversely, structured input and strong traceability can partially compensate for late-stage timing by making contributions analytically usable even within constrained procedural windows.

2.3 Linking the Framework to Participatory Governance

The 6 dimensions are not independent checklists but interacting components of a system. Weaknesses in one element – particularly input structure or traceability – constrain the effectiveness of the others. A legally embedded, well-timed consultation that generates unstructured input and provides no feedback will produce low policy uptake regardless of its formal quality. Conversely, structured input and strong traceability can partially compensate for late-stage timing by making contributions analytically usable even within constrained procedural windows.

[34] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.
[35] OECD. (2018). Regulatory impact assessment best practices. OECD Publishing.

This perspective implies a fundamental shift in how participatory governance is conceptualised. Rather than evaluating participation in terms of its presence, inclusiveness, or formal design, the framework treats it as a component of administrative systems whose effectiveness depends on procedural integration. This challenges dominant approaches that evaluate participation as a standalone democratic innovation, suggesting instead that its impact is determined by the extent to which it is embedded in the internal routines of policymaking. In this sense, participation is not simply a channel for input, but a potential element of policy production — and where such integration is absent, participation is unlikely to generate observable policy uptake, regardless of its formal availability or technological sophistication.

This framework represents a focused operationalisation of a broader model of participatory governance that the larger research project develops across five dimensions: rights and civic space, participation capacity, deliberation quality, policy uptake and accountability, and public value outcomes (Moore, 1995[36]: Meynhardt, 2009[37]). The present study concentrates on policy uptake and accountability, treating procedural integration as the key determinant of whether participation generates observable influence on policy decisions. Contemporary digital platforms such as CONSUL Democracy and Decidim illustrate that technical solutions increasingly exist for structured input, traceability, and multi-stage engagement – but their effectiveness, as the comparative analysis will show, depends entirely on their integration into formal administrative procedures (OECD, 2020[38]).

3. Methodology

3.1 Research Design

This study adopts a qualitative comparative research design to examine how citizen participation is embedded within formal policymaking procedures across countries. The analysis does not aim to measure participation outcomes, but rather to assess the institutional and procedural conditions under which participation takes place.

The research follows a structured, case-oriented comparative approach (Lijphart, 1971)[39], focusing on identifying patterns of similarity and variation across administrative systems. The emphasis is placed on the procedural organisation of participation, including its legal basis, operationalisation through administrative tools, and integration within policymaking processes.

The study relies on systematic desk research, combining analysis of legal frameworks, government-operated consultation platforms, and international governance assessments.

3.2 Case Selection

[36] Moore, M. H. (1995). Creating public value: Strategic management in government. Harvard University Press.
[37] Meynhardt, T. (2009). Public value inside: What is public value creation? International Journal of Public Administration, 32(3–4), 192–219.
[38] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.
[39] Lijphart, A. (1971). Comparative politics and the comparative method. *American Political Science Review*, 65(3), 682–693.

The analysis focuses on a selection of European Union Member States and EU-aligned countries from Central and Eastern Europe, including candidate and neighbouring countries.

The case selection follows a "most similar systems" design (Przeworski & Teune, 1970[40]; Lijphart, 1971[41]). All selected countries operate within broadly comparable institutional environments shaped by:

- European Union regulatory standards on consultation and transparency
- diffusion of administrative practices through OECD frameworks on regulatory governance[42]
- monitoring and reform guidance provided by SIGMA Programme[43]
- alignment with the European Commission Better Regulation framework[44]

Within this relatively homogeneous context, observed variation in participation systems can be attributed to differences in procedural integration, administrative capacity, and implementation practices rather than to fundamentally different institutional structures.

The selected countries include: Czech Republic, Bulgaria, Croatia, Estonia, Hungary, Latvia, Lithuania, Poland, Romania, Slovakia, Slovenia, Ukraine, Moldova, Turkey, North Macedonia, Bosnia and Herzegovina, Serbia, Albania, and Montenegro.

3.3 Data Sources and Construction of Table 1

3.3.1 Structure and Role of Table 1

Table 1 constitutes the primary comparative dataset of the study. It captures the institutional and procedural characteristics of participation systems across countries through a set of standardised analytical dimensions.

Each country is assessed across the following variables:

- Legal Basis
- Mandatory Consultation
- Platform
- Platform Type
- Input Structure
- Feedback and Traceability
- Procedural Integration
- Observed Pattern
- Key Dysfunction

[40] Przeworski, A., & Teune, H. (1970). *The logic of comparative social inquiry*. Wiley-Interscience.
[41] Lijphart, A. (1971). Comparative politics and the comparative method. *American Political Science Review*, 65(3), 682–693.
[42] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.
[43] OECD/SIGMA. (2023). The principles of public administration. SIGMA Programme. https://www.sigmaweb.org/
[44] European Commission. (2021). Better regulation guidelines. https://commission.europa.eu/

These variables are operationalised through qualitative coding based on explicitly defined sources and criteria.

3.3.2 Data Sources by Variable

(1) Legal Basis

The legal basis is identified through analysis of national legislative and regulatory frameworks governing policymaking and public consultation.

Sources include:

- national laws on legislative drafting and transparency
- administrative procedure acts
- regulatory impact assessment (RIA) frameworks

Coding reflects the **degree of formalisation**:

- strong (explicit legal obligation)
- medium (procedural or framework-based)
- low (partial or absent regulation)

(2) Mandatory Consultation

This variable captures whether public consultation is formally required.

Sources:

- national legislation
- procedural rules for legislative drafting
- OECD indicators on stakeholder engagement

Specifically, the study draws on the OECD iREG dimension:

- "existence of formal requirements to consult stakeholders in rule-making"

Coding reflects:

- mandatory and standardised
- mandatory but inconsistently applied
- partial or discretionary

(3) Platform and Platform Type[45]

[45] Platforms examined include: e-Savjetovanja (Croatia): https://esavjetovanja.gov.hr/; Slov-Lex (Slovakia): https://www.slov-lex.sk/; Strategy.bg (Bulgaria): https://strategy.bg/; EIS (Estonia): https://eelnoud.valitsus.ee/; TAP Portal (Latvia): https://tapportals.mk.gov.lv/; TAIS (Lithuania): https://e-seimas.lrs.lt/; RCL Portal (Poland): https://legislacja.rcl.gov.pl/; eKonsultacije (Serbia): https://ekonsultacije.gov.rs/; ENER (North Macedonia): https://ener.gov.mk/; konsultimipublik.gov.al (Albania); eParticipacija (Montenegro): https://eparticipacija.gov.me/; particip.gov.md (Moldova): https://particip.gov.md/

The existence and characteristics of consultation platforms are identified through direct observation of official government portals.

Sources:

- national consultation platforms (e.g. e-Savjetovanja, Slov-Lex, Strategy.bg)
- government legislative portals

Platform type is classified as:

- centralised consultation platform
- integrated policymaking system
- fragmented or decentralised system
- informational platform

This classification is based on:

- scope of use across government
- level of integration with policymaking procedures
- accessibility to public users

(4) Input Structure

This variable captures how citizen input is collected and formatted.

Sources:

- direct examination of platform interfaces
- submission formats available to users

Coding categories:

- structured (input linked to predefined fields or legal provisions)
- semi-structured (partially organised input)
- unstructured (free-text or document submission)

This dimension reflects the administrative usability of participation.

(5) Feedback and Traceability

This variable assesses whether and how authorities respond to stakeholder input and whether input can be linked to decisions.

Sources:

- consultation reports published on platforms
- government feedback documents

- European Commission Rule of Law and Enlargement Reports[46]

Coding reflects:

- presence of responses (yes/no)
- level of detail (individual vs summary)
- clarity of linkage between input and decision

This variable is conceptually aligned with OECD iREG indicators on:

- "feedback provided to stakeholders after consultation"[47]

(6) Procedural Integration

This variable captures the extent to which participation is embedded within formal policymaking processes.

Sources:

- platform functionality (link to drafting workflows)
- OECD iREG indicators on stakeholder engagement in RIA[48]
- European Commission Better Regulation framework[49]

Specifically, the analysis draws on OECD measures of:

- **integration of stakeholder engagement within regulatory impact assessment (RIA)**
- **timing of consultation in the policy cycle[50]**

Coding reflects:

- high (integrated across stages, including drafting and analysis)
- medium (linked to drafting stage)
- low (late-stage consultation only)

(7) Observed Pattern

This variable represents an analytical synthesis of the preceding dimensions.

It is derived through:

- cross-variable interpretation within each case

---

[46] [3] European Commission. (2025). *Rule of law report*. https://commission.europa.eu/; European Commission. (2025). *Enlargement package — country reports*. https://commission.europa.eu/
[47] OECD. (2018). *Regulatory impact assessment best practices*. OECD Publishing, as note 1.
[48] OECD. (2018). *Regulatory impact assessment best practices*. OECD Publishing.; OECD. (2021). *Regulatory policy outlook 2021*. OECD Publishing. The iREG (Indicators of Regulatory Policy and Governance) framework measures the existence, quality, and implementation of regulatory policies across OECD member states.
[49] European Commission. (2021). *Better regulation guidelines*. https://commission.europa.eu/
[50] OECD. (2018). *Regulatory impact assessment best practices*. OECD Publishing, as note 1.; OECD. (2021). *Regulatory policy outlook 2021*. OECD Publishing, as note 1

Examples include:

- late-stage formal consultation
- procedurally structured participation
- integrated participation system

(8) Key Dysfunction

This variable identifies the dominant structural limitation of each participation system.

It is derived analytically based on:

- inconsistencies between legal framework and practice
- weaknesses in timing, feedback, or integration
- fragmentation or capacity constraints

3.3.3 Coding Approach

All variables in Table 1 are coded using qualitative categorical scales. The coding is based on systematic interpretation of:

- legal provisions
- observable platform features
- documented consultation practices
- international governance assessments

Where multiple sources are available, priority is given to:

1. direct observation of platforms
2. legal frameworks
3. international reports as contextual validation

The coding does not aim to produce a quantitative index, but to ensure structured comparability across cases.

3.4 Analytical Method

The analysis proceeds in three steps:

1. Descriptive mapping (Table 1)
   Identification of institutional and procedural characteristics across countries

2. Criterion-based comparison
   Cross-country analysis of each variable (legal basis, input structure, feedback, etc.)

3. Analytical reduction and typology (Table 2)

   Aggregation of variables into simplified dimensions:

   - legal embedding
   - procedural integration
   - input structure
   - traceability
   - uptake potential

This step enables the construction of a typology of participation systems based on their level of functional integration within policymaking processes.

3.5 Limitations

The study is based on desk research and relies on publicly available data. As a result:

- it does not capture internal administrative decision-making processes
- it cannot directly observe how input is processed within institutions
- it does not measure actual policy influence

In addition, the availability and quality of data varies across countries. In some cases, limited transparency constrains the ability to assess feedback mechanisms and procedural integration in detail.

However, such limitations are also analytically relevant. The absence of structured information on participation processes may reflect weaker institutionalisation and lower transparency within governance systems.

Finally, the organisation and cross-validation of country-level data was supported by AI-assisted research tools. All substantive analytical and coding decisions were made by the author and verified against primary sources, including national legal frameworks, official consultation platforms, and reports from international organisations.

4. Comparative Analysis

4.1 Comparative Mapping of Participation Systems

This section presents a structured comparative mapping of how citizen participation is embedded within formal policymaking procedures across the selected European Union and Central and Eastern European countries. The purpose of this section is descriptive and classificatory: it organises empirical observations across cases using a consistent set of analytical dimensions, without yet advancing full explanatory interpretation.

The mapping is based on the variables operationalised in the methodological framework, including legal basis, mandatory consultation requirements, platform infrastructure, platform type, input structure, feedback and traceability mechanisms, procedural integration, participation configuration, and key dysfunctions. These

dimensions capture both the formal institutional design of participation and its observable implementation within administrative systems.

Across the cases, participation is consistently anchored in formal regulatory or procedural frameworks. In a number of countries – such as Bulgaria, Romania, and Albania – participation is explicitly mandated through dedicated legislation governing public consultation on draft normative acts[51]. In others, including the Czech Republic and Estonia, participation is embedded in procedural rules and administrative practices rather than in a single comprehensive legal instrument. This variation reflects different modes of institutionalisation, ranging from legally prescriptive to practice-oriented systems.

At the level of implementation, most countries have introduced digital platforms to facilitate consultation processes. These platforms differ in both structure and function. Centralised systems – such as Croatia's *e-Savjetovanja*, Slovakia's *Slov-Lex*, and Latvia's TAP Portal – provide a unified interface for consultation across government[52]. In contrast, fragmented or decentralised systems – such as those observed in Romania and Bosnia and Herzegovina – rely on multiple institutional websites, resulting in lower levels of standardisation and accessibility[53]. A third category includes platforms with primarily informational functions, where consultation features are limited or inconsistently applied, as in the case of Turkey and, partially, Ukraine.

The structure of citizen input varies systematically across cases. While some platforms enable semi-structured or structured contributions – linking comments to specific provisions or policy elements – many systems continue to rely predominantly on unstructured, free-text submissions. This distinction is analytically relevant, as it directly affects the extent to which input can be processed, compared, and integrated within administrative procedures[54].

Feedback and traceability mechanisms also display significant variation. In a limited number of systems, consultation platforms provide explicit responses to individual contributions, including justification of acceptance or rejection. More commonly, feedback is provided in aggregated form, with limited transparency regarding how specific inputs relate to policy outcomes. In several cases, feedback remains minimal or absent, reducing the visibility of the relationship between participation and decision-making[55].

Procedural integration constitutes a further point of divergence. While participation is formally embedded in policymaking processes across most cases, its functional integration remains uneven. In some systems, participation

[51] For Bulgaria, see Law on Normative Acts, https://lex.bg; for Romania, see Law No. 52/2003 on Transparency in Public Administration; for Albania, see Law No. 146/2014 on Notification and Public Consultation. Full references in Primary Sources.
[52] OECD. (2017). *Regulatory policy outlook*. OECD Publishing.; European Commission. (2021). *Better regulation guidelines*. https://commission.europa.eu/
[53] European Commission. (2025). *Rule of law report*. https://commission.europa.eu/; European Commission. (2025). *Enlargement package – country reports*. https://commission.europa.eu/
[54] OECD. (2018). *Regulatory impact assessment best practices*. OECD Publishing.
[55] OECD. (2020). *Innovative citizen participation and new democratic institutions*. OECD Publishing.; European Commission. (2025). *Rule of law report*, as note 3.

is linked to drafting procedures and administrative workflows, whereas in others it operates as a parallel step, weakly connected to earlier analytical stages or to final decision-making[56].

Taken together, the mapping reveals that participation systems across the selected countries share a broadly similar institutional architecture – characterised by legal embedding, the presence of consultation platforms, and formalised procedures – while differing substantially in how these elements are configured and implemented in practice. The variation observed across cases suggests that the presence of participatory mechanisms does not, in itself, determine their functional role within policymaking processes (OECD, 2020; Fung, 2006).[57].

The results of this comparative mapping are summarised in *Table 1. Comparative Mapping of Participation Systems in Selected EU and CEE Countries* which provides a systematic overview of participation systems across all selected countries using the defined analytical dimensions.

Country	**Legal Basis**	**Mandatory Consultation**	**Platform**	**Platform Type**	**Input Structure**	**Feedback & Traceability**	**Procedural Integration**	**Observed Pattern**	**Key Dysfunction**
Czech Republic	Procedural rules (no single law)	Partial	ODok / eKLEP	Hybrid (institutional-focused)	Semi-structured	Internal feedback dominates; limited public visibility	Integrated in inter-ministerial coordination	Integrated but limited public access	Institutional dominance, weak citizen accessibility
Bulgaria	Law on Normative Acts	Yes (often formal)	Strategy.bg	Centralised consultation	Unstructured	General summaries; no clear link to decisions	Late-stage consultation after drafting	Late-stage formal consultation	Formal compliance, weak policy influence
Croatia	Standardised consultation framework	Yes (consistent)	e-Savjetovanja	Centralised consultation	Semi-structured (linked to provisions)	Comment-level responses with justification	Consultation linked to drafting phase	Procedurally structured consultation	Limited early-stage influence
Estonia	Procedural framework + administrative practice	Yes (practice-based)	EIS	Integrated system	Structured	Systematic feedback; partial traceability	Integrated into drafting and coordination processes	Digitally integrated participation	Dependent on administrative practice
Hungary	Framework law	Yes (inconsistent)	Government portal	Centralised (limited function)	Unstructured	Limited or general feedback	Late-stage and inconsistently applied	Formal but weakly operationalised	Limited transparency and depth
Latvia	Procedural rules	Yes	TAP Portal	Centralised consultation	Semi-structured	General feedback; limited traceability	Consultation linked to drafting, inconsistently applied	Procedural but inconsistent	Variable implementation

[56] OECD/SIGMA. (2023). *The principles of public administration*. SIGMA Programme. https://www.sigmaweb.org/
[57] Fung, A. (2006). Varieties of participation in complex governance. *Public Administration Review*, 66(s1), 66–75

Lithuania	Legislative framework	Yes	TAIS	Centralised consultation	Semi-structured	General summaries; weak linkage to outcomes	Consultation linked to drafting stage	Procedural but uneven	Weak link to decisions
Poland	Multiple legal and procedural instruments	Yes	RCL Portal	Centralised consultation	Semi-structured	General feedback; no systematic traceability	Late-stage consultation dominant	Formal but variable	Inconsistent processing capacity
Romania	Dedicated consultation law	Yes	Fragmented portals	Fragmented	Unstructured	Minimal feedback; no traceability	Late-stage and fragmented across institutions	Legalistic but fragmented	Strong law, weak implementation
Slovakia	Procedural framework	Yes	Slov-Lex	Centralised consultation	Semi-structured	General feedback; partial traceability	Consultation embedded in drafting procedures	Structured procedural participation	Limited early-stage engagement
Slovenia	Rules and guidelines	Yes	eDemokracija	Centralised consultation	Semi-structured	General feedback; inconsistently applied	Linked to drafting; uneven implementation	Guided but inconsistent	Weak enforcement of standards
Ukraine	Multiple legal provisions	Yes (variable)	Rada portal	Informational / partial consultation	Semi-structured	Limited feedback; weak traceability	Weakly standardised; late-stage	Formal but weakly standardised	Fragmentation and instability
Moldova	Transparency law	Yes	participa.gov.md	Centralised consultation	Unstructured	Limited feedback; inconsistent practices	Late-stage consultation	Legal but weakly operational	Weak consistency and uptake
Turkey	No unified consultation law	Partial	e-Devlet	Informational	Unstructured	Minimal or no feedback	Weak procedural integration	Weakly institutionalised	Lack of unified framework
North Macedonia	RIA framework + procedural rules	Yes	ENER	Centralised consultation	Semi-structured	Limited feedback; weak linkage to outcomes	Late-stage consultation dominant	Procedural but weak uptake	Formal but inconsistent
Bosnia & Herzegovina	Multi-level legal frameworks	Partial	Fragmented platforms	Fragmented	Unstructured	Inconsistent feedback across institutions	Weak and fragmented integration	Fragmented system	Institutional fragmentation
Serbia	Policy-planning framework	Yes	eKonsultacije	Centralised consultation	Semi-structured	General feedback; partial traceability	Linked to drafting; depends on institution	Structured but uneven	Depends on administrative practice
Albania	Consultation law	Yes	konsultimipublik.gov.al	Centralised consultation	Unstructured	Limited feedback; weak traceability	Late-stage consultation	Legal but weakly standardised	Formal compliance

Montenegro	Consultation rules	Yes	eParticipacija	Centralised consultation	Unstructured	Limited feedback; inconsistent practices	Late-stage consultation	Structured but weakly applied	Limited administrative capacity

Table 1. Comparative Mapping of Participation Systems in Selected EU and CEE Countries

4.2 Comparative Coding Across Key Dimensions

To enable systematic comparison across cases, the empirical observations presented in Table 1 are translated into a simplified analytical coding scheme. This step reduces complex institutional configurations into a set of comparable dimensions, allowing for the identification of cross-country patterns in the structure and functioning of participation systems.

The coding framework captures five core dimensions: legal embedding, procedural integration, input structure, traceability, and uptake potential. Each dimension reflects a distinct aspect of participatory governance. Legal embedding refers to the extent to which participation is formally required within regulatory or procedural frameworks. Procedural integration captures the degree to which participation is embedded within policymaking processes, including its connection to drafting, coordination, and analytical stages such as regulatory impact assessment. Input structure refers to the format in which stakeholder contributions are collected and organised, distinguishing between unstructured, semi-structured, and structured forms. Traceability reflects the presence of mechanisms linking participation to policy outcomes through feedback, justification, and documentation. Uptake potential represents a synthetic analytical assessment of the likelihood that participation influences policymaking, based on the interaction between timing, integration, and traceability.

Each dimension is coded using a qualitative three-point ordinal scale (Low, Medium, High), based on predefined criteria derived from observable institutional features. These include, inter alia, the timing of participation within the policy cycle, the format of input collection (e.g. free-text submissions versus provision-linked comments), the existence and quality of feedback mechanisms, and the degree of linkage between participation and policymaking procedures. While empirical variation exists within cases, the coding applies a forced classification in order to ensure comparability across countries and analytical consistency.

The coding process is based on triangulation of multiple data sources. Primary evidence is derived from the original dataset constructed through the analysis of national legal frameworks and official consultation platforms. This is complemented by international datasets and qualitative assessments, particularly the OECD Indicators of Regulatory Policy and Governance (iREG), SIGMA monitoring reports, and European Commission Rule of Law and Enlargement reports.

From the OECD framework, the analysis incorporates disaggregated indicators related to stakeholder engagement within regulatory policymaking. Specifically, the study draws on OECD measures of (1) the existence and legal requirement of stakeholder consultation, (2) the timing of engagement within the policy cycle, (3) the provision of feedback to participants, and (4) the integration of stakeholder input within Regulatory Impact Assessment (RIA)

processes (OECD, 2018; OECD, 2021)[58]. These indicators assess the formalisation and procedural quality of participation mechanisms, rather than their substantive influence on policy outcomes. In this study, they are mapped onto the dimensions of legal embedding, procedural integration, and traceability, and are used as a benchmarking layer rather than as primary variables.

SIGMA assessments provide complementary qualitative evidence on the implementation of participation in practice. In particular, SIGMA reports evaluate consultation practices, the timing of stakeholder engagement, the functionality of RIA systems, and administrative capacity for policy development. These dimensions are used to assess whether formally established mechanisms are consistently applied and operationalised within administrative routines (OECD/SIGMA, 2019; OECD/SIGMA, 2023)[59]. This allows the analysis to move beyond formal provisions and capture variation in implementation.

European Commission reports, including the Rule of Law Reports and Enlargement Reports, contribute additional qualitative evidence on legislative processes, transparency, and stakeholder consultation practices. These reports assess participation indirectly, as part of broader evaluations of governance quality and law-making procedures, with particular attention to consultation practices, procedural transparency, and the use of accelerated legislative procedures (European Commission, 2021; European Commission, 2025)[60]. Extracted evidence is used to validate and contextualise the coding of procedural integration and traceability.

Given differences in data availability across countries—particularly for non-OECD members—the coding is applied conservatively. Where evidence is partial or indirect, assessments rely on cross-validated qualitative interpretation. As a result, the coding should be understood as an analytically grounded approximation rather than a precise measurement.

The simplified representation presented in Table 2 enables the identification of broader cross-country patterns. First, the coding highlights the absence of a direct relationship between legal embedding and uptake potential. Several countries with strong legal frameworks – such as Bulgaria, Romania, and Albania – exhibit low levels of procedural integration and traceability, resulting in limited uptake potential. Conversely, Estonia demonstrates relatively high uptake despite a less formalised legal structure. This confirms that legal institutionalisation alone is insufficient to ensure effective participation, and that procedural integration plays a more decisive role (OECD, 2018; European Commission, 2021)[61].

[58] OECD. (2018). *Regulatory impact assessment best practices*. OECD Publishing.; OECD. (2021). *Regulatory policy outlook 2021*. OECD Publishing.
[59] OECD/SIGMA. (2019). *Monitoring report: The principles of public administration*. SIGMA Programme. https://www.sigmaweb.org/; OECD/SIGMA. (2023). *The principles of public administration*. SIGMA Programme. https://www.sigmaweb.org/
[60] European Commission. (2021). *Better regulation guidelines*. https://commission.europa.eu/; European Commission. (2025). *Rule of law report*. https://commission.europa.eu/; European Commission. (2025). *Enlargement package — country reports*. https://commission.europa.eu/
[61] OECD. (2018), as above.; European Commission. (2021), as above.

Second, the coding reveals a clustering of countries around intermediate configurations. A significant number of cases – including Croatia, Slovakia, Slovenia, Poland, Latvia, Lithuania, and Serbia – demonstrate medium values across most dimensions. These systems are characterised by structured consultation procedures and a degree of transparency, but remain limited by late-stage engagement and only partial integration into policymaking processes.[62]

Third, the relationship between input structure and traceability appears conditional rather than linear. While more structured input formats facilitate administrative processing and are often associated with improved feedback practices, this does not consistently translate into higher levels of traceability or uptake. This indicates that input structuring is a necessary but not sufficient condition for effective participation, and must be complemented by institutional mechanisms that link contributions to decision-making processes[63].

Overall, the coding demonstrates that participation systems operate as configurations of interdependent dimensions. The effectiveness of participation depends not on any single factor, but on the alignment between legal frameworks, procedural integration, input design, and feedback mechanisms. Weaknesses in one dimension – particularly procedural integration or traceability – can significantly constrain the overall capacity of participation to influence policymaking[64].

The results of this analytical coding are presented in Table 2, which provides a comparative overview of participation systems across the selected countries in a standardised format.

Country	**Legal**	**Integration**	**Input**	**Traceability**	**Uptake Potential**
Czech Republic	Medium	Medium	Medium	Medium	Medium
Bulgaria	High	Low	Low	Low	Low
Croatia	High	Medium	Medium	High	Medium
Estonia	Medium	High	High	High	High
Hungary	Medium	Low	Low	Low	Low
Latvia	Medium	Low	Medium	Medium	Medium
Lithuania	Medium	Low	Medium	Medium	Medium
Poland	Medium	Low	Medium	Medium	Medium
Romania	High	Low	Low	Low	Low
Slovakia	Medium	Medium	Medium	Medium	Medium
Slovenia	Medium	Medium	Medium	Medium	Medium
Ukraine	Medium	Low	Medium	Low	Low

[62] This pattern is consistent with findings in OECD. (2020). *Innovative citizen participation and new democratic institutions*. OECD Publishing.
[63] OECD. (2018), as note 1.; Fung, A. (2006). Varieties of participation in complex governance. *Public Administration Review*, 66(s1), 66–75
[64] Schmidt, V. A. (2013). Democracy and legitimacy in the European Union revisited. *Political Studies*, 61(1), 2–22.

Moldova	High	Low	Low	Low	Low
Turkey	Low	Low	Low	Low	Low
North Macedonia	Medium	Low	Medium	Low	Medium
Bosnia & Herzegovina	Medium	Low	Low	Low	Low
Serbia	Medium	Medium	Medium	Medium	Medium
Albania	High	Low	Low	Low	Low
Montenegro	Medium	Low	Low	Low	Low

Table 2. Comparative Coding of Participation Systems across Key Dimensions

4.3 Cross-Country Patterns of Participation Systems

The comparative mapping and coding presented in the previous sections reveal a consistent set of structural patterns in how participation operates across the selected countries. While formal mechanisms for citizen participation are widely established, their functional role within policymaking processes remains limited. This limitation does not stem from the absence of participatory instruments, but from their systematic positioning and weak integration within administrative decision-making.

Across cases, participation is characterised by five interrelated features: late-stage engagement, limited structuring of input, weak feedback and traceability, partial procedural integration, and a disjunction between centralised access and decentralised processing. These patterns are observed across both European Union Member States and Enlargement countries, suggesting that they reflect broader characteristics of administrative systems rather than country-specific anomalies.

4.3.1 Timing of Participation: Predominance of Late-Stage Engagement

A consistent pattern across countries is the concentration of participation at relatively late stages of the policy process. Consultation is typically introduced after draft legislation or policy proposals have already been prepared. This is evident in cases such as Bulgaria and Romania, where legal requirements ensure consultation, but engagement occurs only once draft texts are finalised, limiting the scope for influencing policy design[65].

This pattern reflects the internal sequencing of administrative decision-making. Policymaking processes are generally organised around intra-administrative coordination, in which policy problems are defined and solutions developed within ministries before being opened to external input. As a result, participation is introduced at a stage where core decisions have already been stabilised.

[65] European Commission. (2025). *Rule of law report*.; OECD/SIGMA. (2023)

OECD evidence confirms that stakeholder engagement in many regulatory systems occurs predominantly at the drafting stage rather than during problem definition or option development (OECD, 2018; OECD, 2021)[66]. European Commission assessments similarly highlight the prevalence of late-stage consultation and its limited influence on policy direction (European Commission, 2021; 2025)[67].

4.3.2 Structure of Input: Constraints on Administrative Processability

A second pattern concerns the structure of citizen input. Across most countries, participation is based on unstructured or semi-structured submissions, typically in the form of free-text comments. This is particularly evident in Bulgaria, Hungary, and Albania, where consultation platforms allow open-ended contributions without systematic linkage to specific policy provisions[68].

From an administrative perspective, this creates a processing problem. Unstructured input is difficult to aggregate, compare, and integrate into policy analysis. As the volume of contributions increases, the capacity of administrations to engage with them in a systematic way decreases. In practice, this often leads to summarisation or selective use of input.

In contrast, systems such as Croatia's e-Savjetovanja and, to a lesser extent, Slovakia's Slov-Lex, provide semi-structured formats that link comments to specific provisions. This improves the usability of input but does not in itself ensure its influence on policy outcomes.

OECD assessments emphasise that the effectiveness of stakeholder engagement depends not only on its inclusiveness, but also on the structure and usability of the input for decision-making processes (OECD, 2017; 2018[69]).

4.3.3 Feedback and Traceability: Weak Link Between Input and Decisions

Feedback mechanisms across the cases are uneven and generally limited. Only a small number of systems provide systematic responses to individual contributions, indicating whether they have been accepted, modified, or rejected. Croatia represents one of the more developed examples in this regard.

More commonly, feedback is aggregated and generalised. In countries such as Latvia, Lithuania, and Poland, consultation results are summarised without clearly linking specific inputs to policy outcomes. In Bulgaria and Romania, feedback is often minimal, further weakening traceability.

---

[66] OECD. (2018). *Regulatory impact assessment best practices*. OECD Publishing; OECD. (2021). *Regulatory policy outlook 2021*. OECD Publishing.
[67] European Commission. (2021). *Better regulation guidelines*. https://commission.europa.eu/; European Commission. (2025). *Rule of law report*. https://commission.europa.eu/
[68] Based on direct observation of platform interfaces: Strategy.bg (Bulgaria): https://strategy.bg/; Government portal (Hungary): https://kormany.hu/; konsultimipublik.gov.al (Albania): https://konsultimipublik.gov.al/ Full references in Primary Sources.
[69] [3] OECD. (2017). *Regulatory policy outlook*. OECD Publishing

OECD indicators on stakeholder engagement highlight that, while many countries provide some form of feedback, detailed justification of how input influences decisions remains limited (OECD, 2018)[70]. European Commission reports similarly point to a lack of transparency in how stakeholder contributions are reflected in final policy outputs (European Commission, 2025[71]).

The absence of traceability has direct implications for accountability. Participation without visible linkage to decisions cannot be evaluated by participants and does not generate clear expectations of responsiveness. As argued in participatory governance theory, the legitimacy of participation depends not only on inclusion, but on demonstrable responsiveness to input (Fung, 2006)[72].

4.3.4 Procedural Integration: Participation as a Parallel Process

The central finding of the analysis is the weak integration of participation into core policymaking procedures. Although participation is formally embedded in legal frameworks and supported by digital platforms, it is rarely connected to key stages such as problem definition, option development, or regulatory impact assessment.

In many systems, participation operates as a parallel process. Input is collected, but not systematically incorporated into drafting or analytical procedures. This is particularly evident in cases such as Hungary and North Macedonia, where consultation is formally present but weakly linked to policy development processes.

SIGMA assessments consistently identify this gap between formal procedures and implementation, noting that consultation mechanisms are often applied inconsistently and are not fully integrated into policy development workflows (OECD/SIGMA, 2019; 2023)[73].

This pattern corresponds to the concept of institutional decoupling, where formal structures are adopted without being fully embedded in organisational practice (John W. Meyer)[74].

4.3.5 Institutional Dynamics: Centralised Platforms, Decentralised Practice

A further pattern concerns the institutional organisation of participation. Many countries have established centralised consultation platforms that provide a single point of access for stakeholders. However, the processing of input remains decentralised within individual ministries or administrative bodies.

For example, while platforms such as Slovakia's Slov-Lex or Latvia's TAP Portal provide centralised interfaces, the extent to which input is processed and reflected in decisions depends on the practices of individual ministries.

---

[70] OECD. (2018), as above
[71] European Commission. (2025). *Rule of law report*, above.; European Commission. (2025). *Enlargement package - country reports*, as above
[72] Fung, A. (2006). Varieties of participation in complex governance, as above
[73] OECD/SIGMA. (2019), as above.; OECD/SIGMA. (2023), as above
[74] Meyer, J. W., & Rowan, B. (1977). Institutionalized organizations: Formal structure as myth and ceremony. *American Journal of Sociology*, 83(2), 340–363.

OECD and SIGMA reports both highlight the role of administrative capacity and coordination in shaping the effectiveness of stakeholder engagement (OECD, 2020; OECD/SIGMA, 2023)[75].

As a result, platform centralisation improves visibility and access, but does not ensure consistency in implementation.

4.3.6 Structural Explanation: Misalignment Between Participation and Administrative Logic

Taken together, these patterns point to a common structural explanation. Participation systems are designed around principles of openness, inclusiveness, and transparency, while administrative systems are organised around efficiency, coordination, and control.

This creates a fundamental misalignment. Participation introduces additional inputs, increases uncertainty, and expands the range of policy options. Administrative systems, by contrast, are designed to reduce uncertainty and produce decisions within defined constraints. As a result, participation is incorporated in ways that minimise disruption to existing workflows.

From a theoretical perspective, this reflects the tension between deliberative democratic ideals and administrative rationality (Jürgen Habermas[76]; Archon Fung[77]). While participatory models emphasise early and inclusive engagement, administrative systems prioritise stability and predictability.

The result is not the absence of participation, but its containment. Participation is institutionalised, visible, and procedurally organised, yet structurally limited in its capacity to influence policy outcomes.

4.3.7 Implications for Policy Uptake and Participatory Function

Policy uptake is not determined by the presence of participation mechanisms alone, but by the existence of a functional transmission process between input and decision. Such a process requires three minimum conditions: first, participation must occur at a stage where policy options remain open; second, input must be structured in a way that allows analytical use within administrative workflows; and third, administrative procedures must explicitly connect contributions to drafting, analysis, and decision-making outputs[78].

Across the cases analysed, these conditions are only partially met. Estonia represents the closest approximation of a functionally integrated configuration, where participation is linked to administrative workflows across multiple stages of the policy cycle and supported by digital infrastructure that facilitates structured input and partial traceability. In contrast, systems such as Bulgaria and Romania satisfy none of the three conditions consistently –

[75] OECD. (2020). *Innovative citizen participation and new democratic institutions*. OECD Publishing.; OECD/SIGMA. (2023), as above.
[76] Habermas, J. (1996). *Between facts and norms: Contributions to a discourse theory of law and democracy*. MIT Press.
[77] Fung, A. (2006). Varieties of participation in complex governance. *Public Administration Review*, 66(s1), 66–75.
[78] This operationalisation builds on Fung, A. (2006), as above.; OECD. (2018), as above.

consultation occurs late, input is unstructured, and the procedural pathway between contributions and decisions is absent or unclear[79].

The majority of cases fall between these positions. Countries such as Croatia, Slovakia, and Serbia meet the second condition partially — their platforms support semi-structured input — but fail on the first and third, as participation remains concentrated at the drafting stage and feedback mechanisms do not systematically link contributions to outcomes. This intermediate configuration explains the clustering of countries around medium uptake potential observed in Table 2: procedural improvements have been made, but they have not been accompanied by the repositioning of participation within the policy cycle or by the institutional mechanisms needed to close the chain from input to decision.[80]

4.4 Typology of Participation Systems

Building on the cross-country patterns identified in the previous section, this paper develops a typology of participation systems based on two core dimensions: procedural integration and uptake potential. Rather than representing a linear progression from weak to advanced forms, the four types are analytical constructs that capture distinct configurations of institutional design and administrative practice, focusing on how participation functions within policymaking systems rather than on its formal institutional features alone (Lijphart, 1971; Schmidt, 2013)[81].

Type 1: Late-Stage Formal Consultation Systems

This type is characterised by strong legal embedding combined with low procedural integration and low uptake potential. Participation is formally mandated, often through dedicated legislation, but is positioned at a late stage of the policy process, after draft texts have already been prepared.

Input is predominantly unstructured, typically collected through free-text submissions that are difficult to process systematically. Feedback mechanisms are limited, usually consisting of aggregated summaries without explicit linkage between contributions and decisions. As a result, traceability is weak and participation has minimal influence on policy outcomes.

The defining feature of this type is the disconnection between formal requirements and operational use. Participation is institutionalised as a legal obligation, but not embedded in the processes through which policy decisions are formed. This corresponds to a form of institutional decoupling, where formal structures are adopted without being integrated into organisational practice (Meyer & Rowan, 1977)[82].

[79] On Estonia see: OECD. (2020), as above.; European Commission. (2025). *Rule of law report*, as above; On Bulgaria and Romania see: European Commission. (2025), as above.; OECD/SIGMA. (2023), as above
[80] On Croatia and Slovakia see: European Commission. (2025). *Rule of law report*, as above.; OECD/SIGMA. (2023), as above. On Serbia see: European Commission. (2025). *Enlargement package*, as above.
[81] Lijphart, A. (1971).; Schmidt, V. A. (2013). Democracy and legitimacy in the European Union revisited. *Political Studies*, 61(1), 2–22.
[82] Meyer, J. W., & Rowan, B. (1977). Institutionalized organizations: Formal structure as myth and ceremony. *American Journal of Sociology*, 83(2), 340–363.

In this configuration, participation functions primarily as a compliance mechanism. It contributes to procedural legitimacy but does not operate as an input into policy design or analysis, consistent with classic critiques of symbolic participation (Arnstein, 1969)[83].

Examples: Bulgaria, Romania, Albania, Moldova, Montenegro

Type 2: Procedurally Structured but Limited-Uptake Systems

This type includes systems characterised by medium levels of procedural integration and uptake potential. Participation is organised through centralised platforms and supported by procedural rules. Input is typically semi-structured, allowing contributions to be linked to specific provisions, and feedback mechanisms provide a moderate level of transparency.

Despite these improvements, participation remains concentrated at the drafting stage, limiting its influence on problem definition and policy design. While administrative systems are capable of organising and processing input, participation is not positioned at stages where it can shape core policy choices (Fung, 2006[84]; OECD, 2018)[85].

The defining feature of this type is the presence of procedural capacity without corresponding influence. Participation is structured and visible, but its functional role within policymaking remains limited.

Examples: Croatia, Slovakia, Slovenia, Lithuania, Latvia, Poland, North Macedonia

Type 3: Partially Integrated Participation Systems

This type is characterised by higher levels of procedural integration and relatively high uptake potential. Participation is more closely linked to policymaking processes, including drafting and coordination stages. Input is more structured, and feedback mechanisms provide greater traceability between contributions and decisions.

However, this integration is not fully institutionalised. The effectiveness of participation depends on administrative practice rather than consistently enforced procedural rules. In some cases, participation remains more accessible to institutional actors than to the broader public, and its quality varies across policy areas.

The defining feature of this type is partial alignment between participatory mechanisms and administrative processes. Participation is embedded in policymaking workflows to a greater extent than in other configurations, but remains uneven and contingent on capacity and implementation (OECD, 2020[86]; European Commission, 2021[87]).

Examples: Estonia, Czech Republic, Serbia

---

[83] Arnstein, S. R. (1969). A ladder of citizen participation. *Journal of the American Institute of Planners*, 35(4), 216–224.
[84] Fung, A. (2006). Varieties of participation in complex governance. *Public Administration Review*, 66(s1), 66–75.
[85] OECD. (2018). *Regulatory impact assessment best practices*. OECD Publishing.
[86] OECD. (2020). *Innovative citizen participation and new democratic institutions*. OECD Publishing.
[87] European Commission. (2021). *Better regulation guidelines*. https://commission.europa.eu/

Type 4: Fragmented and Inconsistent Participation Systems

This type is characterised by low procedural integration and low uptake potential, combined with institutional fragmentation. Legal provisions may exist, but their application is uneven across institutions and policy areas. Participation is not organised through a unified system, and consultation practices lack standardisation.

Platforms, where present, are fragmented or limited in functionality. Input is largely unstructured, feedback mechanisms are inconsistent, and integration into policymaking processes is weak. The absence of coordination mechanisms results in variability in both access and outcomes.

The defining feature of this type is the lack of system-level coherence. Participation exists in isolated forms, but not as a standardised or integrated component of governance.

This configuration reflects broader constraints related to administrative capacity, coordination, and institutional stability. Fragmentation undermines both the transparency and effectiveness of participation, as consistent procedural standards cannot be ensured (OECD, 2020; World Bank, 2022)[88].

Examples: Bosnia and Herzegovina, Turkey, Ukraine

Implications of the Typology

The typology demonstrates that participation systems do not follow a linear trajectory from weak to advanced forms. Instead, they represent distinct configurations shaped by the interaction of legal frameworks, administrative capacity, and procedural design. Systems may combine strong legal requirements with weak implementation, or structured participation mechanisms with limited policy influence[89].

A key implication is that improvements in individual elements – such as the introduction of digital platforms or the strengthening of legal requirements – do not automatically lead to more effective participation. The effectiveness of participation depends on the alignment of multiple dimensions: timing within the policy cycle, structure of input, feedback and traceability mechanisms, and integration into decision-making processes (OECD, 2020; Fung, 2006).[90]

From an analytical perspective, the typology shifts the focus from participation as a set of mechanisms to participation as a system of interactions. Policy uptake depends on the existence of a procedural chain linking input to decision. Where this chain is incomplete, participation remains external to policymaking, regardless of its formal institutionalisation (Meyer & Rowan, 1977; Arnstein, 1969)[91].

[88] OECD. (2020), as above.; World Bank. (2022). *Worldwide governance indicators*. World Bank.
[89] Schmidt, V. A. (2013). Democracy and legitimacy in the European Union revisited. *Political Studies*, 61(1), 2–22.
[90] OECD, 2020, as above; Fung, 2006, as above.
[91] Meyer & Rowan, 1977, as above; Arnstein, 1969, as above

4.5. Additional Digital Participation Channels Beyond Formal Consultation Systems

While the previous analysis focused on formal consultation platforms embedded in administrative procedures, participatory governance in many countries is also supported by additional digital tools operating outside these frameworks. These channels vary in their level of institutionalisation and connection to decision-making, but in most cases remain fragmented and only weakly integrated into formal policymaking processes.

Across countries, additional participation channels are unevenly developed. In many cases, including Bulgaria, Hungary, North Macedonia, Albania, and Montenegro, participation outside formal consultation remains limited and largely dependent on civil society or donor-supported initiatives. In others, such as Lithuania, Serbia, and Ukraine, digital tools provide more structured forms of engagement but remain only partially integrated into policymaking processes.[92] More advanced practices are often found at the local level in countries such as Poland, Slovakia, and Slovenia, where municipalities have adopted participation platforms – sometimes based on open-source models such as CONSUL Democracy – to support more continuous and structured citizen engagement.[93] Estonia represents a notable case at the national level, with Rahvaalgatus.ee enabling citizen proposals and agenda-setting, although its connection to formal legislative decision-making remains limited, as proposals do not automatically translate into binding policy processes.[94]

Overall, these platforms enhance participation in terms of accessibility and input generation, but their integration into core administrative workflows – such as legislative drafting or regulatory impact assessment — remains weak. As a result, they frequently function as parallel participation channels rather than as components of policymaking systems (OECD, 2020)[95]. This structural divide between local innovation and central institutionalisation represents one of the core challenges that the broader research agenda on hybrid participation models aims to address.

4.6 Digital Platforms as Procedural Enablers: Benchmark Comparison

Building on the limitations identified in existing participation systems, the question arises as to how participation can be more effectively structured within policymaking processes. The comparative analysis shows that most national platforms remain focused on consultation, with limited support for structured input, traceability, and integration into decision-making. This points to the need for alternative procedural models.

---

[92] Evidence on digital participation channels in Lithuania, Serbia, and Ukraine is drawn from national platform documentation and European Commission Enlargement Reports (2025).
[93] On participatory budgeting and CONSUL-based platforms in Polish and Slovak municipalities, see: Sintomer, Y., Herzberg, C., & Röcke, A. (2008). Participatory budgeting in Europe: Potentials and challenges. International Journal of Urban and Regional Research, 32(1), 164–178.; and CONSUL Democracy platform documentation, https://consuldemocracy.org/
[94] Rahvaalgatus.ee platform documentation, https://www.rahvaalgatus.ee/; see also Estonian Ministry of Justice governance documentation.
[95] OECD. (2020). Innovative citizen participation and new democratic institutions. OECD Publishing.

Digital participation platforms such as CONSUL Democracy and Decidim provide useful benchmarks in this regard. Both platforms extend participation beyond consultation by enabling proposal generation, deliberation, and process tracking across multiple stages of the policy cycle.[96] From the perspective of the analytical framework developed in this paper, their relevance lies in their capacity to support key procedural dimensions, particularly input structuring and traceability. By enabling semi-structured or structured contributions and linking participation to specific processes, these platforms improve the usability of input and make its connection to outcomes more visible.

At the same time, differences between the platforms highlight varying levels of procedural sophistication. CONSUL Democracy is primarily proposal-driven, offering structured participation with moderate traceability through voting and tracking mechanisms. Decidim, by contrast, provides more advanced process-based functionalities, including multi-stage participation and enhanced transparency, enabling clearer links between consultation, deliberation, and co-creation phases.[97]

However, in both cases, their effectiveness ultimately depends on their integration into formal administrative procedures. While these platforms can support structured and transparent participation, they do not in themselves ensure policy uptake. Without formal links to policymaking processes – such as legislative drafting or regulatory analysis – they risk functioning as parallel participation channels rather than as components of decision-making systems (OECD, 2020, as note 4; European Commission, 2021)[98].

5. Conclusion

This paper set out to examine a question that existing research has addressed only partially: not whether citizen participation exists within policymaking systems, but whether it functions within them. By adopting a procedural perspective – treating participation as a component of administrative systems rather than as a standalone democratic mechanism – the analysis shifts the analytical focus from institutional availability to institutional integration. This reframing constitutes the paper's core contribution: it demonstrates that the central limitation of participatory governance is not the absence of mechanisms, but their structural position within the processes through which policies are actually produced.

Three findings support this argument, each with implications that extend beyond the specific cases examined.

First, participation remains predominantly late-stage and consultative across the selected countries. Consultation is typically introduced after internal drafting and coordination have already shaped core policy choices, confining participation to a reactive rather than formative role. This is not an accidental feature of administrative design, but a

[96] CONSUL Democracy: https://consuldemocracy.org/; Decidim: https://decidim.org/
[97] For a comparative overview of Decidim functionalities, see: Aragón, P., Kaltenbrunner, A., Calleja-López, A., Pereira, A., Monterde, A., Barandiaran, X. E., & Gómez, V. (2017). Deliberative platform design: The case study of the online discussions in Decidim Barcelona. In the International Conference on Social Informatics (pp. 277–287). Springer.
[98] European Commission. (2021). Better regulation guidelines. https://commission.europa.eu/

predictable consequence of how policymaking systems manage uncertainty and complexity. Administrative processes are organised to reduce the range of options before exposure to external input – a logic that structurally overrides participatory ideals of early and inclusive engagement (Habermas, 1996; Fung, 2006)[99]. This finding challenges the assumption in deliberative democratic theory that expanding participatory mechanisms will naturally translate into more inclusive policymaking. It suggests instead that the timing of participation is determined by administrative rationality, not by democratic aspiration, and that changing it requires institutional redesign rather than simply legal mandate[100].

Second, the effectiveness of participation is fundamentally conditioned by its processability within administrative systems. Unstructured input, weak feedback mechanisms, and absent traceability do not merely reduce transparency – they sever the operational link between citizen contributions and policy analysis. Participation that cannot be translated into administratively usable forms remains informational rather than analytical, and therefore external to the evidence base on which decisions are made. This finding points to an undertheorised interface between participatory governance and administrative capacity: the question is not only whether citizens can contribute, but whether administrative systems are designed to receive, process, and integrate what they contribute. Without attention to this interface, investments in participation platforms and legal requirements will continue to produce formal compliance without functional influence[101].

Third, and most importantly, procedural integration emerges as the decisive determinant of policy uptake – more significant than legal embedding, platform sophistication, or consultation frequency. The cross-country comparison shows that strong legal frameworks do not guarantee meaningful participation, while systems that embed participation within drafting procedures, coordination workflows, and analytical processes such as regulatory impact assessment demonstrate consistently higher levels of traceability and influence[102]. This finding has direct implications for how participatory governance should be evaluated and reformed. Current international frameworks – including OECD indicators and EU Better Regulation assessments – measure the presence and formal quality of consultation mechanisms, but do not capture their functional role within policymaking. A more adequate evaluation framework would assess the existence of a procedural chain from input to analysis to decision, rather than the availability of participation opportunities.[103]

The typology developed in this paper advances these conclusions by demonstrating that participation systems are best understood as configurations of interdependent dimensions rather than as points on a single continuum of development. Countries do not simply have more or less participation – they combine legal embedding, timing, input structure, feedback mechanisms, and procedural integration in distinct ways that produce qualitatively

[99] Habermas, J. (1996). *Between facts and norms*. MIT Press.; Fung, A. (2006), as above
[100] OECD. (2020). *Innovative citizen participation and new democratic institutions*. OECD Publishing.; European Commission. (2021). *Better regulation guidelines*.
[101] OECD. (2018), as above; Meyer, J. W., & Rowan, B. (1977), as above
[102] OECD. (2020), as above.; European Commission. (2025). *Rule of law report*, as above
[103] OECD. (2018), as avove.; OECD. (2021), as above

different functional outcomes (Schmidt, 2013[104].; Lijphart, 1971).[105]. This configurational perspective matters for reform design: it implies that strengthening individual elements in isolation – introducing a new platform, tightening legal requirements, or extending consultation periods – is unlikely to produce meaningful change unless it is accompanied by corresponding adjustments across the full configuration.

At the same time, the analysis points to structural tensions that cannot be fully resolved through better design alone. Participation and administrative efficiency operate according to competing logics. Expanding participation – particularly at earlier stages – increases uncertainty, multiplies inputs, and complicates coordination. Administrative systems are not designed to absorb these pressures without cost. Efforts to embed participation more deeply within policymaking will therefore involve genuine trade-offs between inclusiveness and efficiency, openness and control, and formalisation and substantive influence (Arnstein, 1969; Schmidt, 2013)[106]. Recognising these tensions is essential for designing participation systems that are both realistic and effective – systems that do not promise more than administrative conditions can deliver, but that systematically close the gap between formal consultation and functional influence.

This paper represents the first analytical stage of a broader research agenda aimed at developing a hybrid civic participation model – one that combines digital and analogue participation channels with systematic integration into administrative workflows across the full policy cycle (Osborne, 2010)[107]. The present study provides the procedural foundation for this work by mapping where integration breaks down and identifying the conditions under which participation can move from compliance to contribution.

Ultimately, participation does not fail because it is absent. It fails because it remains insufficiently integrated into the processes through which policies are actually made.

Reference

Arnstein, S. R. (1969). A ladder of citizen participation. *Journal of the American Institute of Planners*, 35(4), 216–224.

European Commission. (2021). *Better regulation guidelines*. https://commission.europa.eu/

European Commission. (2022). *Better regulation: Guidelines and toolbox update*. https://commission.europa.eu/

European Commission. (2023). *Rule of law report*. https://commission.europa.eu/

[104] Schmidt, V. A. (2013). Democracy and legitimacy in the European Union revisited. *Political Studies*, 61(1), 2–22.
[105] Lijphart, A. (1971). Comparative politics and the comparative method. *American Political Science Review*, 65(3), 682–693.
[106] Arnstein, S. R. (1969). A ladder of citizen participation. *Journal of the American Institute of Planners*, 35(4), 216–224.; Schmidt, V. A. (2013), as above
[107] Osborne, S. P. (Ed.). (2010). *The New Public Governance? Emerging perspectives on the theory and practice of public governance*. Routledge.

Freedom House. (2023). *Freedom in the world*. https://freedomhouse.org/

Fung, A. (2006). Varieties of participation in complex governance. *Public Administration Review*, 66(s1), 66–75.

Fung, A. (2015). Putting the public back into governance: The challenges of citizen participation and its future. *Public Administration Review*, 75(4), 513–522.

Habermas, J. (1996). *Between facts and norms: Contributions to a discourse theory of law and democracy*. MIT Press.

Lijphart, A. (1971). Comparative politics and the comparative method. *American Political Science Review*, 65(3), 682–693.

Meyer, J. W., & Rowan, B. (1977). Institutionalized organizations: Formal structure as myth and ceremony. *American Journal of Sociology*, 83(2), 340–363.

Meynhardt, T. (2009). Public value inside: What is public value creation? *International Journal of Public Administration*, 32(3–4), 192–219.

Moore, M. H. (1995). *Creating public value: Strategic management in government*. Harvard University Press.

OECD. (2017). *Regulatory policy outlook 2017*. OECD Publishing.

OECD. (2018). *Regulatory policy outlook 2018*. OECD Publishing.

OECD. (2020). *Innovative citizen participation and new democratic institutions: Catching the deliberative wave*. OECD Publishing.

Pateman, C. (1970). *Participation and democratic theory*. Cambridge University Press.

Schmidt, V. A. (2013). Democracy and legitimacy in the European Union revisited: Input, output and throughput. *Political Studies*, 61(1), 2–22.

Smith, G. (2009). *Democratic innovations: Designing institutions for citizen participation*. Cambridge University Press.

United Nations. (2022). *E-government survey 2022: The future of digital government*. United Nations.

V-Dem Institute. (2023). *Varieties of democracy report*. https://www.v-dem.net/

World Bank. (2022). *Worldwide governance indicators*. World Bank.