

# “Instruments of Climate Mitigation and Energy Transition in Slovakia

JUDr. Matúš Michalovič, PhD.<sup>1</sup>

## 1. Political Situation

**Is EU climate (and energy transition) policy generally supported or viewed critically in the respective national political context? How has national climate (and energy transition) policy developed in recent years? What are the prospects for future political developments? What are the key climate (and energy transition) policy controversies in the national political debate? What has been the role of the Courts in your national context?**

1

EU climate and energy transition policy is formally accepted in Slovakia, but it is not currently treated as a central political project by the highest political leadership. The Government Programme Statement for 2023–2027 [Programové vyhlásenie vlády SR 2023–2027] is framed primarily around inflation, living standards, secure energy supplies and affordable prices. In the energy field, the emphasis falls above all on security of supply, price stability, gas diversification, nuclear energy and support for vulnerable consumers. The Updated Integrated National Energy and Climate Plan for 2021–2030<sup>2</sup> follows the same logic: its core priorities are security, affordability, competitiveness, energy poverty and nuclear energy, with decarbonisation embedded in that broader framework rather than driving it.

Recent movement in Slovak climate policy therefore appears largely reactive and EU-driven. The updated NECP is itself a product of EU governance obligations, and the National Inventory Document 2026 shows that climate governance has, at the institutional level, been folded into a broader Council of the Slovak Republic for Sustainable Development and its Financing, which replaced earlier bodies more specifically associated with the European Green Deal. In practical terms, much of what still moves in the Slovak climate field seems to do so because EU legislation must be updated, reported, planned or transposed, rather than because climate change has become a domestically dominant political priority.

The clearest sign of a more ambitious domestic climate turn was the draft Law on Climate Change and Low-carbon Transformation of the Slovak Republic, introduced by the Ministry of Environment in early 2023. That proposal would have enshrined carbon neutrality by 2050, introduced sectoral targets, and created a more structured national framework for climate governance. After the change of government, however, the project was effectively shelved and no longer forms part of the operative political agenda. For the near future, no major autonomous acceleration of Slovak climate policy appears likely.

<sup>1</sup> This work was supported by the Slovak Research and Development Agency under the Contract no. APVV-23-0645.

<sup>2</sup> [https://commission.europa.eu/document/download/7508acc9-b266-4100-ac2f-6fa4ecd77f17\\_en?filename=Slovakian%20final%20NECP-English%20version.pdf](https://commission.europa.eu/document/download/7508acc9-b266-4100-ac2f-6fa4ecd77f17_en?filename=Slovakian%20final%20NECP-English%20version.pdf).

The central political tensions do not concern the scientific premise of climate change as such, but rather the cost, pace and distributive effects of transition measures. In Slovak political discourse, climate policy is increasingly filtered through questions of energy affordability, industrial competitiveness and social acceptability, especially where EU measures are expected to affect households more directly.

The role of the courts has so far been limited. Publicly visible climate litigation remains sparse: the Climate Change Litigation Database currently lists no domestic Slovak climate case, and the Slovak-linked matters it records concern mainly older EU ETS or Kyoto-compliance disputes, such as PPC Power v Slovak Financial Directorate and the U.S. Steel Košice litigation, rather than strategic rights-based climate cases of the kind seen in some other European jurisdictions. I therefore suggest that, for the time being, the Slovak story remains one of administrative implementation and EU transposition rather than court-led climate governance.

## 2. Overall Climate Policy Targets

**Are the EU's overall climate targets (2035/2040/2050) considered adequate / too ambitious / insufficient in national politics? Has the Member State set more ambitious national climate targets ("gold plating")? If so, what additional national targets are being pursued?**

Slovakia's Updated Integrated National Energy and Climate Plan for 2021–2030 states that the country aims to reduce emissions in line with the Fit for 55 package and to contribute to climate neutrality by 2050. The same document sets a -22.7% non-ETS target, a LULUCF target of -504 kt, and a 25% RES target, while also stressing security of supply and energy affordability as key qualitative priorities. According to the Low-Carbon Development Strategy of the Slovak Republic until 2030 with a View to 2050 [Nízkouhlíková stratégia rozvoja Slovenskej republiky do roku 2030 s výhľadom do roku 2050], Slovakia did not set indicative milestones for 2040, and treated 2050 climate neutrality as the central long-term benchmark. The same strategy also openly acknowledged that the measures already modelled under the WEM and WAM scenarios would not be sufficient to achieve climate neutrality by 2050 without additional measures. According to Greener Slovakia: Environmental Policy Strategy of the Slovak Republic until 2030 [Envirostratégia 2030], Slovakia earlier adopted a limited form of national "gold plating" by raising its non-ETS ambition to at least 20% below 2005 levels by 2030, above the then-applicable EU benchmark. In that respect, Slovak policy has sometimes gone beyond the then-applicable minimum national benchmark, but not broadly or systematically across the whole target architecture. According to OECD Environmental Performance Reviews: Slovak Republic 2024, a 2023 draft climate law would have gone further still by making carbon neutrality by 2050 legally binding, adding sectoral targets, and even envisaging negative net emissions by 2055. However, following the change of government, the draft was effectively shelved, and the current political leadership appears unlikely to revive or adopt it.

I therefore suggest that, in the Slovak context, EU-level climate targets are generally approached not as insufficiently ambitious, but as politically and economically demanding. The dominant national pattern is therefore selective rather than systematic: Slovakia accepts the long-term neutrality trajectory, but its operative climate policy remains cautious, implementation-oriented and closely tied to concerns about feasibility, affordability and energy security.

## 3. Emission Trading System I (Industry)

## **Is ETS I considered appropriate? If not, what reforms are viewed as priorities from the national perspective?**

Slovakia treats ETS I as a central tool of industrial decarbonisation, but not as an area of separate national target-setting, because the EU ETS operates through declining emission-cap trajectories rather than country-specific commitments. The Updated Integrated National Energy and Climate Plan for 2021–2030 presents the Slovak approach as mainly implementation- and investment-based: the ETS allowance price is treated as the main driver of lower emission intensity, while ETS revenues are channelled into support instruments such as the Modernisation Fund. Slovakia combines decarbonisation pressure with industrial cushioning measures: it refers both to state aid for indirect CO<sub>2</sub> costs for electricity-intensive sectors and to the use of the Modernisation Fund, from which Slovakia expects more than EUR 2 billion by 2030, including dedicated support for industrial decarbonisation.

According to the National Inventory Document 2026, total verified Slovak ETS emissions fell from 20.9 Mt CO<sub>2</sub>e in 2021 to 15.3 Mt CO<sub>2</sub>e in 2024, while this document links the more recent decline partly to high fuel prices and to the fact that several operators reduced production or phased out activity. Although this figure covers ETS emissions more broadly than industry alone, it still suggests that ETS I is currently producing real adjustment pressure on Slovak industrial operators.

I therefore suggest that Slovakia's position on ETS I is essentially pragmatic: it does not challenge ETS I as the core instrument for industrial decarbonisation, but seeks to make it politically and economically manageable through compensation, investment support, and gradual technological transition rather than through additional domestic stringency beyond the EU framework.

## **4. Emission Trading System II (Buildings and Road Transport)**

**What share of the national total energy consumption is attributable to buildings and road transport? Is the postponement of ETS II to 2028 viewed positively? Are buildings and road transport already part of a national regulatory regime that anticipates elements of ETS II? How are the prospects for decarbonizing the national building and transport sectors assessed?**

ETS 2 is regarded in Slovakia less as an abstract carbon-pricing instrument than as a politically sensitive issue of household affordability. The report *Impacts of Introducing the ETS 2 System on Households in the Slovak Republic* [Dopady zavedenia systému ETS 2 na domácnosti v SR] makes clear that ETS 2 will apply to buildings and road transport, while the regulated entities will be fuel suppliers rather than households themselves. It also explains that monitoring began in 2025 and that the system is scheduled to take effect in 2027, with the possibility of deferral to 2028 under the relevant EU conditions.

The same materials show why ETS 2 has been approached cautiously in Slovakia. The core concern is the impact on households, especially through heating and private car use. In that sense, ETS 2 is framed domestically less as a classic climate instrument than as a socially and politically sensitive issue of cost distribution. This concern is reinforced by the fact that road transport and residential heating are already among the most important contributors within Slovakia's non-ETS emissions. At the same time, the Updated Greenhouse Gas Emission Projections of the Slovak Republic from March 2025 did not yet model ETS 2 for transport and

residential and commercial buildings, because there was still insufficient information on implementation.

The materials used here do not provide a single consolidated percentage for buildings and road transport together as a share of national total energy consumption. They nevertheless make clear that both sectors represent a substantial part of final energy use and are central to Slovakia's non-ETS challenge. Buildings and transport are already subject to a broader mix of energy-efficiency, renovation and sectoral decarbonisation measures, even if Slovakia has not created a domestic carbon-pricing regime functionally equivalent to ETS 2.

Slovakia's main response is expected to run through the Social Climate Fund and the future Social Climate Plan, not through rejection of ETS 2 as such. I therefore suggest that Slovakia's position is best described as reluctant but adaptive: it accepts the scheme in principle but insists that its operation must be softened by compensation and investment support for vulnerable households and transport users.

4

## 5. Double regulation?

**Is there a discussion about the topic of 'double' regulation: e.g. energy efficiency in ETS installations / build environment, National taxes on/pricing of CO2 emissions, Emission Limit Values in environmental permits?**

A strong standalone debate on “double regulation” does not appear to be central to the Slovak climate-policy controversy. The more visible problem is almost the opposite: Slovakia has no carbon tax, its effective carbon rates are low compared with other EU countries, and carbon-price signals are described as inconsistent across fuels and sectors. Slovak policy documents tend to treat ETS and other instruments as complementary rather than duplicative. For example, energy taxation should work together with carbon pricing through emissions trading, so that the taxation of motor and heating fuels better reflects environmental and health impacts. The clearest example of sensitivity to possible overlap concerns air-pollution charging rather than climate regulation as such. The OECD notes that, under the revised Air Pollution Charges Law, businesses subject to the EU ETS are to be exempted from tax on carbon monoxide emissions by 2025, while the Air Protection Law continues to require permits and emission requirements for stationary sources. According to the Updated Greenhouse Gas Emission Projections of the Slovak Republic from March 2025, Slovak projections already assume the concurrent operation of several layers of regulation, including the Energy Performance of Buildings Directive, the Energy Efficiency Directive, renewable-energy rules, and EU carbon-pricing logic. Yet the document does not frame this coexistence as a major legal problem of “double regulation”.

I would suggest that, in Slovakia, the issue of “double regulation” is present only in a limited and technical sense. The dominant concern is not over-regulation by overlapping climate instruments, but rather the fragmented and sometimes weak overall price and regulatory signal. Where overlaps do arise, Slovak legislation seems more likely to carve out specific exemptions than to question the basic coexistence of ETS, energy-efficiency rules and permit-based emission controls.

## 6. Effort Sharing

**Is the Member State “on track” to meet its national reduction targets under the Effort Sharing Regulation 2018/842? Is failure / compliance / over-achievement of the EU requirements expected? What are the main challenges or success factors influencing**

## **compliance or non-compliance with the EU requirements? Does the state intend to sell its own emission credits or to purchase such credits from other Member States?**

The Updated Integrated National Energy and Climate Plan for 2021–2030 places Slovakia's current effort-sharing obligation in the familiar non-ETS sectors (especially transport, buildings, agriculture and waste) and sets the 2030 ESR target at a 22.7% reduction compared with 2005. The same document also records that Slovakia complied with all annual limits in 2013–2020, which means that its earlier effort-sharing trajectory was formally achieved. That relatively strong past-compliance story is confirmed by The Eighth National Communication of the Slovak Republic on Climate Change, which states that Slovakia's 2020 target was +13% compared with 2005, while actual 2020 ESD emissions were -18.4% compared with 2005. The same report identifies road transport and residential heating as among the largest contributors within the effort-sharing sectors, which already points to where the real pressure lies. The more difficult question is therefore not past compliance but 2030 delivery. The Updated Integrated National Energy and Climate Plan for 2021–2030 works with a more ambitious pathway, while the OECD Environmental Performance Review of Slovakia 2024 warns that projected transport growth appears difficult to reconcile with the required reduction path in non-ETS sectors and that Slovakia is not on a net-zero pathway.

I therefore suggest that Slovakia's effort-sharing record is stronger on past compliance than on future credibility. In other words, Slovakia clearly met its earlier target, but the credibility of its 2030 ESR target will depend above all on whether it can deliver much stronger mitigation in transport and buildings.

## **7. Renewable Energy**

**What progress has been made in the transition towards a national energy supply based on renewable energy? What is the current energy mix, and what are the projections up to 2050? What differences exist in the transformation of the electricity market versus the broader energy market (including non electric heating, transport and other energy use)? What are the major national regulatory instruments to support the transition to renewables? What major obstacles hinder a faster transition to renewable energy at the national level? Are adjustments to the EU's regulatory framework considered necessary? If so, which ones?**

Slovakia supports further expansion of renewable energy, but in a cautious and qualified form. The Updated Integrated National Energy and Climate Plan for 2021–2030 raises the 2030 renewable-energy target to 25% of gross final energy consumption, up from the earlier 19.2%. The same document expects the increase to come mainly from heating and cooling and, to a lesser extent, from electricity, while the trajectory in transport is presented more cautiously.

The planned technology mix is also relatively clear. By 2030, Slovakia expects around 1,700 MW of solar PV, 750 MW of onshore wind and 150 MW of biogas or biomethane, while hydropower is expected to grow only marginally and mainly through modernisation rather than major new construction. The Report on Emission Projections 2025 points in the same direction: photovoltaics are already supported through household and SME schemes, wind development depends heavily on faster permitting, and geothermal remains promising but still comparatively limited.

At the same time, Slovak renewable-energy policy remains distinctly pragmatic. Renewables are not framed as the sole organising principle of energy policy, but as one instrument within a broader strategy still shaped by affordability, security of supply, system stability and environmental safeguards. This also explains the relatively cautious Slovak debate: the principal obstacles are not conceptual opposition to renewables as such, but rather grid constraints, permitting barriers, fragmented land conditions and sustainability concerns, especially in relation to biomass and hydropower.

From the Slovak perspective, the more immediate problem therefore seems to lie in implementation capacity rather than in any fundamental deficiency of the EU renewables framework itself. The main domestic support instruments include investment support for households and SMEs, selected permitting facilitation, and broader EU-funded modernisation and renovation schemes. Beyond 2030, the available Slovak materials do not present a detailed renewables-only vision to 2050; rather, they point to a mixed pathway combining further RES deployment with nuclear energy, grid modernisation and broader electrification. I therefore suggest that Slovakia supports further RES expansion, but not at any price: the dominant emphasis remains on system integration, affordability, security of supply and practical deliverability.

## 8. Land Use

**How exactly are emissions from the land-use sector recorded nationally? What trends can be derived from this data? What strategies are being pursued at the national level to strengthen the land-use sector's contribution to emission reductions and to comply with the LULUCF-Regulation 2018/841?**

In the Slovak climate context, land use is addressed primarily through the LULUCF framework. The Updated Integrated National Energy and Climate Plan for 2021–2030 sets Slovakia's 2030 LULUCF target at +504 kt CO<sub>2e</sub>, while the OECD Environmental Performance Review of Slovakia 2024 notes that this requires an increase in net removals compared with the 2016–18 average. The sector nevertheless remains a major net sink. The National Inventory Document 2026 reports net LULUCF removals of -4 990.66 Gg CO<sub>2 eq.</sub> in 2024, with forest land by far the most important category; the same inventory shows that Slovakia's land structure is dominated by forest land (41.5%), followed by cropland (31.0%) and grassland (17.2%), while settlements and other land are net sources rather than sinks. At the same time, the direction of travel is not fully reassuring. The Eighth National Communication of the Slovak Republic on Climate Change records much stronger net removals for 2020 (-7 659.71 Gg CO<sub>2 eq.</sub>), whereas the OECD Environmental Performance Review of Slovakia 2024 warns that the expected decline in net carbon removals puts Slovakia's 2030 LULUCF target at risk. In that sense, Slovak land-use policy is not about creating a sink from scratch, but about preventing the erosion of an already important sink. The main policy response is centred on forests, cropland and soils. The 2025 emission projections report models LULUCF measures around afforestation of unused cropland, protection of existing forests, sustainable forest management, carbon sequestration in agricultural soils, and adaptation-oriented changes in forest structure; the OECD review presents the same mix and adds that further measures across land-use categories will still be needed.

I therefore suggest that Slovakia's land-use policy is strategically important but presently fragile: the sector still offsets a meaningful share of national emissions, but its future contribution depends on whether forestry and agricultural measures can actually stabilise and strengthen removals.

## 9. Special National Strategies, Programmes, and Ideas

**What special strategies, regulatory programmes, and ideas—beyond those already mentioned—are being pursued nationally for climate mitigation? How do these national concepts and legal instruments relate to EU climate policy? Does a programme for carbon capture and storage exist?**

Beyond the core Updated Integrated National Energy and Climate Plan for 2021–2030, Low-Carbon Development Strategy of the Slovak Republic until 2030 with a View to 2050 and adaptation framework, the most distinctive Slovak idea has been the draft Law on Climate Change and Low-carbon Transformation of the Slovak Republic. It was conceived as a proposal to enshrine carbon neutrality by 2050 in legislation, introduce sectoral targets, create a Council for Climate Accountability, and require local and regional climate action plans. This is important because it would move Slovak climate policy from strategic planning towards a more structured domestic governance model. As mentioned before, this bill has not been adopted and its status remains questionable at best.

A second layer consists of implementation programmes rather than new headline targets. The OECD notes that the Recovery and Resilience Plan allocates 45% of its budget to climate objectives, with a strong focus on energy efficiency and sustainable transport. At a more operational level, Slovakia implemented the Restore Home Project as a long-term renovation programme for family houses and also refers to support for small-scale renewables and boiler replacement in households.

There are also more experimental or sector-specific ideas. The OECD highlights the Ministry of Agriculture's proposed Carbon and Water Bank as a new initiative intended to improve soil and water quality with positive effects on climate, the water cycle and biodiversity. Although this is not a classic mitigation instrument in the narrow ETS sense, it shows that part of the Slovak debate is moving towards land-based and ecosystem-linked climate instruments.

In our view, these national concepts mostly complement and operationalise EU climate policy rather than depart from it. The draft climate law was expressly framed around the Fit for 55 trajectory, while the recovery and renovation programmes largely function as domestic vehicles for implementing EU-funded decarbonisation and energy-transition objectives.

As for carbon capture and storage, the picture is still limited. The Eighth National Communication of the Slovak Republic on Climate Change states that the CCS Directive was transposed by Act No. 258/2011 Coll. on the permanent storage of carbon dioxide in the geological environment, and that suitable geological sites have been identified in Slovakia. However, the same set of materials presents CCS mainly as a future regulatory option or high-cost decarbonisation lever, not as a mature national deployment programme. The Updated Greenhouse Gas Emission Projections of the Slovak Republic discusses carbon capture, utilisation and storage pathways for steel, ammonia and other industrial sectors, while the broader decarbonisation study reproduced makes clear that large-scale CCS would require significant investment and supporting regulation.

Therefore, I suggest that Slovakia currently has a legal basis for CCS, but not yet a fully developed national CCS programme.

## 10. Social and Regional Compensation Mechanisms

**Are there national mechanisms to provide social or regional compensation for the burdens arising from climate protection measures? Is any form of “climate dividend” or “climate payment” being issued?**

Slovakia does not operate a general “climate dividend” or “climate payment” in the strict sense. The materials instead point to a more fragmented model built around energy-price support, housing renovation, and planned EU-funded compensation instruments. In 2022–23, the government adopted broad measures to cushion the energy crisis, including one-off payments for pensioners, families with children and low-income households and later price caps for electricity, gas and heat, but it should be stressed that these measures were largely untargeted. However, that changed in 2026 and those payments are targeted to low-income households, but the system still shows some imperfections. For the climate-transition context proper, the most important future mechanism is the Social Climate Fund. Both the Updated Integrated National Energy and Climate Plan for 2021–2030 and the ETS 2 commentary material describe it as the main instrument to mitigate the social effects of ETS 2 for vulnerable households, vulnerable micro-enterprises, and vulnerable transport users. However, the same materials show that this is still largely a planned rather than fully operational mechanism, dependent on the adoption of a national Social Climate Plan.

There are also some practical compensatory programmes, even if they are not framed as a climate dividend. The Recovery and Resilience Plan prioritises vulnerable households in the renovation of at least 30,000 family houses, while the Restore Home Project and Green Households II, which support renovation, cleaner heating and small-scale renewables in households. These are best understood as socially relevant transition-support measures, not as direct climate cash payments.

Therefore, I would suggest that the Slovak picture is modest and still mainly incomplete. There is no clear national climate dividend, but there are several partial social mechanisms, some already in use, others still being prepared, with the most important future instrument being the Social Climate Fund.

## 11. Adaptation

**Are there national programmes for climate adaptation? How can these be briefly described? Should the EU, from a national perspective, develop climate adaptation programmes, or should this remain the responsibility of the Member States?**

Slovakia has a fairly well-developed strategic framework for adaptation, even if implementation appears less advanced than the formal architecture. The Strategy for Adaptation of the Slovak Republic to Climate Change – Update [Stratégia adaptácie Slovenskej republiky na zmenu klímy – aktualizácia] built on the original 2014 strategy, and the Action Plan for the Implementation of the Strategy for Adaptation of the Slovak Republic to Climate Change [Akčný plán pre implementáciu Stratégie adaptácie Slovenskej republiky na zmenu klímy], approved in 2021, translated that framework into short-term measures for 2021–2023 and medium-term measures for 2024–2027.

The adaptation agenda is also relatively broad. The Action Plan structures adaptation around five cross-cutting actions and seven priority areas, including water protection and use, sustainable agriculture, adapted forestry, biodiversity, health, the residential environment, and technical, economic and social measures. In the same vein, OECD presents Slovakia's adaptation policy as increasingly based on ecosystem-based approaches, with measures such as wetland and floodplain restoration, green infrastructure, more resilient forestry, and better land and water management. Slovakia seems to treat adaptation as a serious policy field rather than a rhetorical add-on. The Eighth National Communication of the Slovak Republic on Climate Change identifies more frequent drought, changing precipitation patterns, floods, forest stress and sector-specific vulnerabilities as already visible domestic risks, while the OECD review notes that the Ministry of Environment now coordinates adaptation across levels of government and that the Recovery and Resilience Plan allocates EUR 159 million to adaptation-related reforms.

At the same time, the OECD review also makes clear that implementation has often been *ad hoc* and project-based, and that the next challenge is to scale up local adaptation and strengthen delivery across sectors and levels of governance. I would therefore describe the Slovak position on adaptation as institutionally mature on paper, increasingly nature-based in orientation, but still uneven in practical execution.

## 12. New liability/compensation regime in the Air Quality Directive (2024/2881) and the amended IE Directive (2024/1784)

**The new Air Quality Directive 2024/2881, art. 28. and the amended IE Directive (2024/1785) requires Member States to establish a liability/compensation regime regarding persons suffering damage to human health caused by violation of the EU-obligations under the two directives. The new EU-obligation should be seen in light of the CJEU-ruling in C-61/21 in which the CJEU rejected Member State liability for human health damage based on the (old) Air Quality Directive. The new obligations place Member States as the one who should pay compensation for the damage, but the legal implications of the new regimes are not entirely clear. How is the new obligation on liability/compensation in the new Air Quality Directive and the amended IE Directive intended to be implemented in your Member State?**

The new compensation regimes under the Air Quality Directive (EU) 2024/2881 and the amended Industrial Emissions Directive (EU) 2024/1785 should not be treated as identical. What matters for Slovakia at this stage is that both regimes are still in the course of transposition and that their final national legal design remains unclear. The key issue is therefore not whether Slovakia must respond legislatively, but how these new EU requirements will be fitted into the existing Slovak private-law and administrative-law framework.

On the IED side, Slovak legislative materials already show an active transposition process through an amendment to Act No. 39/2013 Coll. on integrated pollution prevention and control, and the public legislative materials expressly state that the draft is intended to transpose Directive (EU) 2024/1785. On the air-quality side, there is so far only a preliminary legislative process concerning an amendment to Act No. 146/2023 Coll. on air protection, which suggests that Slovak implementation of the compensation regime under Directive (EU) 2024/2881 is still at an earlier stage.

At present, the accessible Slovak materials do not reveal a fully settled national design for either regime. It is possible to say that Slovakia is already legislating on the IED amendment and has at least opened the air-quality transposition process. It is not yet possible to say with confidence whether Slovakia will implement these compensation mechanisms through a special standalone action, by adapting existing civil-liability rules, or through a mixed model linked to prior administrative findings of infringement.

I therefore conclude that the new compensation regimes are in the course of transposition in Slovakia, but their final legal architecture is not yet publicly clear. The IED amendment appears procedurally further advanced than the air-quality one, and the main unresolved issue is not whether Slovakia must introduce compensation, but how it will integrate that EU requirement into its existing legal framework.