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THE SOCIAL ECONOMY IN THE EUROPEAN UNION: A COMPARATIVE LEGAL AND INSTITUTIONAL ANALYSIS

***Abstract**: This article analyses the state and evolution of the social economy in several European Union countries, including France, Spain, Sweden, Italy and Romania, with a particular focus on comparative institutional dynamics. The social economy refers to economic activities that prioritize social and environmental objectives over profit maximization, contributing to social inclusion, employment generation and sustainable development. The study adopts a qualitative comparative and document-based approach to examine regulatory frameworks, governance principles, economic relevance and policy integration mechanisms across the selected Member States. Attention is given to recent European policy developments, including the European Commission's Social Economy Action Plan and the Council Recommendation on developing framework conditions for the social economy, as well as to instruments supporting access to finance, statistical visibility and participation in public procurement.*

The findings highlight both persistent institutional diversity and emerging convergence trends among national models, reflecting differences in historical traditions, policy approaches and levels of economic integration. At the same time, the analysis shows that European policy frameworks contribute to strengthening the strategic role, institutional consolidation and visibility of the social economy across the European Union. The study suggests that the social economy is evolving into an increasingly important component of the European social market economy, with significant contributions to employment creation, social inclusion and the transition toward a more sustainable, inclusive and resilient economic model.

***Keywords**: social economy, European Union, social enterprises, comparative analysis, EU policy framework, institutional convergence.*

ECONOMIA SOCIALĂ ÎN UNIUNEA EUROPEANĂ: O ANALIZĂ COMPARATIVĂ JURIDICĂ ȘI INSTITUȚIONALĂ

***Abstract**: Acest articol analizează starea și evoluția economiei sociale în mai multe state membre ale Uniunii Europene, inclusiv Franța, Spania, Suedia, Italia și România, cu un accent deosebit pe dinamica instituțională comparativă. Economia socială se referă la activități economice care prioriti-*

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zează obiectivele sociale și de mediu în detrimentul maximizării profitului, contribuind la incluziunea socială, crearea de locuri de muncă și dezvoltarea durabilă. Studiul adoptă o abordare calitativă, comparativă și bazată pe analiza documentară, pentru a examina cadrele de reglementare, principiile de guvernanță, relevanța economică și mecanismele de integrare a politicilor la nivelul statelor membre analizate. O atenție deosebită este acordată evoluțiilor recente ale politicilor europene, inclusiv Planului de acțiune pentru economia socială al Comisiei Europene și Recomandării Consiliului privind dezvoltarea condițiilor-cadru pentru economia socială, precum și instrumentelor care sprijină accesul la finanțare, vizibilitatea statistică și participarea la achizițiile publice.

Rezultatele evidențiază atât persistența diversității instituționale, cât și tendințe emergente de convergență între modelele naționale, reflectând diferențele istorice, abordările de politică publică și nivelurile de integrare economică. În același timp, analiza arată că cadrele de politici europene contribuie la consolidarea rolului strategic, a coerenței instituționale și a vizibilității economiei sociale la nivelul Uniunii Europene. Studiul sugerează că economia socială devine un pilon din ce în ce mai important al economiei de piață europene, având contribuții semnificative la crearea de locuri de muncă, incluziunea socială și tranziția către un model economic mai sustenabil, incluziv și rezilient.

***Cuvinte-cheie**: economia socială; Uniunea Europeană; întreprinderi sociale; analiză comparativă; cadrul de politici al Uniunii Europene; convergență instituțională.*

1.INTRODUCTION.

The social economy is a sector of the economy that comprises organizations that prioritize social and environmental objectives over financial profits, operating within a specific legal and regulatory framework established at both national and European Union levels. The social economy is an essential aspect of the European Union's economic structure, contributing significantly to employment, economic growth, and social cohesion, as recognised in European Union policy instruments and regulatory initiatives concerning social inclusion and sustainable development.[1]

The social economy in the European Union is composed of a diverse range of organizations, including cooperatives, mutuals, non-profits, foundations, and social enterprises. These organizations share a common objective of creating a sustainable and inclusive society by addressing social, environmental, and economic challenges, in accordance with national legal forms and regulatory provisions governing the social economy sector in each Member State.

According to consolidated estimates reported by CIRIEC and the European Commission, the social economy in the European Union employs approximately 13.6-14 million people, representing around 6-6.5% of total employment. The sector's economic contribution is estimated at close to 8% of EU GDP, although precise calculations vary depending on national statistical methodologies and definitional scope.

The European Union has played a significant role in supporting the development of the social economy through financial and regulatory instruments. The European Commission has provided funding through programs such as the European Social Fund Plus and the European Regional Development Fund, in accordance with Regulation (EU) 2021/1057 establishing the European Social Fund Plus and the broader legal framework governing European structural and investment funds.[2]

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1 Defourny J., Nyssens M. Social Enterprise in Europe: Institutional Diversity and Future Perspectives. În: Journal of Social Entrepreneurship, 2021.

2 European Parliament and Council of the European Union. Regulation (EU) 2021/1057 establishing the European Social Fund Plus (ESF+). Available at:https://eurlex.europa.eu/eli/reg/2021/1057/oj (accessed: 15.02.2026).

In the European Union, the social economy has progressively evolved from a historically rooted “third sector” into an increasingly strategic component of the European social market economy. This evolution has been accelerated by successive systemic shocks, including the financial crisis, the COVID-19 pandemic, and recent energy and cost-of-living crises, which have led to the adoption of coordinated legal and policy responses at European Union level aimed at strengthening economic resilience and social protection mechanisms.

A defining feature of the social economy is that its social purpose is embedded in governance and operating rules: democratic participation, primacy of people and mission, limited profit distribution, and reinvestment in collective benefit. These characteristics are often reflected in national legislation governing cooperatives, associations and social enterprises, as well as in European-level soft law instruments promoting accountability and good governance principles.

At European Union level, the policy recognition of the social economy has become more explicit in the post-2020 period. The European Commission’s Social Economy Action Plan (2021) constitutes a key policy instrument guiding Member States in developing coherent regulatory frameworks and strengthening the legal environment of the sector.[3] It frames the social economy as a driver of employment, innovation, inclusive growth and the green and digital transitions.

The strategic relevance of the social economy is also closely connected to the Sustainable Development Goals, particularly those related to employment, social inclusion and environmental sustainability.[4] These objectives are increasingly integrated into European Union policy and legal frameworks concerning sustainable development and corporate responsibility.

A second factor driving increased attention is the need for improved “framework conditions”, including regulation, access to finance, public procurement rules and statistical visibility, all of which are governed by specific legal provisions at both European Union and Member State level. In 2023, the Council adopted a Recommendation on developing social economy framework conditions, reinforcing the importance of coordinated regulatory action and legal harmonisation in supporting the development of the social economy.[5]

From a research perspective, comparative analysis across Member States remains essential. The social economy is present in all European Union countries, yet its forms differ due to legal traditions, welfare regimes and policy choices. Therefore, this article uses a cross-country approach to identify institutional patterns and to analyse the interaction between European Union policy instruments and national ecosystems, with particular emphasis on legal and regulatory frameworks shaping the sector.

The social economy has been widely analysed in academic and policy literature, particularly from economic and social perspectives. However, comparatively fewer studies focus on the legal and institutional interaction between European Union policy frame-

[3] European Commission. Social Economy Action Plan (2021). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accessed: 15.02.2026).

[4] United Nations. Transforming our world: The 2030 Agenda for Sustainable Development.Available at: https://sdgs.un.org/2030agenda (accessed: 15.02.2026).

[5] Council of the European Union. Council Recommendation on developing social economy framework conditions (2023).Available at:https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023H0009 (accessed: 15.02.2026).

works and national regulatory systems governing the sector.

This article addresses the following research question: To what extent does the post-2020 European policy framework contribute to the consolidation and convergence of national social economy models within the European Union, from a legal and institutional perspective?

The research hypothesis of this study is that the post-2020 European Union policy framework contributes significantly to the consolidation and gradual convergence of national social economy models, while preserving institutional diversity across Member States.

The study contributes to the literature by providing a comparative institutional analysis of national social economy models in the context of recent European Union policy developments. Specifically, it highlights Romania as an emerging social economy ecosystem influenced by European funding instruments and national legislation governing social enterprises and non-profit organisations.

The analysis is grounded in an institutional perspective, according to which legal frameworks, governance structures and public policies shape organisational behaviour and development trajectories. The social economy is thus examined not only as a set of entities, but as an institutional ecosystem embedded in national welfare regimes and European Union governance structures, regulated by a combination of binding legal norms and soft law instruments.

2. METHODOLOGY

To analyse the evolution and institutional configuration of the social economy within the European Union, this study adopts a qualitative, comparative and document-based research approach. The analysis focuses on five Member States: Italy, Spain, France, Sweden and Romania, selected due to differences in their welfare regimes, legal traditions and levels of institutional consolidation of the social economy sector.

The research is grounded in a comparative institutional perspective, examining how legislative frameworks, governance structures and public policy instruments shape the development of national social economy ecosystems. In addition, the study employs a legal analysis of the regulatory and institutional framework applicable to the social economy at both European Union and national level. Rather than relying on primary empirical data, the study draws on relevant secondary sources, including key European Union policy documents, notably the European Commission's Social Economy Action Plan[6]and the 2023 Council Recommendation on developing social economy framework conditions[7], as well as OECD reports[8], comparative studies conducted by CIRIEC and the European Economic and Social Committee[9], national legislation, and academic literature on social

[6] European Commission. Social Economy Action Plan (2021). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accessed: 15.02.2026).

[7] Council of the European Union. Council Recommendation on developing social economy framework conditions (2023). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023H0009 (accessed: de 15.02.2026).

[8] Organisation for Economic Co-operation and Development. Recommendation on the Social and Solidarity Economy and Social Innovation (2022). Available at: https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0472 (accessed: 15.02.2026).

[9] CIRIEC, European Economic and Social Committee. Recent evolutions of the Social Economy in the European Union, 2016. Available at: https://www.eesc.europa.eu/sites/default/files/files/qe-04-17-875-en-n.pdf (accessed: 21.02.2026).

enterprises and cooperative traditions. Accordingly, the materials used in the research include European Union policy and legal instruments, national legislative acts, institutional reports, comparative studies and specialised academic literature.

To ensure consistency in the comparison, the analysis is structured around four main dimensions: the legal and regulatory framework; organizational forms and governance principles; economic weight and contribution to employment; and the integration of the social economy into national and European Union-level policy strategies. This framework allows for the identification of both contextual differences and broader convergence trends across Member States This study places particular emphasis on the legal and regulatory dimension, as differences in legislative recognition and institutional support mechanisms directly affect the development and visibility of the social economy in each Member State.

The research is primarily descriptive-analytical in nature, while also incorporating an assessment of policy developments, particularly those emerging after 2020. From a legal-methodological perspective, the study combines the comparative method with document analysis and normative interpretation, to evaluate the extent to which recent European Union policy instruments contribute to the consolidation of national social economy frameworks. It does not aim to test quantitative hypotheses, but rather to interpret institutional developments and to examine how the social economy has been strategically positioned within the broader European economic model.

A limitation of the study concerns the differences in the way the social economy is defined and measured across Member States, which may influence the comparability of the information and estimates presented in reports and comparative studies. Another limitation derives from the diversity of legal definitions and regulatory approaches applicable to the social economy across the selected states, which affects the uniformity of comparative legal analysis.

Overall, the chosen methodology seeks to provide a coherent and balanced comparative analysis of the social economy in the European Union, with particular attention to recent institutional consolidation and strategic developments.

In addition, the selection of Italy, Spain, France, Sweden and Romania follows a most-different systems comparative logic, allowing the analysis of social economy development across distinct welfare regimes and institutional traditions. The selection of the five Member States follows a structured comparative rationale rather than a purely illustrative choice. Three operational criteria guided the selection process.

First, welfare regime diversity was considered essential to capture institutional variation. Italy, Spain and France represent Southern and Continental European models with strong cooperative traditions and formal framework legislation. Sweden reflects a Nordic welfare regime characterised by partnership-based governance and high institutional trust. Romania represents a post-transition economy with a developing social economy ecosystem shaped significantly by European Union structural funds and regulatory alignment.

Second, the presence or absence of comprehensive social economy framework legislation constituted a key differentiating variable. Spain, France, Italy and Romania have adopted explicit legal frameworks defining the social economy, whereas Sweden operates without a single dedicated law, relying instead on sectoral regulation and collaborative governance. This criterion is particularly relevant for the legal dimension of the study, since it allows the examination of the relationship between legislative consolidation, institutional recognition and policy integration.

Third, ecosystem maturity and economic weight were considered. France and Spain represent highly institutionalised and economically significant social economy ecosystems; Italy illustrates a mature cooperative-based system undergoing structural reform; Sweden represents a stable partnership-based model; and Romania illustrates an emerging ecosystem in a process of consolidation. This variation enables the identification of both structural diversity and convergence dynamics under the post-2020 European Union policy framework.

By combining these criteria, welfare regime type, legislative framework configuration and ecosystem maturity, the study adopts a most-different systems comparative design aimed at identifying common European Union-level alignment mechanisms across heterogeneous institutional contexts.

The temporal scope of the analysis focuses primarily on the post-2010 period, with particular emphasis on developments after 2020, when the European Union significantly consolidated its strategic approach through the Social Economy Action Plan[10] and subsequent policy instruments. This temporal delimitation allows for the examination of convergence dynamics emerging under the new European Union policy architecture.

The methodological approach is interpretative rather than econometric. The study does not aim to establish causal relationships through quantitative modelling, but to identify institutional patterns, policy trajectories and governance configurations shaping the social economy across Member States. The comparative institutional perspective allows for the identification of both structural diversity and emerging normative alignment at European Union level.

Furthermore, the research acknowledges that statistical inconsistencies remain a structural limitation in social economy studies, as definitions and measurement criteria vary across countries. While harmonised European sources such as CIRIEC, OECD and European Commission reports are prioritised, national data may reflect methodological differences. This limitation is considered when interpreting cross-country comparisons.

3. LIST OF ABBREVIATIONS

CIRIEC - International Centre of Research and Information on the Public, Social and Cooperative Economy

EESC - European Economic and Social Committee

EU - European Union

GDP - Gross Domestic Product

ESF+ - European Social Fund Plus

OECD - Organisation for Economic Co-operation and Development

ESS - Social and Solidarity Economy (Economie Sociale et Solidaire)

CEPES - Spanish Business Confederation of the Social Economy (Confederacion Empresarial Espanola de la Economia Social)

RUNTS - National Single Register of the Third Sector (Italy)

WISEs - Work Integration Social Enterprises

NRRP - National Recovery and Resilience Plan

[10] European Commission. Social Economy Action Plan (2021).Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accessed: 22.02.2026).

4. DISCUSSIONS AND OBTAINED RESULTS

The social economy in european union member stateS

Regulatory approaches to the social economy differ across Member States. While countries such as Spain, France, Italy and Romania have adopted specific framework laws defining the social economy, Sweden relies primarily on partnership-based arrangements and sectoral regulations without a comprehensive dedicated law, which reflects a divergence in legislative approaches and the degree of formal legal recognition of the social economy within national legal systems.

Between 2010 and 2016, public policies at national level were oriented towards the social economy (CIRIEC & EESC, 2016)[11]. Specific social economy laws have been adopted in Spain (Law 5/2011 on Social Economy)[12], Greece (Law 4019/2011 and Law 4430/2016)[13], Portugal (Law 30/2013 on the Social Economy)[14], France (Law No. 2014-856 on the Social and Solidarity Economy)[15] and Romania (Law No. 219/2015 on Social Economy)[16], which establish legal definitions, institutional frameworks and regulatory conditions governing social economy entities. Similar developments have been observed at regional level in Belgium (Wallonia, Brussels and Flanders) and Spain (Galicia), highlighting the multi-level nature of regulation in this field.

During the same period, new legislative proposals, draft laws and other institutional initiatives, such as accreditation schemes, labels and large-scale national multi-annual plans, have emerged, leading to a major interest in the field, thus contributing to the progressive institutionalisation and legal consolidation of the social economy within Member States. Reforms have also been approved for certain groups of the social economy (social tertiary sector, social enterprises in the tertiary sector and cooperatives) in Italy and Spain (Recent developments in the social economy in the European Union, 2016).

Beyond national definitions, the European Union-level policy debate increasingly treats the social economy as an ecosystem: a set of organisations, financial mechanisms, enabling institutions, networks and policy tools that interact to deliver measurable social value. The Social Economy Action Plan explicitly recognises this need and proposes actions up to 2030 to strengthen favourable legal frameworks, improve access to finance and enhance statistical visibility[17], thereby reinforcing the normative and strategic role of the social economy within the European Union legal and policy architecture.

A recurring issue across Member States is the heterogeneity of legal forms. The social economy includes cooperatives, mutual societies, associations, foundations and social enterprises. Yet the legal recognition of social enterprises varies significantly: some countries

[11] CIRIEC, European Economic and Social Committee. Recent evolutions of the Social Economy in the European Union, 2016. Available at: https://www.eesc.europa.eu/sites/default/files/files/qe-04-17-875-en-n.pdf (accessed:21.02.2026).

[12] Spain. Law 5/2011 on Social Economy. Available at: https://www.boe.es/buscar/doc.php?id=BOE-A-2011-5708 (accessed: 06.03.2026).

[13] Greece. Law 4019/2011 and Law 4430/2016 on Social Economy. Available at: https://www.et.gr (accessed: 15.02.2026).

14Portugal. Law 30/2013 on the Social Economy. Available at: https://dre.pt (accesat la data de 15.02.2026).

[15] France. Law No. 2014-856 of 31 July 2014 on the Social and Solidarity Economy. Available at: https://www.legifrance.gouv.fr (accesed: 22.02.2026).

[16] România. Legea nr. 219/2015 privind economia socială. Available at: https://legislatie.just.ro/Public/DetaliiDocument/172178 (accesed: 14.02.2026).

[17] European Commission. Social Economy Action Plan (2021). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accessed 06.03.2026).

adopt dedicated legal statuses, while others incorporate social enterprise criteria into existing company forms. OECD guidance stresses that legal frameworks matter because they define eligibility for support measures, determine constraints on profit distribution and influence trust and accountability, especially when public funding is involved[18].

Another core dimension is measurement and statistical visibility. European Union institutions have repeatedly underlined that the social economy is often underestimated in official statistics, due to fragmented registries, mixed organisational forms and insufficient satellite accounts. Recent European work on benchmarking and the development of social economy statistics aims to improve comparability and inform policy design, which is essential for ensuring evidence-based regulation and effective public policy interventions at both national and European levels.

The period after 2020 brought renewed emphasis on the sector's contribution to the green and digital transitions. The social economy frequently supports circular economy solutions: reuse and repair, local supply chains, community energy and mobility, and social innovation projects that combine ecological and social goals. The European Commission highlights that social economy entities can deliver innovation while embedding participatory governance and local anchoring, reducing the risk that transitions deepen inequality.

Financing remains a structural bottleneck. While European Union instruments (including the European Social Fund Plus, InvestEU and national recovery plans) can support social economy actors, many entities still face constraints: limited collateral, restricted profit distribution and lower capacity to navigate complex funding procedures. The Council Recommendation explicitly calls for improved access to finance and for strengthening the enabling environment, including through social clauses in public procurement and support for capacity-building[19], thereby emphasising the importance of regulatory and financial instruments in ensuring the sustainability of the sector.

These cross-cutting themes provide an analytical lens for the country sections below. Italy and Spain illustrate strong cooperative and social enterprise traditions with mature networks. France represents a consolidated "social and solidarity economy" framework. Sweden highlights the partnership model and welfare-state linkages. Romania illustrates the challenges of institutional consolidation in a newer ecosystem, strongly influenced by European Union funds and developing regulatory capacity.

Taken together, these developments suggest that the evolution of the social economy across Member States is increasingly shaped by a shared European policy architecture centred on "framework conditions". The 2023 Council Recommendation explicitly calls on Member States to adopt coherent national strategies, improve coordination between ministries, strengthen statistical systems and ensure that public procurement rules facilitate participation by social economy entities. In parallel, European Union financial instruments such as the European Social Fund Plus and InvestEU aim to reduce structural financing gaps and support capacity-building, social innovation and scaling.

While the degree of institutional maturity differs significantly between countries, a gradual convergence can be observed in the recognition of the social economy as an inte-

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[18] OECD. Recommendation on the Social and Solidarity Economy and Social Innovation (2022). Available at: https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0472 (accessed: 18.04.2026).

[19] Council of the European Union. Council Recommendation on developing social economy framework conditions (2023). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023H0009 (accessed: 15.02.2026).

gral component of economic policy rather than solely a welfare-related domain. This shift reflects a broader redefinition at European Union level, where the social economy is positioned as a contributor to competitiveness, territorial cohesion and sustainable transition, within an increasingly coherent regulatory and policy framework at European level.

Below you will find some countries and how the social economy is developed in them:

ITALY

The co-operative movement is properly structured, has a long tradition and is seen as part of the economic system, even if it is non-profit. In this regard, to underline the importance of these units, the competence for coordinating the activities of cooperatives has been transferred from the Ministry of Labour to the Ministry of Industry, reflecting the formal recognition of cooperatives as economic actors within the national legal framework.

The main organisational categories include unrecognised associations (often cultural and recreational organisations operating on a non-profit basis), voluntary organisations providing services under associative structures, social cooperatives, non-governmental organisations active in international development, and recognised associations and foundations, all operating under distinct legal regimes provided by Italian civil and special legislation.

In Italy, the social economy is closely linked to the country's cooperative tradition and to a structured "Third Sector" ecosystem. Beyond historical development, the Italian case is relevant because it demonstrates how legal recognition and institutional coordination can enable scaling while preserving mission orientation. The cooperative movement includes strong federations and long-standing mutualistic practices, and social cooperatives have become key providers of services and labour market integration, benefiting from a well-defined legal status and regulatory framework.

Following the Third Sector reform adopted through Law No. 106/2016 and Legislative Decree No. 117/2017 (the Third Sector Code)[20], and progressively implemented between 2021 and 2023 through the operationalisation of the National Single Register of the Third Sector (RUNTS), Italy has experienced a significant consolidation of the regulatory and institutional framework governing the social economy, ensuring greater legal certainty, transparency and uniformity in the recognition of eligible entities.

From a post-2020 perspective, Italy also illustrates how social economy actors can contribute to resilience: maintaining essential services, supporting vulnerable groups, and responding flexibly to local disruptions. In European Union policy terms, this aligns with the broader view that participatory, community-embedded organisations can stabilise employment and services during crises, in line with the objectives promoted by European Union social policy instruments.

In quantitative and institutional terms, Italy represents one of the most institutionally consolidated social economy ecosystems in the European Union. According to official national data, the Italian Third Sector comprises approximately 360,000 non-profit entities, including associations, foundations, social cooperatives and other civic organisations (Ministero del Lavoro e delle Politiche Sociali, 2023). The sector employs approximately 850,000 paid workers and mobilises more than 5 million volunteers, confirming its structural role in welfare provision and local development. Social cooperatives play a particularly significant role in work integration, social services, health care and com-

[20] Italy. Law No. 106/2016 and Legislative Decree No. 117/2017 (Third Sector Code). Available at: https://www.gazzettaufficiale.it (accesed: 13.02.2026).

munity-based welfare, being expressly regulated as a distinct legal category within the Italian system[21].

The reform introduced by Law No. 106/2016 and Legislative Decree No. 117/2017 (the Third Sector Code) marked a structural turning point in the regulation of the social economy. The establishment and progressive implementation of the National Single Register of the Third Sector (RUNTS) between 2021 and 2023 significantly improved transparency, legal certainty and institutional recognition. By standardising registration procedures and clarifying eligibility criteria, the reform strengthened the sector's credibility and facilitated access to fiscal benefits and public support mechanisms, thus reinforcing the role of law as a key instrument for institutional consolidation.

Italy's social economy model is deeply rooted in a strong cooperative tradition, supported by federative structures and umbrella organisations that provide financial intermediation, advocacy and capacity-building services. This dense organisational infrastructure enhances scaling capacity and political representation, enabling social economy actors to operate competitively in regulated markets such as social care, education and local public services, often within contractual frameworks governed by public procurement law and social service regulations.

Despite its maturity, the sector faces structural challenges. Increasing competition in public procurement markets, pressure for to increase professionalisation and financial sustainability concerns have raised debates regarding mission drift and the preservation of participatory governance. The need to balance economic viability with social objectives remains central, particularly where social cooperatives operate in quasi-market welfare environments, raising legal and policy questions regarding the regulation of hybrid entities combining economic and social functions.

In the context of post-2020 European Union policy developments, Italy appears well-positioned to align with the priorities of the Social Economy Action Plan[22]. The existing legal consolidation and organisational maturity facilitate integration into European Union-supported initiatives related to social innovation, digitalisation and the green transition. Consequently, Italy represents a mature and institutionalised social economy model characterised by regulatory clarity, federative strength and systemic embeddedness within the national welfare architecture.

SPAIN

The social economy in Spain represents a significant and well-established sector comprising a diverse range of organisations, including cooperatives, social enterprises, non-profit organisations and mutual societies. With historical roots dating back to the nineteenth century, the sector has progressively consolidated its position within the national economic system and is widely recognised as a key driver of economic and social development, benefiting from a clear and comprehensive legal framework that ensures its formal recognition within the Spanish legal order.

In quantitative terms, the social economy in Spain constitutes an important component of the national economy, employing over two million people and accounting for approximately 8-10% of the country's Gross Domestic Product. The sector includes more

[21] Italy. Law No. 381/1991 on Social Cooperatives. Available at: https://www.normattiva.it (accessed: 15.02.2026).

[22] European Commission. Social Economy Action Plan (2021). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accessed:15.02.2026).

than 40,000 organisations and is characterised by a high degree of diversity in both organisational forms and fields of activity.

Cooperatives represent a central pillar of the Spanish social economy, with approximately 17,000 cooperatives operating across agriculture, industry and services. These entities are grounded in principles of self-help, democratic governance, solidarity and member participation, principles that are explicitly recognised and protected under Spanish legislation governing the social economy. Alongside cooperatives, social enterprises have gained increasing relevance, particularly in sectors such as health, education and employment, where business practices are combined with explicit social and environmental objectives.

Non-profit organisations, including associations, foundations and non-governmental organisations, also play a substantial role in delivering social services, cultural activities and community development initiatives. Their contribution reinforces the sector's multidimensional impact on social cohesion and territorial development, often within regulatory frameworks governing public service provision and social assistance activities.

The institutional consolidation of the Spanish social economy is supported by a favourable legal framework. Law 5/2011 on Social Economy provides an official legal definition of the sector and establishes core principles such as democratic organisation, equitable distribution of results, the prioritisation of the general interest over individual profit, and a commitment to social cohesion and solidarity. This early legislative consolidation has enhanced institutional visibility and facilitated the integration of social economy actors into national development strategies. The law formally recognises cooperatives, mutual societies, associations, foundations, employee-owned enterprises, special employment centres and work-integration social enterprises as integral components of the Spanish social economy ecosystem, thus ensuring legal clarity and institutional coherence at national level.

Overall, the social economy in Spain can be characterised as a highly institutionalised and economically relevant sector that combines legislative clarity, organisational diversity and substantial employment contribution within the national development model.

Spain is often cited as one of the most developed social economy ecosystems in the European Union due to its combination of cooperative density, institutional recognition and policy instruments supporting the sector. The 2011 framework law offered a structured definition and helped strengthen visibility, while regional governance has supported targeted initiatives aligned with local economic structures, illustrating the interaction between national legislation and decentralised regulatory competences.

A distinctive feature of Spain is the presence of large-scale cooperative experiences and federations that connect social economy actors across sectors, from industry and services to agriculture and social care. This organisational capacity is relevant for scaling because it creates shared services: training, financing, representation and innovation support, often operating within legally recognised associative and federative structures.

After 2020, Spain's policy direction converges with European Union priorities on digitalisation and green transition, with increasing attention to modernisation and to the role of social economy organisations in inclusive employment. European Union-level frameworks adopted in 2021-2023 support this direction by encouraging Member States to integrate the social economy into national strategies and to remove obstacles to financing and market access[23].

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[23] European Commission. Social Economy Action Plan (2021). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accesed: 15.02.2026).

In quantitative terms, Spain represents one of the largest and most structured social economy ecosystems in the European Union. According to recent data published by the Spanish Business Confederation of the Social Economy (CEPES, 2023), the sector comprises more than 43,000 entities, generating approximately 2.2 million direct and indirect jobs and accounting for around 10% of national GDP. These figures position Spain among the leading Member States in terms of economic weight and employment contribution within the social economy.

A central pillar of the Spanish model is Law 5/2011 on Social Economy, which provides a comprehensive legal definition and formal recognition of the sector. The law establishes core principles such as democratic governance, primacy of persons over capital, equitable distribution of surpluses and commitment to social cohesion. This early legislative consolidation has enhanced institutional visibility and facilitated the integration of social economy actors into national development strategies. In addition, Spain has adopted specific regulatory frameworks for work integration social enterprises (empresas de inserción) and special employment centres[24], thereby strengthening the legal instruments supporting labour market inclusion.

The Spanish social economy benefits from strong federative structures and coordinated representation at national level, particularly through CEPES, which acts as an umbrella organisation for cooperatives, mutual societies, foundations and employee-owned enterprises. This organisational density enhances advocacy capacity and access to policy dialogue, enabling the sector to influence public procurement practices and social policy design, within the framework of national and European Union public procurement regulations.

Despite its institutional maturity, structural challenges remain. Fragmentation across autonomous communities may generate regulatory heterogeneity, while smaller entities face financial constraints and limited capacity for digital transformation. OECD assessments underline the importance of strengthening tailored financial instruments and improving impact measurement mechanisms to sustain long-term competitiveness[25], highlighting the need for further regulatory harmonisation and policy coordination.

In the contemporary European Union policy environment, Spain appears strongly aligned with the priorities of the Social Economy Action Plan. The country has incorporated social economy objectives into broader strategies for sustainable growth, green transition and social inclusion. Consequently, Spain can be characterised as a highly institutionalised Southern European model combining strong cooperative traditions, legislative clarity and significant macroeconomic contribution.

FRANCE

In France, the social economy began in the 19th century. In 1980, the "Social Economic Charter", promoted by the UNIOPSS (Union Nationale des Offices Publiques Sociales et Sanitaires), defined the social economy in vague terms as "in the service of humanity", reflecting an early normative attempt to conceptualise the sector prior to its formal legal codification. The French model has had a broad influence on European thinking on the social economy; French organisations have been active members in European sectorial organisations, and French members of the European Parliament have supported

[24] Spain. Law 44/2007 on the regulation of work integration social enterprises. Available at: https://www.boe.es (accessed: 14.02.2026).
[25] OECD. Social Economy and the Green Transition (2023). Available at: https://www.oecd.org (accessed: 15.02.2026).

the development of this sector.

France provides a consolidated model of the “social and solidarity economy” (ESS), combining strong historical roots with a modern policy framework. A key characteristic is the wide recognition of mission-oriented entities that include associations, cooperatives, mutuals and foundations, accompanied by explicit principles: democratic governance, primacy of social purpose and limitations on profit distribution, enshrined within the national legal framework governing the ESS.

What makes the French case particularly relevant in an EU comparative analysis is the integration of the social economy into national socio-economic strategies, including labour market inclusion and territorial development. Many ESS organisations operate as providers of social services, care and integration, with strong local anchoring and long-term partnerships with public authorities, often within contractual and regulatory frameworks governing public service provision.

In the context of recent EU policy developments, France also illustrates the role of social economy actors in maintaining essential services and supporting vulnerable groups. This is coherent with the Commission’s framing of the sector as a contributor to quality jobs, social inclusion and resilience, and with the 2023 Council Recommendation encouraging Member States to improve framework conditions for scaling the social economy[26].

In quantitative terms, France hosts one of the largest social and solidarity economy (ESS) sectors in Europe. According to official data published by the French Ministry of the Economy, the ESS comprises approximately 200,000 organisations and employs around 2.3-2.4 million salaried workers, representing close to 10% of total employment in France. These figures refer to salaried employment and do not include the substantial contribution of volunteers, which further increases the sector’s socio-economic impact.

A decisive step in the institutional consolidation of the French model was the adoption of Law No. 2014-856 of 31 July 2014 on the Social and Solidarity Economy[227]. This law provides a comprehensive legal framework defining the scope of the ESS and codifying its core principles, including democratic governance, primacy of social purpose over capital and limitations on profit distribution. Notably, the legislation extends recognition beyond traditional legal forms to certain commercial companies that pursue a social objective and comply with specific governance and reinvestment constraints, thus introducing a hybrid legal category within the broader regulatory framework.

The French ESS is strongly embedded in territorial development strategies. Regional and local authorities actively support ESS organisations through funding schemes, partnership agreements and socially responsible public procurement practices. This multilevel governance structure reinforces the sector’s role in labour market integration, social services, health care and community-based development, within a regulatory environment shaped by both national legislation and European Union rules on public procurement.

At the same time, the sector faces structural challenges related to scaling, financial sustainability and increased competition in liberalised service markets. The need to balance economic performance with mission integrity remains central, particularly in fields

[26] Council of the European Union. Council Recommendation on developing social economy framework conditions (2023). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023H0009 (accessed: 15.02.2026).
[27] France. Law No. 2014-856 of 31 July 2014 on the Social and Solidarity Economy. Available at: https://www.legifrance.gouv.fr (accesed: 22.02.2026).

such as social care and work integration. In this regard, OECD assessments underline the importance of strengthening impact measurement systems, innovative financing mechanisms and statistical harmonisation to sustain long-term resilience[28], highlighting the ongoing need for regulatory adaptation and policy coherence.

In the context of post-2020 EU policy developments, France appears well-positioned to align with the priorities of the Social Economy Action Plan[29]. Its comprehensive legal framework, institutional maturity and macroeconomic weight allow the French ESS to function as a consolidated Continental European model combining legislative clarity, territorial anchoring and significant employment impact.

SWEDEN

In Sweden, the concept of social economy refers to organised activities whose primary purpose is to help the community based on democratic values and activities that are organisationally independent of the public sector, reflecting a functional rather than strictly legal definition of the sector within the Swedish regulatory context. Economic and social activities, as in most countries, are carried out by cooperatives, associations, foundations and similar groups, regulated under general civil and association law rather than a dedicated legal framework for the social economy. In Sweden, the social economy has its beginnings in the 1990s, and in 1997 the Swedish government decided to appoint a Working Group on the Social Economy, which aimed to analyse this economic form and demonstrate its importance in society[30].

The group worked from March 1998 to December 1999 and carried out a structured assessment of three central dimensions of the Swedish social economy. First, it analysed the relationship between social economy organisations and the public sector, focusing on the division of responsibilities, cooperation mechanisms and the role of civil society actors within the welfare state. Second, it examined the forms of financial support provided by the Swedish government and the European Union, including subsidies, project-based funding and partnership arrangements designed to strengthen organisational sustainability. Third, it evaluated the broader economic and social conditions influencing the development of the sector, such as labour market dynamics, institutional trust and regulatory frameworks.

The final report concluded that the social economy, understood as the third sector, constituted a sphere of prosperity, democracy and growth. It emphasised the sector's contribution not only to service provision and employment, but also to participatory governance, social cohesion and the reinforcement of democratic values within Swedish society, thus highlighting the normative importance of the sector despite the absence of formal legislative codification.

Sweden illustrates a model in which the social economy is strongly connected to welfare-state arrangements and collaborative governance. Even in the absence of a single comprehensive social economy law, the sector functions through partnerships between civil society organisations, municipalities and public institutions, supported by a high lev-

[28] OECD. Social Economy and the Green Transition (2022). Available at: https://www.oecd.org (accessed: 15.02.2026).

[29] European Commission. Social Economy Action Plan (2021). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accessed: 15.02.2026).

[30] Government Offices of Sweden. The Social Economy in Sweden, Official Report, 1999. Available at: https://www.government.se (accesat la data de 15.02.2026).

el of social trust and institutional capacity, within a regulatory environment based on general legislation and public policy instruments.

A key analytical point is that Sweden shows how social economy development can occur through enabling conditions: stable public-private collaboration, funding schemes and strong local governance. This model highlights that legal frameworks are only one dimension of growth; policy coherence, procurement practices and institutional coordination can be equally decisive. This resonates with European Union policy directions that focus on "framework conditions" and on integrating the sector into broader strategies for inclusion, sustainability and innovation.

In quantitative terms, civil society organisations in Sweden account for approximately 3-4% of GDP and involve a substantial share of the population through membership and voluntary participation. The Swedish social economy is particularly active in social services, labour market integration, cultural activities, sports and community development. Work integration social enterprises (WISEs) have gained increasing importance in facilitating access to employment for vulnerable groups, often operating within labour market policy frameworks and supported by public employment services.

Despite its institutional maturity, certain structural challenges persist. The absence of a unified social economy framework law may limit visibility at European level, and smaller organisations can face financial sustainability pressures in competitive public procurement environments, particularly given European Union rules governing competition and procurement. OECD assessments underline similar structural constraints and emphasise the need for improved support mechanisms and policy coherence[31].

In the post-2020 context, Sweden aligns with the priorities of the European Commission's Social Economy Action Plan, particularly regarding social innovation, inclusive employment and sustainable local development. Although structurally different from the legislative models observed in Southern Europe, Sweden demonstrates that a mature social economy ecosystem can operate effectively through stable public-civil society partnerships, decentralised governance and high institutional trust.

ROMANIA

In Romania, the social economy sector is regulated by Law No. 219/2015 on Social Economy, according to which "the social economy is the set of activities organized independently of the public sector, whose purpose is to serve the general interest, the interests of a community and/or the personal non-patrimonial interests, by increasing the employment of people belonging to vulnerable groups and/or producing and supplying goods, providing services and/or executing works"[1], thus establishing a formal legal definition and delimiting the scope of application of the sector within the national legal framework.

The principles of the social economy, as defined under Romanian law, emphasise the prioritisation of individuals and social objectives over profit generation. They include collective responsibility, the reconciliation of members' interests with those of the wider community, and the democratic supervision of members' activities. Romanian legislation also recognises the freedom of association among various organisational forms specific to the social economy, the existence of a distinct legal personality independent from the state, and the allocation of the allocation of most profits toward addressing community

[31] OECD. Social Economy and the Green Transition, Paris, 2023. Available at: https://www.oecd.org (accessed: 15.02.2026).

needs rather than individual gain, reflecting core legal principles aligned with European approaches to the social economy.

In quantitative terms, Romania's social economy ecosystem includes approximately 9,000-10,000 entities and employs between 150,000 and 200,000 persons, representing an estimated contribution of 1.5-2% to national GDP, depending on methodological scope (European Commission, 2020). These figures indicate steady development, while also reflecting a smaller relative size compared to more institutionalised social economy ecosystems in Western and Southern Europe.

Cooperatives represent an important component of the Romanian social economy. These organisations are grounded in principles of self-help, self-responsibility, democracy and solidarity, and operate in sectors such as agriculture, industry and services. Social enterprises constitute another key element of the ecosystem, combining economic activity with explicit social and environmental objectives in fields including health, education and employment. In parallel, non-profit organisations including associations, foundations and NGOs play a significant role in delivering social services, cultural initiatives and community-based activities.

Overall, the social economy in Romania is a growing and dynamic sector that has the potential to contribute significantly to the country's economic and social development. With continued support and investment, the sector is poised to grow and create positive social and environmental impact.

Romania is an emerging yet rapidly evolving case, shaped by a combination of national regulation and European Union-driven funding and policy alignment. Law No. 219/2015 provides the central legal definition and principles, emphasising the primacy of social objectives, democratic oversight, autonomy from the public sector, and the allocation of profits towards community benefit. This legal anchoring is important because it offers a foundation for formal recognition, eligibility for support measures and institutional development.

However, the Romanian social economy still faces structural constraints that influence both scale and performance. One key challenge is institutional fragmentation: the sector includes cooperatives, associations, foundations, social enterprises and work integration initiatives that operate under different regulatory regimes, resulting in a dispersed legal landscape and reduced coherence of the regulatory framework. This fragmentation affects data availability and weakens the sector's statistical visibility, which in turn complicates evidence-based policy design.

Financing and capacity remain another bottleneck. Many Romanian social economy entities depend on project-based grants, frequently linked to European Social Fund-type programmes, which can create discontinuities and administrative burdens. The ability to diversify revenue and access sustainable financing is constrained by limited collateral, small operational scale, and uncertainty about long-term contracts. European Union guidance emphasises the need for improved access to finance and enabling conditions for scaling[32].

At the same time, Romania shows significant opportunities for growth. Labour market inclusion is a major potential contribution: the social economy can support vulnerable groups, including long-term unemployed, youth not in employment, education or

[32] European Commission. Social Economy Action Plan (2021). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52021DC0778 (accessed: 15.02.2026).

training, people with disabilities, and rural populations facing limited local opportunities. In this regard, work- integration social enterprises and cooperatives can complement public employment services by offering pathways that combine training, support and real economic activity.

In addition, Romania's territorial disparities create strong demand for locally anchored solutions. Social economy initiatives can address market failures in rural areas: social services, community care, local food systems, repair and reuse, and micro-mobility. The European Union Social Economy Action Plan explicitly links the social economy to local resilience and cohesion.

Finally, governance and trust. Building credible governance mechanisms and transparent impact reporting can strengthen legitimacy and facilitate partnerships with municipalities and private actors. OECD guidance highlights that effective legal frameworks and support measures should ensure accountability without overburdening organisations, balancing flexibility with safeguards for mission integrity[33].

Overall, Romania's trajectory can be interpreted as a convergence process: moving from a mainly project-funded, fragmented ecosystem toward a more institutionalised social economy aligned with European Union policy expectations on inclusion, sustainability and resilient growth.

Recent policy developments further reinforce the strategic positioning of the social economy within Romania's national development framework. The National Recovery and Resilience Plan, aligned with European Union priorities on social inclusion and green transition, includes measures that indirectly support social enterprises, within the broader legal framework governing European funding instruments.

Moreover, the establishment of official registers for social enterprises and work integration social enterprises has improved formal recognition and monitoring capacity, contributing to the institutionalisation of the sector within the administrative and legal system.

Another important dimension concerns the alignment with European policy benchmarks. The 2023 Council Recommendation on developing social economy framework conditions encourages Member States to adopt coherent national strategies, strengthen access to finance and enhance statistical visibility[34].

From a comparative perspective, Romania's social economy can be interpreted as operating in a transitional equilibrium: institutionally recognised but not yet fully consolidated, financially supported yet structurally dependent on external funding, normatively aligned with European standards but still developing endogenous scaling mechanisms.

COMPARATIVE ANALYSIS OF SOCIAL ECONOMY MODELS IN SELECTED EU MEMBER STATES

In order to better understand these variations and identify broader patterns at European level, a comparative perspective is necessary.

A comparative perspective highlights both significant institutional diversity and emerging convergence patterns in the development of the social economy across the se-

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[33] OECD. Social Economy and the Green Transition, Paris, 2023. Available at: https://www.oecd.org (accessed: 15.02.2026).

[34] Council of the European Union. Council Recommendation on developing social economy framework conditions (2023). Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023H0009 (accessed: 15.02.2026).

lected Member States. Although Italy, Spain, France, Sweden and Romania operate within the common policy framework of the European Union, their social economy ecosystems differ in terms of legal structures, institutional maturity, economic weight and policy integration.

From a legislative perspective, three countries in the sample have adopted explicit framework laws defining the social economy and establishing its core principles: Spain, France and Romania. Spain introduced a comprehensive legal definition through Law 5/2011 on Social Economy, while France consolidated its model through the 2014 Law on the Social and Solidarity Economy. Romania followed with Law 219/2015, which formally recognised social enterprises and work integration social enterprises. Italy, although historically characterised by a strong cooperative sector, adopted a broader regulatory reform through the Third Sector Code (2017), which reorganised the institutional framework governing non-profit organisations and social enterprises. In contrast, Sweden represents a distinctive model in which the social economy operates without a single comprehensive law, relying instead on partnership-based governance and sectoral regulation.

In terms of economic weight, France and Spain represent the most consolidated ecosystems within the sample. In both countries, the social economy accounts for approximately 8-10% of national GDP and around 10% of employment. Italy also hosts a large and institutionalised sector, particularly through its extensive network of social cooperatives and non-profit organisations. Sweden's social economy is smaller in macroeconomic terms but benefits from strong integration with welfare-state governance and high levels of social trust. Romania, by contrast, represents an emerging ecosystem with a significantly smaller economic footprint, reflecting its more recent institutional development and stronger dependence on EU structural funding.

Organisational traditions also vary considerably across the countries examined. Italy and Spain illustrate cooperative-based models characterised by strong federative structures and long-standing mutualistic traditions. France represents a comprehensive "social and solidarity economy" framework encompassing a wide range of organisational forms, including associations, mutual societies, foundations and social enterprises. Sweden illustrates a partnership-based model in which civil society organisations collaborate closely with public authorities in welfare provision. Romania reflects a transition-oriented ecosystem where cooperatives, associations and newly established social enterprises coexist within a developing institutional environment.

Despite these differences, several convergence trends are observable at European level. Since 2020, EU policy initiatives, particularly the Social Economy Action Plan (European Commission, 2021) and the Council Recommendation on developing social economy framework conditions (Council of the European Union, 2023), have increasingly encouraged Member States to strengthen legal recognition, improve access to finance and enhance statistical visibility of the sector. These common policy priorities contribute to a gradual alignment of national strategies, even though institutional diversity remains an inherent characteristic of the European social economy landscape.

Overall, the comparative analysis suggests that while national models remain shaped by historical traditions, welfare regimes and legal frameworks, the social economy across the European Union is increasingly evolving within a shared strategic framework that emphasises inclusive growth, sustainable development and social innovation.

5. CONCLUSION

The comparative overview confirms that the social economy in the European Union is both diverse and increasingly strategic. Diversity is reflected in legal traditions, welfare regimes, cooperative histories and policy choices. Yet a common convergence trend is visible after 2020: the social economy is progressively positioned as a structural pillar supporting inclusive growth, resilience and sustainability.

EU policy frameworks adopted in 2021-2023 significantly reinforce this shift. The Social Economy Action Plan (European Commission, 2021) frames the sector as a contributor to quality employment, innovation and transitions, while the 2023 Council Recommendation encourages Member States to strengthen enabling conditions: coherent strategies, improved access to finance, social clauses and procurement opportunities, and better statistical visibility. Together, these documents signal that the social economy is no longer treated only as a "social policy topic", but as an economic policy instrument relevant to competitiveness, cohesion and long-term stability.

Country cases illustrate different pathways. Italy and Spain show mature cooperative ecosystems and scaling capacity through federations and supportive frameworks. France demonstrates a consolidated social and solidarity economy model with strong institutional recognition. Sweden highlights the role of partnerships and welfare-state linkages even without a comprehensive law. Romania, in turn, illustrates the challenges of consolidation in a newer ecosystem where EU funds and framework building are decisive.

Looking ahead, the sector's contribution will increasingly depend on three interrelated factors. First: improved measurement and visibility, including harmonised statistics and impact reporting, to support evidence-based policy. Second: sustainable finance and market access, including tailored instruments and procurement opportunities compatible with mission constraints. Third: governance and capacity, ensuring that scaling does not compromise democratic participation, mission integrity and local anchoring. OECD guidance underlines that well-designed legal and support frameworks can enable growth while safeguarding social purpose.

In conclusion, the social economy is well-positioned to support the EU's objective of a socially inclusive, environmentally sustainable, and resilient economic model. Its future relevance will be determined by how effectively EU-level strategic direction is translated into national framework conditions, and by the capacity of social economy actors to innovate while remaining accountable to their social missions.

The findings suggest that the social economy is gradually evolving from a complementary welfare instrument into a structural component of the European economic model.

The post-2020 policy consolidation at EU level signals a normative redefinition of the sector: from marginal social actor to strategic driver of inclusive and sustainable growth. This transformation, however, depends on the capacity of Member States to translate EU-level guidance into coherent national framework conditions.

In response to the research question addressed in this article, the findings indicate that post-2020 EU policy frameworks do not eliminate national diversity, but they do contribute to a gradual normative and strategic convergence across Member States.

This study contributes to the literature by providing a comparative institutional perspective that highlights both structural heterogeneity and convergence dynamics within the European social economy. By examining five Member States representing different welfare regimes and levels of ecosystem maturity, the analysis demonstrates that EU-level consolidation functions primarily as a coordinating and enabling mechanism rather than a harmonising one.

Several limitations should be acknowledged. Differences in statistical methodologies, definitional scope and data availability across countries constrain the precision of quantitative comparisons. Moreover, the rapidly evolving nature of EU policy implementation means that long-term effects of the Social Economy Action Plan and the 2023 Council Recommendation will require further empirical assessment.

Future research could explore longitudinal developments in national ecosystem consolidation, evaluate the effectiveness of specific financial instruments under ESF+ and InvestEU, and examine the relationship between social economy growth and regional inequality reduction. A deeper empirical investigation into impact measurement frameworks and governance models would also strengthen the evidence base for policy design.

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