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Three decades of EU climate policy: Racing toward climate neutrality?

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Abstract

The European Union (EU) began developing climate policy in the 1990s. Since then, it has built up a broad portfolio of mitigation policy measures and governance tools, including legally binding targets to reduce greenhouse gas (GHG) emissions, and policy measures addressing emissions trading, renewable energy, energy efficiency, and more. In 2019, the European Commission—the EU's executive arm—published the European Green Deal (EGD), an overarching policy framework to achieve the goal of climate neutrality by 2050. The EGD aims to push EU climate policy and governance far beyond incremental policy development. In this article, we ask: does the EGD represent a break from past patterns of EU climate governance? We argue that it maintains several past patterns, but nevertheless breaks from other established policy and governance trends. We review insights from politicization and new institutionalist theoretical lenses to help us understand these findings. We reveal certain tensions and challenges inherent in the EU's climate governance approach—around speed and coherence, effectiveness and just transition—that highlight future research needs, and raise questions about the EU's ability to implement its climate policy goals.

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1 | INTRODUCTION

The European Union's (EU) portfolio of domestic climate mitigation policy measures is one of the most advanced in the world. While the EU has long aimed to be an exemplary climate policy and governance leader (Bäckstrand & Elgström, 2013; Oberthür & Dupont, 2021; Torney, 2019; Wurzel et al., 2019), its climate action is still insufficient, given the scale, accelerating pace, and scope of the climate challenge, Europe's historical contribution to causing climate change, and its fair contribution to climate mitigation (Dubash, 2020; ESABCC, 2023; Friman & Strandberg, 2014; Gheuens & Oberthür, 2021; IPCC, 2023).

Climate mitigation efforts the world over must constantly catch up with the latest knowledge and assessments (IPCC, 2023): targets need to be ratcheted up, and policy strengthened. The EU has regularly updated its climate policies since the 1990s, but without ever consistently achieving adequate levels of ambition (Dubash, 2020; Gheuens & Oberthür, 2021). The EU's climate policymakers have, in other words, been locked in a cycle of constantly chasing the moving goal of sufficiently ambitious climate action.

In this article, we ask whether the 2019 European Green Deal (EGD) marks a new (more disruptive) phase of EU climate governance—one which moves beyond slow, incremental policy developments (Dupont et al., 2020; Kulovesi & Oberthür, 2020). The EGD is the EU's overarching policy plan to achieve climate neutrality by 2050, and net negative GHG emissions thereafter (European Commission, 2019). It outlines the need for systemic, transformational changes, not only for climate governance (which is the focus of our article), but also for other environmental sustainability goals including reducing other forms of pollution, improving biodiversity and restoring nature (ibid.).

We review knowledge around the EU's climate policy efforts. As a review article, we relied on snowball article search methods, beginning with the extensive expert knowledge of the group of authors, followed by multiple rounds of review to distill the main relevant knowledge advances. We (1) examine in what ways the EGD shifts away from or maintains past climate policy and governance patterns, and (2) review politicization and new institutionalist theoretical lenses to understand any changes. Politicization refers to the processes of moving an issue into (high) political discussions, and the contestation inherent in such processes, including increased issue salience, with more actors involved and a risk of polarization. New institutionalism refers to a set of theories focusing on the different roles of institutions in politics and policymaking.

Given space constraints, we focus on the EU's internal, politicized, and institutional contexts. Many studies on the EU's global climate role, and the geopolitical and global climate governance context within which the EU operates, usefully complement this article (Adelle et al., 2018; Kuzemko et al., 2022; Oberthür & Dupont, 2021). We also focus on climate mitigation policy (reflecting the EU's policy focus). Work by scholars on adaptation governance, and on integrative governance approaches toward nature and earth systems, also complement this review (Biesbroek & Candel, 2019; Dupont, 2016; Groen et al., 2023; Rayner & Jordan, 2010).

We first provide an overview of past patterns in EU climate policy and governance. In summarizing these patterns, we build on earlier EU climate governance research, including a review article published in this journal in 2013 (Rayner & Jordan, 2013). Second, we discuss whether the EGD maintains or breaks these patterns. We reveal the tensions that are inherent in the EU's climate mitigation objectives and governance approaches as outlined in the EGD. Third, we highlight insights from the literatures on politicization and new institutionalism. Finally, we conclude with open questions and avenues for future research, including a call for further policy assessment, explanatory studies, and critical approaches to the analysis of the EU's climate policy, encompassing both the internal and external effects of EU policy choices.

2 | PATTERNS OF EU CLIMATE GOVERNANCE

The EU has succeeded in reducing its GHG emissions (by an estimated 29% in 2021 compared with 1990 levels) and has developed a wide-ranging portfolio of climate policies and measures (EEA, 2022). An overview of EU climate

TABLE 1 Overview of historical EU GHG emissions reduction targets.

Target year	Goal (compared with 1990 levels)	Status
2000	Stabilization of CO_2 emissions	Achieved
2008–2012	8% reduction of GHG emissions	Achieved
2020	20% reduction of GHG emissions	Achieved
2030	40% reduction of GHG emissions	Achievement expected with new measures
2030	55% reduction of GHG emissions (updated target, including carbon removal possibilities)	Additional measures required
2040	Target yet to be proposed	Measures yet to be proposed
2050	Climate neutrality	Additional measures required

Source: EEA, 2022; Oberthür & Dupont, 2021.

mitigation targets is found in Table 1, and key policy measures since the 1990s are presented in Figure 1. The purpose here is not to list all targets and policies, but to reveal patterns in EU climate governance and policy choices.

We can broadly summarize three decades of EU climate policy and governance as follows (see Figure 1): the 1990s saw limited progress, marked by a failed carbon/energy tax proposal from the Commission that was blocked by member states. The 2000s were a time of growing politicization of climate change and marked the design, implementation, creation and, later, revision of the Emissions Trading System (ETS), a key policy measure creating a European carbon market for GHG emission allowances. They also saw the development of a wide-ranging climate policy portfolio, including the explicit connection of climate and energy policy. The first half of the 2010s was a period of slowed-down climate policy development, when policy implementation was patchy and policy advances were difficult, occasional, and incremental—not least given the wider EU context of financial crisis and austerity. Toward the second half of the 2010s, new policy efforts were advanced, especially around target-setting, policy measures for 2030, and the publication of the EGD in 2019 (Gravey & Moore, 2018; Jordan & Rayner, 2010; Kulovesi & Oberthür, 2020; Oberthür & von Homeyer, 2023; Skovgaard, 2014).

We observe that the EU developed five main patterns of governance action over these decades (Damro & MacKenzie, 2008; Jordan & Rayner, 2010; Kulovesi & Oberthür, 2020). The first pattern that emerged is setting targets to reduce emissions at decadal intervals (see Table 1). From the mid-2000s, targets were set by the European Council, the highest political institution in the EU, bringing together the heads of state or government of EU member states. This reflects the growing political importance and prioritization of the issue in the EU, with climate change moving up the political agenda from environmental ministers into the hands of prime ministers and presidents (Dupont, 2019). It should be noted that the targets themselves were the result of hard-fought political bargaining, and not necessarily fully reflective of scientific recommendations of the EU's fair share contribution to global mitigation efforts (Boasson & Wettestad, 2013). For example, the EU's final goal to achieve a 20% reduction of GHG emissions by 2020 was below the IPCC recommendation that developed nations and regions should reduce emissions by 25%–40% by 2020 (IPCC, 2007), although the EU had placed the option of a 30% emissions reduction goal on the table in global negotiations. The EU's emission reduction targets are therefore ambitious only relative to the even more inadequate action of other major economies.

The second pattern was that target setting was followed by the European Commission proposing a package of implementing legislative measures that were subject to negotiations between the European Parliament and the Council of the European Union, under the Ordinary Legislative Procedure of legislative decision-making (see Box 1). The Commission has increasingly relied on the policy package approach: proposing several legislative measures together that are then negotiated side-by-side, arguably an entrepreneurial effort by the Commission to advance policy (Boasson & Wettestad, 2013). Since the 2000s, these policy packages have been proposed more frequently and have become increasingly complex, including more policy measures with each round, with more pages of text, and more interconnected issues, to negotiate (Hurka et al., 2021; see Figure 1).

A third pattern was the increasing emphasis on an integrated approach across a range of policy domains, policy strategies and within a multi-level governance context, starting with integrated climate and energy policy approaches (Dupont, 2016; Jordan et al., 2012; Kivimaa et al., 2023; Rietig, 2021). The expanding policy packages connected climate and energy policy (in the 2000s), and then climate and land-use, land-use change, and forestry (2016), and climate and social issues to achieve a just transition to climate neutrality (in 2021; see Figure 1).

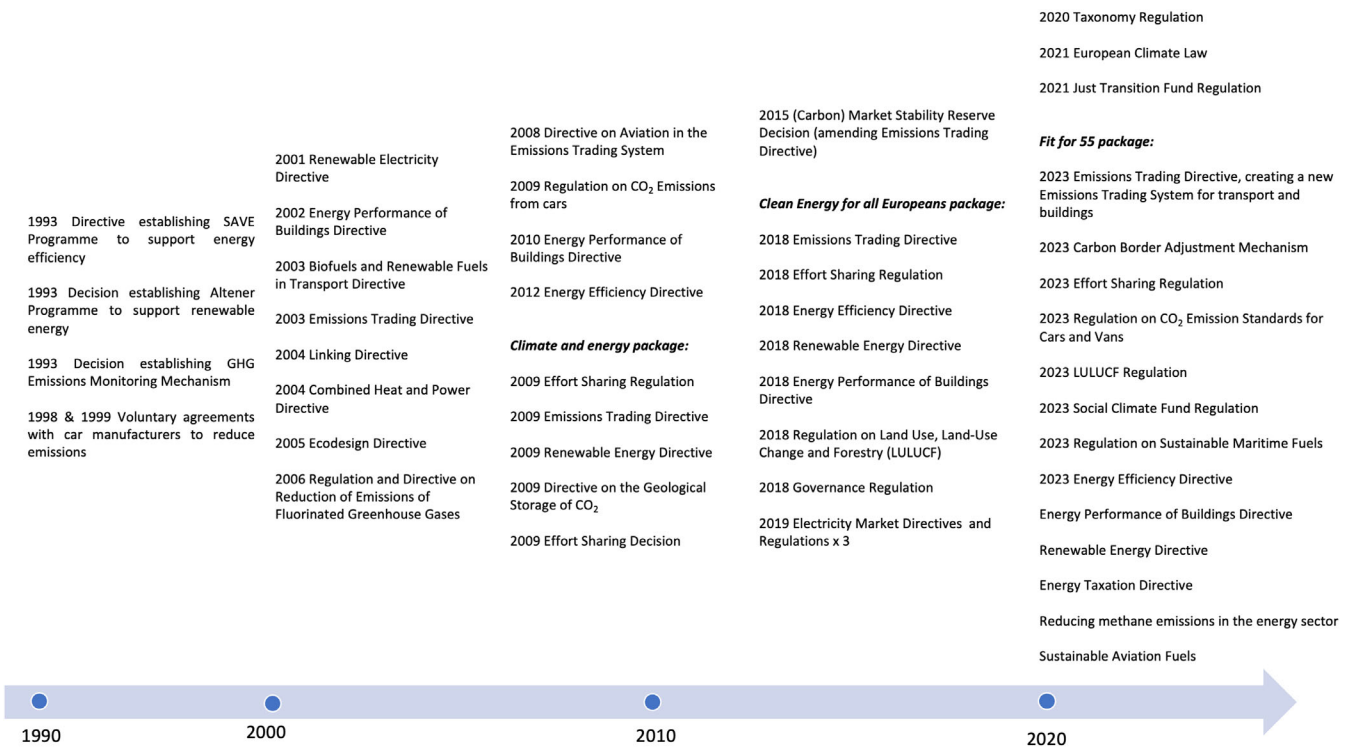

FIGURE 1 Overview of key policy measures to achieve targets. *Source*: EU official websites; Oberthür & von Homeyer, 2023.

BOX 1 How does the EU make policy?

Whether or not policy is made at the EU level depends on the division of competence in a given policy area, as laid down in the EU's Treaties. Environmental and climate policy is a shared or mixed competence of the EU. This means that both the EU and member states can, in principle, make policy in these areas, with EU measures confining the leeway for member states.

The EU is composed of three institutions that co-decide policy: the European Commission, the European Parliament, and the Council of the European Union. The European Commission is the executive arm of the EU. It has the sole right to make legislative proposals. Once it has published its proposal, the European Parliament, composed of 705 directly elected Members of the European Parliament, and the Council of the European Union, composed of the ministers of the member states, begin negotiations on the proposal. Negotiations first occur separately in the institutions, across political groups in the European Parliament and among member states in Council. This is followed by inter-institutional negotiation processes between the three co-deciding institutions. Once agreement is reached on an amended proposal among the institutions and formally adopted (through voting) in the European Parliament and the Council of the EU, it is published in the Official Journal of the EU and becomes law.

EU climate policies, therefore, pass through a process of internal negotiation, bargaining, and compromise both inside and among the EU institutions before finally being agreed upon.

A fourth pattern is that the main measures of EU climate governance (ETS, renewables, energy efficiency and effort-sharing approaches to GHG emission reductions among member states) remained central pillars in a path-dependent process throughout successive policymaking rounds. However, there were changes in the scope of measures adopted and shifts in political approach. This is connected to the second and third patterns of increasing numbers

of measures and expanded integration, which also presented opportunities to adapt the combination of hard (legally binding) and soft policies and measures (Knodt et al., 2020; Moore et al., 2021; Oberthür, 2019; Oberthür & von Homeyer, 2023). Shifts also occurred in the governance level at which policy was implemented. For example, the distribution of emission allowances was taken out of the hands of member states, and the ETS became centralized at the EU level after the first revision of the ETS Directive in 2009 (Wettestad et al., 2012). Another example is the shift from binding national targets for member states to achieve a certain share of renewable energy by 2020 to a joint EU target for renewable energy by 2030 that is only binding at EU level and to which member states determine their respective contributions nationally.

A fifth pattern or feature of EU climate policy and governance was the EU's overwhelming focus on climate mitigation and long neglect of adaptation efforts. Climate mitigation policy has been a core EU activity, but adaptation has been left in the hands of member states and has been seen as an issue for local and national governments. This neglect is reflected, for instance, in the limited EU legislation on climate adaptation or formal ways to integrate climate change adaptation into key economic policy domains (trade and finance) (Pitzen et al., 2022). However, as mitigation efforts have remained inadequate globally, and as climate change continues apace, adaptation policy has become even more urgent, and has therefore become a key part of the necessary climate policy and governance catch-up exercise (Candel et al., 2023; Groen et al., 2023; Rayner & Jordan, 2013).

3 | EGD: BREAKING WITH PREVIOUS PATTERNS?

Since 2019, there has been a further surge in EU climate policy activity. New knowledge on climate change, alongside the global trend of rising GHG emissions, and the EU's slow pace of emission reductions, has pushed the EU to revise its targets repeatedly. Commission President Ursula von der Leyen entered office with a promise to prepare the EGD, which was published in December 2019. The EGD was dubbed the EU's new growth strategy, with the goal of achieving climate neutrality by 2050 at its heart (European Commission, 2019).

Analyses show that the EGD takes a far more holistic approach to climate governance than seen previously, by extending the policy focus to include all sectors and systems. It also connected climate governance explicitly to the social realm, calling for a just transition, although this remains an underdefined idea (Johansson, 2023). Under the EGD, the just transition means that no-one should be "left behind" in the transition to climate neutrality, and that support should be provided to EU regions and communities that may be vulnerable to negative effects of the transition (European Commission, 2019). The scope, scale, and approach of the EGD were also unprecedented in climate governance history (Bloomfield & Steward, 2020). The early 2020s mark a period of intense policy development, with negotiations on the EGD's implementing legislation (Dobbs et al., 2021; Dupont & Torney, 2021; Siddi, 2021). But does the EGD mark a break from past patterns?

First, the EGD maintains the pattern of decadal target-setting, but there are changes in how those targets are agreed. Target setting has become more openly discussed and part of legislative negotiations within the European Parliament and the Council. While the European Council first approved the climate neutrality goal to 2050 politically, and later strengthened the GHG emission reduction goal for 2030 to 55%, the European Climate Law that set both the 2050 and 2030 goal into law was negotiated under the Ordinary Legislative Procedure among the other EU institutions. The European Climate Law also calls on the Commission to propose a new target for 2040 and an indicative carbon budget for 2030–2050, taking scientific advice into consideration, including from the newly established European Scientific Advisory Board on Climate Change.[1] The Climate Law was one of the first policy measures to be negotiated under the EGD. In another example, in May 2022, following Russia's second invasion of Ukraine, the Commission put forward the REPowerEU policy plan. This included a proposal to increase the EU's 2030 target for the share of renewable energy in final energy consumption to 45%, even while negotiations on a target of 40% by 2030 were ongoing. Provisional agreement was reached in March 2023, between Parliament and Council, that the final target for 2030 for renewables should be at least 42.5%, with a provisional top-up of a further 2.5% to reach the 45% target.

Second, the policy package approach has also been maintained, but considerably extended. The "Fit for 55" legislative package, published in 2021, proposed implementing measures to achieve the 2030 target to reduce GHG emissions by at least 55% compared with 1990 levels. This was the largest package of policy measures on climate governance ever published by the Commission (see Figure 1), increasing policy complexity (Hurka et al., 2021). The Fit for 55 package includes measures that blend "push" and "pull" factors to drive down emissions while providing financial transfers to

member states for sectors and individuals that are vulnerable to negative effects of the green transition (Boasson & Tatham, 2023; Skjærseth, 2021).

The third pattern of an integrated approach is also present under the EGD. However, the quality of, and commitment to, the integrated approach goes much further than past integration efforts (Dupont, 2016; Oberthür & von Homeyer, 2023). The EGD highlights that all policies and projects of the EU need to integrate the overarching goal of climate neutrality (European Commission, 2019), expanding into policy realms that were hardly connected to EU climate governance previously, such as social policy, finance, and food. This is enshrined in Article 6 of the European Climate Law, which requires the Commission to regularly review the consistency of existing EU measures and assess the consistency of any draft measure or legislative proposal it makes with the climate-neutrality objective.

The aim to achieve a just transition is perhaps the clearest example of the expansion of the integrated approach under the EGD—it connects EU climate (mitigation) policy to social policy, an area where the EU has limited policymaking competence and few available policy tools. So far, the EU has relied on financial transfers to implement its just transition objective. However, there are some tensions inherent in the EU's push for an effective and just transition. Focusing on effectively reducing GHG emissions as quickly as possible may not allow time for the democratic and social processes aligned with a just transition. Neither does it provide time and space for innovative policy tools to be developed and tested. Further, the design of the EGD policy measures and their external effects may not be coherent with global just transitions (Dunlap & Laratte, 2022; Kuzemko et al., 2022). The EU's REPowerEU plan and its scramble for alternative energy sources, following the Russian invasion of Ukraine, illustrates this well: while the EU considerably increased its supply of global Liquefied Natural Gas (LNG), by paying high prices, Pakistan faced electricity blackouts. Other countries returned to coal as they simply could not compete with the prices that the EU could pay (Kuzemko et al., 2022). Furthermore, the shift to renewables also creates (in)justice effects because many materials are mined, and wastes are processed, outside the EU (Sovacool et al., 2019).

Fourth, whereas the main pillars of EU climate governance have been maintained since 2019, they have been complemented not only with a new political approach, affecting the scope, breadth, and depth of these central policy measures, but also with several entirely new policy measures. This can be seen as a partial breakaway from past patterns. New measures, adopted in 2023 to achieve to 2030 goal, include the Carbon Border Adjustment Mechanism (CBAM), that puts a price on (certain) products entering the EU market to reflect the emissions inherent in their production, a new ETS covering buildings and transport, and a Social Climate Fund, established to compensate vulnerable households for the negative effects of this new, expanded ETS. The CBAM, for example, is a new EU effort to deal with the external dimensions of EU climate policy, affecting companies and countries outside the EU. Analysis connects this mechanism to a broader idea to advance climate policy globally with key countries, in a climate club (Falkner et al., 2022; Szulecki et al., 2022). It also partly responds to EU industry competitiveness concerns about ensuring that EU industries are not unfairly penalized under the ETS. Concerns have been raised, however, over CBAM's compatibility with international law, including the Paris Agreement and the principle of common but differentiated responsibilities (Marín Durán, 2023).

Fifth, the observation that the EU focuses on climate mitigation policy and neglects adaptation policy may no longer be completely valid. Although the EGD maintains an emphasis on climate mitigation, it also breaks from the past by elevating climate adaptation. This is achieved not only with the adoption of the new EU Adaptation Strategy and the obligation to make progress on adaptation under the European Climate Law, but also with the integrated approach found in the proposals for a Nature Restoration Law and a Soil Law that aim to enhance the capacity of nature to adapt to a changed climate. However, these EGD proposals—outside the central climate mitigation governance packages—have received significant political pushback, perhaps signaling a new round of politicization and contestation around climate policy. While adaptation has received greater attention, further development is needed especially on the integration of mitigation and adaptation policies. Recent research has highlighted that speedy climate mitigation efforts may come at some cost to coherence, also across environmental issues (Davies et al., 2021; Dobbs et al., 2021; Skjærseth, 2021), ultimately putting both mitigation and adaptation efforts at risk (Osaka et al., 2021).

In summary, while we see a maintenance of several past patterns of EU climate policy and governance since 2019, there have also been some breaks with the past. These breaks include institutional and political aspects, especially around target discussions, a considerable expansion of the integrated approach, and efforts to advance on adaptation policy. These breaks also reveal tensions and challenges in EU climate governance under the EGD, which may also stem from the framing of the EGD as the EU's growth strategy. This framing may limit the real transformative potential of the EGD toward a just transition and may hide the wider challenges around coherence with other

environmental issues. Crespy and Munta (2023) find that the policies and tools associated with the just transition inside the EU do not lead to a just transition that adequately addresses environmental and social problems. The EU institutions may themselves be hampered in the implementation of a just transition by their own set-up and institutional design, as feminist institutionalist perspectives have highlighted in previous research (Minto & Mergaert, 2018).

4 | POLITICIZATION, INSTITUTIONALISM, AND THE EGD

Politicization and new institutionalism can enhance our understanding of both the timing and scale of EU choices and of the persistent tensions and challenges underlying those choices. Academic literature has in particular (but certainly not exclusively) focused on these two key lenses, although they have regularly been applied separately rather than in combination.

First, politicization plays a role in either constraining or enabling climate policy advancement. Politicization involves contestation from changes in issue-salience, changes in actor constellations around an issue, and risks of polarization. It can include the movement of policy issues from technical or quasi-governmental spheres (e.g., among junior-level policymakers or regulators) to higher levels of political decision-making (De Wilde et al., 2018; Hay, 2007; Kuzemko, 2013). This process of politicization involves raised salience of the issue and contestation of status quo and (failing) policy frameworks or policy actor constellations. Politicization can enable policy advancement, if the high-level political attention frees up new capacity and resources to act and creates a political context that leads political actors to adopt new climate policies (Dupont, 2019; Feindt et al., 2021). Alternatively, politicization can constrain policy advancement, if the contestation processes involved in elevating the issue to high-level politics opens political space for actors aiming to delay, dilute, or block climate action (Bressanelli et al., 2020; Jordan et al., 2022; Jordan & Moore, 2020; Schmidt, 2019). Even with the uncertain outcomes of politicization, some argue that it remains necessary to ensure climate change is prioritized politically or politicized (Kivimaa et al., 2023; Paterson et al., 2022; Pepermans & Maeseele, 2016; Sareen et al., 2023).

Studies have shown that climate change has been increasingly politicized in the EU since at least the mid-2000s (Dupont, 2019; Oberthür & Dupont, 2011). It has even been a "securitized" issue, emphasizing the security challenges that climate change brings, and thereby also serving to focus high-level political attention on the issue (Carter et al., 2021; Dupont, 2019; Kivimaa et al., 2023). This politicization has either enabled or constrained climate policy development, depending on the EU's wider political context. By the mid-2000s, climate change was firmly on the EU political agenda, and the wider political context enabled the advancement of climate mitigation policy action (Dupont et al., 2023; Oberthür & Dupont, 2011). During the economic and financial crises in the late 2000s and early 2010s, and their accompanying austerity measures, although climate change remained high on the political agenda (faring better than broader environmental policy in the EU; Gravey & Moore, 2018), the wider context was more constraining. This helps explain the then incremental nature of climate policy advancement, with conflicts about when, how and to what degree EU climate policy should advance (Burns & Tobin, 2020; Skovgaard, 2014).

The political salience of climate change reached new heights in the EU in 2018–2019, following the adoption of the Paris Agreement in 2015, and in part pushed by the IPCC's 2018 report on global warming of 1.5°C and Fridays for Future protests (Dupont et al., 2023; IPCC, 2018; Orsini & Kang, 2023). In some countries, such as Australia, the politicization of climate change led it to become a party positional issue leading to varying degrees of polarization. However, in the EU, climate change has been a valence issue, with disagreements rather around the shape and type of policy response, not on whether there should be a European response (Bevan et al., 2016; Carter & Pearson, 2022). This politicization could be seen as enabling the adoption of the EGD in the first place, but it also helped ensure the commitment to the EGD as an overarching policy framework, even in the face of opposition during the multiple crises in the 2020s (Dobbs et al., 2021; Dupont et al., 2020; Dupont & Torney, 2021; Kuzemko et al., 2022). Research therefore shows that the enabling context of politicization cannot be taken for granted (Bressanelli et al., 2020; Fisher et al., 2022). The complexity of climate change, and of the expanded climate governance framework, could drive a more constraining context of politicization, if consensus-building efforts are not rolled out (Boasson & Tatham, 2023).

Second, the institutional context of the EU has frequently been studied in literature to understand policy choices and broader development of the EU. The institutional context refers not only to the features of decision-making procedures (such as the Commission's right to make legislative proposals) and the legal basis for EU policy action, as laid down in the EU's Treaties, but also to potential space for opportunities for EU institutional or policy change. Building

on insights from, especially, historical institutionalism, such research has examined several factors, including (1) the role of path dependency, examining the effects of past (institutional or policy) decisions on future governance measures; (2) the opportunities for policy change presented by critical junctures (crises and/or windows of opportunity); and (3) the entrepreneurial role of policymakers to use those critical junctures to advance new policy ideas (Capoccia, 2016; Dupont et al., 2020; Hall & Taylor, 1996; Lockwood et al., 2017). Research building on sociological, feminist, or discursive institutionalist approaches provides additional insights into the role of relationships, interests, and ideas in driving policy change (Fitch-Roy et al., 2020; Kuzemko, 2015; Minto & Mergaert, 2018; Rosamond & Dupont, 2021).

While institutionalist lenses have helped us understand policy and institutional change, they do not necessarily provide any judgment on the type of change. A policy entrepreneur (such as the Commission or one of its officials) may use a critical juncture or window of opportunity to advance or roll back EU climate policies and governance (Dupont et al., 2020). Hence, it is helpful to bring the politicization lens together with institutionalist understandings of the EU (as an arena of consensual decision-making), to reveal some underlying conditions for how or when institutional or policy change occurs. An enabling politicized context, where climate change is a highly prioritized issue, can spur policy and institutional change that further advances climate governance. But a constraining politicized context, in which climate change is polarized, with prominent actors against climate action, is more likely to delay or disrupt policy change, as a lack of consensus hampers EU decision-making in general (Gravey & Jordan, 2020; Rosamond & Dupont, 2021).

Insights from new institutionalism help explain why the EGD has remained a resilient, central policy framework even during multiple crises. EU climate policy and governance have even advanced quite quickly under the EGD during these crises, unlike the slow development of EU climate policy during the crises in the late 2000s and early 2010s (Gravey & Moore, 2018; Kulovesi & Oberthür, 2020; Skovgaard, 2014). The crises of the 2020s could be viewed as critical junctures that may have led to further advancing the EGD. But the EGD, and especially the legally binding nature of its targets (which may reduce the potential for conflicts based on positional party politics), could also be seen as contributing to a path-dependent response to the crises: the pre-existing policy framework (EGD) shaped policy expansion in times of crisis (e.g., via REPowerEU). With a committed and entrepreneurial Commission, that made use of critical junctures and windows of opportunity to advance EU climate governance, we find a surge in policy development, moving beyond established past patterns (Dupont et al., 2020; von Homeyer et al., 2022).

An institutionalist lens also reveals the limits to policy entrepreneurialism. As made clear in the analysis of the just transition, the EU has limited policy options, especially in areas where the EU does not hold much legal competence to act, and EU institutions themselves may not easily be able to overcome the institutional factors that hamper implementation of a just transition (Magnusdottir & Kronsell, 2015; Minto & Mergaert, 2018). The just transition is seen broadly as a transactional and financial transfer policy, with the EU having limited competence in social affairs generally, and a distant relationship to European citizens (Crespy & Munta, 2023). This raises questions about the institutional capacity of the EU to implement its EGD policies, particularly given the different political contexts, and different degrees of commitment and capacities of the member states.

5 | CONCLUSION

The EU's climate efforts have advanced considerably since the 1990s. The EU now has one of the most developed climate policy portfolios in the world and has successfully reduced its GHG emissions. Yet, it has also long been caught in a cycle of inadequate action requiring repeated revision of targets and policies. With the adoption of the EGD in 2019, the tempo and scope of climate policy action increased, despite several crises. The EGD has maintained several past patterns of EU climate policy and governance, but also moves beyond these patterns, especially with regard to discussions on GHG emission reductions targets, an integrated policy approach and efforts to advance adaptation policy. But these breaks from past patterns also reveal tensions inherent in EU climate policy and governance under the EGD, around effectiveness and just transition at the global and EU level, and around speed and coherence, particularly with other environmental issues. This also raises questions about the EU's capacity to implement its own policies, particularly under different conditions of politicization.

More research is required on assessing and understanding EU climate policy and governance. Further research on the enabling and constraining conditions, and wider societal and democratic conditions, for transformational change is urgent. Attention to new policy proposals within this framework is necessary. In 2024, the Commission will propose a new GHG emission reduction target for 2040 and an indicative carbon budget for 2030–2050,

followed by proposals for implementing measures. Assessments of their adequacy will be necessary, along with assessments of (adequacy of and progress toward) the 2050 climate neutrality goal. But research is also needed to critically assess the EU's approach to the implementation of the EGD, and to climate policy more broadly, such as how mitigation and adaptation polices can be better integrated. Implementing an integrated policy framework that accounts for the urgency of the climate mitigation challenge, together with the (global) just transition, and with an eye for ensuring effectiveness across mitigation, adaptation, and the broader sustainability goals embedded in the EGD, may require an alternative vision for the EGD itself. As a growth strategy, the same injustices inherent in the economic and societal system that generated climate change will remain, or even become more aggravated, in an EU striving for climate neutrality.

AUTHOR CONTRIBUTIONS

Claire Dupont: Conceptualization (lead); formal analysis (lead); methodology (lead); project administration (lead); visualization (lead); writing – original draft (lead); writing – review and editing (lead). **Brendan Moore:** Conceptualization (equal); resources (equal); writing – original draft (supporting); writing – review and editing (supporting). **Elin Lerum Boasson:** Conceptualization (supporting); writing – original draft (supporting); writing – review and editing (supporting). **Viviane Gravey:** Conceptualization (supporting); writing – original draft (supporting); writing – review and editing (supporting). **Andrew Jordan:** Writing – original draft (supporting); writing – review and editing (supporting). **Paula Kivimaa:** Writing – original draft (supporting); writing – review and editing (supporting). **Kati Kulovesi:** Writing – original draft (supporting); writing – review and editing (supporting). **Caroline Kuzemko:** Writing – original draft (supporting); writing – review and editing (supporting). **Sebastian Oberthür:** Conceptualization (supporting); writing – original draft (supporting); writing – review and editing (supporting). **Dmytro Panchuk:** Writing – original draft (supporting); writing – review and editing (supporting). **Jeffrey Rosamond:** Writing – original draft (supporting); writing – review and editing (supporting). **Diarmuid Torney:** Writing – original draft (supporting); writing – review and editing (supporting). **Jale Tosun:** Writing – original draft (supporting); writing – review and editing (supporting). **Ingmar von Homeyer:** Writing – original draft (supporting); writing – review and editing (supporting).

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CONFLICT OF INTEREST STATEMENT

The authors declare no conflicts of interest.

DATA AVAILABILITY STATEMENT

Data sharing is not applicable to this article as no new data were created or analyzed in this study.

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ENDNOTE

[1] The European Scientific Advisory Board on Climate Change (ESABCC) has proposed a target of 90–95% emissions reductions for 2040 (ESABCC, 2023).

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