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economies

By disaster or by design?

Effective policymaking in a polycrisis

Imprint

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List of abbreviations

BRG	Better Regulation Guidelines
DG	Directorate-General
DG ENER	Directorate-General for Energy
DNSH	Do no significant harm principle
EGD	European Green Deal
EP	European Parliament
EIAs	Environmental Impact Assessments
IAs	Impact Assessments
IOGP	International Association of Oil & Gas Producers
IPCR	Integrated Political Crisis Response
ISCs	Interservice consultations
LNG	Liquified natural gas
MS	Member States [of the European Union]
NECPS	National Energy and Climate Plans
PCD	Policy Coherence for Development
Sec-Gen	Secretariat General
RAS	Rapid Alert System
RE	Renewable Energy
RRF	Resilience and Recovery Facility
RRP	Recovery and Resilience Plans
TFEU	Treaty on the Functioning of the European Union

Executive summary

In recent years, the EU has been facing continuous and simultaneous crises that affect different policy areas in a complex and interconnected way—this can be called the **polycrisis**. Examples of this are the COVID-19 pandemic and the Russian war on Ukraine, where both events had compounding effects on supply chains, inflation, and climate policies. However, these crises have shown that emergencies requiring fast action can clash with practices of effective governance. Therefore, it is important to reflect on whether and how, **in moments of crisis response, are principles of effective governance for a green and just transition upheld in a way that enables the policy process to deal with trade-offs and tensions that arise?**

This policy brief explores the design of REPowerEU as an example to understand how this crisis management policy process worked and the impacts this had on the policy outcomes. This was developed through expert interviews and insights from a roundtable event held in March 2023.

Through research and interviews with topic experts, ZOE Institute has developed a framework of effective governance for the green and just transition. The framework focuses on six enablers that can help tackle the green and just transition challenges:

- **competence, capacity, & capability;**
- **evidence-informed;**
- **participation;**
- **coherence, coordination, & collaboration;**
- **commitment & leadership; and**
- **experimentation & adaptability.**

The REPowerEU process successfully upheld many enablers for the effective governance of green and just transition. However, while some were evident, others were given a lower priority or skipped altogether due to the time pressure. This demonstrates a need for adaptive, responsive, and flexible governance.

Introduction

Less than two years apart, the COVID-19 pandemic and the Russian invasion of Ukraine radically altered the work plan of the EU institutions. This included developing new unscheduled instruments, like the Recovery and Resilience Facility (RRF) or REPowerEU, as well as derailing the timeline of others, such as the existing schedule of the Economic Governance Framework Review[1]. Many new mechanisms and changes to existing ones were designed at an unprecedented pace, which matched the urgency of the situation.

These programmes highlighted both capacities and existing challenges in the EU and Member States (MS). For example, the response programmes to both crises showed European solidarity to an extent previously unfathomable, and they also spotlighted the fragility of some healthcare systems. They also showed us the capacity of governance processes to adapt to crises: governance has the ability to change.

The capacity of governance processes to adapt in situations of crisis is essential as they will continue to occur. With the simultaneous crises and their many spill-over effects, many have begun to refer to these conditions as governing within **polycrisis**[i]. Governing in the context of polycrisis challenges existing policymaking processes, which have been developed through decades of work on designing good governance from considering participation to working towards policy coherence. Many of the things that we have come to understand as important processes for effective governance require time, but governing well in crisis requires a fast pace.

This tension between fast and slow is mirrored in the reality we see playing out in the context of recent crises; that governing in the polycrisis can lead to two opposing outcomes. In some cases, governing in the context of polycrisis can increase ambition in policymaking. In her speech on the Green Deal Industrial Plan in 2023, Commission President von der Leyen perceived the EU's response to crises as an "accelerator" for the European Green Deal (EGD)[2]. The EU introduced NextGenerationEU and formed the RRF, wherein almost 40% of funding was dedicated to the green transition. This demonstrates how a crisis can be used to progress toward overarching economic and environmental goals. Another example is the accelerated pace of renewables uptake through the REPowerEU plan, in 2022 after the Russian gas interruption[3].

However, governing in crisis can also have regressive effects. In the example of the Russian war on Ukraine, several European countries had to revert to coal, diverging from their decarbonisation plans and the EGD to ensure energy supply for the short term[4]. Governments perceived this divergence from climate targets as necessary to maintain energy supply as they headed into a cold winter. This shift meant prioritising social and economic wellbeing over climate objectives. This underlines a dilemma faced by policymakers: how to deal with trade-offs between what is needed to achieve short-term objectives like social security and long-term objectives like mitigating climate change.

Trade-offs refer to interactions between policy objectives in which the improvement of one will ultimately lead to the deterioration of another, requiring a decision or prioritisation between them[5]. While processes are in place to mitigate trade-offs when formulating policies, the unexpectedness of crisis and the need for rapid response puts this mitigation ability at risk. In the moment of shock, policymakers need not only to make difficult decisions. They also need to make sacrifices in what is considered an "effective governance" process to respond quickly, as the policymaking process under "normal" circumstances can be very time-consuming. Crisis response requires faster outcomes, so the process is sometimes shortened, for example by skipping the impact assessment. However, during times of crisis as in "normal" times, principles of effective governance for a green and just transition should be maintained to

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i   Polycrisis refers to multiple crises entangled in various dimensions making it hard to address the problems

enable the policy process to manage and minimise trade-offs and tensions that arise.

This policy brief explores REPowerEU as an example of a policy process in a crisis response to understand how this process worked and the impacts this had on the policy outcomes. It is assessed against the framework for effective governance for the green and just transition[6] explained in section 3.

Background on REPowerEU

On 24 February 2022, Russia launched a full-scale invasion of Ukraine. The same day, the EU imposed additional[ii] sanctions on Russia, targeting the financial, energy, and transport sectors, among some other areas[7]. The EU imports 90 % of the gas it consumes, with Russia providing almost 40 % of that share[8]. In reaction to the EU's sanctions, Russia cut off 80 % of its gas supply to the EU in only eight months[9].

On 8 March 2022, the Commission published the REPowerEU Communication, which outlined urgent actions to curtail rising prices, ensure winter supply through gas storage, and cut Russian gas dependencies[10]. On 10–11 March 2022, EU leaders adopted the Versailles declaration[11], which called for reducing energy dependencies. In this declaration, leaders invited the Commission to propose a REPowerEU plan by the end of May.

Between 24–25 March 2022, the European Council agreed on a complete phaseout of Russian fossil fuels and asked the Commission to present a comprehensive plan. By 18 May, the REPowerEU Package was prepared and ready, proposing the dual goals of reducing energy dependence on Russia and tackling the climate crisis[12].

Versailles Declaration –
Phase out Russian oil

REPowerEU
communication

Russian invasion
of Ukraine

Disversification and
gas storage efforts

EP and the Council
reach agreement on financing
REPowerEU and enabling
MS to introduce
REPowerEU chapters in
their RRP

REPowerEU Package

European Gas Demand
Reduction Plan

24 February 2022

8 March 2022

10–11 March 2022

18 May 2022

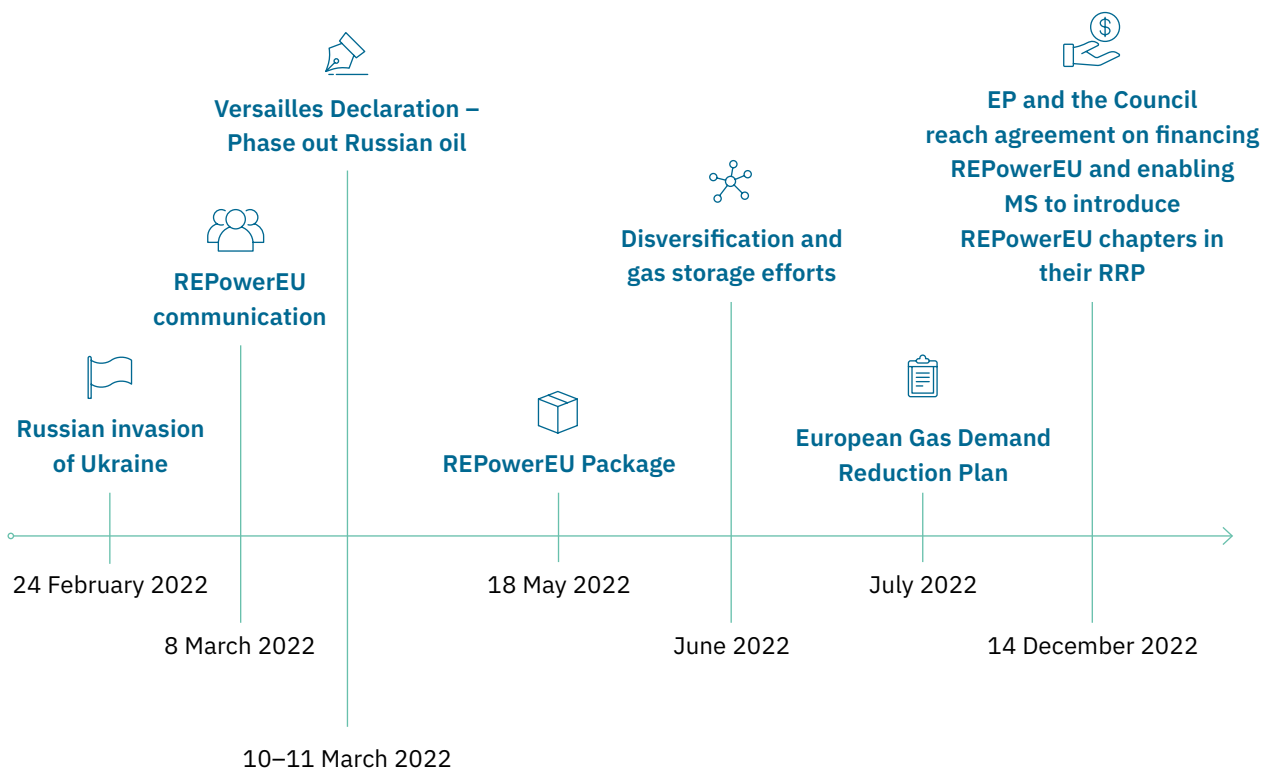June 2022

July 2022

14 December 2022

Figure 1: Timeline of REPowerEU

ii   The EU first began sanctioning Russia in 2014 after its initial invasion of Ukraine. The first package of sanctions was adopted on 23 February 2022 when Russia recognised the Ukrainian Donetsk and Luhansk oblasts as independent entities and sent troops to these regions.

The plans quickly started to materialise throughout the coming months[iii]. The Commission established the EU Energy Platform Task Force on 25 May. In June, the EU worked on diversifying gas supplies by establishing partnerships with countries such as Egypt and Israel. It also adopted new gas storage rules[13]. In July 2022 the Commission introduced a European Gas Demand Reduction Plan to reduce gas use in Europe by 15 % until spring 2023[14]. On 14 December 2022 the EP and the Council reached an agreement on financing and enabled the MS to introduce the REPowerEU chapters into the RRPs[15].

The main pillars of the REPowerEU policy package are energy savings, diversifying energy suppliers, accelerating renewable energy (RE), and supporting investment plans[16]. The Commission designed the package based on existing mechanisms such as the Recovery and Resilience Plans (RRPs) and the reshuffling of funds under the RRF framework. The National Energy and Climate Plans (NECPs) are also leveraged as a framework to help countries wean off Russian fossil fuels[17].

The outcome of the process is a policy that utilises synergies between the need to reduce dependence on Russian fossil fuels and decarbonisation. However, tensions exist in the social and environmental implications of this policy. Central and Eastern European countries such as the Czech Republic[18] have allocated a large portion of their investments to fossil fuel infrastructure under REPowerEU to secure their energy security beyond Russian supply. This demonstrates the dilemma mentioned previously, of prioritising social and economic wellbeing over climate objectives.

Energy savings
The Commission relied on short-term and mid- to long-term measures. It planned for a 5 % reduction in the short-term demand for oil and gas[19]. The short-term measures include behavioural changes with information-based tools, such as the Playing my Part campaign[20]. The Commission also recommended monetary tools such as price adjustments and tariff structures to encourage savings[21]. Mid-to long-term measures included setting higher binding targets for energy efficiency from 9 % to 13 % and increasing MS ambitions for energy savings obligations[22].

Diversifying supply
New energy partnerships and EU Energy Platform with the MS to pool demand and coordinate the purchase of gas, liquefied natural gas (LNG), and hydrogen[23]. The Commission also set up an EU External Energy Strategy to facilitate this diversification and build long-term partnerships with suppliers[24].

Accelerating the clean energy transition
The Commission proposed to increase the Renewable Energy Directive 2030 targets from 40 % to 45 %. The Commission also provided recommendations to accelerate the process of obtaining permits for RE projects. It also advised MS to specify 'go-to' areas for renewables and shortened, simplified permitting processes[25].

Investments
The Commission recommended reshuffling finances from existing funds. €225 billion would be available in loans under the RRF while increasing the envelope with €20 billion in grants from the sale of EU Emission Trading System allowances. Additionally, funds from the Cohesion Policy, Common Agricultural Policy, and Innovation Fund would be made available to support the transition to renewables[26].

The short timeline — from February to May 2022 — of REPowerEU shows the Commission's quick responsiveness to an energy crisis that has environmental, social, political, and economic impacts. This raises a question of whether the policymaking process was able to uphold the principles for effective governance for the green and just transition and mitigate harmful trade-offs along the way.

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iii   The timeline is showing only some of the actions following the proposal and not a comprehensive list

Analytical Framework: Enablers of Effective Governance

Inspired by the OECD's Framework on Sound Public Governance and further refined through a synthesis of other frameworks of good and effective governance alongside interviews with topic experts, ZOE Institute has developed a framework of effective governance for the green and just transition[27]. This framework establishes principles upon which effective governance processes should be based and builds on decades of work around policy coherence, foresight, and good governance. However, in the context of governing within polycrisis, it is important to reflect on to what extent these principles are maintained, how they might look different or be adapted in rapid response governance, and what we can learn from this for future crises.

This policy brief uses REPowerEU as an example to analyse the policymaking process against the principles of effective governance for a green and just transition framework. It investigates how these principles can be safeguarded, even in the face of a rapid response to a crisis. ZOE Institute developed this framework to provide policymakers with principles and tools for a policymaking process that can help manage tensions and trade-offs and find synergies where interactions between policy objectives have positive correlations. In the context of REPowerEU, this is especially important because the energy transition, while broadly being a process to achieve environmental goals, has many social impacts as fossil fuel industries are phased out and households need to be retrofitted for energy efficiency.

This framework divides principles into "foundations" and "enablers", with all of them contributing to effective processes that can help in mitigating the tensions and trade-offs and enable synergies when creating policy instruments. **Foundations** refer to overarching conditions that contribute to effective governance; they are the preconditions for good policies. **Enablers** are practices to employ to create good policy instruments. The foundations and enablers can be seen in Figure 2. The framework focuses on the enablers as they can directly tackle the challenges of the green and just transition. There are six enablers outlined:

- competence, capacity, & capability;
- evidence-informed;
- participation;
- coherence, coordination, & collaboration;
- commitment & leadership; and
- experimentation & adaptability.

These enablers can all help policymakers manage tensions and trade-offs when designing policy instruments. Table 1 defines each of the enablers and how they can support policymakers' capacity to deal with trade-offs and tensions.

Enabler	Definition	Ability to support managing tensions & trade-offs
Competence, capacity, & capability	Skills, knowledge, and available time of policymakers, and the ability of policymakers to interpret the evidence at their disposal	• Capacity to interpret data and complex relationships between policy goals and potential impacts can help policymakers make decisions and prioritisations when designing policies • Available time allows policymakers the space to consider all the evidence, meet with stakeholders, and collaborate with others
Evidence-informed	Using evidence such as data and scientific advice to design policies, but also evidence from evaluations to feed back into the process	• Evidence can demonstrate the potential or actual interactions between policy instruments to give a clearer picture of the potential impacts one policy can have on other policy areas
Participation	The public, civil society, and other actors should have the opportunity to participate in decision-making and agenda setting	• Helps bring new perspectives and insights into how policies can impact different groups • Increase public acceptance of policies and of the overall transformation • Brings special expertise and knowledge from different types of stakeholders
Coherence, coordination, & collaboration	Whole-of-government approach, working across policy areas (e.g., between ministries or DGs) to create policy coherence	• Ensures consistency of and between policies and increases their effectiveness • Amplifies synergies between policies
Commitment & Leadership	Policymakers' commitment to create policies with the best outcomes for people and planet, and their leadership in steering the ship towards these outcomes	• Prioritises one goal over another, making it clearer which outcomes to prioritise when assessing a trade-off • Provides leadership to take action and make decisions
Experimentation & adaptability	Readiness to adapt to changing realities and depart from the status quo if the status quo is not working	• Allows for testing assumptions and new ideas and trying new approaches • Space to change tactics when an unexpected negative impact arises

Table 1: Enablers for effective governance of the green and just transition

As seen in the table, the enablers are interconnected. For example, to make **evidence-informed** policies, policymakers require the **competence, capacity, and capability** to interpret and use the evidence. **Coherence, coordination, and collaboration** involve commitment from leaders to long-term goals, and the capacity of policymakers to make space for collaboration. Finally, **experimentation & adaptability** rely on the vision of leadership to experiment with new solutions when evaluation findings or new evidence requires it. Therefore, it is impor-

tant to explore the current strengths and shortcomings within the Commission's policy cycle to examine how adherence to the enablers can be improved in this policymaking process.

The enablers should be embedded throughout the policy cycle as they are not specific to one activity or stage. The analysis below considers the REPowerEU development process from the viewpoint of each enabler, examining how it was (or was not) adhered to within the policy cycle.
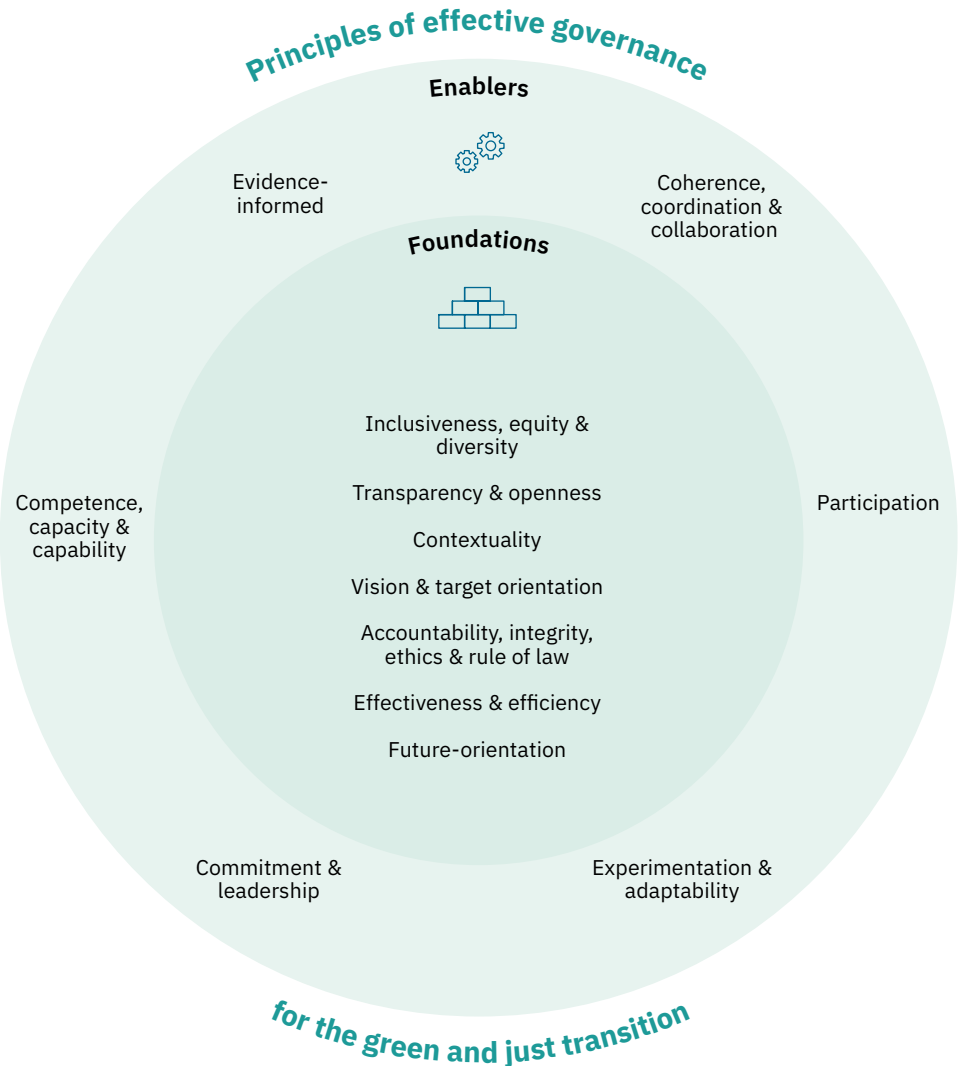
Principles of effective governance

Enablers

Evidence-informed

Coherence, coordination & collaboration

Foundations

Competence, capacity & capability

Inclusiveness, equity & diversity

Transparency & openness

Contextuality

Vision & target orientation

Accountability, integrity, ethics & rule of law

Effectiveness & efficiency

Future-orientation

Participation

Commitment & leadership

Experimentation & adaptability

for the green and just transition

Figure 2: Principles of effective governance for the green and just transition

REPowerEU: Policy process

REPowerEU demonstrates a non-conventional case of EU governance where there was a need for various exceptions and untraditional decision-making processes to react to an emergency. This made use of Article 122 of the Treaty on the Functioning of the European Union (TFEU) in decision-making which allowed for rapid intervention in establishing corrective limitations on gas prices[28], acceleration of permit-granting processes for RE deployment[29], coordinated demand-reduction measures for gas[30] or better coordination of gas purchases[31].

Based on the legal basis of Article 122 of the TFEU, as an exceptional legal provision, an extraordinary procedure can be activated for accelerated decision-making. The Council can adopt measures on a Commission's proposal, including regulations[iv], by qualified majority voting without the participation of Parliament as co-legislator. Although this article can only be used for temporary measures, the vagueness of the provisions[v] and its disproportionate use in the last years confirms it as an emergency decision-making tool "on the rise" in the context of the polycrisis. This situation, particularly in relation to the socio-economic and environmental trade-offs highlighted by REPowerEU (highlighted in section 5) has raised major questions regarding the democratic deficit arising from the recurrent use of Article 122. The link between the so-called "abuse" of Article 122 and the measures related to accelerating the deployment of renewables has been the subject of major criticism for being considered a contravention to the principle of non-regression[vi], lacking democratic support, and giving rise to situations of legal uncertainty. Consequently, this could trigger environmental litigation at the local and regional level,

thus hampering effective implementation[vii]. Therefore, it is essential to maintain principles of effective governance also during crisis response.

The following sections elaborate on how each enabler worked in REPowerEU to conclude on how it can be improved for crisis governance and managing trade-offs and tensions.

Competence, capacity, & capability

Policymakers need the skills, knowledge, and time to derive key information from evidence, create participatory processes, interpret foresight scenarios, and manage potential tensions and trade-offs of policy ideas. This enabler is overarching and operates "behind the scenes" of the policymaking process; it involves training and support to equip policymakers with the capacity to design good policies and manage trade-offs. Moreover, timing is key in the policy process. Suitable skills must be applied at the right stage of the policy process so that knowledge is utilised more competently.

At a roundtable in March 2023 organised to reflect on this topic, experts debated the suitability of this enabler in crisis management as competencies, capacities, and capabilities are context-dependent and may vary in times of crisis. However, Hustedt et al. (2022) argue that capacity in crisis focuses on the preparedness to manage it. This includes the administrative and analytical capacity to foresee, detect, and monitor a crisis[32]. Preparedness for a crisis can increase resilience against shocks by putting in place

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iv Compared to other instruments in the EU acquis, regulations are binding legislative acts with direct application and general scope, which in practical terms means a higher and more effective capacity for intervention on national frameworks.

v   Whose conditions of application are set out without further detail, as per the first paragraph of the article (122.1) stating that "the Council (…) may decide, in a spirit of solidarity between Member States, upon the measures appropriate to the economic situation, in particular if severe difficulties arise in the supply of certain products, notably in the area of energy."

vi The principle of non-regression prohibits any recession of environmental law or existing levels of environmental protection and comprises its protective norms in the category of non-revocable and intangible legal rules, in the common interest of humanity.

vii For example, according to the European Environmental Bureau (EBB): https://eeb.org/eu-is-taking-a-troublesome-path-to-accelerate-renewables-roll-out-ngos-say/

contingency plans, mutual assistance agreements, and financial instruments[33]. Therefore, the importance of this enabler is in upholding the rest of the enablers under the proper stages of the policy cycle to manage the crisis, while also acknowledging that competencies are situation-dependent.

The speed with which REPowerEU was designed and adopted shows a strong capacity to deal with time pressure and high competence level amongst the policymakers involved in its development. According to insights from experts, the main Directorates-General (DG) involved were the Secretariat-General (Sec-Gen) and DG for Energy (DG ENER).

One expert questioned whether the operational structure of the Commission in practice allows the Commissioner and DG with the right expertise to lead in dealing with the problem. The expert argued that the President's cabinet was overly involved in the electricity market design which should have been the in the hands of Commissioner Simson and Vice President Timmermans. This is an example of a situation where the more political and urgent the problem, the higher in the hierarchy the decision-making is, away from the specialised competencies. In sum, REPowerEU upheld 'competence, capacity, and capability' well, as policymakers were able to deal with time and political pressure and successfully create the policy package. However, there is a need to maintain a balance between the needed technical and leadership capabilities for crisis response.

Evidence-informed

The Communication on Better Regulation[34] states that reliable evidence is needed to help the Commission deal with its ambitious agenda and face current policy challenges in Europe. This includes the transparent involvement of stakeholders who bring expertise on relevant policy topics, the use of quantitative and qualitative data, impact assessments, and results of evaluations.

The Commission relied on the competencies of DG ENER to bring in technical proposals for the design of the policy package. Many of the elements of REPowerEU were repackaged from existing work done by DG ENER for the EGD or COVID-19. In addition, various DG ENER sub-divisions and Energy Cabinet members met with energy providers during the planning and preparation process.

During standard policy cycles, impact assessments (IAs) are conducted when an economic, social, or environmental impact is expected due to the Commission's actions as part of Better Regulation Guidelines (BRG). IAs last around one year on average. The BRG allow for exceptions from IAs for political emergencies with justifications[35]. In the case of REPowerEU, the Commission did not conduct complete IAs for the overall policy package due to time limitations except for some elements. Instead, the Commission relied on existing data. A Commission expert mentioned conducting much analysis. However, the data, especially regarding energy efficiency, was limited and difficult to model. Another expert stated that the economic benefits to society outweighed the costs due to the importance of energy. A weakness of the sacrifice of a full IA is risking the assessment of the full social and environmental impacts.

Moreover, REPowerEU allowed targeted exemptions[viii] from the do no significant harm (DNSH)[ix] principle to ensure energy security. Although this would permit faster projects and secures supply, it creates regressive climate change implications. More importantly, it risks setting precedents for further derogations in times of crisis and possible incoherence with other policies, thus relating also to the 'coherence, coordination, & collaboration' enabler[36].

In sum, the Commission relied heavily on evidence-informed solutions from DG ENER and ener-

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viii The proposal states that "the reforms and investments set out in those REPowerEU chapters which aim to improve energy infrastructure and facilities to meet immediate security of supply needs for oil and gas should not be required to comply with the principle of 'do no significant harm' and should therefore be exempted from such assessment".

ix do no significant harm' means not supporting or carrying out economic activities that do significant harm to any environmental objective, where relevant, within the meaning of Article 17 of Regulation (EU) 2020/852

gy companies that helped draft REPowerEU. However, the lack of IAs creates a blindspot regarding the possible social and enviromental trade-offs and tensions that may arise as a result. This demonstrates how short-term problem-solving during a crisis response can create long-term negative consquences.

Participation

According to the BRG, "stakeholder consultation is an essential element of policy preparation and review"[37]. Consultations usually occur in response to evaluations, impact assessments, and preparation of policy initiatives. Participation of a broad array of viewpoints representing society's diverse experiences are important to priority setting and decision-making that is acceptable to citizens. Moreover, sensitive issues, such as energy, which affect many aspects of life, require inclusive processes as citizens can be "users, consumers, protesters, supporters and prosumers"[38].

Due to the time urgency, the REPowerEU process did not include **formal public consultations**. The Commission conducted a stakeholder consultation with the International Association of Oil & Gas Producers (IOGP) to make decisions[39], essentially giving them a "wish list" for fossil fuel infrastructure[40].

Participation from civil society organisations can add improvements to policy outcomes and increase public acceptance. There are several changes in REPowerEU priorities between the initial communication[41], leaked version, and final plan[42]. One example is that the initial communication did not include "save energy" as a main pillar of measures, which was added later in the REPowerEU plan. This may have been a result of informal exchanges with independent think tanks, such as ZOE Institute, which provided studies on demand-side reduction solutions[43]. Another example is the change of wording regarding bioenergy. The leaked version referred to bioenergy with a vague reference to biomass from forests: "solid biomass for some forest-rich Member States". However, in the final version the wording was changed to "non-recyclable biomass waste and agricultural and forest". This may also have been a result of objec-

tions from environmental NGOs to forest biomass and crop biofuels[44].

The process was criticised by climate groups for the closed-door procedure that gave weight to the contributions of large energy actors. This contributed to a less transparent process that lacked any independent scrutiny[45]. According to experts it also excluded small businesses from preparing for the policy outcomes. This has two impacts; one is affecting the democratic process and citizens' rights to a transparent procedure. It can also jeopardise public acceptance of solutions such as renewables if it comes at the cost of nature.

The REPowerEU policymaking process shows a general openness to informally include external experts and think tanks. However, it fell short in enabling formal participation — a noticeable gap in managing crises.

Coherence, coordination, & collaboration

Coordination and collaboration across policy areas (horizontal) and different levels of policymaking (vertical) help ensure coherence in policies which can have impacts across multiple policy areas.

In principle, the Commission invests extensive resources in vertical **coordination**, starting with data preparation and analysis at the technical level. Second, there is data processed at the intermediate level and passed on to the higher level, which provides feedback and guidance accordingly. For sensitive and important files, the Secretary-General coordinates the political validation of these acts throughout the process[46]. This requires the competence and capability of policymakers at each level to navigate their duties throughout the policy cycle. On a horizontal level, there is coordination and **collaboration** across DGs, such as through the interservice consultation. The interservice consultation (ISC) is a formal tool to ensure coherence and coordination before passing legislation to the College of Commissioners.
According to an expert for REPowerEU, DG ENER was in close contact with other DGs at different hierar-

chical levels early in the process, even before the ISC, to maintain a collaborative and coherent process. Although most experts agreed that the process was centralised, one expert stated that there was extensive coordination efforts where information was shared between the analytical and political level quickly and the President was in close contact with with the head of DG ENER.

The expert mentioned that Sec-Gen applied an emergency process during COVID-19 which was also applied during REPowerEU, wherein the ISC takes place under a short but complete process. For REPowerEU, it allowed flexibility in setting different energy efficiency targets towards the end of the process (from 9 % to 13 %).

The EU can use the Integrated Political Crisis Response (IPCR) during a crisis. The presidency of the Council can activate the mechanism to coordinate political response between EU institutions, MS, and other affected stakeholders. The IPCR was activated in full mode in February 2022 following the invasion. This mode includes 24 / 7 contact points, a web platform to exchange information, and crisis meetings with EU ambassadors and ministers[47]. Moreover the Commission has developed a software system, Argus[x], for emergencies that require EU-level action. It links all DGs and Commission services for sharing information, and MS are connected through the Rapid Alert System (RAS)[xi][48]. Argus aims at having a coordinated process during crisis[49]. Experts did not mention how these mechanisms played a role in facilitating communication for REPowerEU. However, some argued that there was a lack of formal structure for communication between the Commission and Heads of State for REPowerEU's formulation even though there were bilateral meetings to ensure coordination with MS. One problem mentioned was the untraditional approach of MS addressing the

President through non-papers[xii] instead of waiting for the Commission's proposal. Another problem was the President flying to capital cities to meet Heads of State to hasten communication apart from the European Council meetings.

The Commission conducted bilateral meetings with Member States to discuss national priorities related to REPowerEU and ensure acceptance and feasibility[50]. According to experts, tensions arose in the priorities between the MS and the Commission. On the one hand, the Commission was pushing for a focus on renewables. On the other hand, the MS, who carry the implementation responsibility, asked for flexibility for LNG and gas. Moreover, the Commission set ambitious targets for renewables (45 %) and energy efficiency (13 %) in REPowerEU. However, it was unclear whether MS would be able to adhere to these plans or not. In March 2023, it was shown that the MS were in disagreement. The final negotiations saw pushbacks from the MS, where targets decreased to 11.7 % for energy efficiency[51] and 42.5 % for renewables[52]. Therefore, there is a need to better coordinate with MS expectations and ability to implement when planning a policy.

In terms of **coherence**, one of the pillars of REPowerEU is to invest in renewable energy and accelerate their uptake, which in theory shows overall coherence to the objectives of the EGD[53]. The proposal states that the amendments to the RRPs are consistent with other EU objectives, such as the cohesion policy fund and Common Agricultural Policy[54]. Some experts viewed REPowerEU as well-aligned with the EGD. Others perceived it as less coherent and watering down environmental laws with exemption from the DNSH principle and lack of environmental IAs (EIAs). Moreover, REPowerEU introduced the designation of "go-to[xiii]"areas as a measure to fasten renewables uptake. However, environmental groups

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x Provides an internal platform enabling the DGs and services of the Commission to exchange, in real time, relevant information.

xi The Rapid Alert System is set up among the EU institutions and Member States to facilitate the sharing of insights related to disinformation campaigns and coordinate responses. The RAS is based on open-source information with insights from academia, fact-checkers, online platforms and international partners.

xii Non-papers are informal documents put forward in closed negotiations within EU institutions.

xiii Renewables go-to area means a specific location, on land or sea, that MS can designate as particularly suitable for the installation of renewable energy production plants.

fear that if not well defined under EIAs, adequate spatial planning and democratic processes, these would have a backfiring effect on biodiversity[55].

As the EU plans to diversify its energy supply sources, it will extend its relationships to North African countries to import hydrogen. REPowerEU states that the "EU will provide its international partners with long-term perspectives for mutually beneficial cooperation by integrating hydrogen and renewable energy development and trade"[56]. However, it does not detail the measures to be taken to maintain ecological, social, and economic coherence across these foreign relations. Therefore, there are potential trade-offs or tensions that could arise in the partner countries as well.

Overall, the Commission's structures maintained coordination and collaboration through a strong vertical coordination and fast-tracked ISC which ensured benefitting from competencies across DGs. However, according to some experts, collaboration and coordination with MS are yet to be improved in order to align planning and implementation. Moreover, in terms of coherence with long-term climate and EU goals, the consequences are still unclear.

Commitment & leadership

Strong commitment and leadership are essential to anticipate future shocks and set priorities. In a crisis, strong leadership is crucial to identify how to move forward quickly. Moreover, a political leader is needed to symbolise powerful action to the public[57]. Centralisation in crisis management decreases short-term coordination costs and helps manage high political negotiations[58].

In the case of REPowerEU, EU Heads of State and Governments identified the most pressing issues during the informal meeting on 10–11 March. In the Versailles declaration they stressed the urgency of energy security and independence from Russian fossil fuels[59]. The European Council mandated establishing the EU Energy platform to coordinate joint gas purchasing. According to interviewed experts, the REPowerEU process had a centralised approach to delivering the package. Due to the high politicisation

of the emergency, the Heads of State were highly involved. In the Commission, the President was the most involved in the process. Executive Vice-President Frans Timmermans was also involved, along with Commissioner Kadri Simson to a lesser extent, in developing the strategy. Interviewed experts agreed that the Commission successfully brought solutions with a sense of direction within the pressured time frame.

According to exchanges with experts, the President and Vice President were leaning towards a focus on renewables as the primary solution. However, pushback from MS created a drift in direction. Whereas the President leaned toward giving flexibility for fossil fuels, Vice President Timmermans was against that path. This demonstrates a clash of responsibilities of each, where the President focused on finding compromises for solutions and the Vice President prioritised commitment to the EGD. Eventually the REPowerEU plan included investments estimated at €10bn by 2030 for gas infrastructure[60].

All in all, there was strong commitment and leadership to manage the crisis and strength in giving a sense of direction. Nevertheless, the need for quick solutions meant resorting to fossil fuels and investments in LNG infrastructure for short-term energy supply which possibly keeps the industry alive for longer[61].

Experimentation & adaptability

Experimentation & adaptability is a future-oriented enabler that helps in managing crises. It is about using innovation and new ideas to adapt to changing realities and unique needs. Experts agreed that there is a lack of experimentation from leaders during crises as there is no space for potential failure. However, in times of uncertainty in crises when solutions are unknown, experimentation might be inevitable. This enabler also includes adaptability and learning from new situations arising, a key capacity for resilience and crisis management[62].

The Commission showed experimentation when it introduced energy sufficiency concepts through measures encouraging behavioural changes such

as turning down heating and walking as a mode of transport, as well as decreasing prices of public transport[63]. Another element of adaptability in REPowerEU is the legal innovation to provide funding. Famà (2023) argues that by allowing MS to transfer allocated funds from other instruments such as the Cohesion Funds, the Commission has shown flexibility to adjust the constraints of the Multiannual Financial Framework that sets in advance the spending cap for a seven-year period, limiting the capacity for crisis response funding[64].

The Commission has shown some capacity for experimentation to introduce new measures or mechanisms. Yet, the case of REPowerEU demonstrates the need to formalise a structure allowing policymakers the space for experimentation and adaptability for new solutions and processes during a crisis.

To sum up, not all of the enablers were upheld as strongly as others during the REPowerEU process due to the challenges of the crisis. The Commission was able to uphold *competence, capacity, and capability* and *commitment and leadership* strongly, and there was also some space for experimentation and adaptability. However, it fell short on maintaining three enablers: evidence-informed; coherence, coordination, and collaboration; and participation. These weaknesses explain some of the potential to result in trade-offs and tensions, as discussed in the following section.

Potential tensions and trade-offs arising from the process

Although it is too soon to assess the full impacts, some potential trade-offs and tensions can be expected to arise as a result of the underapplication of enablers. REPowerEU's weakest enablers were evidence-informed; coherence, collaboration, and coordination; and participation. The weak application of those enablers shows evident trade-offs between short and long-term goals where policymakers prioritise quick solutions over long-term sustainability goals.

REPowerEU was not sufficiently based on **evidence-informed** actions due to skipping IAs. The lack of impact assessments raises concerns on how RE projects may lead to trade-offs and tensions on communities living close to them such as noise disruptions, land use change, or other externalities[65]. It also raises important questions about the extent to which new or additional energy path dependencies were created with coal-power use. Moreover, the designation of "go-to" areas for renewables was criticised as they can potentially do more harm than good for climate and biodiversity targets if exempted from regulations such as EIAs or stakeholder consultations[66]. The Commission recommended expediting permitting RE projects as energy is an overriding public interest[67]. However, although these projects serve the greater public interest, impacts on a regional level have to be taken into consideration to avoid backlash to them in implementation[68].

The unevenness of **participation** could lead to several potential trade-offs and tensions in policy implementation. Conducting stakeholder consultations with only IOGP may result in benefits only to certain industries, further creating fossil fuel lock-ins. Moreover, allowing overriding regulatory processes for renewables endangers the acceptability of these projects by the public. On a sectoral level, some tensions may arise as there is a lack of assessment of impacts on jobs. The REPowerEU Communication states that the Commission encourages stakeholders to establish a large-scale skills partnership under the Pact for Skills, however, it does not include any exact assessments on job loss, creation, and re-skilling needs[69]. The European Trade Union Confederation (ETUC) called for the inclusion of trade unions in future restructuring process to help them anticipate and plan for changes[70].

Coherence is weak in the REPowerEU process through several factors. As mentioned, the exemption from the DNSH principle may have watered down environmental laws.

Under the RRF regulation, the DNSH states that "measures related to power and/or heat generation using fossil fuels [...] should not be deemed compliant under DNSH for the purposes of the RRF" with exceptions made on a case-by-case basis[71]. However, the REPowerEU amendment changes to "the reforms and investments set out in those REPowerEU chapters which aim to improve energy infrastructure and facilities to meet immediate security of supply needs for oil and gas should not be required to comply with the principle of 'do no significant harm' and should therefore be exempted from such assessment"[72].

According to the Climate Action Network (CAN)[73], this leads to several problems. One is easing the investments in fossil fuel infrastructure under diversification justifications. This also includes backtracking from eliminating fossil fuel investments from EU funds. Moreover, CAN deems this action unnecessary as building new LNG infrastructure requires a long time and does not fix short-term supply problems. Finally, the amendment is inconsistent where solar panels investments are subject to DNSH, while fossil fuel investments are exempted. All in all, this represents short-sightedness for the need for quick solutions versus relying on the new RE developments for long-term solutions.

In addition, the EU plans to import LNG and hydrogen from North African countries to diversify the energy supply, posing a risk of several trade-offs. One is that the EU is creating demand for fossil fuels rather than influencing those countries to pursue green energy transition[74]. Secondly, the new LNG trade relationships create another short vs. long-term trade-off as it risks further dependency on an area with a high cost of capital and investment risk due to government ineffectiveness, corruption, and regulatory quality, among other issues[75]. Moreover, to meet the EU's demand, North African countries will have to ramp up their hydrogen production which negatively impacts land and water use. This may also compromise their plans for the Paris agreement as they will focus on exports instead of their own local production[76]. Therefore, there is a need to ensure coherence of crisis policies with the EU's foreign policies[xiv][77] and not creating harmful trade-offs across borders.

Through this example we see that a crisis management response that aims to act quickly may sacrifice some of the enablers of the effective governance of green and just transition and have a risk of harmful trade-offs as a result. Therefore, it is essential to find measures to uphold the enablers in a fast-tracked process to mitigate the potential trade-offs and tensions.

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xiv Policy Coherence for Development (PCD) states that EU and MS should not undermine their partner countries' development through EU policies.

Recommendations

The process of developing REPowerEU shows weaknesses in the EU's crisis response governance, particularly with regard to using evidence to inform policies, allowing for participation, and creating policy coherence. As the polycrisis continues to present the EU with complex challenges and uncertainty about the future, this example can present learnings for the future.

The following recommendations propose ways in which the EU can be better prepared for fast but effective responses to future crises:

Evidence-informed

- Evidence-informed practices can benefit from faster procedures by developing a fast-tracked IA model. The BRG should include a **Rapid Impact Assessment** for crisis response where the duration would depend on the complexity and severity of the situation. However, the duration should still allow for a fast process with minimum requirements to be followed to ensure visibility for potential impacts and trade-offs.
- The Scientific Advice Mechanism suggests involving national statistical offices and European agencies. Those agencies have capacity to track important indicators during a crisis which can help identifying impacts and prioritising needs for recovery[78].
- Integrating strategic foresight into EU policymaking processes can help policymakers to be more prepared for developments that arise. Foresight uses collective intelligence to anticipate these developments and other risks and prepare the EU to withstand shocks. This can support the Commission in "evidence-based anticipatory policymaking"[79].
- Building capacity for evidence-informed policymaking in non-crisis mode is important for having the practice and habit to use evidence well in times of emergency.

Participation

- Participation needs to be integrated in crisis management as trust in institutions and governments must be maintained in crises. Affected groups and business should have the space to present opinions, concerns, and the right to be heard as well as understand the impact of their deliberation. Fast-tracked modes of participation can be implemented in **which public consultations are targeted to a pre-defined group**. This group can include civil society specialised in the topic and representatives of the most vulnerable groups.
- The Commission can reinforce existing tools such the "Have your Say[xv] platform to fast-track the process in crises[80]. The questions in the consultations need to be simplified to be accessible to the average citizen so that they can have a meaningful contribution.
- Building capacity for participatory policymaking in non-crisis mode is important for having the practice and habit to use participation well in times of emergency.

Coherence, coordination, and collaboration

- Coherence, coordination and collaboration can be improved through **crisis response communication and information sharing channels**. This can be done by building on and enhancing the performance of existing structures like RAS, Argus, and IPCR to to improve information sharing and coordination[81]. These measures could improve the collaboration and coherence of the policymaking process across DGs, EU institutions, and MS. Moreover it increases access to information from different sources such as external experts, academia, civil socity and citizens. Consequently, it will also develop a more transparent and participatory process.

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xv Online platform where citizens and businesses can share their views on new EU policies and existing laws.

- Processes that have been developed, such as the use of DNSH, need to be practiced during non-crisis policymaking in order for them to become habit and not be percieved as a burden or barrier to crisis response.
- Strengthing capacity for cross-institutional collaboration and coordination in non-crisis mode is important for having the practice and habit to maintain coherence well in times of emergency.

While this is not a comprehensive list, these recommendations aim to offer suggestions for improvements to the crisis response process which can help policymakers respond more quickly to an urgent need. The key conclusion of this assessment is that normal EU policymaking processes are time-consuming, and policymakers need tools which can help them respond quickly while also adhering to these principles for effective governance for the green and just transition. With such rapid response tools, based on enablers of effective policymaking, policymakers will be better equipped to manage tensions and trade-offs that arise along the way. In addition to rapid response tools, policymakers need to build capacities on these enablers in times that are not emergencies to be able to have the habit and practice as a foundation for good crisis response.

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