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To what extent has the EU Green Deal changed EU energy policies?
A Punctuated Equilibrium Theory analysis of the Renewable Energy Directive Revision.

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Abstract

The European Green Deal is supposed to be a game-changer for the Union and in particular its energy policies. The EU is often portrayed as advancing slowly because of the need for consensus in its decision-making process, meaning that game-changers are more the exception than the norm for the EU. This paper will investigate the extent of change brought by the Green Deal on the Union's energy policymaking, using Baumgartner and Jones' punctuated equilibrium theory. It will do so by taking the Renewable Energy Directive as a case-study and by comparing its several iterations through a process tracing.

INTRODUCTION

On 11 December 2019, European Commission President Ursula Von der Leyen introduced the European Green Deal. This plan is meant to overhaul Europe's economy and EU policymaking, which poses the question of the extent of change brought by the Green Deal: Is it really a radical turn?

This article will take a closer look at the Green Deal and its effect on EU policies, in particular energy policies, as they are set to be greatly impacted by the Green Deal. Energy is indeed a major source of carbon emissions, as electricity and heat production alone were responsible for 31,20% of the EU's Co2 emissions alone in 2019.¹ More generally speaking, it also proposes a case study of how policy change occurs in the framework of the EU. To do so, this article will study a key proposal from 2021: the revision of the Renewable Energy Directive, the so-called RED.

The Renewable Energy Directive most notably sets one of the Union's three decarbonization targets: renewable energy uptake. It was introduced in 2009 just before the Lisbon Treaty's adoption, and then recasted in 2018. Studying its evolution through time, and comparing it with what is happening under the Green Deal, would therefore allow one to determine the extent of change brought by the program to a major decarbonization policy.

To investigate the extent of change brought by the Green Deal to the EU's energy policy, we will rely on the Punctuated Equilibrium Theory of policy change created by Baumgartner and Jones.² This theoretical framework was chosen it explains agenda setting, as well as the extent, the nature and the type of change new ideas bring.³

¹ European Environment Agency, "EEA greenhouse gases", *National Emissions reported to the UNFCCC and the EU Greenhouse Gas Monitoring Mechanism*, European Environment Agency, Copenhagen, 13 April 2021, Last consulted on 5 April 2021: <https://www.eea.europa.eu/data-and-maps/data/data-viewers/greenhouse-gases-viewer>

² Frank R. Baumgartner, and Jones D. Bryan, *Agendas and Instability in American Politics*, Second Edition (Chicago, IL: University of Chicago Press), 2009.

³ *Ibid.*, 11-12.

1. The Punctuated Equilibrium Theory

The Punctuated Equilibrium Theory (PET) is a theoretical framework created by Jones and Baumgartner in 1991. This theory, based on the study of the US political system, argues that it is characterized by “long periods of stability”⁴ which “are interrupted by bursts of frenetic policy activity”.⁵ This phenomenon is explained by the fact that both the public and politicians are constrained by “bounded rationality”.⁶ They cannot deal with all policies simultaneously and are limited by institutional rules.⁷

This situation allows for policy subsystems to take the lead in policymaking. Those subsystems are composed of different actors involved in decision-making in a program or a specific policy area.⁸ who seek policy monopolies because it would allow them to have the political system fully accommodate their own interests. Such monopolies do not create a permanent equilibrium in politics, rather they create temporary stability.⁹ The whole system can indeed be put down by “*a change in intensities of interest*”¹⁰ which is usually caused by a change in the way actors and the public perceive the policy.¹¹

This period of change is triggered by what Baumgartner and Jones call “positive feedback”.¹² Most of the time, policy monopolies fuel a negative feedback loop, whereby they make adjustments to policies to answer a particular criticism without changing the core of the policy, as they reject the ideas supporting such change.¹³ Though sometimes, an idea will gain traction and lead to positive feedback, leading to change, which can then “cascade”¹⁴ into more change,¹⁵ allowing the idea to spread until it reaches a point where it

⁴ *Ibid.*, xvii

⁵ *Ibid.*

⁶ *Ibid.*, xxiii

⁷ *Ibid.*, xxiii-xxiv

⁸ *Ibid.*, 5-6.

⁹ *Ibid.*

¹⁰ *Ibid.*

¹¹ *Ibid.*

¹² *Ibid.*, 16.

¹³ *Ibid.*

¹⁴ *Ibid.*

¹⁵ *Ibid.*

receives negative feedback once more.¹⁶ This so-called "S-shaped Curve"¹⁷ of policy change leads to the destruction of the policy monopoly and a change of the subsystem.¹⁸

Baumgartner and Jones explain that those feedbacks can be fueled by two main categories of events: a change in the definition and the image of a policy, that is the way an issue and its solutions are defined and understood,¹⁹ and a policy venue change, which is an Institutional structure change or a change of Institutional rules.²⁰ All of these elements and mechanisms are the basis of punctuation in policymaking, the rapid outburst of change.

The Punctuated Equilibrium Theory has also already been applied to the European Union. For instance, C. Burns, J. Clifton, and L. Quaglia published in 2018 a study on the EU's post-crisis financial reforms²¹ testing the theory on the European Union's banking and financial regulations following the Eurocrisis and Greece's economic reforms.²² The Punctuated Equilibrium Theory was also used by Benson and Russel to look at long-term change, between 1968 and 2010, in the EU energy policy,²³ in which they showed that if dynamics for change exist and frequently appeared in the EU, its institutional structure always slowed down change,²⁴ similar to the analysis Burns et al. Benson and Russel stressed that despite energy becoming a shared competency with the Lisbon Treaty, the fact that it is a very salient policy area for Member-States slows down change.²⁵ These works show that the EU Institutional structure, and in particular the existence of veto-players can influence the extent and pace of public policy change. This article will attempt to test this conclusion, and to assess how salient it is in the case of EU energy policies.

¹⁶ *Ibid.*, 17.

¹⁷ *Ibid.*

¹⁸ *Ibid.*

¹⁹ *Ibid.*, 25-27.

²⁰ *Ibid.* 31-35.

²¹ Charlotte Burns, Judith Clifton, and Lucia Quaglia, "Explaining Policy Change in the EU: Financial Reform after the Crisis", *Journal of European Public Policy* 25, no. 5, (2017), 728-46, <https://doi.org/10.1080/13501763.2017.1301535>

²² *Ibid.*, 7-16.

²³ David Benson and Duncan Russel, "Patterns of EU Energy Policy Outputs: Incrementalism or Punctuated Equilibrium?," *West European Politics* 38, no. 1 (2015), 185-205, <https://doi.org/10.1080/01402382.2014.936707>.

²⁴ David Benson and Duncan Russel, *op. cit.*, 202.

²⁵ *Ibid.*

2. Research Framework

This paper, through a comparative case study, will try to test the assumption that the European Green Deal created a punctuation in EU energy policymaking:

To what extent has the European Green Deal brought about change to the Union's energy policy?

Four independent variables and one dependent variable were identified. As this article is about punctuations in EU energy policy, the dependent variable will be the *EU's Energy Policy* itself, which will be studied through the lenses of the Renewable Energy Directive and its two revisions.

The first independent variable in this article will be the presence of *positive feedback* supporting the development of renewable energies. The assumption here is that the Green Deal and changes to EU energy policies did not come from anywhere: they result from a renewed focus on sustainability and climate change, which created an enthusiastic wave for policies promoting sustainability.

H1: Between the first renewable energy directive (REDI) and the 2021 proposal for a revision (REDIII), the EU energy subsystem has been subject to a positive feedback supporting a focus on sustainability, which turned it into the dominant policy image for EU energy policy and culminated in the European Green Deal.

The second independent variable is subject to a lot of attention from PET scholars:²⁶ *the existence of policy entrepreneurs*. Positive feedback for sustainability in itself is not enough to change the policy image of a subsystem; some actors must also act to trigger change by imposing their vision of a problem and its solution as the policy image.²⁷

²⁶ Frank R. Baumgartner, and Jones D. Bryan, *op. cit.*, 28-29.

²⁷ *Ibid.*

H2: Entrepreneurship from the Commission and the Parliament in the Renewable Energy directives negotiation processes allowed targets, sub-targets, and biofuels sustainability criteria to increase throughout RED revisions.

H2.1: Policy change was also caused by Renewable Energy companies, federations, and environmental NGOs' policy entrepreneurship.

Following the Punctuated Equilibrium Theory's assumptions, the third independent variable in this article is the *policy subsystem*. The assumption will be here that with the first Renewable Energy Directive created a policy subsystem by expanding EU action in the energy area, and that this subsystem was affected by the Green Deal.

H3: There has been a change in the EU renewable energy policy subsystem with the Green Deal because of Institutional organization change, elections, and empowerment of pro-sustainability actors.

The last independent variable is the *existence of veto players*. The literature applying the Punctuated Equilibrium Theory to the EU tends to stress the difficulty for the Union's political system to provoke punctuations, primarily because of veto players and Institutional rules.²⁸

H4: The existence of important veto-players in the EU energy policy system limited the push for change in the EU energy policy.

3. Operationalization

This article will be built as a process tracing with a case study of the 2009 Renewable Energy Directive, its 2018 revision and the 2021 revision proposal. The objective here will be to trace back the evolutions of EU renewable energy policies over the past ten years with a focus on this Directive. This will be done in order to compare the different versions of the

²⁸ Charlotte Burns, Judith Clifton, and Lucia Quaglia, *op. cit.*, 739-40.

Directive and to better understand historical events and trends which influenced it, and to see if a punctuation really happened with the European Green Deal.²⁹

The case study will be built around three types of qualitative sources. The first type will be 17 interviews with people involved in the field of European energy policymaking, in particular REDII and III. The second source will be one hundred and eighty-nine articles from the Financial Times published between January 2007 and April 2022. This method allows to study changes in the macropolitical situation and the policy image.³⁰ The Financial Times was chosen because it is one of the leading EU news sources and for feasibility reasons, as it offers simplified access to its archives and online publications.

THE 2009 RENEWABLE ENERGY DIRECTIVE: FROM ENTHUSIASM TO CRISIS

The first Renewable Energy Directive (REDI) was adopted after long negotiations in 2009.³¹ This directive is the first to set a binding framework encouraging renewable energy development.

1. The Renewable Energy Directive I: a Breakthrough in EU Energy policy

Sustainability has been one of the Union's main concerns in energy policymaking since the 1990s³² due to the growing environmentalist movement in the 70s, 80s and 90s but also by international climate diplomacy throughout the 1990s. All of this resulted in a mention of environmental protection in the Maastricht Treaty and later on, white papers declaring it as

²⁹ Philippe Bezes, Bruno Palier, and Yves Surel, "Le process tracing : du discours de la méthode aux usages pratiques", *Revue française de science politique* 68, no. 6 (2018), 961-65, <https://doi.org/10.3917/rfsp.686.0961>.

³⁰ Frank R. Baumgartner, and Jones D. Bryan, *op. cit.*, 50-51.

³¹ European Parliament and Council of the EU, "Directive 2009/28/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of the use of energy from renewable sources and amending and subsequently repealing Directives 2001/77/EC and 2003/30/EC", *Official Journal of the European Union*, L 140/16, Brussels, 6 June 2009, henceforth "Directive 2009/28/EC".

³² Michèle Knodt and Marc Ringel, "European Union Energy Policy: A Discourse Perspective" in *Handbook of Energy Governance in Europe*, ed. Michèle Knodt and Jörg Kemmerzell (Cham: Springer International Publishing, 2020), 8-10 https://doi.org/10.1007/978-3-319-73526-9_50-2

one of the EU's main objectives alongside the security of supply and market competitiveness. This trend led to the adoption of the RES-E directive in 2001, which had only non-binding objectives for Member-States.³³ Nevertheless, these elements are insufficient to explain the adoption of a much more stringent and binding legislative proposal such as the First Renewable Energy Directive: if sustainability was taken into account by EU policymaking, it never had been, so far, the Union's primary concern.³⁴

Several factors can account for the directive's adoption. Firstly, positive feedback supporting a refocusing of energy policies on sustainability started to get strong at that time, as renewable energy sources to become quite popular and well perceived in the media. This is shown empirically by the results of the analysis carried out on the sample of Financial Times articles presented here. 29 articles were analyzed between 2007 and 2010 and show a sizeable enthusiasm for Europe's environmental goals, notably its renewable energy targets. A majority of the Financial Times' articles published around the time of RED I's negotiations are indeed quite positive on the topic, praising renewables and publishing articles with titles such as "Renewables to emerge leaner, fitter, stronger".³⁵

³³ *Ibid.*

³⁴ *Ibid.*

³⁵ Mike Scott, "Renewables to emerge leaner, fitter, stronger", *Financial Times*, 16 November 200, Last accessed on 23 April 2022: <https://www.ft.com/content/eff7918e-b275-11dd-bbc9-0000779fd18c> Title.

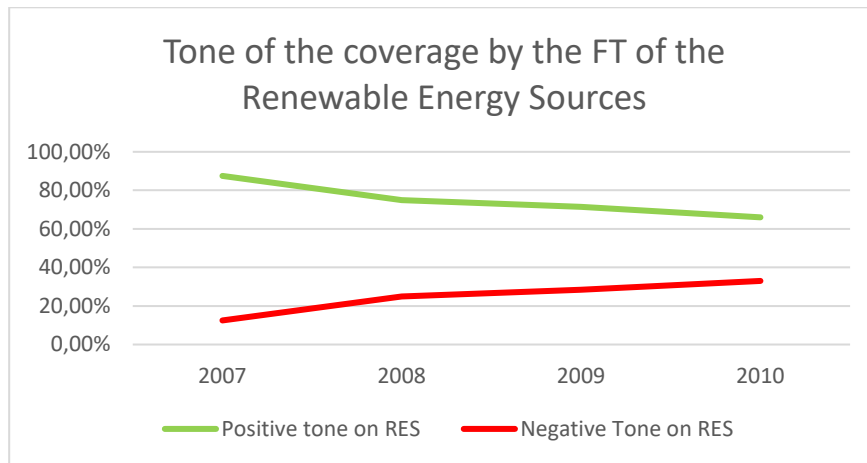


Figure 1: Tone of the coverage by the FT of the Renewable Energy Sources (2007 – 2010) ³⁶

If one could easily qualify media as being enthusiastic at the time about Renewables themselves, the same can't be said of the Union's renewable policy: over this period, FT articles are quite critical of the use of targets for renewable energy uptake, stressing that an approach entirely based on the Emission Trading System would be preferable;³⁷ it also relays several studies claiming the EU might not even reach its targets.³⁸ Negative coverage in the studied sample overtakes positive coverage in 2008. Criticisms then tone down but remain strong. Overall, despite these criticisms on EU policies, positive feedback supporting a greater emphasis on sustainability and the promotion of renewables in EU energy policy is observed between 2007 and 2010.

³⁶ Source: FT coverage analysis, author's production.

³⁷ For Example: The FT View, "Europe's greenhouse gas goal is good but its methods less so", *Financial Times*, 9 March 2007, Last accessed on 23 April 2022: <https://www.ft.com/content/c596cf88-ce7c-11db-b5c8-000b5df10621>

³⁸ For Example: Fiona Harvey, "EU warned energy goal will be missed", *Financial Times*, 25 November 2008, Last accessed on 23 April 2022: <https://www.ft.com/content/06f9214a-ba82-11dd-accd-0000779fd18c>

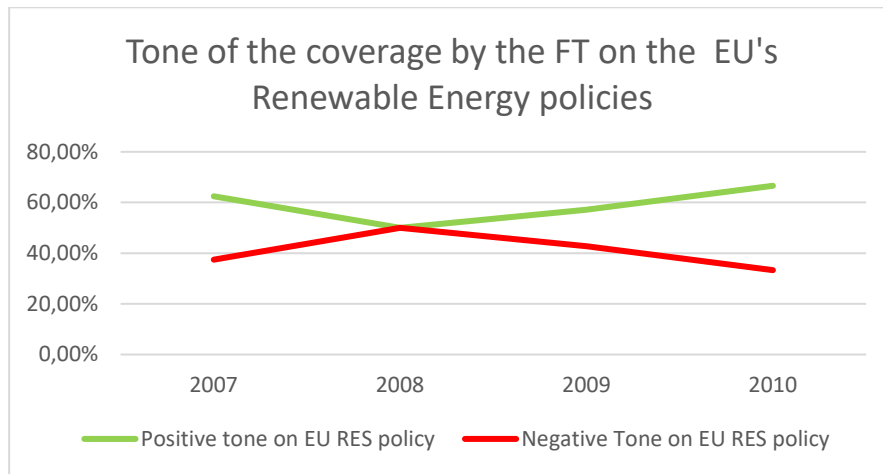


Figure 2 Tone of the coverage by the FT on the EU's Renewable Energy policies (2007-2010)³⁹

Rising support for renewables did not, on its own, bring about a change of course. Some policy entrepreneurs managed to use it to increase the EU's action in the field of energy. The first entrepreneur who played a key role in the obtention of a political agreement on the renewable energy target was not one of the co-legislators but a European Council member: Angela Merkel.⁴⁰ The German Chancellor had at the time the rotating presidency of the European Council and made environmental policies one of the cornerstones of her presidency.⁴¹ She, therefore, pushed for the "20/20/20 target" to be approved by EU leaders: a 20% reduction of Greenhouse gas emissions, alongside a 20% target for the share of renewable energy production and another 20% target for energy consumption reduction.⁴² It was also stressed at the time in the media that Chancellor Merkel was key in securing binding targets.⁴³ The Commission also played a key supporting role by releasing an impact assessment presenting the 20/20/20 approach as the most efficient one.⁴⁴ Though if the Chancellor was key in obtaining a political agreement, Germany then downplayed the

³⁹ Source: FT coverage analysis, author's production.

⁴⁰ Knodt and Ringel, *op. cit.* 9.

⁴¹ *Ibid.*

⁴² *Ibid.*

⁴³ George Parker, Bertrand Benoit, Daniel Dombey, "EU agrees bold deal on climate change", *Financial Times*, 9 March 2007, Last accessed on 29 April 2022: <https://www.ft.com/content/32d01ef6-cdbf-11db-839d-000b5df10621>

⁴⁴ Alexander Bürgin, "National binding renewable energy targets for 2020, but not for 2030 anymore: why the European Commission developed from a supporter to a brakeman", *Journal of European Public Policy* 22, n° 5 (2015): 696-698, <https://doi.org/10.1080/13501763.2014.984747>.

ambition of the legislative act to follow, REDI.⁴⁵ In a 2008 European Council, Member-States decided to keep the 20% renewable energy sources uptake target but to exclude energy-intensive industries from the count.⁴⁶ It also decided not to follow up with 2007 discussions for a higher 30% target and instead promised to pursue it depending on the result of COP 15 in Copenhagen.⁴⁷ The financial crisis then crushed any hope of going beyond this agreement in the final REDI directive.⁴⁸ Therefore if Germany did not push for a more ambitious directive as initially expected at the time, it was still key in securing a deal on binding targets. A second important entrepreneur in those negotiations were NGOs and the nascent renewable energy sector, as both succeeded at presenting Renewables as a potent decarbonization tool. They also successfully pushed for a technology-specific target, against the electricity sector's call for a single target for Green House Gases, paired with the ETS.⁴⁹ The action of all these policy entrepreneurs as well as the positive feedback emphasizing sustainability, led to the first RED directive, which can be considered an ambitious legislative piece, especially for the pre-Lisbon treaty era.

2. The first Renewable Energy Directive

The first important aspect of the new directive is targets, setting an EU-wide objective of reaching a 20% share of renewables in the Union's energy mix.⁵⁰ Initially, the Commission also kept some leeway in its proposal to increase the target to 30%, depending on whether further international commitments are made - though this never happened in the

⁴⁵ Michèle Knodt et Marc Ringel, *op. cit.*, 9-10.

⁴⁶ *Ibid.*

⁴⁷ *Ibid.*

⁴⁸ *Ibid.*

⁴⁹ Elin Lerum Boasson et Jørgen Wettestad, "EU Renewable Energy: David beating Goliath?", in *EU Climate Policy: Industry, Policy Interaction and External Environment* (London: Routledge, 2016) quoted in Oscar Fitch-Roy, David Benson, and Catherine Mitchell, "Wipeout? Entrepreneurship, Policy Interaction and the EU's 2030 Renewable Energy Target," *Journal of European Integration* 41, no. 1 (2019): 988, <https://doi.org/10.1080/07036337.2018.1487961>.

⁵⁰ Directive 2009/28/EC, *op. cit.*, Art. 3 -1.

end.⁵¹ Those binding targets were not a flat 20% for all Member-States, but rather targets depending on the situation and renewable energy potential of each Member-State.⁵²

A second important feature of the directive is its governance system, which was rather innovative for the time. The directive indeed required Member-States to draw-up national renewable energy action plans (NREAP) from a template designed by the Commission detailing how they would work toward their respective target.⁵³ The Commission is then tasked with reviewing those plans and formulating recommendations.⁵⁴ Those plans also incorporated declarations by Member-States on their expectations regarding renewable electricity production and whether they would need to buy or be in a position to sell their renewable electricity production surplus.⁵⁵ This governance is quite innovative as the 2001 RES-E directive did not incorporate such a system and only referred briefly to the creation of a report by Member-States detailing how they would reach their targets.⁵⁶

The third important feature or rather missing feature is the support for a specific support scheme for renewables.⁵⁷ Since the RES-E, the Commission tried to promote the market-based “tradeable guarantees of origin” system or green certificate:⁵⁸ consumers are supposed to buy a certain amount of renewable electricity each year defined by the Member-State, and its purchase is guaranteed by the certificate whose sale generates revenue for the electricity producer.⁵⁹ It was most notably implemented in the United Kingdom,⁶⁰ though

⁵¹Israel Solorio and Helge Jörgens, “Contested Energy Transition? Europeanization and Authority Turns in EU Renewable Energy Policy”, *Journal of European Integration* 42, no. 1 (January 2, 2020): 84, <https://doi.org/10.1080/07036337.2019.1708342>

⁵² Directive 2009/28/EC, *op. cit.*, Recital 15.

⁵³ *Ibid.*, Article 4.

⁵⁴ *Ibid.*

⁵⁵ *Ibid.*

⁵⁶ European Parliament and Council of the EU, “Directive 2001/77/EC of the European Parliament and of the Council of 27 September 2001 on the promotion of electricity produced from renewable energy sources in the internal electricity market”, *Official Journal of the European Union*, L283 final, Brussels, 27 October 2001, *op. cit.*, Article 3.2.

⁵⁷ Israel Solorio and Helge Jörgens, *op. cit.*, 85.

⁵⁸ *Ibid.*, 82-83.

⁵⁹ Anne Held and al., *Design features of support schemes for renewable electricity Task 2 report*, ECOFYS, Utrecht, 27 January 2014, 5 (Summary).

⁶⁰ Israel Solorio and Helge Jörgens, *op. cit.*, 82.

other Member-States such as Germany and Spain had other systems⁶¹ such as the Feed-In-Tariff system, where the State guarantees a certain price for renewable electricity, whatever the market price.⁶² In the 2001 RES-E directive, the Commission tried to push for the first system to be implemented at the EU level to create a truly European support scheme system, something that it tried to include again with REDI.⁶³ Though because of Member-State reluctance to drop their respective national systems, REDI remained neutral in terms of support scheme, acknowledging both systems as relevant.⁶⁴

Finally, one last feature of the directive concerns biofuels and biomass. Both are recognized in REDI as renewable energies,⁶⁵ though they are also subject to sustainability criteria, as the production of energy from those sources can also have negative effects on the environment.⁶⁶ For instance, a big concern around biomass is that it encourages deforestation as it requires the use of wood to produce electricity, which damages biodiversity and can also emit Co2.⁶⁷ Regarding biofuels, they are also accused of encouraging deforestation as well as competing with land used for food production while also emitting Co2.⁶⁸ Countries like Sweden and Finland, however, are also quite favorable to those energies, as they constitute a large part of their renewable energy production.⁶⁹ In the end, if sustainability criteria are adopted, they are quite loose, and the Commission will pledge to further investigate the issue in the following years, leading to further stringency in those criteria.⁷⁰

Those four features of the directive are quite novel, as they were not treated in such a coherent manner by the EU before. They are also major because they will remain sticking

⁶¹ *Ibid.*

⁶² Anne Held and al., *op. cit.*, 4 (Summary).

⁶³ *Ibid.*, 85.

⁶⁴ *Ibid.*

⁶⁵ Directive 2009/28/EC, *op. cit.*, Art. 17.

⁶⁶ *Ibid.*

⁶⁷ Interview with a journalist covering EU policies in a Brussel based publication, in discussion with the author, Brussels, 28 March 2022.

⁶⁸ *Ibid.*

⁶⁹ Interview with a journalist covering EU policies in a Brussel based publication, in discussion with the author, Brussels, 28 March 2022.

⁷⁰ Interview with a Climate Action Network (CAN) Europe representative, in discussion with the author, Online, 21 February 2022.

issues in the coming revisions of the directive, and because they had important implications for Member-States energy policy. Even though the EU did not fully have an energy competence, the dynamic created by policy entrepreneurs and ensuing positive feedback therefore clearly accelerated the venue change regarding energy policy, from Member-States to the Union. All of this hints toward REDI being the result of what Baumgartner and Jones call a “Downsian mobilization”.⁷¹

3. REDI as a “Downsian mobilization”⁷²

In the Punctuated Equilibrium Theory, the “Downsian mobilization”⁷³ is a phenomenon whereby a sudden wave of enthusiasm leads policymakers to shift their attention to a specific policy and to seek an important change to the way it works and is designed. It is then followed by a sudden drop in attention, either because the effects of the new policy take time to become visible, meaning citizens and policymakers will progressively pay less attention to it, or because the issue is so difficult to tackle that any policy seems insufficient.⁷⁴

In the case of the first renewable energy directive, we saw a clear wave of enthusiasm for sustainability and renewables occurring in the second part of the years 2000s.⁷⁵ The EU and its leaders responded to it by setting sustainability goals, including for the energy sector through two European Councils.⁷⁶

This sudden wave of enthusiasm for those topics led some policy entrepreneurs to try to push for their vision of a sustainable European energy sector, most notably A. Merkel, NGOs and the Renewable Energy Sector. More precisely, they pushed for a change in

⁷¹ Baumgartner and Jones, *op. cit.*, 88.

⁷² *Ibid.*

⁷³ *Ibid.*

⁷⁴ *Ibid.*

⁷⁵ Analysis of Financial Times coverage of EU renewable energy policies, 2007-2010 period. Also see Michèle Knodt and Marc Ringel, *op. cit.*, 9-10.

⁷⁶ *Ibid.*

energy policy image, toward sustainability, by encouraging renewable energy uptake.⁷⁷ And they also pushed for a venue change, as energy policymaking is now, at least for renewables, tackled at the European level more than ever before. Their work was successful in that they prevented any vetoes from blocking the REDI proposal.

Furthermore, as was the case in Baumgartner and Jones' case study on US nuclear energy policy, the mobilization seems to have created a new policy subsystem, as anticipated in the third hypothesis of this study. With REDI, the EU obtained a clear role in renewable energy policymaking and a new subsystem appeared for that field, composed of: the Commission as it checks RED's implementation and follows up on it; the Council and the Parliament as co-legislators (most notably its energy Commission, ITRE); and EU level stakeholders such as electricity companies and NGOs, as they seek to influence the process.

THE 2018 RENEWABLE ENERGY DIRECTIVE

If REDI was adopted in the context of a strong momentum for renewables, the recasting of the renewable energy directive (REDII) will face more difficulties linked to the Eurocrisis.

1. Renewables and the Eurocrisis

Following the Renewable Energy Directive's adoption, interest in renewable energies and sustainability did not die down, *per se*: in the sample used here, the number of articles published increased from 29 to 51 between 2011 and 2014, compared to the previous period. Though this finding has to be nuanced by the fact that the Financial Times developed its online activities over time, it still shows at the very least that interest did not die down. What is also very interesting to observe is the sharp contrast in terms of the coverage's tone.⁷⁸

⁷⁷ Michèle Knodt et Marc Ringel, *op. cit.*, 10 also see Elin Lerum Boasson et Jørgen Wettestad quoted in Oscar Fitch-Roy, David Benson, and Catherine Mitchell, *loc. cit.*

⁷⁸ *Ibid.*

It appears very clearly that the articles, Op-eds, and blog posts published are much more critical of Renewable Energy sources. If the majority of the coverage was still positive in 2010, in 2011 only about 25% of the articles analyzed had a positive tone on renewables.⁷⁹ This improves in 2012 but negative coverage remains strong, and in 2013 and 2014 it becomes majoritarian once again.⁸⁰ This can be explained by two factors.

The first one is the ongoing economic crisis. Unlike what is observed with the first directive, concerns over energy prices and competitiveness of the EU's industry started to be increasingly present in renewable energy-related media coverage.⁸¹ The Financial Times conveys in particular EU energy companies' concerns over the Union's decarbonization plans and actively calls for at least a softening of these policies.⁸²

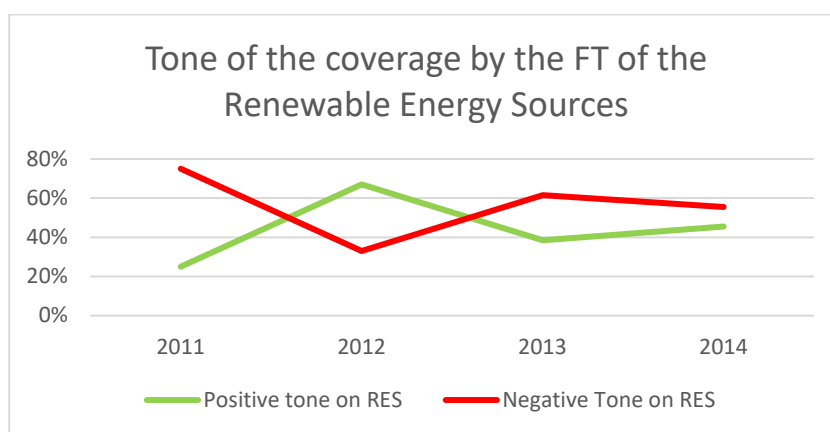


Figure 3 Tone of the coverage by the FT of the Renewable Energy Sources (2011-2014)⁸³

This negative dynamic is also observable in the coverage of EU policies. For instance, the FT published articles stressing that the EU's energy policy will substantially increase energy prices.⁸⁴ Both findings mean that the strength of the positive feedback that had brought an ambitious renewable energy policy between 2007 and 2010 has clearly been

⁷⁹ *Ibid.*

⁸⁰ *Ibid.*

⁸¹ Bürgin, Alexander, *op. cit.*, 698.

⁸² Results from the Financial Times Coverage, author's own production.

⁸³ *Ibid.*

⁸⁴ Pilita Clark, "EU faces 20 years of rising energy bills", *Financial Times*, 16 October 2011, Last accessed on 24 April 2022: <https://www.ft.com/content/fb79d97e-f7fd-11e0-8e7e-00144feab49a>

replaced with negative feedback supporting stagnation. And if attention for the topic of renewables did not die down as would be expected under the Punctuated Equilibrium Theory, it still lost momentum because of the focus on the green transition's economic cost. This led to an overall stagnation of this policy field, at least in terms of EU policy proposals.

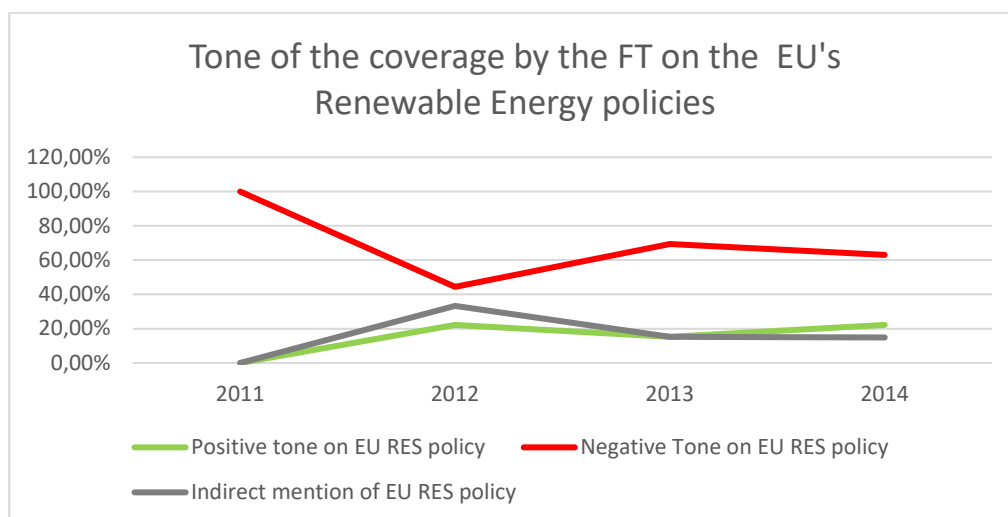


Figure 4 Tone of the coverage by the FT on the EU's Renewable Energy policies (2011-2014)⁸⁵

A second explanation for this drop is the overall failure of climate diplomacy during COP15 in Copenhagen.⁸⁶ Some EU leaders felt that the Union had failed to play its leadership role, and that it would be difficult to convince other countries to cooperate on decarbonization. In face of this, the European Union decreased its ambition in terms of climate diplomacy without putting it to a complete halt.⁸⁷ This trend was reinforced by the increasing salience of energy security as a political priority for the EU: new Member-States from central and Eastern Europe were keen to insist on it as Europe was very dependent on energy imports from third countries, most notably Russia.⁸⁸ Those concerns would gain particular traction because of the 2014 war in Donbas, which constrained natural gas supply

⁸⁵ Results from the Financial Times Coverage, author's own production.

⁸⁶ Bürgin, Alexander, *op. cit.*, 698.

⁸⁷ *Ibid.*

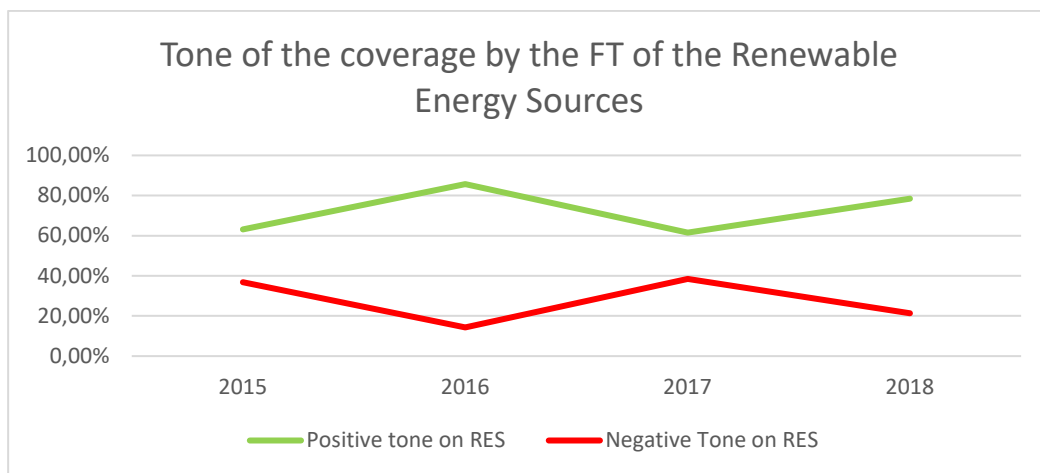
⁸⁸ Michèle Knodt et Marc Ringel, *op. cit.*, 13-15.

and reinforced Central and Eastern European Member-States' proposal to focus on security of supply for Europe's energy policy.⁸⁹

Therefore, we see that between 2011 and 2014 the Union's sustainability momentum died down, and the adoption of policies in support of renewable energies slowed down at the European level. Support for renewables within the subsystem therefore decreased, and because of the lack of intervention from the macropolitical level, renewables support policies were kept largely as is.

2. The Renewables' second wind

After 2015, momentum starts to build up once more for renewables. This can be observed with the Financial Times' coverage of renewables becoming positive again. The FT's focus moves increasingly toward subjects such as EU energy companies calling for more ambition on renewables,⁹⁰ though criticisms are still present (for instance, regarding the rise in energy prices caused by renewable energy development).⁹¹ The presence of this type of narrative clearly shows that this new positive feedback is not fully dominant yet.



⁸⁹ *Ibid.*

⁹⁰ Andrew Ward, "European energy groups push EU for tougher climate change goals", *Financial Times*, 5 November 2017, last accessed on 28 April 2022: <https://www.ft.com/content/4d39bd72-c20c-11e7-a1d2-6786f39ef675>

⁹¹ Michael Pooler, "Heavy manufacturers warn over burden of costs in EU policy", *Financial Times*, 13 October 2015, Last accessed on 28 April 2022: <https://www.ft.com/content/0e47e83c-68f9-11e5-a57f-21b88f7d973f>

Figure 5 Tone of the coverage by the FT of the Renewable Energy Sources (2015 – 2018)⁹²

Regarding EU policies, The Financial Times also publishes more articles stressing the climate urgency and the need for EU action, in particular in the context of COP21.⁹³ Criticisms about the Union not doing enough for renewables also started to appear. For instance, some articles point out to the increasing administrative burden for companies involved in renewables.⁹⁴ Furthermore, coverage started to increasingly cover utility companies' decisions or positions regarding renewables: this is a sign that after initial resistance, many of them are now focusing on renewables. In a sense, these energy sources have entered the realm of normality within the EU's energy mix.

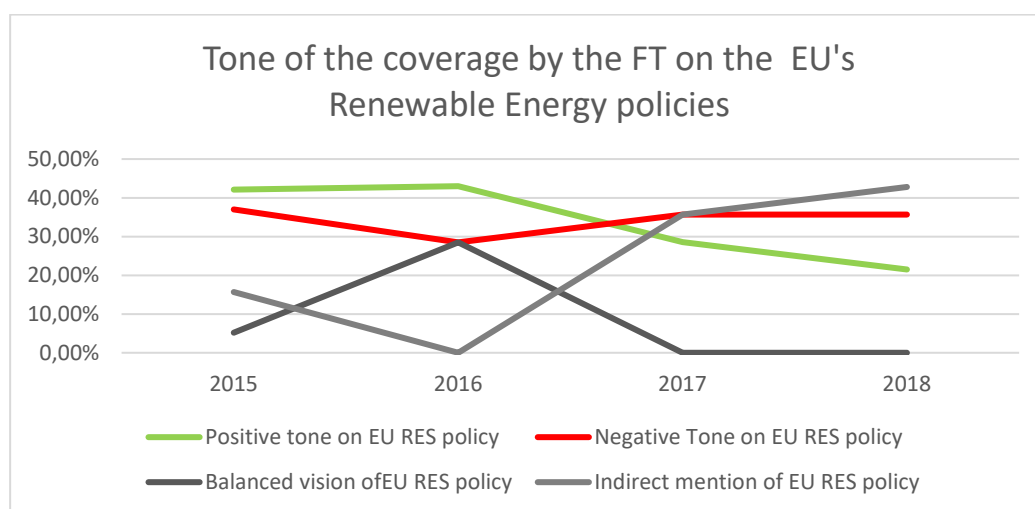


Figure 6 Tone of the coverage by the FT on the EU's Renewable Energy policies (2015-2018)⁹⁵

This comeback of positive feedback for renewable energy support can be explained by several factors. First is the creation of the energy union in 2015. If the debates around this program were mainly about security of supply at first, Western and Nordic Member-States

⁹² Results from the Financial Times Coverage, author's own production B.

⁹³ Mackenzie Weinger, "A COP21 disturbance in the force", *Financial Times*, 17 November 2015, Last accessed 24 April 2022: <https://www.ft.com/content/ab42b463-9287-37ec-ae43-e1c41441855e>

⁹⁴ Pilita Clark, "Politics, red tape 'turning EU clean energy into zombie industry'", *Financial Times*, 12 April 2015, Last accessed on 24 April 2022: <https://www.ft.com/content/36342a3e-df71-11e4-b6da-00144feab7de>

⁹⁵ Results from the Financial Times Coverage, author's own production.

successfully managed to add references to sustainability within its policy goals, giving new assurance to businesses that the EU is still committed to supporting renewables.⁹⁶

Another factor is the success of COP21 in Paris, which gave new impetus to the fight against climate change, and new, higher targets for the EU and its Member-States to reach.⁹⁷ This would directly lead the Juncker Commission to propose the 2016 “Clean Energy for all Europeans” communication, aiming at a roadmap for new policies to be presented to reach the objectives set during the COP21.⁹⁸

This renewed presence of positive feedback supporting further action to promote renewable energy sources gives the EU a new window of opportunity to act, and propose a recast of the Renewable Energy Directive.

3. The recast of the Renewable Energy Directive (REDII)

If positive feedback favoring more ambition on renewables started to reappear, the subsystem was still influenced by some negative feedback, in particular the Commission. In 2014, it was split between proponents of targets and advocates of a fully-market based approach based on the ETS and a single greenhouse gases target.⁹⁹ In the end, President Barroso decided to keep a 27% renewable energy target binding at the EU’s level.¹⁰⁰

This decision by the Commission was not adequately challenged by stakeholders, as the renewable energy federation EREC had collapsed, leaving those actors more dispersed.¹⁰¹ As NGOs were more focused on the revision of the ETS,¹⁰² support for high binding renewable energy targets was weaker than with REDI.¹⁰³

⁹⁶ Michèle Knodt et Marc Ringel, *op. cit.*, 13-15.

⁹⁷ European Commission, “Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, the Committee of the Regions and the European Investment Bank: ‘Clean Energy for All Europeans’”, *op. cit.*, 4.

⁹⁸ *Ibid.*

⁹⁹ Bürgin, Alexander, *op. cit.*, 700-703.

¹⁰⁰ *Ibid.*

¹⁰¹ Oscar Fitch-Roy, David Benson, and Catherine Mitchell, *op. cit.*, 989.

¹⁰² *Ibid.*, 989-992.

¹⁰³ *Ibid.*

Negotiations on REDII, therefore, started with a proposal for a less stringent framework and a moderate increase of the target. The effect of the new wave of enthusiasm also took time to have effects on the Council: a strong coalition of Member-States led by the United Kingdom, Spain and a large part of the central European countries opposed going beyond what was proposed by the Commission.¹⁰⁴ Therefore, there was in a sense no entrepreneur to bring the file forward leading to a stalemate.

A new attempt at revision of the RED was then made in 2017, as pressure increased to implement COP21 commitments and as Member-States executives changed.¹⁰⁵ This time, Germany was less supportive of binding targets while Italy and Spain became strong advocates of them.¹⁰⁶ Other countries, such as France and Luxembourg, also started to play a leading role in pushing for the 27% target.¹⁰⁷ There were still important divisions within the Council, with Central and Eastern European countries opposing both high targets and nationally binding ones, out of fear of the cost of the transition.¹⁰⁸ Overall, Member-States were all reluctant to keep those binding targets,¹⁰⁹ and the Juncker Commission decided not to challenge this preference.¹¹⁰

But the actor which used the post-COP21 momentum, and turned the tide in a sense, was the European Parliament, led by the Luxembourg S&D rapporteur Claude Turmès and his team,¹¹¹ that promoted a 35% target.¹¹² Though the Parliament failed to obtain nationally binding targets, it was successful in bringing the level of the target up to 32%.¹¹³

¹⁰⁴ Pierre Bocquillon, and Tomas Maltby, “EU Energy Policy Integration as Embedded Intergovernmentalism: The Case of Energy Union Governance.” *Journal of European Integration* 42, no. 1 (January 2, 2020), 46-48. <https://doi.org/10.1080/07036337.2019.1708339>

¹⁰⁵ Pierre Bocquillon, and Tomas Maltby, *loc. cit.*

¹⁰⁶ *Ibid.*

¹⁰⁷ *Ibid.*

¹⁰⁸ *Ibid.*

¹⁰⁹ *Ibid.*

¹¹⁰ Interview with an Energy Community Official, *loc. cit.*

¹¹¹ Interview with a S&D group political advisor, in discussion with the author, Online, 24 March 2022.

¹¹² Pierre Bocquillon, and Tomas Maltby, *op. cit.*, 47.

¹¹³ *Ibid.*, also confirmed by Interview with a S&D group political advisor, in discussion with the author.

Another change occurred with biomass and bioenergy. As mentioned, there were already doubts about their sustainable character. After investigation, the Commission concluded that stronger sustainability criteria were required.¹¹⁴

Aside from targets, governance was also tweaked. The legal basis for the drafting of national plans indeed switched from the directive to the Governance Regulation, which increased the capacity for the Commission to scrutinize their content and implementation.¹¹⁵

Lastly comes support schemes. Here again, the Commission failed to impose the development of a “European” system for support scheme.¹¹⁶ It still managed to put constraints around those systems through state aid rules, which finally banned the Feed-in Tariffs scheme, a move therefore made outside of the Renewable Energy Directive II.¹¹⁷ REDII also imposed requirements to facilitate renewable energy permitting processes, as those procedures soon became a bottleneck for renewable energy deployment.¹¹⁸

4. An incremental step

We observed throughout the period in between REDI and REDII an alternance between negative and positive feedback, supporting stability and then change. First, a switch away from sustainability concerns fueled by the Eurocrisis as well as the failure of COP15 led to greater scepticism regarding the salience of renewable energy sources for Europe’s energy mix. In that sense, both policy-image and subsystem evolved compared to the previous period. Continued support for renewables from Western and Northern Member-

¹¹⁴ Interview with a journalist covering EU policies in a Brussel based publication, in discussion with the author, Brussels, 28 March 2022.

¹¹⁵ Israel Solorio and Helge Jörgens, *op. cit.*, 87-90.

¹¹⁶ Thomas Vogelwohl *et al.*, “Chapter 3: German Renewable Energy Policy: Independent Pioneering versus Creeping Europeanization?”, in *A Guide to EU Renewable Energy Policy* (Cheltenham, UK: Edward Elgar Publishing, 2017), <https://doi.org/10.4337/9781783471560.00013>. Quoted in Israel Solorio and Helge Jörgens, “Contested Energy Transition? Europeanization and Authority Turns in EU Renewable Energy Policy,” *Journal of European Integration* 42, no. 1 (January 2, 2020), <https://doi.org/10.1080/07036337.2019.1708342>. *op. cit.*, 89.

¹¹⁷ *Ibid.*

¹¹⁸ European parliament and Council of the European Union, “Directive (EU) 2018/2001 of 11 December 2018 on the promotion of the use of energy from renewable sources (recast)”, *Official Journal of the European Union*, L328/82, 21 December 2018, Art.16 and Interview with a representative from an EU based utility B, in discussion with the author, Online, 10 March 2022.

States led the Commission to propose a small increase of the target in 2014 while dropping the targets' binding character for Member-States.

Though after COP21, things turned around once more, with a new burst of enthusiasm for renewable energies, fueled by climate diplomacy, the environmental movement getting strong once again, as well as the increase in Renewables competitiveness. Positive feedback started to trigger change, therefore. And it was also followed by an evolution of the subsystem, most notably among Member-States governments, with many of them becoming more supportive of renewables. Both policy image and EU renewable energy subsystem evolved. But there still was no punctuation because of resistance within the Council and the Commission's preference for non-nationally binding targets. Veto-players, therefore, blocked the punctuation, as is sometimes observed in the EU by Punctuated Equilibrium scholars.¹¹⁹ This does not mean that no change happened, but that it was incremental: a limited increase of the renewable energy target; binding targets for the EU and not the Member-States; and biomass and biofuels sustainability became more stringent. After the first Renewable Energy Directive caused a clear punctuation in the Union's energy policy, a second one caused a much more incremental change – but a change nonetheless.

THE 2021 PROPOSAL FOR A REVISION OF THE RENEWABLE ENERGY DIRECTIVE

If the first renewable energy directive created a punctuation in EU energy policy, its recasting brought only incremental change. Now with the European Green Deal (EGD), a new impetus for sustainability in climate policy could lead one to expect a punctuation to happen with the 2021 RED revision proposal.

1. The European Green Deal: a new momentum

¹¹⁹ David Benson and Duncan Russel, *op. cit.*, 201-202.

2019 was marked by renewed momentum for climate action, with movements such as the Friday for Future getting important traction and Green-leaning political parties obtaining good result during the European Parliament election.¹²⁰ This momentum had a clear influence on the tone of the FT article sample analysed here: between 2019 and April 2022, out of the 56 articles studied, more than 80% adopt a positive tone on renewable energy sources. Articles adopting a negative tone were mostly focused on the adverse effects of biomass and biofuels.

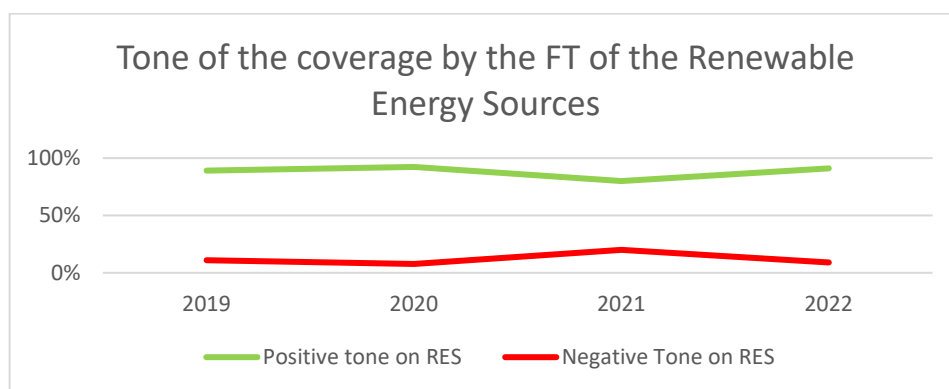


Figure 7 Tone of the coverage by the FT of the Renewable Energy Sources¹²¹

Though the same cannot be said of EU policies: if the positive tone remains predominant until 2021, it loses this position in 2022 to more balanced articles or articles not directly mentioning EU energy policy.¹²² Negativity centres around the EU’s difficulty to adopt a clear stance over bioenergy and solutions to soaring energy prices.

¹²⁰ Financial Times Editorial Board, “Leaders have yet to grasp the enormity of the climate task”, *Financial Times*, 22 September 2019, Last accessed on 28 April 2022: <https://www.ft.com/content/0ff3811c-db9d-11e9-8f9b-77216eb1f17> Also Interview with an Assistant to MEP, in discussion with the author, Online, 24 February 2022.

¹²¹ Results from the Financial Times Coverage, author’s own production.

¹²² *Ibid.*

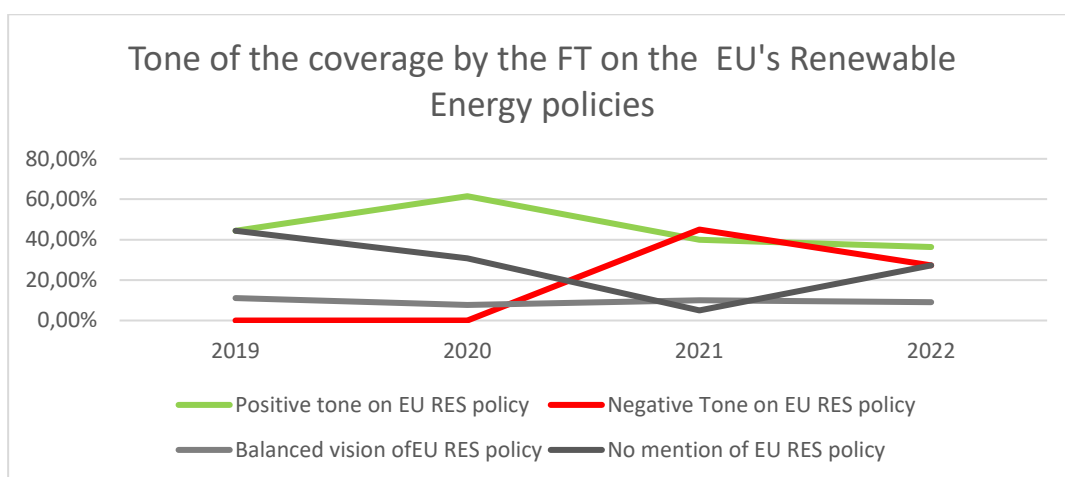


Figure 8 Tone of the coverage by the FT on the EU's Renewable Energy policies¹²³

The positive feedback that started in 2015 came into full swing around 2019, sufficient to generate even more momentum for policies promoting sustainability than in 2018 according to interviews.

“The Green Deal was crucial, I was very sceptical at first but now there is real change and political momentum for higher RES targets”¹²⁴

Furthermore, the political situation was all the more favorable to renewables as the 2020 targets defined in the first renewable energy directive were met: the Union reached the 20% renewable energy uptake target –¹²⁵ even if not all Member-States did reach their targets.¹²⁶ Renewables have become rather cheap and profitable because of technological improvements, government subsidies, and high gas prices.¹²⁷ Since 2015 a clear momentum was created for sustainability and renewables, which could be the beginning of a new “S-curve” of positive feedback.

¹²³ *Ibid.*

¹²⁴ Interview with a Representative from bioenergy Europe, in discussion with the author, Online, 15 March 2022.

¹²⁵ European Environment Agency, *EU achieves 20-20-20 climate targets, 55% emissions cut by 2030 reachable with more efforts and policies*, 26 October 2021, last accessed on: <https://www.eea.europa.eu/highlights/eu-achieves-20-20-20>

¹²⁶ Interview with a researcher from Institut Jacques Delors – Notre Europe specialized on energy issues, in conversation with the author, online, 8 March 2022, *loc. cit.*

¹²⁷ Interview with an ACER Official, in discussion with the author, Online, 25 March 2022.

2. A new renewable energy policy subsystem

Political momentum and the renewed clear dominance of the sustainability frame also led to a change in the EU renewable energy policy subsystem. First, within the Commission, a group of Commissioners headed by Executive Vice-President Frans Timmermans is directly in charge of the Green Deal. This is also reflected within the internal organization of the Commission's directorate generals, as they are much more focused on sustainability issues.¹²⁸ The Commission seems more united than with REDII and focused on the green transition.

Then comes the co-legislators. The European Parliament that was elected in 2019 is quite different to the previous one which adopted REDII:

“Compared to REDII, the fact we increased the targets show there is a different awareness in Institutions and political groups: they have more youth and newcomers who brought freshness in the debate”¹²⁹

This idea is also reinforced by EP political group's support for higher renewable energy uptake targets than those proposed by the Commission, up to 45 or even 51%.¹³⁰ Division are not really about whether or how much renewable energy sources are needed, but rather about the type of energy to be supported: for instance, the EPP supports a greater inclusion of low-carbon gases.¹³¹

In the Council, REDII rapporteur Claude Turmès, representing Luxembourg as energy minister, seems to be a policy entrepreneur enjoying the support of Scandinavian countries, as well as southern European ones, as they developed renewable energies quite

¹²⁸ Interview with an EU Commission Official, in discussion with the author, Brussels, 22 March 2022.

¹²⁹ Interview with a S&D group political advisor, in discussion with the author, Online, 24 March 2022.

¹³⁰ Frédéric Simon and Kira Taylor, “Widespread support in EU Parliament for 45% renewable energy target”, *Euractiv*, 22 March 2022, last accessed on 29 April 2022: <https://www.euractiv.com/section/energy/news/widespread-support-in-eu-parliament-for-45-renewable-energy-target/>

¹³¹ Interview with an Assistant from MEP Grüdler's office, in discussion with the author, Online, 1 April 2022.

extensively.¹³² Central and eastern European countries showed slowing ambition on the level of the renewable energy uptake target.¹³³ In this case, and contrary to REDI, there seems to have been very limited intervention from Heads of State and Government, as they were never mentioned as key players, meaning that the debate is focused within the subsystem.

When it comes to stakeholders, energy utilities have become strong, unambiguous supporters of renewables:

“With the increase in RES in energy mixes, the majority of actors are largely the same but they are now more positive and pushing for RES. For instance, Eurelectric was mainly representing fossil electricity, and it is now all about RES: the change is more within the actor than among the actors”¹³⁴

Regarding NGOs, they were also much more mobilized around renewables than in 2014, just like for REDII. They even managed to influence the text, when the Commission released the first outline of its REDIII proposal in May 2021:

“In Spring 2021, the Commission was already considering including low-carbon energy sources in the RED certification scheme, [...] CAN wrote a letter with many NGOs, MEPs and RES stakeholders, which successfully managed to convince the EC to drop this solution”¹³⁵

Therefore, not only a change in policy image occurred with the Green Deal, actors within the EU renewable energy subsystem, and most notably those covering the REDIII proposal, were different from those who worked on the previous versions of the directive.

¹³² Interview with an official from Belgium’s permanent representation, in discussion with the author, 17 March 2022.

¹³³ *Ibid.*, also Interview with an Assistant to MEP, in discussion with the author, online, 24 February 2022.

¹³⁴ Interview with an EU Commission Official, in discussion with the author, Brussels, 22 March 2022.

¹³⁵ Interview with a Climate Action Network (CAN) Europe representative, in discussion with the author, Online, 21 February 2022.

3. The proposal for a revision of the Renewable Energy Directive

If the conditions for a punctuation to happen are present, the picture is much different when looking at the Commission's July 2021 REDIII proposal. The Commission's proposal set a 40% target for 2030,¹³⁶ which would constitute an 8-point percentage increase compared to REDII. The Parliament then supported a 45% target,¹³⁷ representing 13 points of percentage increase, which is more than the increase between REDI and REDII. Several interviewees stressed that by going to 40 or even 45%, the target crossed a kind of threshold: if the previous renewable energy directives were about promoting renewables, REDIII, by taking the 2030 target higher, makes EU energy policy enter into a new paradigm where renewables would dominate the Union's energy mix.¹³⁸

“RED and REDII were about supporting a new industry, now that we're geared toward net zero, REDIII is becoming broader and not just about RES anymore” (Author own's translation)¹³⁹

It has to be underlined that this ambition came only incrementally: REDII moved the renewable energy uptake target from 20% in 2020 to 32% in 2030, and REDIII would amend REDII to increase the target by 8% under the Commission proposal.

Other aspects of the text seem to also represent incremental change. On governance, REDIII sticks to the system created with REDII, though the proposal also introduces nationally binding sub-targets in economic sectors where decarbonization has been considered too low.¹⁴⁰

¹³⁶ European Commission, “Proposal for a directive of the European Parliament and of the Council amending Directive (EU) 2018/2001 of the European Parliament and of the Council, Regulation (EU) 2018/1999 of the European Parliament and of the Council and Directive 98/70/EC of the European Parliament and of the Council as regards the promotion of energy from renewable sources, and repealing Council Directive (EU) 2015/652”, *Official journal of the European Union*, COM(2021) 557 final, Brussels, 14 July 2021 Art. 1 – 2a amending article 3. Henceforth “Proposal for a directive amending Directive (EU) 2018/2001”.

¹³⁷ Frédéric Simon and Kira Taylor, *loc. cit.*

¹³⁸ Interview with a wind sector representative, in discussion with the author, online, 24 February 2022.

¹³⁹ *Ibid.*

¹⁴⁰ Interview with a Climate Action Network (CAN) Europe representative, in discussion with the author, Online, 21 February 2022, also see: “Proposal for a directive amending Directive (EU) 2018/2001”, *op. cit.*, Article 1 – 11 amending article 22a also see Interview with a Representative of the electricity sector, *loc. cit.*

When it comes to bioenergy and biomass, change is also incremental. Biomass support schemes are set to be phased out starting in 2026, as the technology is considered as mature by policymakers and therefore competitive without public support.¹⁴¹ Criteria for it to be recognized and counted in the renewable energy target are set to become more stringent, with the Commission pushing for the implementation of the “cascading principle”¹⁴² for woody biomass: biomass could be used only from certain residues of a chopped tree that cannot be used for other usages.¹⁴³ On biofuels, support schemes are not set to be phased out, but stringency is also expected to increase.¹⁴⁴ Whatever happens on those energy sources, change is likely to be only incremental, as it will be only about increasing or decreasing sustainability criteria stringency.

Finally comes support schemes. REDIII does not change anything on support schemes themselves, as they are still dealt with under state aid rules. It also seems to be stagnating regarding permitting, as it will not reopen article 16 dealing with this topic.¹⁴⁵ Therefore, in this field there is also no radical change that could support the idea of a punctuation in EU energy policy.

4. The Green Deal and energy policy: more incrementalism

To summarize this last section, all the hypotheses that were made in this article are confirmed.

First, there was more positive feedback stressing the need for more support to sustainability goals in EU energy policies compared to the previous period. If sustainability was getting more traction before the Green Deal, it was neither the dominant issue in the EU

¹⁴¹ “Proposal for a directive amending Directive (EU) 2018/2001”, *op. cit.*, Article 1 – 2b amending article 3, also interview with a researcher from Institut Jacques Delors – Notre Europe specialized on energy issues, *loc. cit.*

¹⁴² *Ibid.*

¹⁴³ *Ibid.*

¹⁴⁴ *Ibid.*, also see “Proposal for a directive amending Directive (EU) 2018/2001”, *op. cit.*, Article 1 – 18 amending article 29.

¹⁴⁵ Interview with a representative from an EU based utility B, in discussion with the author, Online, 10 March 2022.

political sphere nor the priority of EU energy policies. This changed with the Green Deal, where decarbonization and climate neutrality became the new mainstream in EU policies.

This led to a policy image change of course, as EU energy policy has started to be built around one objective: reaching carbon neutrality by 2050. This new policy image in turn gave impetus to the Renewable Energy Directive's 2021 revision and was described by interviewees as being quite strong, a real game changer.

With the new policy image, the subsystem in charge of the Union's energy policy changed as well. The Commission reorganized around the Green Deal and renewable energy promotion. The Parliament is "greener" than ever since the 2019 elections, while the Council is still divided but has a new policy entrepreneur in its rank with Luxembourg's energy minister Claude Turmès. Stakeholders are also different in that energy companies changed their stance to promote renewables and low-carbon energy sources and called for ambitious targets. NGOs coalized with renewable energy companies and are also quite influential in the policymaking process. This subsystem is now geared around sustainability and decarbonization. This represents a bigger change than what was observed in REDII and seems comparable to the change brought by REDI through the creation of the subsystem.

When looking at the current proposal and the debates around the directive, it is doubtful any punctuation occurred or will occur. For instance, the increase in the renewable energy uptake target happened only incrementally: if REDIII represents a doubling from the 2020 target, this increase was still proposed twice, first with REDII and then REDIII. On all the other topics, only incremental change is observed, and though some of them are challenged by stakeholders or Member-States, they are unlikely to end up representing a clear shift from REDII.

Therefore, despite all the conditions present for a radical change to be brought by REDIII this change is not visible so far. But what can explain this situation? As anticipated with the fourth hypothesis, reluctance from Member-States to commit to higher targets and

to have them get a binding character has slowed down change, despite Turmès and stakeholders' entrepreneurship. Therefore, as of today, it seems then that once again the EU's institutional framework and its many veto players slowed down change once again, as the divisions within the Council offset the effects of the positive feedback loop on both the renewable energy policy image and its subsystem.

CONCLUSION

In this article, we compared the different political situations and content of the three renewable energy directives from 2009, 2018 and the July 2021 Commission proposal. We first saw that several changes to the policy image occurred within the period. The first one occurred in 2007-2009 with a strong focus on climate issues and sustainability in the field of energy. It would then be followed by a period of economic crisis and international tensions bringing to the fore other concerns such as affordable energy and security of supply. The COP21 in Paris started to bring back sustainability under the spotlight, creating a dynamic which resulted in the European Green Deal. The first hypothesis was therefore confirmed.

A second phenomenon observed is the presence of policy entrepreneurs appearing in the legislative process of each version of the directive. In the first RED, it was heads of State such as A. Merkel, as well as environmental NGOs which stirred the process forward. With REDII it was rather the European Parliament and its rapporteur, and finally in REDIII, stakeholders such as NGOs and renewable energy companies as well as C. Turmès as Luxembourg energy minister were pushing the file forward. Hypothesis 2 and 2-a are therefore also confirmed.

Then, over the period is a progressive change in the EU renewable energy policy subsystem. At first, it was mainly dealt with at the national level, with the EU focusing on topics such as competition in the energy sector. This subsystem, after a venue shopping in

the case of REDI but also the adoption of the Lisbon treaty, was then empowered with competencies regarding the development of renewables. It was then quite divided throughout the years 2010s, as other priorities than sustainability were on the forefront. It then changed once again progressively as of 2015 and then very rapidly around 2019: and became fully geared toward the green transition as part of the Green Deal. Therefore, here again, the third hypothesis is confirmed, in that the Green Deal brought a change in the policy subsystem.

This means that, in a normal situation, under the Punctuated Equilibrium Theory, a punctuation would occur would be observable in the EU's energy policy through REDIII, just as it did with REDI. Yet, it did not.

As anticipated in the fourth hypothesis, the presence of veto-players prevented a punctuation from occurring and fostered incremental change in the end. Those veto-players are the Member-States themselves: if some of them are very ambitious about the energy sector's decarbonization, and did play a policy entrepreneurship role, it was not the case for all Member-States. Member-States tend to oppose high, binding targets in both REDII and III, especially Central and Eastern ones, as their energy mix is quite carbon-heavy and costly to decarbonize, both in financial and social terms. Furthermore, all Member-States were not keen on revamping the directive's framework, or even the broader governance regulation. This led most institutional actors to drop support for nationally binding targets.

This result is quite interesting in terms of explaining the way the EU works. It shows that the Punctuated Equilibrium Theory, though developed for the US political system, can work in the EU context, as other scholars have argued.¹⁴⁶ Though just like they highlighted, punctuation is more difficult to obtain in a European context than in the US one: if all the conditions for a punctuation to happen in the US are present in the EU, it might still struggle to achieve it. And in the case of the Renewable Energy Directive, it was clearly because of

¹⁴⁶ David Benson and Duncan Russel, *op. cit.*, 201-202.

Member-States reluctance to radically change the directive, which is quite telling about the EU's balance of power.

Of course, the research carried out in this article has some limits. The first one is that it is based on only one directive. If the Renewable Energy Directive is an interesting for analyzing the EU energy policy, the latter remains much broader than renewables, therefore it could be also interesting the confirm those findings by looking at other texts from this policy field.

Furthermore, the third Renewable Energy Directive has not yet been adopted by the EU: another limit of this research work is then that the final REDIII might be significantly different from the one currently being discussed. It might also never be adopted.

In the context of the Ukrainian War and the weaponization of energy by Russia against the EU, things might move fast soon, and it would be interesting to come back on EU energy policymaking in a few years to see how the EU reacted to this crisis.

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