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Article

Comparing Strategies and Success of Policy Entrepreneurs in EU Energy and Climate Policy Processes

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Abstract: Background: The clean energy transition required for the decarbonisation of societies make policymakers targets for broad business and non-business advocacy to ensure that their often-conflicting interests are protected or taken into consideration in public policies. The concept of policy entrepreneurs foregrounds the role of agency in understanding such acts of advocacy. This paper aims to further the understanding of policy entrepreneurs by comparing strategies used by policy entrepreneurs from different social spheres, advocating policy change or the status quo, in four longitudinal cases related to EU energy and climate policy 2011–2023. Results: Policy entrepreneurship was mainly of a cultural-institutional nature, aiming at altering or diffusing people's perceptions, beliefs, norms and cognitive frameworks, worldviews, or institutional logics. However, the actions of the European Commission (EC) also included structural entrepreneurship, aiming at overcoming structural barriers to enhancing governance influence by altering the distribution of formal authority and factual and scientific information. The motives of policy entrepreneurs in the four cases differ, but strategies do not differ significantly between the public, private and civic spheres of society. The results indicate that civil society policy entrepreneurs focus on building broader coalitions than do public and private sector entrepreneurs. There is no indication that policy entrepreneurs from a certain sector would be more successful than others in setting the agenda, changing the perceptions of policy actors, or influencing actual policy change. Conclusions: It is concluded that policy entrepreneurs advocating policy change are more active and use more elaborate strategies than policy entrepreneurs advocating the status quo. Thus, they are more successful in influencing policy outcomes. The EC was the only policy entrepreneur to use structural entrepreneurship. The EC acts to expand its reach into areas where the EU does not hold much legal competence according to the constitution of the EU. Other policy entrepreneurs in the cases were also found to act in non-transparent ways. This comes with democratic deficits related to accountability and legitimacy and should be combated to reinstate and reinforce the position and powers of both national and European legislators in making important decisions that impact the lives of European citizens.

Keywords: climate policy; comparative analysis; European Union; policy entrepreneurs; policy entrepreneurship; strategies

1. Introduction

Given the current climate crisis, with rapidly increasing temperatures and more frequent and intense weather extremes leading to extensive damage and losses in nature and societies (IPCC, 2023),

climate change mitigation through a clean energy transition (Bressand & Ekins, 2021) is currently one of the most important public policy areas. The clean energy transition toward climate neutrality is a cross-boundary problem that cuts through society and governance levels. This second-generation energy transition, focusing on 'power-to-fuel' and energy system efficiency with equal treatment of supply- and demand-side measurements, requires the transformation of social organisation involved at an order of magnitude greater than it was for the first-generation transformation focusing on renewable energy sources for heat and power production (Bressand & Ekins, 2021).

More pervasive and cross-boundary public policy issues such as climate change and the related clean energy transition, as well as sustainable development, fair trading and civil rights, have made public executives and legislators targets for broad business and non-business advocacy to ensure that one's often conflicting interests are protected or taken into consideration in public policies (Harris, 2001; Bitonti & Harris, 2017). Thus, liberal democracies have seen an increase in interest groups (IGs) and other stakeholders trying to influence public policy processes and policy outcomes as well as governance arrangements (Baumgartner & Leech, 1998; Klüver, 2013; Bitonti, 2017a, 2017b).

Political science offers a variety of theories, frameworks and concepts to explain policy processes and the roles of stakeholders influencing agenda-setting and decision-making on public policy. One such concept is the *policy entrepreneur* (PE), defined as "advocates who are willing to invest their resources – time, energy, reputation, money – to promote a position in return for anticipated future gain in the form of material, purposive, or solitary benefits" (Kingdon, 1984, p. 179). They are central actors in political agenda setting and for policy change, as they 'soften' the political system for certain ideas and ensure that there are packages of problems and policies that are ready when there is an opportunity to put the problem on the agenda (Mintrom, 2020). This concept is attractive since it highlights the role of agency in understanding policy change (Mintrom & Norman, 2009; Mintrom, 2020). According to the *Multiple Streams Framework* (MSF) (Kingdon, 1984; Herweg et al., 2023), policy change occurs when streams of problems, policy options and politics are connected by PEs who, as individuals or collectives, attempt "to transform policy ideas into policy innovations and, hence, disrupt status quo policy arrangements" (Petridou & Mintrom, 2021, p. 945). A policy option must be promoted by PEs with resources, strategies, and access to the politics stream when there is an open policy window of opportunity where the streams can meet and form the policy community in the policy stream. PEs are involved not only in agenda setting on public policy but also in policy formulation (Gunn, 2017).

PEs from different sectors are and will continue helping formulate new, innovative climate policies at the local, national, regional and global governance levels. In fact, leading scholars on PEs stress the need for more actors to become PEs and "step forward and catalyze change processes" (Mintrom, 2019, p. 307) in relation to climate governance (Mintrom & Leutjens, 2017). Regarding climate governance, Boasson and Huitema (2017) suggest that more research is needed on (i) whether PEs that seek change are more active and/or more successful than PEs that defend the status quo, and (ii) whether there is more successful entrepreneurship in public or private arenas of governance. They also call for the need to study the failure of PEs. Such analysis is crucial for establishing that PEs influence outcomes (Arnold et al., 2023). In addition, Green (2017) and Mintrom and Luitjens (2017) argue for more comparative research on PEs in climate governance. Such research should distinguish PEs from the strategies they use (Green, 2017). Strategies are the causal mechanisms that link the independent variable (PEs) to the dependent variable (some form of policy change). Few scholars have responded to these calls, and the research agenda is still relevant. New theoretical and empirical contributions along these lines could greatly advance our understanding of agency and structure in contemporary politics in climate policy and governance and governance in general (Petridou & Mintrom, 2021).

Given these research gaps, this paper aims to further the understanding of strategies used by PEs from different sectors and social spheres in energy and climate policy processes and which strategies are successful or unsuccessful. To meet this aim, I undertake a comparative analysis of the motifs, strategies, successes and failures of PEs over time related to new and revised EU policy and legislation to stimulate a clean energy transition for meeting the new EU target on climate neutrality

by 2050. I compare four cases focusing on EU supranational policies for (i) enhancing the energy efficiency of buildings, (ii) enhancing the energy efficiency of companies, (iii) strengthening the role of energy efficiency in climate policy with the 'energy efficiency first' (EE1) principle, and (iv) decarbonising maritime shipping. The different policy changes were introduced with the adoption and subsequent changes to the Energy Efficiency Directive (EED) 2012–2023 and the new FuelEU Maritime Regulation (FEUM) 2013–2023. In addition to contributing to the literature on PEs, this paper provides valuable knowledge on key actors in policy processes related to the clean energy transition, furthering our understanding of the politics of clean energy and just transition more broadly (cf. Kuzemko et al., 2019; Bressand & Ekins, 2021; Pearse, 2021).

The four cases involved PEs from different spheres of society, i.e., the public sector, the private (non-profit) sector, civil society, and the hybrid sector (both public and private), making it possible to compare PE motifs, strategies, and the success and failure of different kinds of PEs. This adds civil society PEs as a category to the public and private sector PEs stressed by Boasson and Huitema (2017) as well as Brouwer and Huitema (2018). Civil society actors have played an increasingly important role in climate governance since the UN climate summit in Copenhagen 2009 (Pandey, 2015; Nasiritousi et al., 2016; Reimer & Saerbeck, 2017; Carter & Childs, 2018). For private sector PEs, I differentiate profit from non-profit organisations, the latter category including, e.g., privately funded think tanks. In addition, the four cases cover different sectors of EU climate policy, with PEs acting in different policy subsystems of different degrees of maturity, from nascent (shipping) to mature (energy efficiency, buildings), to different degrees of collaboration/conflict. Three of the cases focused on policy processes over a decade in which changes were made to the legislation. In the fourth case, policy was developed over a decade until legislation was finally adopted. This makes it possible to scrutinise PEs' strategies dynamically over time, which is important since the impacts of PEs can operationalise expansively, spanning different phases of the policy process (Green, 2017). The following research questions are addressed:

- R1 What motivated PEs and which strategies were used by different PEs in the four cases?
Which were the similarities and differences?
- R2 Which PE strategies were successful and less successful in influencing the policy process
in the four cases?
- R2 Did the PE strategies and related success or failure change over time?
- R4 Did the strategies and related success or failure differ between public sector, private
sector, hybrid sector and civil society PEs?
- R5 Were PEs seeking change more active and successful than PEs advocating status quo?

The paper is outlined as follows. Section 2 reviews the literature on PEs to outline the theoretical framework for analysing the motifs, strategies and success of PEs, while the methodology is described in section 3. The macrolevel context on policy entrepreneurship in EU climate governance, including previous research on PEs in EU climate policy, is described in section 4. Results of the case studies are presented in section 5, then analysed and discussed in section 6. The discussion also addresses ethical and democratic issues related to PEs. Conclusions are drawn in section 7.

2. Policy Entrepreneurs in the Policy Process: A Theoretical Framework

When analysing the success or failure of PEs, one must distinguish PEs from other policy actors and identify their motifs and strategies and the influence of context. Figure 1 captures the conventional model of the PE’s strategic behaviour and impact on the policy process. These factors are described and in the remainder of this section.

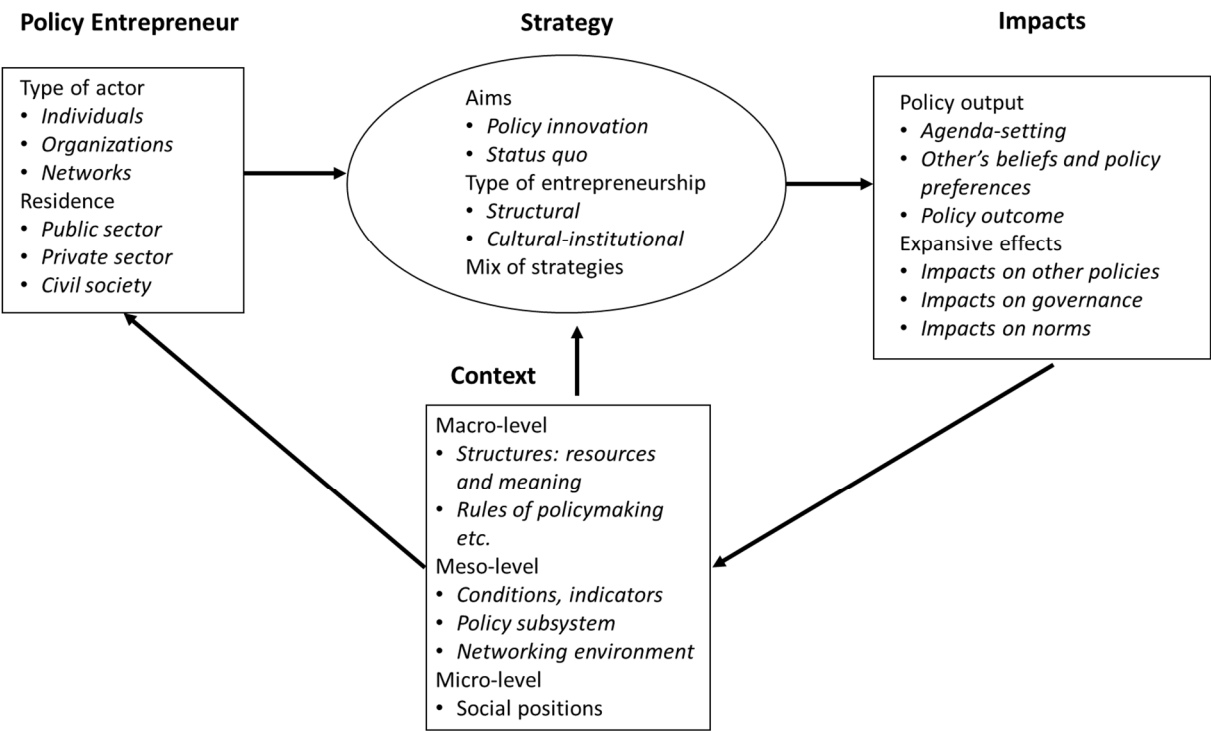


Figure 1. Model of strategic behaviour and impacts of policy entrepreneurs. Based on Teske & Schneider (1994), Mintrom (1997, 2000), Mintrom & Vergari (1998), Crow (2010), Arnold et al. (2017), Bakir & Jarvis (2017), Boasson & Huitema (2017), Green (2017), and Brouwers & Huitema (2018).

2.1. Who Can Be a Policy Entrepreneur?

The PE concept has been accused of fuzziness, meaning different things to different scholars even within the same discipline (Cairney, 2013; Petridou, 2017; Arnold et al., 2023). In early studies, such as that of Kingdon (1984), only individuals were considered PEs, but studies of policy entrepreneurship in Europe have included organisations as agents. The broad scope of PEs includes not only individuals such as elected politicians, public officials, academics and experts but also companies, business associations, non-governmental organisations (NGOs), think tanks, other IGs, political parties and public institutions, e.g., the European Commission (EC), the Council of the EU (Council), the European Central Bank, the European Investment Bank, or national, regional or local governments and authorities (Herweg, 2016; Petridou, 2017; Mintrom, 2020; Liebe & Howarth, 2020; Pircher, 2020; Heldt & Müller, 2022; Herweg & Zohnhöfer, 2022; von Malmborg et al., 2024). Zito (2000, 2017) even refers to “collective entrepreneurship”, in which advocacy coalitions act entrepreneurially to formulate individual policies.

Second, we must distinguish policy entrepreneurship from other actions. Boasson and Huitema (2017, p. 1351) argue that “privileged actors in powerful positions deploy[ing] the regular tools at their disposal and merely do their job, they are not demonstrating entrepreneurship”. This could be interpreted as privileged persons or organisations in powerful positions, such as cabinet ministers, EU commissioners, EU institutions or national governments, not being able to act as PEs. However, according to Kingdon (1984), entrepreneurship can be deployed by actors in and out of government

– elected officials, lobbyists or civil servants – at different levels and in different domains. They do so if they are “persistent and skilled actors who launch original ideas, create new alliances, work efficiently or otherwise seek to ‘punch above their weight’” (Boasson & Huitema, 2017, p. 1344; Green, 2017). For instance, the current EC president Ursula von der Leyen and former EC commissioner Frans Timmermans were described as PEs for launching the *European Green Deal* in 2019 (Kreienkamp et al., 2022; Becker, 2024), and the EU High Representative for Foreign Affairs and Security Policy, Federica Mogherini, acted as a PE and pushed for policy change in the EU’s foreign and security policy (Sus, 2021). Schneider and Teske (1992) found that PEs often come from inside the political system, even from government cabinets (Saetren, 2016). Similarly, Rabe (2004) found that PEs on US climate change policy came from within the federal administration. In addition, partisan effects of Labour’s policy entrepreneurship have been identified for UK law and order policy (Staff, 2018) and UK education policy (Olsson Rost & Collinson, 2022). Overall, acting as a PE depends on a “set of behaviors in the policy process, rather than a permanent characteristic of a particular individual or role” (Ackrill & Kay, 2011, p. 78).

To further distinguish who can be a PE, they are similar to ‘experts’ (Christensen et al., 2023) and ‘lobbyists’ (Bitonti & Harris, 2017) in the policy process but differ from traditional lobbyists in that they are more actively involved in problem framing and in the technical and legal aspects of policy solutions to a problem in an area in which they have expertise. Lobbyists are often paid by a client, while PEs pursue their own interest and use their own finances. In addition, PEs usually work as disruptive change agents with new policy ideas, catalysing innovative policy change (Roberts & King, 1991; Capano & Galanti, 2021), while lobbyists often but not always advocate the status quo (Mintrom, 1997; Baumgartner & Leech, 1998). However, some PEs are active in blocking policy change and maintaining the status quo (Boasson & Huitema, 2017; Arnold, 2021), although some PE scholars dispute that advocating the status quo should be related to policy entrepreneurship because it is more consistent with classic IG politics (Green, 2017). Moreover, PEs can come from within the government, while lobbyists come from outside the government. Compared to lobbyists, PEs are considered “heroic” or “crazies” with a “desire to change the world” and “push humanity forward” (Mintrom, 2019, p. 320). In that sense, PEs can be considered ‘thought leaders’ to borrow a concept from the business strategy literature (Young, 2013; Harvey et al., 2021).

2.2. Motives and Strategies of Policy Entrepreneurs

Drawing on Kingdon’s definition of PEs, most scholars have assumed that PEs are instrumentally rational (Bakir & Jarvis, 2017), motivated by a “desire for power, prestige and popularity, the desire to influence policy, and other factors in addition to any money income derived from their political activities” (Schneider et al., 1995, p. 11) or “satisfaction from participation, or even personal aggrandizement” (Kingdon, 2002, p. 123). However, policy actors are rather boundedly rational and motivated by cognitive rationality, i.e., their beliefs and ideas (Sabatier, 1988; Zahariadis, 2007; Bakir, 2009). PEs may engage in policy advocacy to prevent opponents with conflicting beliefs from securing ‘evil’ policies, triggering a ‘devil’s shift’ (Sabatier & Jenkins-Smith, 1999). Arnold (2022, p. 26) argues that “[o]ppositional factors, by triggering a value-laden, devil shift-influenced fear of a threat to a desired policy goal, can catalyze policy entrepreneurship”.

Previous research has shown that PEs work in an energetic, sometimes activist, strategic manner with the intention to innovatively change political alignments (Roberts & King, 1991; Capano & Galanti, 2021). Strategies used by PEs are the lines of action taken to reach their aims, the latter of which fall into two categories (Boasson & Huitema, 2017):

- *Structural entrepreneurship*: acts aimed at overcoming structural barriers to enhancing governance influence by altering the distribution of formal authority and factual and scientific information; and
- *Cultural-institutional entrepreneurship*: acts aimed at altering or diffusing people’s perceptions, beliefs, norms and cognitive frameworks, worldviews, or institutional logics.

By analysing the scholarly literature, Aviram et al. (2020) identified 20 strategies and three traits of PEs: trust building, persuasion, and social acuity. These factors may vary with respect to the target

audience, level of government at which PEs operate, sector, and PEs’ professional roles, timing, number and types of actors involved, relationship to the development of international politics, etc. Brouwer (2015) and Brouwer and Huitema (2018) proposed four categories of strategies (Table 1), which are applied for the analysis in this paper.

Table 1. Strategies of policy entrepreneurs (Based on Roberts & King, 1991; Mintrom & Norman, 2009; Brouwer, 2015; Brouwer & Huitema, 2018).

Approach to policy change	Strategies used by PE
Attention- and support seeking strategies	Problem framing; Idea generation
	Strategic dissemination of information
	Lead by example; Use demonstration projects.
	Rhetorical persuasion; Media attention
	Exploitation of focusing event(s)
Linking strategies	Coalition and team building with bureaucratic insiders and policy influencers outside of government
	Issue linking
	Game linking
Relational management strategies	Networking by using social acuity
	Trust building
Arena strategies	Venue shopping
	Timing

For structural entrepreneurship, three strategies are particularly important: (i) creating and working in networks and advocacy coalitions, (ii) strategic use of decision-making processes, and (iii) strategic use of information (Boasson & Huitema, 2017). Through networking, a PE learns the worldviews “of various members of the policymaking community” (Mintrom, 1997, p. 739), which enables the PE to persuade policy actors with high levels of legitimacy or authority to join (Wihlborg, 2018). The strategic and smart use of decision-making procedures and venues relates to timing and thus launching the policy idea when there is an open policy window (Kingdon, 1984). Finally, PEs can reach their aims by assembling new evidence and making novel arguments (Dewulf & Bouwen, 2012), carrying ideas (Swinkels, 2020) that serve as ‘coalition magnets’ (Béland & Cox, 2016) to convince an appropriately powerful coalition of supporters to back the proposed changes (Boasson & Huitema, 2017; Mintrom & Luetjens, 2017), either by manipulating who gets what information, if information is distributed asymmetrically and information is scarce (Moravcsik, 1999; Zahariadis, 2003), or by strategic manoeuvring, such as providing as little information as possible to one’s likely opponents (Mackenzie, 2010).

For cultural-institutional entrepreneurship, framing problems and policy options is the most important strategy for making people positive about the ideas coming from the entrepreneur and negative about existing and competing policy or governance arrangements (Boasson & Huitema, 2017). As Copeland and James (2014, p. 3) put it, framing is about “strategic construction of narratives

that mobilize political action around a perceived policy problem in order to legitimize a particular solution". How a condition is framed as a problem influences how we think about the problem (Knaggård, 2015), which enables coupling to certain policies but not to others (Weiss, 1989). To persuade others, a PE must consider the perspectives of various actors and create meanings and frames that appeal to them (Fligstein, 2001). PEs deploy 'outsider tactics' by shaping public discourse on problems and policy solutions or 'insider tactics' by working with policymakers to design regulations (Gabehart et al., 2022; Tosun et al., 2023).

The framing of policy solutions is done by connecting problems to solutions and further to the politics. Such coupling follows different mechanisms, depending on how the policy window was opened. If the window is opened by a push from the problem stream, coupling is done by 'consequential coupling' (Zahariadis, 2003), also called 'problem surfing' (Boscarino, 2009). Then, the task for PEs is to find a solution to the problem. If the policy window is opened by a push from the politics stream, coupling is done by 'doctrinal advocacy' (Zahariadis, 2003), also called 'problem-focused advocacy' (Boscarino, 2009), where the PE looks for a problem that suits a given solution. In some cases, where it is hard to couple all streams at once, coupling is made by the mechanism of 'issue linking' (Dolan, 2021), where the PE links coupled pairs from different strands to end up with linking all streams.

Becker et al. (2024) and Petridou et al. (2024) recently suggested that PEs can be considered proactive, performing 'entrepreneurship by opportunity', or reactive, performing 'entrepreneurship by necessity' as a response to vertical pressure. A sense of urgency and necessity, professional norms and technical skills make reactive PEs utilise actions not underpinned by the proactive quest for opportunities. Compared to proactive PEs, reactive PEs "seek to affect change under conditions of urgency while they do not exhibit intentionality and a priori adherence to a specific policy solution" but look for and advocate "the design and/or implementation of a public policy solution/.../as the best, but not always the preferred, choice" (Petridou et al., 2024, p. 84). Such reactive entrepreneurship is deployed by PEs in the management and governance of crises and emergencies, e.g., the COVID-19 pandemic and flood events (Taylor et al., 2023; Becker et al., 2024).

Importantly, Braun et al. (2024) found that PEs employ different strategies over time when interacting with their immediate and wider contexts in attempting to foster policy change—they cocreate with policymakers to shape their ecosystems and society at large. This echoes the critique of mainstream research on PEs, claiming that "in contrast to widely held view that PEs promote ideas and operate outside decision-making processes (Mintrom, 2000), PEs are endogenous to policymaking processes" (Bakir & Jarvis, 2017, p. 469).

A related critique is that mainstream research on PEs focuses on the meso-level context of policy change, i.e., the immediate context of a particular policy, in policy formulation but dismisses the macro- and microlevel contexts within which a PE is embedded (Bakir & Jarvis, 2017). They demonstrate that context impacts policy entrepreneurship and institutional entrepreneurship, at least in the public sector. The agency of PEs is "most likely to generate policy and institutional changes when they are reinforced by complementarities arising from context dependent, dynamic interactions among interdependent structures, institutions and agency-level enabling conditions" (Bakir & Jarvis, 2017, p. 465). Acknowledging Giddens's (1979) concept of 'duality' between agency and structure, PEs and context "should not be viewed in isolation but as linked through strategy" (Zahariadis & Exadaktylos, 2016, p. 62). The macrolevel context consists of formal and informal institutions, i.e., a relatively stable collection of rules and practices embedded in structures of resources and meaning that enable and constrain PE agency (cf. March & Olsen, 2008). The microlevel context includes the social position of the PE, who, be they individuals or organisations, can occupy multiple social positions with different identities in different parts of the policy

process, e.g., as decision-makers, academics, framers and brokers. This enables PEs to work in different ideational realms, programmes, discourses, building coalitions and generating consensus (Bakir, 2009). In addition, by addressing the 'ahistorical' nature of mainstream PE research, disregarding that "previous policies affect current debates and institutional innovation, or institutional contexts that shape how, why, and where policy reforms take place" (Bakir, 2009, p. 573) and that the outcomes of PE agency today will affect future debates, there needs to be a feedback loop from policy outcomes and other expansive effects (cf. Green, 2017) to context.

2.3. Success or Failure of Policy Entrepreneurs

Previous studies indicate that the question of whether PE advocacy systematically and successfully promotes policy change is unresolved (Arnold, 2021). Not all PEs are successful (Boasson & Huitema, 2017; Arnold, 2021). Success is defined in different ways. For some, a PE is successful if the advocacy leads to changes in other policy actors' policy preferences (Teske & Schneider, 1994). This can be compared to policy-oriented learning (Sabatier, 1988). For others, a PE is successful if s/he influences agenda setting in such a way that the PE pet issue is considered by policymakers (Mintrom, 1997; Mintrom & Vergari, 1998). However, another view is that a PE is successful if she has an influence on policy and governance outcome (Boasson & Huitema, 2017), e.g., the adoption of specific PE policy measures (Arnold et al, 2017; Crow, 2010; Mintrom, 1997, 2000). What is deemed success depends on the aim of the PE agency.

Mintrom and Norman (2009) assume that success is more likely for a PE who has more characteristics that define her as such or who deploys entrepreneurial strategies with greater frequency or intensity (cf. Binderkrantz & Krøjer, 2012). This is a circular deduction. Most PEs strive for policy innovation, which consists of initiation, diffusion, and the evaluation of effects that such innovations create, the latter requiring analytical capacities (Jordan & Huitema, 2014). These challenges are central to the work of PEs. It is their willingness to use their positions for leverage and for aligning problems and solutions that increase the likelihood of policy change (Mintrom & Norman, 2009). The ability of PEs to successfully promote policy innovation also depends on their ability to identify relevant competencies and develop and effectively deploy them (Considine et al., 2009; Meijerink & Huitema, 2010). In addition, a successful PE must understand the concerns of the actors they seek to persuade, use social acuity to build teams, networks, and coalitions, be knowledgeable to strategically disseminate information, and be organising, corresponding to political activation and involving civic engagement (Mintrom & Norman, 2009; Aviram et al., 2020; Arnold, 2021). Anderson et al. (2020) added that PE's influence depends not only on their ability to define problems and build coalitions but also their ability to provide new and reliable information to elected officials. The ability of PEs to get the attention of decision-makers is important for their success. According to MSF, a PE's package of problem and policy solution can be coupled with the policy stream only when a policy window of opportunity is open. If a policy window is not fully open, PEs may use 'salami tactics' (Zahariadis, 2003), which means breaking favoured policies into modest segments and presenting them sequentially, steering policymakers toward the desired outcome without raising alarm at any one stage.

By categorising the characteristics, goals and strategies of successful PEs related to anti-fracking policies in New York State, Arnold (2021) suggested three PE archetypes. *Activists* are highly active, display many PE characteristics and deploy a wide range of strategies to reach several moderate policy goals. *Advocates* have similar characteristics as activists but are less active, use fewer strategies and focus primarily on one ambitious policy goal. *Concerned citizens* manifest rather few PE characteristics and tend to lobby for restrictive/ambitious measures with relatively little facility or effort. Activists and advocates were found to be successful, while concerned citizens had no impact or a negative impact. An interesting implication of her study is that "it may not be necessary for an actor interested in securing a policy goal to go 'all in' as an activist." "Policy change can potentially be achieved through more modest, accessible advocacy" (Arnold, 2021, p. 985).

3. Method and Material

Regarding the choice of method for studying PEs, Ohemeng and Grant (2023) raise a fundamental question. Research in recent decades has largely focused on providing generalisable knowledge on PE strategies using quantitative methods. However, they claim, this research overlooks why and how PEs utilise certain strategies. To understand in a meaningful way the nuances of PE behaviour, qualitative research methods must be used (Mintrom, 2020). To pursue the analysis for this paper, a comparative multiple case study approach based on phenomenology has been used. This methodology is suitable because the research questions are qualitative in nature. I adopted cross-case comparison (Yin, 1994; Eisenhardt & Graebner, 2007) to identify and explain similarities and differences. Phenomenological approaches include obtaining rich data, delineating meaning units, transforming meaning into sensitive statements and synthesising a general structure (Giorgi, 1997; Ohemeng & Grant, 2023).

3.1. Case Selection

Four cases were selected for their theoretical relevance, i.e., their ability to generate as many properties as possible of the phenomenon under study (Glaser & Strauss, 1967):

- A. Provisions on individual metering and billing (IMB) of heating, cooling and domestic hot water to enhance energy efficiency in multifamily and multipurpose buildings. The provisions were first adopted in 2012 (EU, 2012a) and amended in 2018 (EU, 2018).
- B. Provisions to enhance energy efficiency in companies across all sectors. The provisions were first adopted in EED in 2012 (EU, 2012a) and amended in 2023 (EU, 2023a). A large majority of MSs and IGs unsuccessfully advocated for amendment in 2018.
- C. Provisions to strengthen the role of energy efficiency in EU climate policy by introducing the *energy efficiency first* (EE1) principle. The provisions were gradually introduced in EU policy documents from 2015 onward until EE1 was made legally binding with the 2023 recast of EED (EU, 2023a), and
- D. Provisions in the FuelEU Maritime regulation (FEUM) to enhance uptake of low and zero carbon (LoZeC) fuels and decarbonise international maritime shipping. The policy was gradually introduced in EU policy documents from 2013 until provisions were adopted in 2023 (EU, 2023b).

The first case (A) addresses innovative policy on the energy efficiency of buildings, complementing the previous focus on technical measures such as renovation provided for in the EU energy performance of buildings directive (EPBD), with a focus on changing the human behaviour of occupants (von Malmborg, 2021, 2022). However, the initial provisions were unconditional and hampered renovation, which is why the amended provisions put technical and behavioural measures in context and aligned two different EU directives, i.e., EPBD and EED. The second case (B) addresses a complete change in the focus on which companies should implement energy audits and energy management systems, from focusing on company size to focusing on annual energy use (von Malmborg & Strachan, 2023; von Malmborg, 2024a). The third case (C) provides a paradigm shift in EU energy and climate policy, requiring that energy efficiency be treated on par with power production and investments in power grids (von Malmborg, 2023a, 2023b). The innovative idea and impact of the EE1 principle are further manifested through the launch of the journal *Energy Efficiency First* in 2024, by the scientific publisher Elsevier. The final case (D) is about introducing, for the first time ever, EU legislation to decarbonise maritime shipping, implying that the EU overtakes global leadership from the International Maritime Organization (IMO) (von Malmborg, 2023c, 2024b).

The different cases included PEs from different sectors or social spheres, i.e., public, private, civic. In addition, some PEs proactively advocated policy change while other reactively advocated

the status quo. Some PEs acted as ‘activists’, while others acted as ‘advocates’. In addition, the four cases cover different sectors of EU climate policy, with PEs working in different policy subsystems of different degrees of maturity, from nascent (shipping) to mature (energy efficiency, buildings, industry), to different degrees of collaboration (energy efficiency, buildings, industry) or conflict (shipping).

3.2. Identifying Policy Entrepreneurs, Their Motifs and Strategies

Arnold et al. (2023) recently criticised PE scholars for paying too little attention to the methodological question of how to empirically identify PEs. Generally, scholars identify PEs by event-based or process-based approaches, such as “asking elites and experts to point them out, querying secondary sources, surveying possible entrepreneurs, and focusing on high-profile advocates” or “using secondary sources” (p. 659), using a “I know it when I see it” standard to distinguish PEs from other policy actors (p. 660). Using elite or expert input to identify PEs may overrepresent the prevalence of PEs while overlooking less connected or less expert policy actors trying to influence policy. It is a problem that case studies of successful policy entrepreneurship, typically involving an event-based PE identification approach, dominate the literature. Fewer scholars have examined failure cases to assess whether policy entrepreneurship was absent or if PEs used bad strategies, yet such analysis is crucial for establishing that PEs influence outcomes. According to Arnold et al. (2023, p. 662), more careful analyses of cases with varied outcomes are needed to understand whether PE presence or absence correlates with these outcomes in a theoretically anticipated way. Even fewer studies have examined cases where PEs were present but unsuccessful and have attempted to explain why they failed. If a jurisdiction fails to adopt a path-breaking policy, the failure may not be solely attributable to a lack of policy entrepreneurship. PEs might lack facilitative characteristics or use outdated or bad strategies to try and advance policy goals.

I view PEs as individual or organisational change agents who are strategically and entrepreneurially involved in framing and developing innovative policies, presenting them well-packaged to policymakers or political executives. To avoid the pitfalls mentioned, the stepwise process suggested by Arnold et al. (2023) was applied for identifying and distinguishing PEs once potential PEs were identified:

1. One marker of significant resource investment (time or money),
2. AND: at least one entrepreneurial goal,
3. AND: at least one entrepreneurial strategy or characteristics,
4. AND: at least one network partner.

To screen potential PEs in the cases, responses to the EC’s public consultations, reports from negotiations in the Council, and reports in the pan-European online newspaper *Euractive*, writing about developments in EU policy, were analysed. The screening was also facilitated by previous studies of advocacy coalitions (von Malmborg, 2021, 2023b, 2023c; von Malmborg & Strachan, 2023). The screening identified 50–400 policy actors in each case, out of which only 4–40 in each case were more active and vocal, provided more reports and policy briefs, and led the work in different policy networks and advocacy coalitions. Thus, not all potential PEs were surveyed with questions about resources, goals, strategies and network partners. Most policy actors were involved in the case of decarbonising shipping, and the fewest were involved in the case of the energy efficiency of buildings. After such analysis, seven organisations from the public, private and civil society sectors were identified to meet the stepwise criteria and considered PEs in the four cases (Table 2). The EC, through different DGs, was a PE in each case. In all cases, key individuals with positions such as deputy directors, heads of units, policy officers or associates were particularly important for driving policy entrepreneurship, but they were supported by teams in their organisations without which they could not act as PEs. This confirms the importance of institutional entrepreneurship in combination with policy entrepreneurship (Bakir et al., 2021).

Table 2. Policy entrepreneurs (organisations and individuals) in the four cases.

Policy entrepreneur	Energy efficiency of buildings	Energy efficiency in companies	Strengthening the role of energy efficiency	Decarbonizing maritime shipping
<i>Public sector</i>	European Commission, DG ENER (head of unit A and policy officer A in energy efficiency unit)	European Commission, DG ENER (policy officer B in energy efficiency unit) Government Offices of Sweden, Ministry of the Environment and Energy (deputy director A in energy division, PhD)	European Commission, DG ENER (heads of Unit A+B and policy officer C in energy efficiency unit)	European Commission, DG MOVE (Head of maritime transport unit)
<i>Private sector</i>	n/a	n/a	Regulatory Assistance Project RAP) (associate, energy efficiency, PhD)	n/a
<i>Civil society</i>	n/a	n/a	European Climate Foundation (ECF) (director climate governance)	Transport & Environment (policy officer shipping)
<i>Hybrid sector</i>	n/a	n/a	Energy Efficiency Financial	n/a

Institutions Group (EEFIG)

3.3. *Data*

To collect data on motives, strategies, success and failure, semi-structured interviews and qualitative text analysis were combined (Table 3). Ten interviews were held with key individuals in the organisations acting as PEs: one each from the Government Offices of Sweden (GOS), the Regulatory Assistance Project (RAP) and Transport & Environment (T&E), and in total seven from the Commission. In addition, three interviews were held with the Swedish energy and transport counsellors in the cases of energy efficiency of building, energy efficiency in companies, EE1 and FEUM. They acted as chairs of the Council energy and transport working groups during final trilogue negotiations between the Council, EC and EP in spring 2023, leading to political agreements and adoptions of EED and FEUM. The interviewees were asked about their motifs and entrepreneurial strategies (see interview guide in Supplementary material). The participants were also asked about their views on their opponents' strategies in advocacy. The interviews were not recorded, but notes were taken. For texts, policy documents from the EC as PEs in all cases, policy papers from the Government Offices of Sweden, the Ministry of the Environment and Energy (GOS/MEE) as PEs on the energy efficiency of buildings and companies, and reports and policy papers from the PEs on EE1 and FEUM, were analysed looking for perceptions of problems and positions on policy proposals.

Table 3. Data sources.

Data sources	Energy efficiency of buildings	Energy efficiency in companies	EE1 principle	Decarbonization of maritime shipping
Interviews	IP1. Deputy director, Energy Division, Swedish Ministry of the Environment and Energy (January 2018)	IP1. Deputy director, Energy Division, Swedish Ministry of the Environment and Energy (January 2018)	IP5. Head of Unit B, Energy efficiency, European Commission, DG ENER (March 2023)	IP10. Head of Unit, Maritime transport, European Commission, DG MOVE (March 2023)
	IP2. Energy counsellor A, Swedish Permanent Representation to the EU (January 2018)	IP2. Energy counsellor A, Swedish Permanent Representation to the EU (January 2018)	IP7. Policy officer C, Energy efficiency, European Commission, DG ENER (March 2023)	IP11. Policy officer, Maritime transport, European Commission, DG MOVE (March 2023)
	IP3. Head of Unit A, Energy efficiency, European Commission, DG ENER (January 2018)	IP3. Head of Unit A, Energy efficiency, European Commission, DG ENER (January 2018)	IP8. Associate, Regulatory Assistance Project (August 2022)	IP12. Policy officer, Transport & Environment (August 2022)
	IP4. Policy officer A, Energy efficiency, European Commission, DG ENER (January 2018)	IP5. Head of Unit B, Energy efficiency, European Commission, DG ENER (March 2023)	IP9. Energy counsellor B, Swedish Permanent Representation to the EU (March 2023)	IP13. Transport counsellor, Swedish Permanent Representation to the EU (March 2023)
		IP6. Policy officer B, Energy efficiency, European Commission, DG ENER (March 2023)		

Documents	<ul style="list-style-type: none">- EC proposal for EED (EC, 2011)- EC proposal for amending EED (EC, 2016a)- Council general approach amending EED (Council, 2017)- EP amendments to the proposal for amended EED (EP, 2017)- ‘Sweden’s views on the amendment of EED’, non-paper 24 February 2016- ‘Summary of Sweden’s views on the review and revision of EED and EPBD’, non-paper 11 March 2016- ‘Swedish input in view of the revision of the EED and the EPBD – the importance of applying the “energy efficiency first”-principle’, non-paper May 2016- Swedish views on metering and billing of energy and the energy performance of buildings, in view of the upcoming revision of EED, non-paper 19 May 2016- Swedish views on metering and billing of energy and the energy performance of buildings, in	<ul style="list-style-type: none">- EC proposal for recast EED (EC, 2021a)- EC Regulatory Impact Assessment (EC, 2021b)- Answers to the EC public consultation on the recast EED (EC, 2021c)- ‘Sweden’s views on the amendment of EED’, non-paper 24 February 2016- ‘Summary of Sweden’s views on the review and revision of EED and EPBD’, non-paper 11 March 2016- Proposal by Austria, Czech Republic, Denmark, Greece, Hungary, Ireland, Latvia, Portugal, Romania and Sweden for revision of EED Articles 8(4) and 8(6) on energy audits for large enterprises, non-paper 20 October 2016- Sweden’s comments on the scoping paper for a new guidance paper on Article 8 of the EED, Letter to the EC, 5 June 2017	<ul style="list-style-type: none">- EC proposal for recast EED (EC, 2021a)- EC Regulatory Impact Assessment (EC, 2021b)- Answers to the EC public consultation on the recast EED (EC, 2021c)- Council general approach on the proposal for recast EED (Council, 2022a)- Draft report on the proposal for recast EED (Fuglsang, 2022)- EP amendments to the proposal for recast EED (EP, 2022a)- Efficiency first: Key points for the energy union communication (Bayer, 2015)- Efficiency First: A new paradigm for the European energy system (ECF, 2016)- Governance for Efficiency First (RAP, 2016)	<ul style="list-style-type: none">- EC proposal for FEUM (EC, 2021d)- EC Regulatory Impact Assessment (EC, 2021e)- Answers to the EC public consultation on FEUM (EC, 2021f)- Council general approach on the proposal for FEUM (Council, 2022b)- Draft report on the proposal for FEUM (Warborn, 2022)- Amendments on the proposal for FEUM of the EP Committee on Transport and Tourism (TRAN, 2022)- EP amendments to the proposal for FEUM (EP, 2022b)- ‘Parliament backs EU’s maritime fuel law to curtail shipping emissions’, Sean Goulding Carroll, Euractive, 19 October 2022.^a- ‘FuelEU Maritime deal lets shipping off the hook’, Cíaran Cuffe & Jutta Paulus, Euractive, 17 October 2022.^b- ‘Lack of green maritime fuels makes liquid natural gas a
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view of the upcoming revision of EED, non-paper 25 January 2017	- Council general approach on the proposal for amended EED (Council, 2017)	necessity says Commission’, Sean Goulding Carroll, Euractive, 29 September 2021. ^c
- Council general approach on the proposal for amended EED (Council, 2017)	- Council general approach on the proposal for recast EED (Council, 2022a)	- ‘Europe can be a global leader in shipping decarbonization’, Getting to Zero Coalition, Euractive, 8 April 2022. ^d
	- Draft report on the proposal for recast EED (Fuglsang, 2022)	- ‘Shipping is not Fit For 55 – with only months left for the EU to get it right’, Seas at Risk, Euractive, 16 March 2022. ^e
	- EP amendments to the proposal for recast EED (EP, 2022a)	- ‘FuelEU Maritime: Analysis and recommendations. How to drive the uptake of sustainable fuels in European shipping’, (T&E, 2022a).
		- ‘Broad industry-NGO coalition calls for EU hydrogen quota for shipping’, (T&E, 2022b)
		- ‘Joint open letter to the European Parliament and the Council’. Transport & Environment, Clean Air Task Force and others, June 2022. ^f
		- ‘Ambitious marine fuel standards: Tackling climate change and developing business opportunities’. Joint open letter

by Danish Shipping and others to the European Parliament, European Commission and the Swedish Council Presidency, 9 December 2022.^g

- ‘ECSA statement on FuelEU Maritime negotiations, European Community Shipowners’ Associations’, 2023, 15 February 2023.^h

- ‘Joint statement by ECSA and T&E on FuelEU Maritime’, 31 May 2022.ⁱ

- ‘Joint Statement of ECSA EWABA, eFuel Alliance, the Advanced Biofuels Coalition and GoodFuels on FuelEU Maritime’, 1 June 2022.^j

^a <https://www.euractiv.com/section/shipping/news/parliament-backs-eus-maritime-fuel-law-to-curtail-shipping-emissions/>; ^b <https://www.euractiv.com/section/shipping/opinion/fueleu-maritime-deal-lets-shipping-off-the-hook/>; ^c <https://www.euractiv.com/section/shipping/news/lack-of-green-maritime-fuels-makes-liquid-natural-gas-a-necessity-says-commission/>; ^d <https://www.euractiv.com/section/shipping/opinion/europe-can-be-a-global-leader-in-shipping-decarbonisation/>; ^e <https://www.euractiv.com/section/shipping/opinion/shipping-is-not-fit-for-55-with-only-months-left-for-the-eu-to-get-it-right/>; ^f <https://cdn.catf.us/wp-content/uploads/2022/06/16135420/joint-letter-fueleu-maritime-and-afir.pdf>; ^g <https://www.worldshipping.org/statements/ambitious-marine-fuel-standards>; ^h <https://www.ecsa.eu/news/ecsa-statement-fueleu-maritime-negotiations>; ⁱ <https://www.ecsa.eu/news/joint-statement-ecsa-and-te-fueleu-maritime>

In the material collected, perceptions of problems and positions on climate change, as well as on policies and policy proposals, entrepreneurial strategies and responses to these problems, were identified. The data was coded in relation to problem framing, policy proposal, beliefs and motifs for policy change, entrepreneurial approaches (structural or cultural-institutional (cf. Boasson & Huitema, 2017)), entrepreneurial strategies (see Table 1 for a categorisation of different strategies), and kinds of impacts/outputs.

4. Contexts of Policy Entrepreneurship in EU Climate Governance

The context at the macro, meso- and microlevels frames who choose to act as a PE, their aims, motives and strategies. Climate governance in the EU is contextually influenced by macrolevel factors such as multilevel governance and the formal and informal procedures of policymaking. Each of the cases analysed and compared are further influenced by the meso-level context of EU climate policy. Microlevel contexts differ between the cases and are described in section 5.

4.1. Multilevel Governance

The EU is a complex polity (Hix, 2007). It is not and can probably not become a democratic entity. It has only multiple transnational epistemic communities, expert networks, and sporadically emerging publics, and should be seen as a 'demoicracy', with multiple national demoi (Müller, 2010; Nicolaïdis, 2012). A demoicracy can be understood as a "union of peoples, understood both as states and as citizens, who govern together but not as one" (Nicolaïdis, 2013, p. 351). As such, policymaking in the EU takes place in a multilevel governance (MLG) setting, emphasising parallel processes of decentralisation and European integration (Marks, 1993; Hooghe & Marks, 2001). For MLG in the EU, 76 supranational institutions, bodies, and agencies,¹ and 27 national, 1 200 regional, and almost 87 000 local governments (OECD, 2018) are linked in territorially overarching policy networks. Since the EU is a member of international agreements, a fifth layer can be added – the international. These layers interact with each other vertically across different levels of 'government' and governance, and horizontally with other relevant actors within the same level.

Three EU institutions are central in EU policymaking: the EC, the Council and the European Parliament (EP). The EC² is tasked with promoting the public interest of the EU; proposing and enforcing legislation as well as by implementing policies and the EU budget. The EC is the EU's politically independent executive arm. It is alone responsible for drawing proposals for new EU legislation. The Council, and the European Council, consist of representatives of national governments in the EU member states (MSs).³ The European Council is the policy-making venue for overall policy guidelines, where negotiations are made by heads of governments and states. The Council is a single legal entity, but it meets in ten different configurations, depending on the subject being discussed. The Council is a venue for policymaking on specific legislation. Negotiations are held between ministers from specific policy areas, but most negotiations are performed in Council working groups where MSs are represented by civil servants (counsellors) from MS government offices. The EP is a directly elected EU body with legislative, supervisory, and budgetary

¹ EU institutions and bodies. https://european-union.europa.eu/institutions-law-budget/institutions-and-bodies/search-all-eu-institutions-and-bodies_en?f%5B0%5D=oe_organisation_eu_type%3Ahttp%3A//publications.europa.eu/resource/authority/corporate-body-classification/EU_BODY&f%5B1%5D=oe_organisation_eu_type%3Ahttp%3A//publications.europa.eu/resource/authority/corporate-body-classification/EU_INST (Last accessed 11 September 2024)

² https://european-union.europa.eu/institutions-law-budget/institutions-and-bodies/search-all-eu-institutions-and-bodies/european-commission_en

³ https://european-union.europa.eu/institutions-law-budget/institutions-and-bodies/search-all-eu-institutions-and-bodies/council-european-union_en

responsibilities.⁴ It also performs democratic scrutiny of all EU institutions. It consists of 705 Members of the EP (MEPs), which belong to eight party groups.⁵ MEPs are selected every five years.

The three institutions are not monoliths. MSs may group in different coalitions within the Council during negotiations on a general agreement (Huhe et al., 2018). Similarly, different party groups in the EP form coalitions during negotiations on the negotiation mandate for trilogues. In the EC, different DGs may dispute on a legislative proposal prior to its adoption before and during the so-called interservice consultation.

Governance and policymaking in the EU can be described as a mix of supranational negotiations and intergovernmental cooperation between sovereign MSs in the Council and the EP, codified through a succession of major treaties (Tosun & Graziano, 2022). According to the treaties, MLG in the EU shall respect competences, share responsibilities and cooperate between various governance levels. Reference is made to the ‘subsidiarity principle’, enshrined in Article 5(3) of the Treaty of European Union (TEU) (EU, 2012b), aiming to guarantee a degree of independence for a lower authority in relation to a higher body or for a local authority in relation to national government. Subsidiarity should place decisions as close as possible to citizens and ensure that EU-level action is justified considering the possibilities available at the national, regional or local level.

4.2. *The Ordinary Legislative Procedure*

Decision-making on EU legislation aimed at European integration, i.e., harmonising legislation in the EU, follows what is called the ‘ordinary legislative procedure’ (OLP) (Roedinger-Rynning, 2019). In the system, the EP must approve EU legislation together with the Council in an act of co-decision. The procedure starts with a legislative proposal from the EC, who holds the right of initiative to put forward legislative proposals in the EU. A call for new or amended legislation can also come from the Council (through Council conclusions) and the EP (through resolutions), requesting that the EC put forward legislation. Based on input from a public consultation, lobbyists and PEs and the findings within a regulatory impact assessment (RIA), the EC formulates a proposal and addresses it to the two co-legislators simultaneously, which can adopt, reject or amend the proposition. The proposal is also sent to the European Economic and Social Committee and the Committee of the Regions, which can respond to the proposal but do not have a formal role in the decision-making process. But prior to the EC presenting a legislative proposal, the EC’s Regulatory Scrutiny Board (RSB) assesses if the proposal is in line with the treaties, including assessing whether the proposal meets the subsidiarity principle. It happens that RSB disapproves a legislation for breaching the subsidiary principle, e.g., in relation to energy efficiency of buildings, which happened in the case of the recast of the EPBD proposed in 2021 and adopted in April 2024 (Swedish energy counsellor, March 2023).

The Council and the EP negotiate and decide on their respective negotiation mandates for tripartite inter-institutional negotiations (so-called trilogues) between the Council, the EP and the EC, which aim at reaching a political agreement between the co-legislators. Trilogues have become a standard operating procedure in EU decision-making (Brandsma, 2015; Roederer-Rynning, 2019). Under co-decision, negotiation in trilogues can facilitate cooperation between the two co-legislators (Roederer-Rynning & Greenwood, 2021) by creating “mutual confidence, and positive trust spirals” and by augmenting “skills at political compromise” (March & Olsen, 1998, p. 960). Agreement between the Council and the EP following trilogue negotiations requires consensus (Brandsma, 2015;

⁴ https://european-union.europa.eu/institutions-law-budget/institutions-and-bodies/search-all-eu-institutions-and-bodies/european-parliament_en

⁵ European People’s Party (EPP, Christian democrats), Progressive Alliance of Socialists and Democrats (S&D, social democrats), Renew Europe (liberals), Greens/European Free Alliance (Greens/EFA, greens), European Conservatives and Reformists (ECR, nationalist conservatives), Patriots for Europe (PfE, far-right nationalists), the Left (GUE/NGL, left), and Europe of Sovereign Nations (ESN, far-right nationalists).

Puetter, 2016; Roederer-Rynning & Greenwood, 2021). Once the text is politically agreed upon, the two co-legislators formally adopt legislation jointly, having equal rights and obligations.

4.3. Meso-Level Context of Policy Entrepreneurs in EU Climate Governance

4.3.1. Development of EU Climate Policy

The EU began developing climate policy in the 1990s and has since built a broad portfolio of mitigation policy measures and governance tools, including legally binding targets to reduce GHG emissions and energy use and increase the share of renewable energy sources and policy measures addressing emissions trading, renewable energy, energy efficiency, land-use and land-use change, transport, taxation and more (Dupont et al., 2023).

Since the early 1990s, the EU, particularly the EC, has aspired to exercise global leadership in climate governance and other environmental policy areas (Tobin et al., 2023). To be able to show 'exemplary leadership' internationally, the EC has taken several steps to develop transformative climate policy (Dupont et al., 2023). However, the role of the EC as a PE is affected by advocacy of other policy actors. As mentioned, the European Council, the Council and the EP can request that the EC put forward legislation. The EC usually responds to such calls by proposing legislation. For instance, the EP took the initiative in the early 1990s to develop EU's climate policy and made the EC propose a carbon dioxide tax (Wettestad et al., 2012). In 2007, the European Council adopted the so-called 20-20-20 targets on climate, renewable energy and energy efficiency (Council, 2007), which were then included in the EC's climate and energy policy package (EC, 2008). The EC is heavily dependent on external expertise, and strong lobbying and PE advocacy are carried out on the EC from various quarters, including private profit and nonprofit, public and civil society organisations from the EU and abroad, before the EC presents its proposals for legislation (Broscheid & Coen, 2003; Chari & O'Donovan, 2011; Coen et al., 2021). As described in section 5, this occurred in all cases in this study. Sometimes to the better for the climate, sometimes to the worse.

In late 2019, EC President Ursula von der Leyen presented the *European Green Deal* (EGD) (EC, 2019) in response to the climate and environmental challenges facing the world as manifested in the 2015 Paris Agreement. EGD is a roadmap to make the EU's economy sustainable by turning climate and environmental challenges into opportunities across all policy areas and making the transition fair for all. It is also "a new growth strategy aimed at transforming the EU into a fair and prosperous society, with a modern, resource-efficient and competitive economy where there will be no net GHG emissions by 2050 and where economic growth is decoupled from resource use" (EC, 2019, p. 1). In spring 2021, the EU legislators approved, as part of implementing EGD, a new *European Climate Law* (ECL) (EU, 2021), which states that EU GHG emissions will be reduced by 55 % by 2030 compared to 1990 levels and that the EU, by 2050, will be the world's first climate-neutral continent. To meet these targets, the EC, acting as a PE, presented in July 2021 a complementary and interconnected set of proposals as part of the so-called *Fit for 55* (FF55) legislative package (EC, 2021g) to make the EU climate, energy, land use, transport and taxation legislation fit for reducing net GHG emissions by at least 55 % by 2030.

4.3.2. Subsidiarity and EU Climate Policy

There is a constant debate on subsidiarity and the need for collective action at the EU level to further European integration. In EU climate policy, as in EU policy in general, MSs often contest EU policy based on either sovereignty (subsidiarity claims) or substance (Wettestad et al., 2012; Herranz-Surrallés, 2019; Herranz-Surrallés & Solorio, 2022). MSs usually want room for manoeuvring and flexibility related to national circumstances. Since the entry into force of the Lisbon Treaty in 2009, climate, energy and transport policy have been a shared competence between MSs and the EU, with climate policy being based on Articles 191–193 of the Treaty on the Functioning of the European Union (TFEU) (EU, 2012b). EU energy policy is based on Article 194 of EU, while EU transport policy is based on Articles 90–100 of the TFEU. The question of subsidiarity is particularly challenging in EU policy on the energy efficiency of buildings, in focus of the first case in this study, since there is

shared competence between the EU and MSs on energy policy but exclusive competence for MSs and no competence for the EU on building and housing policy (Björklund et al., 2023).

4.3.3. Previous Research on Policy Entrepreneurs in EU Climate Policy

Through its privilege in proposing and presenting legislative proposals, the EC is often considered a central and 'natural' PE in EU politics and governance in many different policy areas, e.g., energy, climate, water, information and communications technology, research, defence, security, social rights and finance (Maltby, 2013; Edler & James, 2015; Becker et al., 2016; Herweg, 2016; Bocquillon, 2018; Simpson, 2020; Vesan et al., 2021; Zeilinger, 2021; Herweg & Zohlnhöfer, 2022; Kreienkamp et al., 2022; Bürgin, 2023; Silander, 2023; Valin & Huitema, 2023; Becker, 2024; Sus, 2024). From the perspective of MSF, the EC frames the problem and links it to policy options, which are then coupled to the politics stream as a package. The EC also participates in Council negotiations and in trilogues. However, the EC does not act as a PE every time it proposes new legislation; it does so only when it proposes innovative policies and legislation (cf. Roberts & King, 1991). Kreienkamp et al. (2022, p. 735) analysed the role of EC as a PE in transformative change in EU climate policy from the combined perspective of MSF and multilevel governance, emphasising "the importance of creating windows of opportunity but also seizing synchronistic moments when such windows open from political situations 'above' or 'below'". The importance of such situations from 'above' was apparent for the EGD/FF55 policy proposals of the EC in 2021.

The framing of climate and energy policies in the EU has been analysed, focusing on individual policy packages at specific points in time (Maltby, 2013; Palmer, 2015; Bocquillon, 2018) as well as over time (von Malmberg et al., 2023a). Since approximately 2005, the EC has acted to shift political norms, successfully framing energy import dependency as a problem requiring an EU-level solution (Maltby, 2013). Palmer (2015) found that persuasive framing enabled the PE to impinge agenda-setting processes, while boundary work enabled the PE to forfeit an existing policy considering widespread criticism. The Juncker energy and climate policy package from 2009 gathered support among stakeholders from framing it as a way for the EU to gain leadership in the green energy transition (Bocquillon, 2018). This situation was similar to that of the EGD/FF55 (Kreienkamp et al., 2022).

The framing of EU energy efficiency policy has expanded over time, from focusing on energy security of supply via climate change to energy poverty and other 'multiple benefits' (von Malmberg, 2023a; von Malmberg et al., 2023a). The EC has a central role in this change, both as a structural PE (changing power relations) and a cultural-institutional PE (changing worldviews). According to von Malmberg et al. (2023a), the EC acts to expand its reach into areas where the EU does not hold much legal competence according to the TFEU (EU, 2012b), such as buildings, housing and social affairs policy, through the domain of energy efficiency policy by referring to its 'multiple benefits'. From the EC perspective, energy efficiency policy is a Swiss knife that is able to solve many different problems, including energy poverty. From the critics' perspective, it is a Trojan horse, where the EC, in a non-transparent way, tries to sneak in new policy domains by disguising them as an energy efficiency policy to increase EU competence in relation to national governments. In that sense, the policy entrepreneurship of the EC is structural, furthering European integration, and includes actions aimed at changing governance influence by altering the prevailing distribution of authority in a way that gives the EC more power (cf. Boasson & Huitema, 2017).

5. Results: Strategies of Policy Entrepreneurship in EU Climate Governance

5.1. Case A: *ENHANCED Energy Efficiency of Buildings*

5.1.1. Problem and Policy Issues

The EC (2021a, 2021b) estimates that 40 % of final energy in the EU is used in buildings and that this sector accounts for 36 % of total GHG emissions in the EU. Improving the energy and climate performance of buildings is important for decarbonising societies by 2050. The energy efficiency of

buildings can be improved by different measures, ranging from technical-structural measures to organisational and behavioural measures (von Malmborg et al., 2023b). The energy efficiency of buildings has been an issue on the EU policy agenda for more than 50 years, and EU policies have expanded in scope and size over time as the EU has become more ambitious. However, legislation such as the EPBD, first adopted in 2002, has focused mainly on technical and structural measures.

In 2011, the EC Directorate-General for Energy (DG ENER) proposed complementary legislation on individual metering and billing (IMB) in the new EED to stimulate behavioural changes, e.g., lowering the indoor temperature and closing windows. EC proposed that individual meters should be installed unconditionally in each apartment of multifamily and multipurpose buildings and that billing should be based on actual consumption (EC, 2011). The reasons given by the EC for provisions on IMB stressed the need for final customers (and end-users) to be better informed of their own energy use to reduce it.

However, the governments of Sweden and Finland and the IGs in the two MSs saw the EC proposal as a threat, negatively impacting housing policy, which is a national competence from a subsidiarity perspective, as well as counteracting more effective energy efficiency renovations, and acted as PEs to maintain the status quo to avoid the 'evil' of the IMB. IMB could save energy by 0–20 %, while deep renovations could save 60–100 %. In Finland and Sweden, so-called gross rent is the dominant pricing model in multifamily housing, where the costs of heating, cooling and domestic hot water are included in the rent. In continental Europe, net rent is the dominating price model, where the costs of heating, cooling and domestic hot water are paid separately, in addition to the rent. The governments of Finland and particularly Sweden, the latter represented by a deputy director of GOS/MEE, argued that "gross rent and no IMB would provide incentives for energy efficiency renovations and improve the energy efficiency of buildings in the EU, while IMB requires a shift to net rent that reduces incentives for renovations" (IP1, deputy director, GOS/MEE). Taking a systems perspective on policy to enhance the energy efficiency of buildings, they observed a conflict between EED and EPBD. Notably, the deputy director of GOS/MEE holds a PhD in environmental systems analysis and was trained in systems thinking. Other MSs in the Council did not understand the issue at stake and did not support the governments of Finland and Sweden in the Council negotiations. This was because the IMB is mainly an issue where buildings are heated with district heating or cooled with district cooling, which is the case in Sweden and Finland but not in most MSs. In eastern and central European MSs, where district heating is also common, tenants do not have the opportunity to influence their own indoor temperature with thermostatic valves, which is why the IMB is a nonissue in those countries.

In late 2015, the EC announced a revision of the EED. At an early stage, contributing to agenda-setting, GOS/MEE proposed the introduction of 'proportionality' as an important condition for the installation of IMBs in existing buildings – that it shall be installed in existing buildings "where it is technically feasible and cost-effective to be proportionate to the potential energy savings" (IP1, deputy director, GOS/MEE). After negotiations, when the Council and the EP held identical positions, provisions of the original EED on unconditional requirements for the IMB of heating and cooling in new buildings or buildings that underwent major renovations were deleted. The same applied to the unconditional requirement for the IMB of domestic hot water in buildings that are undergoing major renovations. In the revised EED, there was only one unconditional requirement for the IMB for domestic hot water in new buildings, which was a fallback position of the GOS/MEE. In addition, provisions on IMB in new buildings were clarified, referring to metering at the unit level in multifamily buildings or multipurpose buildings, and final users in addition to final customers were mentioned.

5.1.2. Motifs and Strategies of Policy Entrepreneurs

When the IMB provisions were initially negotiated in 2011–2012, the EC acted proactively for policy change, while the governments of Sweden and Finland reactively advocated the status quo. When the EED was amended in 2016–2018, the EC wanted to maintain the status quo, while the GOS/MEE, with support from the Finnish government, proactively advocated policy change. The

different strategies used by the EC and GOS/MEE as PEs in the two phases are summarised in Table 4.

Table 4. Strategies deployed by policy entrepreneurs in in relation to policy for energy efficiency of buildings.

Policy entrepreneur	Attention- and support seeking strategies	Linking strategies	Relational management strategies	Arena strategies
<i>EC (DG ENER)</i>				
2011–2012 (change)	Problem framing, idea generation, strategic use of information, rhetorical persuasion	Coalition and team building with Denmark and Germany; Linking IMB to issues such as behavioural change	Networking	Timing
2016–2018 (status quo)	Problem framing, strategic use of information	n/a	n/a	n/a
<i>GOS-MEE</i>				
2011–2012 (status quo)	Problem framing, strategic use of information, using demonstration projects, rhetorical persuasion	Linking behavioural change to technical measures for energy saving	n/a	n/a
2016–2018 (change)	Problem framing, idea generation, strategic use of information, leading by example, using	Coalition and team building with MS governments, bureaucratic insiders and	Networking by using social acuity, trust building by showing high ambitions on EU	Timing, venue shopping, influencing Council negotiations as

demonstration	policy influencers	headline target for	well as EP
projects, rhetorical	outside of	energy efficiency	negotiations
persuasion, media	government,		
attention,	linking IMB to		
exploitation of	issues such as		
focusing event(s)	renovations and		
	energy poverty,		
	linking energy		
	policy to social		
	policy		

In both phases, the EC and GOS/MEE used problem framing and the strategic use of information to gain attention and seek support for their respective positions. There was no difference if the PE advocated for policy change or the status quo. However, it is evident that PEs advocating for the status quo focused only on these strategies, trying to persuade others through good arguments. Using the PE archetypes, they can be considered ‘concerned citizens’, representing housing owners and tenants. Their motif was to avoid new policies to counteract the effectiveness of existing policy and thus a ‘threat-centred’ policy entrepreneurship to prevent the EC from securing its ‘evil’ policy – a ‘devils shift’. To their defeat, the governments of Finland and Sweden did not understand the value of interacting with other policy actors in 2011–2012. As mentioned by the deputy director at GOS/MEE (IP1), he thought that good arguments underpinned by statistics would do the job. Nor did the national IGs of building owners in Finland and Sweden opposing the IMB understand the value of interacting with MSs and IGs at the EU level. Social acuity was low. Opponents of the IMB in Sweden had long focused on influencing the Swedish government in the phase of implementing EU provisions into national legislation rather than influencing actors at the EU level before and during negotiations of the EED (von Malmborg, 2021).

Aiming for policy change in different phases, both the EC and GOS/MEE used a broader palette of strategies. EC acted as an ‘advocate’, while GOS/MEE acted more ‘activistic’. Compared to 2011–2012, the strategy of GOS/MEE, led by the deputy director of the GOS/MEE in charge of the EED dossier, who acted as a PE to change the IMB provisions in 2016–2018, changed considerably. Motivated by negative experiences from negotiating the original EED and heavy critique from Swedish IGs when EED should be transposed and implemented, claiming that the “current IMB provisions are illegitimate”, the deputy director of GOS/MEE (IP1) and Sweden’s energy attaché in Brussels (IP2) decided that it was necessary to “take a new approach to advocacy through proactive policy entrepreneurship”. In addition, the EC opened an infringement case on Sweden for noncompliant transposition of IMB provisions, and changing the IMB provisions in EED could take away the legal ground for the infringement case. Among other things, GOS/MEE acted early to frame the problem, build coalitions of likeminded and network with policymakers in all EU institutions. Three months after the announcement of the revision and nine months prior to the EC proposal being presented to the Council and the EP in November 2016, GOS/MEE presented a position paper with proposals for revised provisions on IMB. The purpose was to influence the EC proposal but also to influence other MSs (IP1, deputy director, GOS/MEE). Three months before the EC proposal, GOS/MEE invited and teamed up with national IGs critical toward the IMB, including the tenants’ union and the national associations of public and private housing owners, energy companies and local authorities. Once the EC proposal was presented, GOS/MEE continued to present position papers on IMB and met with rapporteurs on EED in the EP as well as influential people among MSs in the Council, including the Presidency, and this had an impact. Moreover, GOS/MEE teamed up with EU-level IGs such as the Housing Europe (HE) and the European Property Federation (EPF),

representing public and private building owners; the International Union of Tenants (IUT, representing energy end-users and thus consumers); and three Swedish MEPs in the EP committees for industry, research and energy (ITRE) as well as environment, food safety and public health (ENVI), the latter being rapporteur on the EED file for ENVI. An important effort and activity of GOS/MEE and the coalition opposing IMB, in addition to presenting coordinated position papers, was the organisation of a seminar in the EP. In April 2017, GOS/MEE, together with HE, EPF and IUT, organised a lunch seminar in the EP on policies to improve energy efficiency of buildings. The seminar was hosted by two Swedish MEPs representing Renew Europe and the Greens/EFA. Since GOS/MEE and other actors in the advocacy coalition opposing the IMB were negative to the division of the IMB and the renovation of buildings, the seminar focused, by issue linking, on how EED and EPBD could promote a coherent and holistic approach to reducing energy use in buildings in a cost-effective way. What are the respective roles of building owners and residents in improving the energy performance of buildings? What is the potential of IMB and behavioural changes compared to technical-structural energy efficiency renovations? In what ways can consumers be empowered? By putting the IMB in relation to the energy efficiency renovations of buildings, a better narrative was given than if the IMB was bad. At the seminar, the HE chair referred to the experiences of IMB in Swedish member companies, showing that energy use increases, not decreases, because of IMB. In addition, she claimed that the IMB would dramatically change housing and tenancy policies, which in turn would violate the Lisbon Treaty and have negative impacts on energy efficiency and thus counteract the aim of the EED. It was also mentioned that the IMB provisions could increase energy poverty and thus influence social policy negatively.

The extensive work of the GOS/MEE as a PE and its allies opposing the IMB impressed other MSs, which supported proposals from the governments of Sweden and Finland to add proportionality as a precondition for the IMB in the Council's general agreement and mandate for trilogue negotiations. At the same time, the governments of Denmark and Germany, with lots of companies producing energy meters, were less vocal as proponents of the IMB, and they did not oppose the position of the Swedish and Finnish governments put forward to the Council. Sweden's position regarding new buildings and buildings undergoing major renovations was further developed and demands for IMB in buildings undergoing major renovations were deleted in the Council negotiations, as were requirements for IMB for heating and cooling in new buildings. The entrepreneurial strategies of GOS/MEE also influenced the EP. The positions of the Council and the EP were identical and similar to the position put forward by GOS/MEE and its allies for why the legislation was amended accordingly.

5.2. Case B: Enhanced Energy Efficiency in Companies

5.2.1. Problem and Policy Issues

Business in industry, transport, energy and the tertiary sector account for 75 % of the EU's final energy use (Eurostat, 2023), which makes companies an important sector for developing policies for promoting energy efficiency. Studies of corporate energy management in different sectors suggests that 'energy audits' (EAs) and 'energy management systems' (EnMSs) are necessary but not sufficient for improving energy efficiency in companies. They could help overcome the lack of and asymmetric information about the most important measures to take to improve the energy efficiency of a process, system or organisation. According to the EED, an EA is 'a systematic procedure with the purpose of obtaining adequate knowledge of the energy consumption profile of a building or group of buildings, an industrial or commercial operation or installation or a private or public service, identifying and quantifying opportunities for cost-effective energy savings, identifying the potential for cost-effective use or production of renewable energy and reporting the findings' (EU, 2023a, p. 30). EED defines an EnMS as 'a set of interrelated or interacting elements of a plan which sets an energy efficiency objective and a strategy to achieve that objective, including monitoring of actual energy consumption, actions taken to increase energy efficiency and measurement of progress' (EU, 2023a, p. 29). Like environmental management systems (EMSs) and quality management systems, EnMSs are based on

the Deming plan–do–study–act cycle for continual improvement used in most corporate management systems and can be certified according to standards of the International Organization for Standardization (ISO), ISO 50001.

EAs have been regulated in EU law since the entry into force of the EU energy services directive (ESD) in 2006 (EU, 2006). According to the ESD, MSs should ensure the availability of efficient, high-quality EA schemes that are designed to identify potential energy efficiency improvement measures and that are carried out in an independent manner for all final consumers, including smaller domestic, commercial, and small and medium-sized industrial customers. After a proposal by the EC (DG ENER), provisions on EAs were made mandatory for large companies adopting the original EED in 2012 (EU, 2012a), which also repealed the ESD. EED provided that MSs shall ensure that enterprises that are not SMEs are subject to an EA carried out in an independent and cost-effective manner by qualified and/or accredited experts or implemented and supervised by independent authorities under national legislation. The original EED also introduced voluntary provisions on EnMS.

When transposing the provisions of the original EED, MSs encountered challenges related to the concept of ‘large companies’, which are defined as ‘not being small or medium-sized enterprises (SMEs)’, and thus for identifying the target group of national legislation. The challenge for MSs arose when headcount, economic turnover and balance sheet analyses were performed to identify whether a company was large. This is because the analysis should consider ownership and thus linked and related enterprises such as subsidiaries. For a company to be an SME, it must be autonomous. This means that a large company can consist of several small or medium-sized, but linked or related entities located anywhere in the world. This made it difficult for MS law enforcement agencies to identify which companies should undertake mandatory EAs. The availability of data on entities in other countries was limited unless law enforcement agencies in different MSs and jurisdictions collaborated. It is even harder for law enforcement agencies in the EU to get hold of data on companies outside the EU. Consequently, MSs addressed the situation and treated companies, particularly multinational companies, in different ways, hampering the level playing field for companies in the EU internal market. This also led to frustration among MS civil servants and companies.

As part of the FF55, the EED provisions on energy efficiency in companies changed. Provisions were changed from focusing on large companies to focusing on companies with high energy use. Companies will be subject to an EA if their annual energy use exceeds 10 TJ. The recast EED also includes requirements for companies with the highest energy use to implement certified EnMSs. All enterprises, including SMEs that exceed 85 TJ of annual energy use, will have to implement a certified EnMS. The new provisions are deemed one of the three most important policies and measures of the EED in terms of contributions to energy savings and increased energy efficiency in the EU (EC, 2021b).

5.2.2. Motifs and Strategies of Policy Entrepreneurs

The problems with the 2012 EED provisions on EAs were identified by MSs few years after the entry into force of the directive. There was a clear dissatisfaction among MSs with the performance of the EA provisions of the EED. This issue was raised by MSs in an EU-wide concerted action project on implementing EED, which sparked several studies by consultants, academics and the EC (e.g. EC, 2016c). These studies confirmed the critique by MSs and catered to the consensus among MSs and the EC on the problem description and the need for policy change.

A policy window to re-examine and change the provisions was opened in 2016–2018, when the EED was undergoing a limited amendment. Motivated by negative experiences of the original provisions, which were impossible to implement in a way that safeguarded a level playing field for EU companies, and with frustration among MS civil servants and companies, a group of 13 MSs⁶ led

⁶ Austria, Czech Republic, Denmark, Finland, Greece, Hungary, Ireland, Latvia, Lithuania, Portugal, Romania, Spain and Sweden.

by GOS/MEE ⁷ proactively presented a joint position paper in early 2017 with a proposal for how to change the legislation. This was supported by all other MSs but one. The Maltese Presidency of the Council, who led the negotiations in the Council in the initial deliberations, as well as the EC as an “entrepreneurial gatekeeper” selecting, rejecting or reshaping the ideas that float around in the “policy primeval soup” (Kingdon, 1984, p. 140), were hesitant to include changes to the provisions on EAs in the amended EED since the article was not included in the EC proposal. They feared that opening of the article in the Council would send a signal to the EP, who could then put forward proposals for other amendments, e.g., that companies are forced take measures on the outcomes of the EAs and invest in energy efficiency measures. The EC, Malta and the successive Council Presidencies wanted to keep the amendment of the EED limited, avoiding distortions in the negotiations with the EP. This nonaction in terms of not including the issues of EAs in the 2018 amendment of the EED was a way by the EC and the Council Presidency to address the policy risk that the EP would come up with new controversial policy ideas (cf. Leong & Howlett, 2022). This was frustrating to the deputy director of GOS/MEE, who claimed that the EC “manipulated the Council Presidency to intrude the possibility of sovereign MSs to bring new policy ideas to the table” and “distrusted the Council of being able to deal with potential policy proposals of the EP in trilogues” (IP1, deputy director, GOS/MEE).

The issue was buried but reopened by the EC with the recasting of the EED in 2021-2023. The proactive policy entrepreneurship of GOS/MEE in 2017 supported by IGs such as the Coalition for Energy Savings (CfES) and European Alliance for Saving Energy (EU-ASE), researchers and think tanks such as Centre for European Policy Studies (CEPS), the European Council for an Energy Efficient Economy (ECEEE), and ISI Fraunhofer Institute had born fruit. There was already consensus among policy actors when the EED was amended in 2018 that thresholds should be based on annual energy use in the future rather than on company size, as in the original EED, but the policy window was not open. Thus, this was not an issue in the negotiations on the recast EED in the Council, the EP or the trilogues.

In summary, the different strategies used by EC (DG ENER) and GOS/MEE as PEs in the policy process on EED provisions for enhanced energy efficiency in companies are presented in Table 5. Both EC and GOS/MEE acted as ‘advocates’ according to Arnold’s (2021) archetypes.

Table 5. Strategies deployed by policy entrepreneurs in relation to policy for energy efficiency in companies.

Policy entrepreneur	Attention- and support seeking strategies	Linking strategies	Relational management strategies	Arena strategies
<i>EC (DG ENER)</i>				
2016–2018 (status quo)	n/a	Linking opening of the provisions to risk of EP	n/a	Timing

⁷ The initiative was taken by the deputy director of the Government Offices of Sweden, Ministry of the Environment and Energy, responsible for the EED dossier. It was the same person as in the case of IMB and energy efficiency of buildings (see section 4.2).

introducing other
issues

GOS-MEE

2016–2018, 2021–2023 (change)	Problem framing, idea generation, strategic use of information, leading by example, using demonstration projects, rhetorical persuasion	Coalition and team building with MS governments, bureaucratic insiders and policy influencers outside of government	Networking by using social acuity	Timing, venue shopping
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5.3. Case C: Strengthening the Role of Energy Efficiency in Climate Policy

5.3.1. Problem and Policy Issues

The clean energy transition needed to limit global warming to 1.5 °C above preindustrial levels and meet the UN sustainable development goal on affordable and clean energy requires massive deployment of energy efficiency and renewable energy sources (IPCC, 2023). According to the International Energy Agency (IEA, 2021), energy efficiency can contribute more than 40 % of the global GHG emission reductions needed to meet the Paris Agreement targets. The IEA (2019) refers to energy efficiency as the first fuel in the clean energy transition.

With reference to the ‘first fuel’ narrative and strongly influenced by advocacy of the Brussels-based, global private sector think tank RAP,⁸ the international environmental NGO (ENGO) European Climate Foundation (ECF),⁹ and the hybrid sector Energy Efficiency Financial Institutions Group (EEFIG),¹⁰ the EC under president Jean-Claude Juncker introduced the energy efficiency first (EE1) principle in the EU energy and climate policy narrative with the Energy Union communication (EC, 2015) and the 2016 Clean Energy for All Europeans legislative package (EC, 2016b), presenting it as the overarching theme of EU energy and climate policy. EE1 was introduced as a nonbinding principle in EU legislation with the regulation of the governance of the Energy Union and climate action (Governance Regulation), defined as follows:

taking utmost account in energy planning and in policy and investment decisions, of alternative cost-efficient energy efficiency measures to make energy demand and energy supply more efficient, in particular by means of cost-effective end-use energy savings, demand response initiatives and more efficient conversion, transmission and distribution of energy, whilst still achieving the objectives of those decisions (EU, 2018, p. 15).

The EE1 narrative was also included in the EU Strategy for Energy System Integration (EC, 2020). The 2021 EC proposal to recast the EED (EC, 2021a, 2021b) as part of the EGD and FF55 included

⁸ RAP describes itself as an organisation “advancing policy innovation and thought leadership within the energy community”. /<https://www.raponline.org>
⁹ <https://www.europeanclimate.org>
¹⁰ EEFIG was set up by the EC and the United Nations Environment Program Finance Initiative (UNEP-FI) in 2013. It is an expert group comprising over 200 organisations working with energy efficiency investments in the EU. <https://eefig.ec.europa.eu>

stronger provisions on EE1. The EP and the Council formally adopted the recast EED in July 2023 (EU, 2023). This made EE1 a legally binding principle for EU MSs to apply in policy, planning and decision-making on investments regarding the energy system and in sectors that affect energy supply and energy demand, exceeding 100 million euros each and 175 million euros for transport infrastructure projects. EE1, as an overarching, binding principle, complements two other guiding principles of EU energy and climate policy, i.e., cost-effectiveness and consumer protection. EE1 indicates a paradigm shift contrasting the earlier path-dependent agenda for EU energy policy, disconnecting the energy supply side from the energy demand side.

5.3.2. Motifs and Strategies of Policy Entrepreneurs

The introduction of the EE1 narrative in EU energy and climate policy, from the 2015 Energy Union strategy to a binding principle in the EGD/FF55 recast EED, was strongly influenced by proactive policy entrepreneurship by RAP, ECF and EEFIG. RAP, leading the work in the coalition, was motivated by a “dedication to accelerating the clean energy transition through thought leadership, taking a systems perspective on energy policies traditionally addressed as silos” (IP9, associate, RAP), while ECF was motivated by a will to save the world from climate catastrophes and provide funding. RAP and EEFIG have strong analytical resources. Since 2015, they have “provided guidance in reports, policy papers and meetings with the EC on how EE1 has been and can be implemented as well as its benefits” (IP9, associate, RAP). EEFIG, working toward the financial sector to increase investments in energy efficiency, stressed that energy efficiency investments are strategically important for the EU and financial institutions and that a binding EE1 with ‘multiple benefits’ framing can help the sector (EEFIG, 2015).

However, there was a lack of politically understandable problem framings in 2015, and no policy window opened for making EE1 binding. The politics stream was not receptive to the techno-economic needs for systems approach and the merits of consumer flexibility proposed by RAP and ECF. It ended with EE1 being defined in the Governance Regulation, without requirements for application in practice. It took until 2020ish for the policy window to start open by a push from the problem stream, with clear problem narratives. First, the Paris Agreement targets to limiting the temperature increase to 1.5 °C above preindustrial levels and consequential demands for extensive GHG emission reductions. This led the EC to present the EGD and the EU to adopt the ECL. Second, Russia’s second war on Ukraine led the EC to present the REPowerEU Plan and the associated EU Save Energy Strategy, which stressed the need for stronger energy efficiency policy. Third, indicators showed a large untapped economic potential for further energy savings. Fourth, the increased integration of renewable energy sources in the power system requires a systems approach to the green energy transition, with consumer flexibility and demand-side measures. The fifth is the emergent discourse about ‘multiple benefits’ of energy efficiency, where energy efficiency is thought to help solve all kinds of problems. This coupling of problems and policy solutions mainly followed the mechanisms of ‘doctrinal advocacy’ or ‘problem-focused advocacy’ where the RAP, the ECF, the EEFIG and the EC, led by DG ENER, looked for a problem that suited a given solution. EE1 was established as a nonbinding principle with the Governance Regulation, but for making EE1 binding, the PEs had to look for better problem narratives than in 2016–2018 when the EED was amended and the Governance Regulation was negotiated.

Active entrepreneurship by RAP, ECF and EEFIG as ‘advocates’ (cf. Arnold, 2021) inspired the EC to ‘advocate’ and sequentially introduce the narrative of EE1 in EU policy, first in the Energy Union communication (EC, 2015), second in the Clean Energy for All Europeans package (EC, 2016), manifested in the Governance Regulation (EU, 2018b), in the Strategy for Energy System Integration (EC, 2020), and finally as a self-standing, binding article in the Recast EED (EU, 2023). The views of RAP, ECF and EEFIG were supported by other IGs, particularly CfES, an ENGO gathering more than 500 business and civil society associations, 200 companies, 1500 cooperatives and 2500 cities in favour of energy efficiency, and EU-ASE. They all stressed that the “EE1 principle should be systematically and consistently applied in EU law” (CfES, 2021, p. 27). RAP, EEFIG and ECF, acting as PEs primarily coupling the problem and policy streams, provided guidance in reports, policy papers and through

meetings with the EC on how EE1 has been and can be implemented as well as its benefits for more than five years (Bayer, 2015; Rosenow et al., 2016; EEFIG, 2015; ECF, 2016; RAP, 2016). To sequentially influence the EC, they used so-called ‘salami tactics’ (Zahariadis, 2003), breaking favoured policies into modest segments and presenting them sequentially, steering policymakers toward the desired outcome without raising alarms at any one stage. These organisations were also successful in linking the problem and policy solution to part of the politics stream, influencing the EP rapporteur and calling for a very strong application of EE1.

In summary, the different strategies used by EC (DG ENER), RAP, ECF and EEFIG as PEs in the policy process of making EE1 a binding principle with the recast EED are presented in Table 6.

Table 6. Strategies deployed by policy entrepreneurs to make EE1 a binding principle in EU climate policy.

Policy entrepreneur	Attention- and support seeking strategies	Linking strategies	Relational management strategies	Arena strategies
<i>RAP, ECF and EEFIG</i>				
2015–2023 (change)	Problem framing, idea generation, strategic use of information, using demonstration projects, rhetorical persuasion	Coalition and team building with bureaucratic insiders and policy influencers outside of government, linking energy efficiency to issues such as energy systems perspectives, demand-response, climate change mitigation, multiple benefits	Networking by using social acuity	Timing, venue shopping, influencing EC as well as MEPs
<i>EC (DG ENER)</i>				
2021–2023	Problem framing, idea generation, strategic use of	Linking energy efficiency to issues such as	n/a	Timing

(change)	information,	energy systems
	rhetorical	perspectives,
	persuasion	demand-response,
		climate change
		mitigation,
		multiple benefits

5.4. Case D: Decarbonisation of Maritime Shipping

5.4.1. Problem and Policy Issues

Shipping is a key sector for the EU economy (EC, 2013). Approximately three-quarters of all international trade in and out of the EU is carried by sea (European Maritime Safety Agency, 2023), and the sector contributed 49 billion euros to EU GDP and two million jobs in 2020, of which 685,000 were at sea (EC, 2021e). Indicators have shown that rising GHG emissions from maritime shipping are problematic. The EU shipping sector emitted 138 million tonnes of CO₂ in 2018, corresponding to approximately 11 % of all EU transport CO₂ emissions and 3–4 % of total EU CO₂ emissions (EC, 2021e). The GHG emissions from EU maritime transport (i.e., emissions related to intra-EU routes and incoming and outgoing routes) increased by +48 % between 1990 and 2008 (EC, 2013). EU-related emissions from shipping are expected to further increase by 51 % by 2050 compared to 2010 levels. According to the EC (2021d, 2021e), the current fuel mix in the maritime sector is composed of >99 % fossil fuels. This is due to insufficient incentives for operators to reduce GHG emissions and a lack of mature, affordable, and globally utilisable alternatives to fossil fuels in the sector. Policy measures to decarbonise maritime shipping would best be regulated at the international level, where the IMO adopted an initial climate strategy in 2018, with targets for reducing GHG emissions (IMO, 2018). This strategy was revised in July 2023, setting a net-zero emissions target by mid-century and interim targets for 2030 and 2040 (IMO, 2023). However, no agreement has been reached on binding measures to reach these targets, which is why EU legislation is the only one in the world.

The issue of decarbonising the EU maritime sector entered the EU policy agenda with the 2013 Strategy for Integrating Maritime Transport Emissions in the EU’s GHG Reduction Policies (EC, 2013). However, prior to the FEUM regulation, proposed by the EC in 2021 as part of the EGD/FF55 and adopted by the Council and the EP in July 2023 (EU, 2023b), international shipping was the only mode of transport not included in the EU’s commitment for GHG emissions reductions. The policy window for the FEUM started to open by a push from the problem stream as a response to global warming and the need to reduce GHG emissions from all sectors. However, views on the emission reduction targets for the sector and the meaning of ‘decarbonising maritime shipping’ differed among policy actors. There were two main PEs in the FEUM case—the EC (through the DG MOVE) and T&E (the European Confederation of Green Mobility NGOs)—both suggesting innovative policy change but with different targets and different policy options.

Heavily influenced by the incumbent maritime and fossil fuel industries such as the European Community Shipowners’ Associations (ECSA), the International Chamber of Shipping (ICS), the World Shipping Council (WSC), CLIA Europe (a cruise lines trade association), SEA Europe (a group representing shipbuilders and maritime equipment manufacturers), FuelsEurope, Shell and BP, the EC, under the lead of DG MOVE, proposed a technology neutral and goal-based policy with GHG intensity targets (EC, 2021d). EC (2020) argued that a 90 % reduction in transport sector GHG emissions is needed by 2050 to achieve economy-wide climate neutrality by 2050. In its RIA accompanying the proposal for the FEUM regulation, the EC (2021e, p. 1) argued that LoZeC fuels “should represent 6–9 % of the international maritime transport fuel mix in 2030 and between 86–88 % by 2050 to contribute to the EU economy wide GHG emissions reduction targets”. With reference to the high capital expenditures and long commercial life of existing vessels and the high

costs of the most effective but also most expensive LoZeC fuels, i.e., electrofuels¹¹, the incumbent shipping industry and the EC argued that transformative technology is costly with a high risk of technology lock-in and stranded assets. Given the inherently global nature of the shipping sector, an important framing factor was the importance of flag neutrality and a favourable regulatory framework, a level playing field, for ports, ship operators and shipping companies (EC, 2021d). This framing and policy were largely supported by the shipping industry and MSs of the Council.

As an alternative to the EC proposal and taking a different point of departure, T&E in coalition with Seas at Risk (SaR), an association of ENGOs dedicated to marine protection, and the Getting to Zero Coalition (GtZC)¹² called on EU legislators to set a clear target for zero-emission shipping by 2050, in line with the Paris Agreement, and to ensure that new policy measures and interim targets work toward achieving the EU target of climate neutrality by 2050. T&E, in collaboration with other IGs and progressive companies from the maritime value chain, had a different view than the EC on how to stimulate innovation related to LoZeC fuels, particularly zero-carbon fuels such as electrofuels. T&E and allies claimed that the technology-neutral approach proposed by the EC will help ship operators choose the cheapest fuel options to cut emissions, i.e., liquified natural gas and biofuels, fuels that ENGOs oppose. T&E and allies argued that electrofuels are key to achieving full decarbonisation by 2050. The share of green electrofuels must be at least 18 % in 2030 and 85 % in 2040, along with strong energy efficiency measures (T&E, 2022a). Thus, T&E, together with members of the GtZC, the Clean Air Task Force (CATF), a US-based ENGO pushing for technology and policy changes needed to achieve a zero-emissions planet at an affordable cost, and many progressive companies and organisations across the maritime value chain (T&E, 2022b), wanted lawmakers to spur the uptake of electrofuels via the inclusion of technology-specific measures such as multipliers and mandatory sub-quotas. T&E proposed that EU lawmakers set a sub-quota of 6 % electrofuels, which will increase beginning in 2030 and bridge the cost-competitiveness gap with other alternative fuels via the introduction of a multiplier of 5 for electrofuels. According to T&E and its allies, high(er) sub-quotas will stimulate market development and the deployment of electrofuels. A technology-specific policy to stimulate innovation (production, provision and deployment) of the most advanced (but also most costly) sustainable maritime fuels, i.e., electrofuels, “will drive down costs and help make the ensuing rapid scale-up and uptake of electrofuels commercially viable by 2030, making the 2050 clean energy transition end-date within reach” (IP13, policy officer, T&E). This could help unlock massive investments and job opportunities in Europe and globally and contribute to making the EU the leading global supplier of zero-emission shipping and fuel production technology. This is also important from a strategic autonomy perspective, giving first a mover advantage to the global hydrogen economy, as claimed by T&E. This framing and policy option was largely supported by the EP and some MSs in the Council.

After a combination of deliberative negotiations and bargaining, the Council and the EP reached a political agreement on the FEUM in March 2023. The co-legislators agreed on legislation with increased ambitions for international GHG reductions compared to the proposal of the EC but not to 100 % by 2050, as proposed by T&E, and they introduced a multiplier and potentially a sub-quota to stimulate the innovation of electrofuels. The new regulation (EU, 2023b) was formally adopted by the EP and the Council in July 2023, establishing the world’s most ambitious legislation to stimulate the decarbonisation of maritime shipping beyond the borders of the EU. In short, the FEUM provides the following:

- GHG intensities well-to-wake should be reduced by 2 % from 2025, 6 % from 2030, 14.5 % from 2035, 31 % from 2040, 62 % from 2045 and 80 % from 2050.

¹¹ Green electrofuels are derived from hydrogen made with renewable electricity and include hydrogen, e-methanol, e-methane, ammonia, and e-diesel.

¹²¹² The *Getting to Zero Coalition* is a partnership between the *Global Maritime Forum* and the *World Economic Forum*, aimed at accelerating the rollout of deep-sea zero emission vessels powered by zero emission fuels. More than 150 companies have joined the coalition.

- A sub-quota of 2 % for electrofuels will be adopted by 2034 if an analysis of the electrofuel market shows that a multiplier is not enough to drive market development for electrofuels beyond 1 % in the fuel mix by 2031.

These requirements would apply to ships above 5 000 gross tonnes and encompass 100 % of their intra-EU voyages and 50 % of their voyages between EU ports of call and ports of call located in third countries.

5.4.2. Motifs and Strategies of Policy Entrepreneurs

As mentioned, incumbents were successful in lobbying the EC as an agenda-setter, proposing more moderate emission reductions and a technology-neutral, goal-based approach with no special treatment of the more innovative but also more expensive electrofuels. Incumbents were a barrier to an ambitious policy proposal of the EC, but they did not manage to stop special treatment of electrofuels in the final agreement of the EP and the Council on FEUM. Concerted action of ENGOs and progressive companies in the shipping value chain, led by T&E as a PE, gathered enough support in the EP and among MSs to stand the ground against heavy lobbying by incumbent companies in the shipping and fossil fuels industry. The focus on leadership in the transition toward a hydrogen economy was important for gaining political support among MSs and in the EP.

The motif of T&E to act as a PE was an ambition to “counter the ‘evil’ fossil fuel lobby and advance EU climate policy as much as possible for the EU to reach zero GHG emissions and climate neutrality by 2050, saving the world from climate catastrophes” (IP13, policy officer, T&E). Opposing the beliefs and influence of incumbents, T&E emerged as a ‘threat-centred’ PE presenting a devil’s shift to the ‘evil’ policy proposal of the EC. To succeed, T&E put forward its views on the problem and its solution, both in the consultation process before the EC presented its proposal and once the proposal went live. In the process of problem framing, T&E joined forces with other IGs, such as SaR, CtZC, CATF and many other companies and organisations across the maritime value chain, to leverage the knowledge and skills of others toward a common goal (T&E, 2022b), e.g., knowledge about the technical feasibility and market development plans related to zero-carbon fuels. T&E had strong analytical capacity in-house. To convey its messages and gather support for the alternative policy option, T&E used reports, open letters and participation in meetings and conferences. T&E also participated in targeted stakeholder consultations at the European Sustainable Shipping Forum and the European Ports Forum. T&E also wrote op eds in online media such as *Euractive*. Advocating a different policy option than the EC and wanting to influence the Council and the EP once the EC had presented its proposal, T&E also put much effort in building a broad coalition of ENGOs, IGs, elected politicians and companies in the shipping industry and fuels industry. Overall, EC acted as an ‘advocate’, while T&E acted as an ‘activist’ PE.

In summary, the different strategies used by EC (DG MOVE) and T&E as PEs in the policy process leading to the adoption of the FEUM regulation are presented in Table 7.

Table 7. Strategies deployed by policy entrepreneurs in relation to policy for decarbonising maritime shipping.

Policy entrepreneur	Attention- and support seeking strategies	Linking strategies	Relational management strategies	Arena strategies
EC (DG MOVE)				

2021–2023 (change)	Problem framing, idea generation, strategic use of information, rhetorical persuasion	Linking decarbonisation to level playing-field and competition of European maritime sector	Networking by using social acuity	Timing, venue shopping, influencing EC as well as MEPs
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T&E

2021–2023 (change)	Problem framing, idea generation, strategic use of information, using demonstration projects, rhetorical persuasion, media attention	Coalition and team building with MS governments, EU politicians, and bureaucratic insiders, as well as policy influencers outside of government, such as NGOs, companies and business associations, linking decarbonisation to EU leadership in global race to hydrogen economy	Networking by using social acuity	Venue shopping, advocating its views in the EC public consultation, <i>European Sustainable Shipping Forum</i> , and <i>European Ports Forum</i>
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6. Analysis and Discussion

6.1. Comparing Motifs and Strategies of Policy Entrepreneurs’

In the four cases described, seven organisations acted as PEs, some of which were the same in several cases (Table 8). In the cases of the energy efficiency of buildings (IMB) and companies (EA/EnMS), respectively, the main PEs were the EC (DG ENER) and GOS/MEE (more specifically, a deputy director at the Swedish Ministry of the Environment and Energy). In the case of EE1, the main PEs were the EC (DG ENER) and the RAP, ECF and EEFIG. For the EC (DG ENER), which leads the EED, the organisation was similar in 2018 and 2012 but different in 2023, with new directors, heads of units and policy officers. Finally, in the case of the FEUM, the main PEs were the EC (DG MOVE) and T&E. As mentioned in section 2.2, most PEs seek policy change. Thus, they can be considered

proactive PEs (cf. Becker et al., 2024). However, PEs sometimes act to maintain the status quo, reacting to ‘evil’ policy proposals by the EC. Of the four cases, two included reactive PEs that advocated the status quo at different times. The EC (DG ENER) advocated policy change, while the GOS/MEE advocated status quo regarding IMB in the process leading to the adoption of the original EED in 2012. However, in the process leading to the amendment of IMB provisions in 2018, the roles were switched. The GOS/MEE, as an ‘activist’, advocated for policy change to amend the ‘evil’ existing IMB provisions, while the EC advocated for the status quo. For the EED provisions on EAs/EnMS, the GOS/MEE advocated for policy change, and the EC opted for the status quo at the time of the revision of the EED in 2018. When the EED was recast in 2023, both the EC and GOS/MEE advocated policy change. In the other cases, all PEs sought policy change.

Table 8. Types of policy entrepreneurs in the different cases.

Type of policy entrepreneur	Public sector entrepreneurs	Private sector entrepreneurs	Hybrid sector entrepreneurs	Civil society entrepreneurs
Seeking policy change	EC DG ENER (IMB, EA/EnMS, EE1; 2011–2012, 2021–2023), EC DG MOVE (FEUM; 2021–2023), GOS-MEE (IMB, EA/EnMS; 2016–2018, 2021–2023)	RAP (EE1)	EEFIG (EE1)	ECF (EE1), T&E (FEUM)
Maintaining status quo	EC (IMB; 2016–2018), GOS-MEE (IMB; 2011–2012)	n/a	n/a	n/a

As for the EC as a PE, the EC is not monolithic. Although climate action has a dedicated DG (DG CLIMA), there are significant overlaps with the work of other DGs covering policy areas such as energy and transport (DG ENER, DG MOVE), which are important for EU climate policy according to the EGD and are responsible for the legislation analysed in this paper. EC policy proposals are often criticised internally in interinstitutional rivalry (Simpson, 2020) because competing interests, beliefs and policy priorities can hamper climate policy ambition (Rietig, 2019). It is often a specific directorate general (DG) and its commissioner or a unit within and its head and specific (group of) policy officers that act as PEs. Mid-ranking officials in the EC often play a crucial role in identifying and utilising a political window of opportunity (Edler & James, 2015). This was the case in all four cases analysed, with a policy officer and her/his head of unit acting as PEs.

6.1.1. Motives

For motives, the EC aimed for an “ambitious enough innovative package of policies and legislation that could help the EU meet its new climate targets set out in the EGD and ECL”. According to the heads of units in DG ENER and DG MOVE (IP3, IP7, IP11), “contributing to European integration by presenting harmonised legislation” was also paramount. For GOS/MEE, the other public sector PE, active in two cases, the main motif when acting as a proactive PE can be interpreted as revenge and rectification, and a will to correct illegitimate thus ‘evil’ EU legislation causing problems for public administration in MSs as well as companies across the EU, all in all counteracting the aim of increasing energy efficiency. Finally, PEs from the private and hybrid sector and civil society, no companies or business associations but think tanks and NGOs, were motivated by their dedication to providing the most innovative climate policies in their respective fields of expertise, truly contributing to 100 % of GHG emission reductions by 2050. ENGOs wanted policy to ‘save the world’. As for EE1, PEs aimed for a paradigm shift in energy and climate policy, breaking with the path dependent approach disconnecting energy supply from energy demand (cf. Lafferty & Ruud, 2009; Kettner & Kletzan-Slamanig, 2020; Herranz-Surrallés & Solorio, 2022). In two cases, PEs from the public sector and civil society were ‘threat-centred’ (cf. Arnold, 2022) and motivated by a desire to counteract ‘evil’ policy proposals from the EC in a ‘devil shift’ (cf. Sabatier & Jenkins-Smith, 1999): GOS/MEE in the case of energy efficiency of buildings and T&E in the case of decarbonising shipping. In two cases, for the energy efficiency of buildings (GOS/MEE) and EE1 (RAP), PEs advocated policies based on a systems approach, aligning different EU laws that otherwise contradict each other. Notably, the lead PEs in these organisations both hold PhD degrees, which none of the other leads did. This is not significant for the strategies chosen, but it says something about their social positions and expertise needed to propose ground-breaking policy change.

6.1.2. Types of Entrepreneurship

From the case descriptions (section 5), it is evident that policy entrepreneurship was mainly of a cultural-institutional nature, aiming at altering or diffusing people’s perceptions, beliefs, norms and cognitive frameworks, worldviews, or institutional logics (cf. Boasson & Huitema, 2017). However, the actions of the EC (DG MOVE) related to the decarbonisation of maritime shipping can also be seen as a case of structural entrepreneurship, aiming at overcoming the structural barriers to enhancing governance influence by altering the distribution of formal authority. The EC was the only PE to use structural entrepreneurship. In most cases, PEs aimed at altering the perceptions, beliefs, norms and cognitive frameworks and worldviews of different policy actors and policymakers in the Council and the EP. However, the policy entrepreneurship of the GOS/MEE on the energy efficiency of buildings and companies in 2016–2018 also addressed the EC (DG ENER), aiming to influence the EC proposal for an amended EED. The EC (DG ENER) was the main addressee of policy entrepreneurship by the RAP, ECF and EEFIG in the case of EE1. They aimed to influence what the EC proposed in different policy documents.

6.1.3. Strategies

What strategies were used by the different PEs? Did strategies differ depending on which sector they came from, if they were advocating policy change or status quo, and over time? As summarised in Table 9, it seems that the strategies of PEs in the four cases analysed and compared do not differ significantly between the public, private and civic spheres of society. They use all four types of strategies. However, it can be noted that public and civil society PEs also try to increase their attention and support through media attention. In addition, it seems that civil society PEs focus on building broader coalitions than do public sector entrepreneurs, covering hundreds or thousands instead of tens of organisations. In addition, civil society PEs acted more like ‘activists’, while private and hybrid sector PEs acted more like ‘advocates’ (cf. Arnold, 2021). Their policy ideas served as ‘coalition magnets’ (cf. Béland & Cox, 2016). The EE1 and FEUM cases saw RAP, ECF, EEFIG and particularly T&E build coalitions, including MS governments, EU politicians, companies, business associations,

local authorities and NGOs. In comparison, public sector entrepreneurs focused on building coalitions with MS governments, EU politicians and business associations, leaving individual companies, local governments and NGOs behind. PEs did not address the institutions as such but selected MEPs and their assistants, policy officers and chiefs as well as commissioners in the EC, cabinet ministers, state secretaries and civil servants in MS governments, and CEOs, heads of public affairs, directors, partners or topical experts in companies, business associations or NGOs.

Table 9. Strategies deployed by policy entrepreneurs from different sector.

Type of policy entrepreneur	Attention- and support seeking strategies	Linking strategies	Relational management strategies	Arena strategies
Public sector (EC/DG ENER, DG MOVE, GOS-MEE)	Problem framing, idea generation, strategic use of information, leading by example, using demonstration projects, rhetorical persuasion, media attention	Coalition and team building with MS governments, EU politicians, as well as policy influencers outside of government, such as business associations, linking climate and energy policy to economic competitiveness, multiple benefits	Networking by using social acuity, trust building	Timing, venue shopping
Private and hybrid sector (RAP, EEFIG)	Problem framing, idea generation, strategic use of information, using demonstration projects, rhetorical persuasion	Coalition and team building with bureaucratic insiders and policy influencers outside of government, linking climate and energy policy	Networking by using social acuity	Timing, venue shopping

		to multiple benefits		
Civil society (ECF, T&E)	Problem framing, idea generation, strategic use of information, using demonstration projects, rhetorical persuasion, media attention	Coalition and team building with MS governments, EU politicians, and bureaucratic insiders, as well as policy influencers outside of government, such as NGOs, companies and business associations, linking climate policy to economic development and innovation	Networking by using social acuity	Timing, venue shopping

Differences when advocating policy change or status quo

Table 10 summarises the results of strategies employed by PEs advocating policy change or the status quo. It is worth noting that maintaining the status quo was the aim in two cases (IMB and EA/EnMS) and was advocated only by PEs from the public sector (GOS/MEE and the EC/DG ENER). It is evident that PEs aiming at policy change act like ‘activists’ or ‘advocates’ and use a broader palette of strategies than PEs aiming at maintaining the status quo, acting more like ‘concerned citizens’. They use more attention- and support-seeking strategies as well as relational management strategies. When the GOS/MEE advocated the status quo instead of introducing provisions on the IMB for enhancing the energy efficiency of buildings in 2011–2012, it only used attention- and support-seeking strategies. When the EC advocated the status quo in relation to provisions on enhancing energy efficiency in companies in 2016–2018, it mainly used linking strategies but also referred to bad timing to stop policy change. This confirms the importance of the policy window of opportunity for PEs to transfer experiences and new knowledge to policy learning and policy change. Despite the knowledge of the EC in 2016–2018 that provisions on EAs would better change, it took until 2021, before a policy window was opened by a push from the politics stream and the EC proposed such change.

Table 10. Strategies deployed by policy entrepreneurs seeking policy change or maintaining status quo.

Aim of policy entrepreneur	Attention- and support seeking strategies	Linking strategies	Relational management strategies	Arena strategies
Seeking policy change	Problem framing, idea generation, strategic use of information, leading by example, using demonstration projects, rhetorical persuasion, media attention, exploitation of focusing event(s)	Linking climate policy to economic competitiveness, economic development, innovation, multiple benefits	Networking by using social acuity, trust building by showing high ambitions on EU headline target for energy efficiency	Timing, venue shopping
Maintaining status quo	Problem framing, strategic use of information, using demonstration projects, rhetorical persuasion	Linking opening of the provisions to risk of EP introducing other issues	n/a	Timing

Differences over time

The next research question relates to changes in strategies over time. In the case of the energy efficiency of buildings (IMB), both the GOS/MEE and the EC changed strategies from 2011–2012 to 2016–2018, as they switched from advocating the status quo to policy change and vice versa. Advocating policy change, GOS/MEE’s approach was more elaborate and included many more strategies than when GOS/MEE advocated the status quo. The change in approach, from the ‘concerned citizen’ to the ‘activist’, was very much dependent on the ideas and efforts made by the deputy director in charge of EED at GOS/MEE. He actively approached key persons in different IGs to take them onboard and make a joint action toward the EC, the EP and the Council. Similarly, the EC used fewer strategies to maintain the status quo when the IMB provisions were renegotiated in 2016–2018. In the case of enhancing energy efficiency in companies, the EC also switched from advocating policy change to maintaining the status quo and then back to policy change. The policy debate was most heated in 2016–2018, when GOS/MEE fought for policy change and the EC advocated status quo. When the EC finally proposed a policy change in 2021, based on previous

proposals from the GOS/MEE and allies, all parties were already onboard, and the need for active entrepreneurship was limited.

In the case of EE1, RAP, ECF and EEFIG as well as EC (DG ENER) used ‘salami tactics’ to sequentially introduce the EE1 narrative in EU climate and energy policy. Initially, they focused on attention- and support-seeking strategies, framing the problem, proposing policy and using information in a strategic way. Problem framing developed over time, as the politics stream was not receptive to including EE1 as a binding principle until the policy window opened in approximately 2020. Thus, timing was important. Now, EE1 was framed in relation to five different problems. Advocating EE1 as a binding principle also required coalition building and networking to attract broad support. Finally, we discuss the case of policy for decarbonising maritime shipping. This issue was raised by the EC in the early 2010s and was introduced in the strategy for integrating maritime transport emissions in the EU’s GHG reduction policies (EC, 2013). This strategy proposed a three-stage approach, starting with introducing requirements for shipowners to monitor, report and verify CO₂ emissions, adopted in 2013. The next step was to introduce targets for GHG emission reductions, which were proposed in the Climate Target Plan (EC, 2020). The final step was to develop policy instruments to meet the targets, e.g., the FEUM. Similar to the strategies for introducing EE1, this staged approach of the EC can be seen as a ‘salami tactic’, although the proposal for policy instruments to reduce GHG emissions was presented only in the third stage.

Overall, these findings confirm the findings of Braun et al. (2024) that PEs employ different strategies over time when interacting with their immediate and wider contexts in attempting to foster policy change. PEs are endogenous to policymaking processes and cocreate with policymakers to shape their ecosystems and society at large (Bakir & Jarvis, 2017).

Coalition building

As seen in all cases and used by PEs from all social spheres, coalition building is an important strategy for successfully influencing policy change. Through careful construction of coalitions/teams, it is possible for a PE to find effective ways to leverage the knowledge and skills of others toward a common goal. Policy networks, as repositories of knowledge, know-how, war stories, and professional gossip, can be vital sources of information for PEs. Knowing how to effectively tap local and broader networks can help PEs advance their advocacy efforts (Petridou & Mintrom, 2021). The approach of GOS/MEE in 2016–2018, in which a broad normative coalition advocating change in IMB provisions was formed, shows the importance of coalition building for small MSs to be successful as PEs in the EU (cf. Selck & Kuijpers, 2006; Björkdahl, 2008; Panke, 2012; von Malmberg, 2022). In the case of EE1, RAP, ECF and EEFIG joined with CfES and EU-ASE, encompassing a total of 5–6 000 organisations. In the case of the FEUM, T&E gathered with more than 200 ENGOS, business associations related to sustainable fuels and sustainable shipping and progressive companies across the maritime shipping value chain. Notably, the informal advocacy coalitions built by RAP, ECF and EEFIG and T&E also included formal coalitions such as CfES and GtZC, respectively.

6.2. Comparing the Success and Failure of Policy Entrepreneurs

Most studies of PEs focus on successful cases. Boasson & Huitema (2017) and Arnold et al. (2023) argue for more studies of unsuccessful cases. “Understanding why entrepreneurs are more successful in some cases than in others requires study of unsuccessful cases as well. /.../Only by juxtaposing cases with different outcomes can we gain a better understanding of how contextual factors may impede or enable entrepreneurs to influence policy and governance” (Boasson & Huitema, 2017, pp. 1351-1352). As mentioned in section 2.3, success or failure can be related to outcomes such as (i) influencing agenda-setting, (ii) changing other policy actors’ policy preferences, and (iii) actually influencing policy and governance.

From the four cases, we find that GOS/MEE entrepreneurship was unsuccessful in (i) maintaining the status quo regarding IMB in 2011–2012 and (ii) advocating policy change regarding energy efficiency in companies in 2016–2018 but successful in advocating policy change regarding IMB in 2016–2018 and energy efficiency in companies 2021–2023 (von Malmberg, 2021, 2022; von Malmberg & Strachan, 2023). Despite initially being unsuccessful in changing policy on energy

efficiency in buildings and companies, GOS/MEE was successful in setting the agenda at an early stage in both cases and was particularly successful in changing the perceptions of other policy actors on energy efficiency in companies. Second, the strategy of the EC maintaining status quo related to the IMB in 2016–2018 was rather unsuccessful (von Malmborg, 2021, 2022), but its strategy to maintain the status quo on energy efficiency in companies in 2016–2018 was successful in terms of not changing the policy (von Malmborg & Strachan, 2023). In both cases, the agenda was set by the Swedish government through the GOS/MEE.

The strategies of RAP, ACF, EEFIG and EC, which acted as ‘advocate’ PEs to sequentially introduce the EE1 narrative in EU climate and energy policy, were very successful in terms of agenda-setting, changing perceptions, and changing policy, as EE1 was adopted as a binding principle in 2023 (von Malmborg, 2023a, 2023b). In the FEUM case, the strategies of both the EC as an ‘advocate’ and the T&E as an ‘activist’ were successful regarding agenda-setting and changing perceptions and were moderately successful in terms of influencing policy change, with the Council and the EP bargaining to find a compromise that included elements of both the EC and the T&E narratives (von Malmborg, 2023c, 2024b). T&E was particularly successful in gathering support for an alternative policy design to influence the EP and enough powerful MSs in the Council to call for higher emission reductions and special treatment of electrofuels. Overall, there seems to be no difference in success related to the sector from which a PE comes (Table 11).

Table 11. Success of policy entrepreneurs from different sectors.

Type of PE	Setting the agenda	Change others’ beliefs	Adoption of policies and policy instruments
Public sector			
EC (DG ENER)	+++	++	++
EC (DG MOVE)	+++	++	+(+)
GOS-MEE	+++	+(+)	++
Private and hybrid sector			
RAP, EEFIG	+++	+++	+++
Civil society			
ECF			
T&E	+++	+++	+++
	+++	++(+)	+(+)

However, we can find a clear pattern regarding PEs advocating policy change or status quo and PEs acting as ‘activists’, ‘advocates’ and ‘concerned citizens’. The evidence from this study indicates that PEs advocating policy change are more active and use more elaborate strategies than PEs advocating the status quo on the same policy issue (IMB and EA/EnMS, respectively), and they are

more successful in changing the perceptions of policy actors and influencing actual policy change (Table 12).

Table 12. Success of policy entrepreneurs seeking policy change or maintaining status quo.

Type of PE	Setting the agenda	Change others’ beliefs	Adoption of policies and policy instruments
Seeking policy change	+++	+++	++(+)
Maintaining status quo	+++	+	+

How can these differences be explained? Since the issues and macro- and meso-level contexts were similar for both kinds of PEs in the two cases, this difference could be explained by differing ‘actor-specific’ factors, i.e., microlevel context (cf. Mahoney, 2007, 2008; Klüver, 2011, 2013; Bakir & Jarvis, 2017; Arnold, 2021). To be successful, a PE must understand the concerns of the actors they seek to persuade, use social acuity to build teams, networks, and coalitions, be knowledgeable to strategically disseminate information, and be organising, corresponding to political activation and involving civic engagement (Mintrom & Norman, 2009; Aviram et al., 2020; Arnold, 2021). When the GOS/MEE advocated for the status quo of the IMB in 2011–2012, advocacy and policy entrepreneurship in EU affairs were new to the persons in charge, with little legacy of EU advocacy in the energy division at the ministry. They knew how to disseminate information strategically but held little social acuity in EU circles and did not understand the value of teaming up with relevant competencies and actors with relevant personal positions in networks and coalitions. The transaction costs were high. In summary, the GOS/MEE used bad strategies to try and advance policy goals that led to PE failure (cf. Arnold et al., 2023). The EC, maintaining the status quo on IMB and EA/EnMS in 2016–2018, was more knowledgeable as a PE but was taken by surprise by the new entrepreneurial approach taken by GOS/MEE, particularly because GOS/MEE managed to build a coalition of IGs that for the first time ever had a shared position. This came as a shock to the EC head of unit, who was caught off guard and failed to maintain the status quo. A Swedish consultant in the field of energy, based in Brussels, was also surprised and told that she had never before seen GOS/MEE act in this proactive way in Brussels. (von Malmborg, 2022).

In the case of energy efficiency in companies, GOS/MEE acted proactively as an ‘advocate’ PE in 2016–2018 and gained support from all MSs and the EC, but the policy did not change until 2023. The initial lack of success can be explained by the lack of a fully open policy window, and perhaps more importantly, the EC, as a PE aiming to maintain the status quo, acted as an ‘entrepreneurial gatekeeper’. In this case, PE strategies were effective, but there was a lack of facilitative characteristics (cf. Arnold et al., 2023).

The problem framing and policy proposal of T&E for decarbonising shipping were transformative. Similarly, RAP, ECF and EEFIG inspired the EC to present a transformative policy change on EE1. As highlighted by Kreienkamp et al. (2022), the ‘hyper-consensual’ environment of EU politics poses a great challenge to PEs seeking to advance transformative policy change. The central role of consensus-building in EU policy change is to maintain a path-dependent dynamic, where no single actor can prescribe policy and minority interests can be easily mobilised to block reform (Hix, 2007). T&E and allies had no influence on the EC proposal and had some influence on the Council but were rather successful as ‘activist’ PEs toward the EP. The durable entrepreneurship

of RAP, ECF and EEFIG as ‘advocates’ received the EC to propose gradually stronger provisions on EE1. The EC itself was receptive and acted strategically on ‘external shocks’ to reframe energy efficiency policy and the role of EE1 to make it appetising for EU politicians. T&E, RAP, ECF and EEFIG were all successful at coupling all three streams according to their views. In all, this was not only a ‘coincidence of propitious conditions’ (Palmer, 2015, p. 281) in the EU politics stream but also a strategically outlined act of entrepreneurial agency, either as an ‘activist’ or as ‘advocates’. Overall, this finding echoes the findings of Ringel et al. (2021, p. 9) that “especially hybrid stakeholders [such as EEFIG and the coalition of EEFIG, RAP and ECF], combining industry, think tanks and NGO actors, can take a strong role for consensus building on EU energy efficiency policy. The situation was similar in the case of FEUM, where T&E built a broad coalition of industry, think tanks and NGOs. Similar findings were reached by Carter and Childs (2018), who analysed the policy entrepreneurship of ENGO Friends of the Earth in UK climate policy. The strategies used by T&E and ECF (with RAP and EEFIG) confirm research in political sociology that the success of NGOs in advocacy for EU environmental policy depends on “effective coalitions, political opportunities in the form of either powerful allies in the EU institutions or, conversely, the possibility of mobilising grassroots members to act in particularly influential MSs, are found to be central to explaining influence over EU decisions” (Parks et al., 2023, p. 106).

Overall, these findings confirm the findings of Arnold (2021) that PEs characterised as ‘activists’ and ‘advocates’ use a broader set of strategies and are more successful in influencing policy change, while PEs characterised as ‘concerned citizens’ are less active and less successful in policy change, although they can have an impact on agenda setting and influence other policy actors’ beliefs. In addition, civil society PEs tend to be more activistic than PEs from the public and private sectors, although the GOS/MEE deployed activistic agency to change EED provisions on the IMB in 2016–2018. The characteristics and type of entrepreneurship employed by PEs also seem to depend on the target group of advocacy. Compared to GOS/MEE and T&E, who targeted the EC, MSs in the Council in MEPs and party groups in the EP as ‘activists’, RAP, ECF and EEFIG acted as ‘advocates’ to influence the EC. The wider the target group is, the more activistic PEs there are, at least if they are not from EU institutions. EC also targets MSs, MEPs and party groups but acts as an ‘advocate’. It holds a special position in EU policymaking, with the formal privilege of proposing new legislation and thus in less need of activistic entrepreneurship.

6.3. Ethical Considerations on Policy Entrepreneurs

As described in section 5.4, EC was the only PE to use structural entrepreneurship aiming at overcoming the structural barriers to enhancing governance influence by altering the distribution of formal authority. Despite shared responsibilities between the EU and MSs on energy, climate and transport policy, FEUM is a regulation, not a directive, with limited flexibility for MSs. The rationale of the EC to propose a regulation was that EU policy on decarbonisation of shipping must consider the fact that maritime transport services in the EU and between the EU and non-EU countries can be provided by operators of all nationalities. The global nature of the sector underlines the importance of flag neutrality and a favourable regulatory framework, which would protect the competitiveness of EU ports, ship owners and ship operators. A level playing field for ship operators and shipping companies is critical to a well-functioning EU market for maritime transport. In addition, the FEUM encompasses ship owners and ship operators in the EU as well as third countries, stretching beyond the borders of the EU. The FEUM has generated a multilateral process that includes IGs at the national, EU and international levels. The role of the EU in the IMO and its strong support for multilateralism provided motivation to advance maritime climate policy to lead by example. The FEUM was framed by the EC as an opportunity to achieve global leadership in the clean energy transition and to reinforce the legitimacy of the EU and its institutions.

These findings contradict the claim by Brouwer (2015) and Brouwer and Huitema (2018) that the strategic behaviour of public sector PEs is not about double-dealing or playing nasty tricks. This creativity of the EC to be a successful structural PE, being a ‘purposeful opportunist’ in interpreting rules and procedures in an ever more complicated and contested EU, was also highlighted by

Copeland (2022) and Becker (2024) in their analyses of policymaking on EGD. Some may applaud the EC for trying to pressure MSs into engaging with the EGD, especially if they see it as promoting the delivery of 'public goods'. Others might find that the EC transcends its mandate (Becker, 2024). Proposing a regulation instead of a directive on FEUM gains the EC 'implementation powers' (Bauer & Becker, 2014; Crespy & Menz, 2015).

This phenomenon of 'competence creep', or 'harmonisation by stealth', where the EU acts outside of its powers and slowly expands its competences beyond what is conferred upon it by its members, informally increasing the powers of the EC while reducing the powers and flexibility of MSs, has been acknowledged for centuries (Garben, 2019). Competence creep comes with democratic deficits related to accountability and legitimacy and should be combated to reinstate and reinforce the position and powers of both the national and European legislators in making important decisions that impact, directly or indirectly, the lives of European citizens (Garben, 2022).

Similar to Edler and James (2015), the case of FEUM with two competing problem framings and discourses (von Malmberg, 2023c, 2024b, 2024c) and the case of EE1 with problem framings evolving over a long period and two competing discourses (von Malmberg, 2023a) indicate that ambiguity about the problem is a key feature in the complex process of framing and mobilisation. Thus, ambiguity can be seen as a multidimensional and dynamic phenomenon that changes its nature and function over the different stages of the agenda-setting process and that opens a window of opportunity for the EC to take on a more structural entrepreneurial role. Overall, this suggests that the impacts of PEs, particularly PEs employing structural entrepreneurship, on democratic norms and principles such as accountability and legitimacy should be analysed (cf. von Malmberg, 2024d).

But not only agency of the EC as a PE can be questioned from ethical and democratic perspectives. Compared to policy entrepreneurship of the Swedish government in two cases, with widely anchored proposals for policy change due to bad experiences of existing policies, the problem framing and policy proposals put forwards by RAP, ECF and EEFIG on EE1, and by T&E on FEUM were untransparent. Both gathered wide support in progressive business communities and environmental organisations, but their anchorage among citizens was unclear. Both proposals were claimed to address climate change, which is of high priority to EU citizens, but they were rather technical and lacked reference to climate and social justice issues (von Malmberg, 2024b, 2024c, forthcoming).

With some similarities between PEs and lobbyists, one could wonder who pays the PEs. While lobbyists are pursuing the interest of and paid by a client, PEs pursue their own interests. Boasson and Huitema (2017, p. 1344) define PEs as "persistent and skilled actors who launch original ideas, create new alliances, work efficiently or otherwise seek to 'punch above their weight'". In the four cases analysed in this paper, the EC and GOS/MEE are public institutions paid by taxpayers' money through the EU and Swedish national budget. T&E is a federation of green transportation NGOs, whose work is financed by membership fees but also donations and grants from public institutions. RAP is a think tank, who in the case of EE1 got finance from ECF. Regarding T&E, RAP and ECF, there are no suspicions of unduly finance and dependence on anonymous actors wanting them to pursue their ideas as lobbyists. However, suspicions can be raised about EEFIG being set up by the EC and UNEP-FI. Thus, EEFIG works on a mandate from the EC and took part in the development of EE1 from the very beginning. This raises questions why EEFIG acted as an 'independent' PE instead of a consultant to the EC. It is a sign of non-transparency and further technocratisation of EU policymaking led by the EC, avoiding accountability and reducing legitimacy to the EU citizens.

With few exceptions, there are hardly any studies of how PEs relate to political philosophy of democracy and ethics. Arguing that PEs, like lobbyists, should be confronted with the challenge of generating legitimacy, political accountability, and justice in their actions and the implementation of their targeted policy change, von Malmberg (2024d) recently proposed a framework for critical analytical research on PEs and democratic policy processes, as well as a normative framework for potential regulation of how PEs should act not to violate democratic norms. Framing of problems should be done in a way that it resonates with the public interest, policy solutions must be justified, just and legitimate, and the agency of PEs should be transparent.

7. Conclusions

This paper aims to further the understanding of strategies used by PEs from the public, private and civic sectors in the policy process, whether they differ, and which strategies are successful/unsuccessful. Do strategies change over time? It also aims to elucidate whether PEs seeking policy change are more active and successful than PEs advocating for the status quo. Addressing these questions makes the paper theoretically contribute to research gaps in the literature on PEs. To meet these aims, a comparative analysis of motives and strategies and related success or failure of PEs related to new and revised EU legislation to stimulate a clean energy transition to reach the new EU target on climate neutrality was undertaken. Four cases focusing on EU supranational policies for (i) enhanced energy efficiency in buildings, (ii) enhanced energy efficiency in companies, (iii) strengthening the role of energy efficiency in climate policy with the EE1 principle, and (iv) decarbonisation of maritime shipping, were scrutinised. Thus, the comparative analysis further contributes to the theory on policy entrepreneurship in climate governance.

In the four cases analysed, there were a total of seven organisations acting as PEs, some of which were the same in several cases. Three were public sector actors, one was a private sector actor, one was a hybrid sector actor, and two were civil society actors. The EC was a PE in all cases. Policy entrepreneurship was mainly of a cultural-institutional nature, aiming at altering or diffusing people's perceptions, beliefs, norms and cognitive frameworks, worldviews, or institutional logics. However, the actions of the EC (DG MOVE) on policy for decarbonising maritime shipping and, to some extent, of the EC (DG ENER) on policy to strengthen the role of energy efficiency in climate policy can also be seen as structural entrepreneurship, aiming at overcoming the structural barriers to enhance governance influence by altering the distribution of formal authority. In all cases but that in which the EE1 principle was made binding and PEs aimed to influence the EC to propose a new policy, PEs were mainly targeting different policy actors and policymakers in the Council and the EP. However, the policy entrepreneurship of the GOS/MEE in 2016–2018 also addressed the EC (DG ENER), aiming to influence the EC proposal for amending the EED.

The comparative analysis revealed that the motives involved in engaging as PEs differ. Some are acting more instrumentally rationally, while others are engaged more emotionally in presenting a competing policy to prevent the EC from securing an 'evil' policy. Such 'threat-centred' entrepreneurship was deployed by a public sector PE, but not in all cases it participated, and by civil society PEs. The strategies of PEs in the four cases do not differ significantly between the public, private and civic spheres of society. They use all four types of strategies. However, the results indicate that PEs targeting policymakers in the Council and the EP tend to be more activist than PEs targeting the EC. In addition, civil society PEs focus on building broader coalitions than do public and private sector entrepreneurs, including not only business associations and MS governments but also EU politicians, companies, local authorities and NGOs. For the success of PEs, the analysis shows no evidence that PEs from a certain sector would be more successful than others in setting the agenda, changing the perceptions of policy actors, or influencing actual policy change. However, we can find a clear pattern regarding PEs advocating policy change or the status quo. The empirical evidence indicates that PEs advocating policy change are more active and use more elaborate strategies than PEs advocating the status quo on the same policy issue. Both kinds of PEs are successful in setting agendas, but PEs advocating policy change, be they 'activists' or 'advocates', are more successful in changing the perceptions of policy actors and influencing actual policy change. Threat-centred PEs, driven by beliefs and ambitions to counteract 'evil' policy proposals, seem to be as successful as more instrumentally rational PEs if they know how to deploy different resources and strategies.

The study reveals signs of unethical and non-democratic agency of some PEs. This confirms previous critical studies of PEs in EU and Swedish climate policy. Like lobbyists, PE should be confronted with the challenge of generating legitimacy, political accountability, and justice in their actions and the implementation of their targeted policy change. As with lobbying, there should be a public debate on regulation of PEs to make PEs adhere to ethical norms of democracy. Scholars of PEs, policy processes, democracy, law, public affairs and others can contribute to such a development.

This paper builds on a comparative study of four cases with seven different PEs in total. The results should be seen as indications (hypotheses) of differences in motives, strategies, success and failure of different types of PEs with different aims for their entrepreneurship. More comparative research is needed to verify or disapprove these hypotheses.

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