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The European Green Deal Agenda After the Attack on Ukraine: Exogenous Shock Meets Policy-Making Stability

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Abstract

The present article investigates how the EU climate and energy governance framework launched by the European Green Deal has been affected by the exogenous shock of the Russian war of aggression on Ukraine. Harnessing punctuated equilibrium theory, the theoretical approach applies its conceptual triad of policy images, venues, and feedback to the adoption of the current REPowerEU program as a critical test case of highly stable policy-making encountering a situation of exogenous shock. In the empirical part, a mixed-method content analysis of policy documents issued by the European Council and Commission from the adoption of the European Green Deal in 2019 to the current stage is presented to gauge the impact of the Russian attack on agenda-setting at the macro and meso-political levels of the EU. A second step evaluates how the expanded and more geopolitical policy image of the REPowerEU agenda is applied to extant governance processes. In this regard, the analysis identifies three factors limiting the impact of exogenous shock: the availability of three separate policy subsystems for the parallel processing of policy components, institutional safeguards for maintaining policy stability through supranational rules and provisions, and the critical function of the Commission in limiting revisions to a few targeted proposals. In conclusion, policy stability outweighs aspects of disruption and change, while the more diverse set of policy processes creates new challenges for the coherence of efforts to achieve decarbonization.

Keywords

agenda-setting; climate change; European Green Deal; punctuated equilibrium theory; REPowerEU

Issue

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1. Introduction: EU Climate and Energy Governance in a Setting of Crisis

The Russian war of aggression against Ukraine presents a challenge to the EU’s energy and climate policies for two main reasons. First, the sanctions adopted against imports of fossil fuels from Russia have impacted the energy prices and security of member states and, by extension, their efforts to promote renewable energies and investment in infrastructure to diversify fossil fuel supplies. In this context, the anticipation of energy shortages and rising energy prices adds to the perception that there is a crisis or even “polycrisis” in the EU (Anghel & Jones, 2023; Massetti & Exadaktylos, 2022; Webber, 2018). Second, the shock of war occurs at a time during

which EU energy and climate governance has expanded from regulatory policies to a broader framework of governance processes promoted through the European Green Deal (EGD; cf. European Commission, 2019) and programs of “green” investment through the Resilience and Recovery Plans (RRPs) established as a response to the pandemic. The challenges raised by the war are therefore addressed in the context of ongoing change and expansion concerning the policy-making instruments, political boundaries, and institutional framework of EU climate governance (Rietig, 2021; Schramm et al., 2022; Siddi, 2021). In the current setting, we observe greater debate about new policy instruments, raising questions about the durability of institutional change prompted by ongoing crises (Buti & Fabbrini, 2023).

The effect of these dynamics on current ambitions to move towards carbon neutrality, as endorsed in the EGD agenda, is far from obvious. As an exogenous shock with immediate negative impacts on economic growth and consumer prices, the outbreak of war in Ukraine could repress the “green” transition in favor of a renewed emphasis on economic and security policy targets, particularly from a short-term perspective. By contrast, a longer-term view on solutions to the problem of energy dependency recommends investments and regulation to promote zero-carbon energy production and technology as an approach to tackling the dual challenge of decarbonization and energy security (von Homeyer et al., 2021). These contrasting interpretations add to an increasing dynamic of contestation of energy and climate policies since the proclamation of the EGD agenda (Dupont & Torney, 2021; Eckert, 2021; Paterson et al., 2022; Wendler, 2022a). The REPowerEU (REPEU) plan, adopted in May 2022 as the main EU response to the war (European Commission, 2022a, 2022b), stands at the crossroads of these dynamics.

Against this background, and in the second year after the proclamation of the EU response to Russia’s attack on Ukraine, the present article evaluates these dynamics by investigating the question: Does REPEU create a policy shift in the ongoing implementation of the EGD agenda? And, do observable shifts become effective as vectors reinforcing or weakening the EU’s ambition of moving towards carbon neutrality? By addressing these questions, this contribution adds to the focus of this thematic issue on the impact of perceived crises on the policy processes and institutions of EU governance. It also relates to a growing research debate about the interactions between policy-making stability and disruption, which are discussed as dynamics of turbulence, crisis, and contestation within the field of energy and climate governance (Dupont & Torney, 2021; Eckert, 2021; Siddi, 2021; von Homeyer et al., 2021, 2022). Section 2 presents the theoretical framework based on punctuated equilibrium theory (PET) and considers the policy stability literature; after presenting the selection of data and method (Section 3), the main part then turns to the decision-making processes launched through the REPEU package and its effects on the pursuit of the EGD agenda (Section 4); the final part of the article weighs up the main findings and conclusions (Section 5).

2. Theoretical Framework: Punctuated Equilibrium Meets EU Policy-Making Stability

PET fits the approach and questions of the present analysis through three of its key features: First, its analytical focus elucidates how shifts of attention caused by situations with high complexity and uncertainty, such as the war in Ukraine, are processed in political systems and affect political agendas. Second, an emphasis is placed on policy beliefs and their role in agenda-setting and defining complex and multi-faceted

challenges such as climate change. Finally, policy change is explained as a result of feedback loops between processes of agenda-setting at the macro-political level and decision-making in specialized policy subsystems (cf. Baumgartner et al., 2009; Baumgartner & Jones, 2015; Baumgartner et al., 2018; Jones & Mortensen, 2018; Workman et al., 2022). As the policy-making theory that most explicitly describes sudden, far-reaching change akin to shifting tectonic plates, PET also provides explanations for incremental policy development and absorption of pressure for change. The topic and question at the center of this article—namely, how a relatively sudden exogenous event affects political agendas—is addressed by PET through three main concepts: (a) the development of policy images as a set of dominant beliefs about a problem proclaimed through political agendas, (b) the effect of their modification on the involvement and balance of policy venues as sites of decision-making and components of specialized policy subsystems, and (c) different forms of policy feedback as the main source for the emergence (or absence) of far-reaching policy change. These inform the present approach in the following way:

1. Policy images: These are defined as a set of expressed beliefs about the scope and nature of a given policy problem; they are proposed by political agents to define the priorities of political agendas and consist of a mixture of “empirical information and emotive appeals” (Baumgartner et al., 2018, p. 62). Policy images, therefore, shape agendas in two ways: by containing emotive messages describing the nature and scope of a given complex policy problem (such as illustrating certain aspects of the multiple dilemmas associated with climate change) and by providing empirical information about possible courses of action and suitable solutions for the given problem (such as suggesting approaches of reducing carbon emissions or improving the resilience of societies against extreme weather events). A critical background condition for a change of policy images is shifts of political attention to different subjects following events such as exogenous shocks. In this context, a modification of policy images becomes more likely when policymakers are confronted with changes in dominant political topics and face an overload of information about the severity and consequences of events with high degrees of uncertainty. The present case of the Russian attack on Ukraine appears as a likely case for such a shift towards security-related issues and subsequent modification of policy images. A challenge for applying the concept of policy image as proposed by PET, however, is that it is considered as both the cause and effect of ongoing policy change, involving different time horizons: While shifts of political attention caused by exogenous shock can

only be assessed in a longitudinal perspective, a change of policy images becomes relevant as a factor for policy-making in more specific short-term settings, described subsequently.

2. **Policy-making venues:** The effect of changing policy images on decision-making is central to explaining policy change through PET. In this context, interactions between two levels of institutions are crucial: those at the macro-political level with high political visibility and mandates for agenda-setting, and more specialized policy subsystems with specific mandates, fields of expertise, and decision-making competence. As policy images are tied to the specific approaches to policy problems embedded in particular policy subsystems, their change can have a disruptive effect by proposing different problem perceptions and requiring different fields of competence and expertise. Within the distinction of political levels, the typical approach to explaining policy change by PET is that macro-political institutions adopt new agendas and thereby re-assign tasks to different policy subsystems (Baumgartner et al., 2018, p. 63). Therefore, politics at the macro-level is associated with punctuation and far-reaching policy change, whereas policy subsystems support incrementalism and policy-making stability. A key factor for this association is how political information is processed at both levels: Macro-political venues and agents absorb and communicate information in a sequential manner (i.e., one after the other) by identifying problems and proclaiming priorities of action; policy subsystems support parallel processing of multiple challenges through decentralized decision-making in sites with specific fields of competence. The subsequent analysis, therefore, investigates how processes of agenda-setting, particularly by the European Council (EC), interact with specialized policy subsystems involved in EGD governance; a critical aspect in this regard is activity by the Commission as a meso-level mediating between macro-politics and subsystems by enacting guidelines adopted by the EC and tabling specific proposals.
3. **Policy feedback:** Policy change is evaluated as a result of two different forms of interaction between macro-political institutions and policy subsystems. Positive feedback results from direct linkages between both levels and creates policy change caused by a rapid and substantial shift of dominant policy images and subsequent disruption of policy monopolies within established subsystems. By contrast, negative feedback occurs when policy subsystems remain shielded from direct intervention by macro-political events. It describes ongoing and incremental decision-

making along established policy trajectories without major expansion or shifts of relevant venues and associated topics. Rather than identifying the absence of policy change, negative feedback identifies forms of resilience of policy-making subsystems against external shock. In this context, the observation of policy change as the incremental modification of a regulatory framework within an otherwise stable decision-making path should be distinguished from policy shifts as the deviation from such a path. Concerning the specific case of climate policy, this distinction appears important as the pursuit of decarbonization targets is inseparable from substantial change in affected policy areas, particularly within a longer-term path of adjustments defined by conditions of policy stability. By contrast, policy shifts mean a turn away, slow down, or re-direction of envisaged policy changes.

To summarize, the application of PET to our present case follows three main steps: First, we evaluate the degree to which the Russian attack on Ukraine has shifted political attention to questions of security and led to the creation of a new policy image for EU climate and energy policy; second, we evaluate in how far observed changes in the dominant policy image affect or re-calibrate the involvement of extant policy venues and their interaction in specialized subsystems; and third, we evaluate observable policy-making results within our scope of analysis against the backdrop of the dualism of positive and negative feedback.

Considering scope conditions, we have discussed factors at the outset that speak in favor of considering the war in Ukraine as a major external shock that will potentially prompt far-reaching shifts of agendas, venues, and policy-making. These external factors, however, should be weighed against the high degree of policy stability (cf. Paterson et al., 2022) identified with the evolution of EU energy and climate governance (Delbeke & Vis, 2019; Jordan & Moore, 2020). Factors that have been identified as contributing to this stability include the longer-term and incremental buildup of regulatory frameworks for carbon pricing and emission reductions with increasing scope and stringency (Oberthür & von Homeyer, 2023); the successful policy integration of a range of policy fields into the remit of EU climate action (Adelle & Russel, 2013; Dupont, 2016; Rietig, 2019); a largely shared and comprehensive framing of climate action culminating in the proclamation of the EGD, its legal foundation in European Climate Law (Machin, 2019; Paleari, 2022; Wendler, 2022b), and subsequent implementation through the Fit for 55 package (Erbach & Foukalová, 2023; de las Heras, 2022; von Homeyer et al., 2022). The present case study establishes a critical test of whether the exogenous shock of the Ukraine war disrupts this relative stability by prompting a shift in political attention at the macro-political level of the

EU, affecting the established climate policy image that the Commission promoted, and affecting relevant institutional settings and policy-making.

3. Data and Method: Combining Quantitative Content Analysis and Qualitative Approaches

As explained in Section 2, applications of PET involve both a longitudinal perspective on agenda-setting over time and a view on the more ad-hoc impact of new policy images on policy venues and decision-making. The two perspectives require different methodological approaches applied in the empirical part. The first method is the comparative analysis of topics and agendas, in order to gauge shifts of attention over time and between political levels. Our first step of analysis, therefore, reviews agenda-setting at three political levels and sets of documents: First, all conclusions adopted by the EC as the highest macro-political institution of the EU since the adoption of the EGD in December 2019 to the present stage; second, the four Annual Work Programs (AWPs) of the European Commission from 2020 through 2023, which present more specific policy-making agendas of the EU in fields of key importance, including those comprised in the EGD; and finally, the three major policy documents of the Commission defining its approach to climate and energy policy within the period from 2019 to the present, including the communications on the EGD, the NextGenerationEU (NGEU) program, and the REPEU program.

In comparison with one another, these sets of documents cover the macro, meso, and policy-specific levels of agenda-setting. For evaluating shifts of political attention, the subsequent analysis measures the relative weight of references to different thematic areas broadly related to climate action. Considering the large amount of text covered in this step, an approach of quantitative content analysis is applied using automated text coding for the entirety of 27 policy documents (20 EC conclusions adopted from December 2019 to the present, the four AWPs published by the von der Leyen Commission, and the three policy documents mentioned above). Four broad thematic categories were identified and are frequently raised in relation to topics of climate and energy governance, concerning its rationales, embedding in economic policies, and application in a current setting of crisis and geopolitical context:

1. Green transition is applied as a category to capture references to the ecological effects of climate change, the concept of sustainability, and core components of the EGD, particularly the promotion of a circular economy, renewable energy, and just transition.
2. Competitiveness is used as a term for approaches combining efforts to achieve decarbonization with technological change and economic competitive-

ness, particularly digitalization, artificial intelligence, and the functioning of capital, product, and energy markets.

3. Green recovery refers to the management of the health and economic crisis caused by the Covid-19 pandemic and the idea of a resilient recovery through “green” investment based on grants and loans, particularly through the NGEU program.
4. Security is applied as a category for references to the Russian attack on Ukraine and related terms of military aggression and defense, as well as proposals for the management of the resulting energy, food, and security crises, and references to supplies with fossil fuels.

Adopting the quantitative content analysis method, a dictionary for automated coding was built consisting of between 15 and 20 keywords for each thematic category listed above (65 keywords in total). Relevant terms were selected by running frequency rankings of keywords and word combinations and subsequent checks of keyword-in-context. The automated coding of all 27 documents resulted in a data set of 2,907 coded text segments, 1,383 of which were coded in EC conclusions, 693 in Commission AWPs, and 831 in the three Commission policy documents. A full list of selected documents, the dictionary used for automated text coding, and details such as word frequency rankings for each institutional level and thematic category are presented in the Supplementary File.

The second methodological component is the review of policy images and venues, where a qualitative approach was applied to specify the policy image established within the current REPEU agenda, defined as a combination of emotive appeals and empirical statements. Given the limited amount of text documenting this policy image and considering the importance of key highlighted statements not appropriately weighed in a quantitative survey, a qualitative analysis appears better suited to complete this second step of the analysis. While embedded in the previous mapping of topics and agendas, this step goes into greater depth by identifying those components of the current REPEU program that either establish continuity with or create change concerning the previous EGD agenda. Turning to policy venues, the next step investigates how the enactment of the REPEU agenda affects extant policy subsystems involved in climate and energy governance. A key point in this regard is the distinction between different sets of governance processes applied for regulatory legislation, executive cooperation applied for the governance of green investment, and a set of partially new, coordinative processes of “soft” (i.e., not legally binding) governance. A third step then evaluates observable policy results regarding the concepts of positive and negative feedback.

4. Punctuating the Equilibrium? EU Climate and Energy Governance After the Attack on Ukraine

The subsequent empirical part applies our theoretical model to the present case by tracing policy developments since the adoption of the EGD to the current stage and then zooming in on the impact of the REPEU program as the EU’s main response to the Russian attack on Ukraine. The analysis starts with a survey of topics and policy images (Section 4.1) and their linkage with relevant policy venues (Section 4.2); pulling together both aspects, we subsequently evaluate the current dynamics of policy change and feedback (Section 4.3).

4.1. Topics and Policy Images: Broadening the EGD Agenda to Address New Challenges

As explained in Section 3, the first step is to evaluate the extent to which the Russian attack on Ukraine has effected a shift of attention in a comparison between the categories of topics presented there. The results of this content analysis for the conclusions of the EC are shown in Figure 1.

The results confirm that since the start of the war on Ukraine in February 2022, the thematic focus of EC conclusions has shifted to topics related to the Russian attack and its impacts, to the degree that references to

security issues have become by far the biggest thematic category. This finding is corroborated by a manual count of the number of recitals in the EC conclusions under the thematic headings of “Russia” and/or “Ukraine.” These increased to 86 recitals of 159 in 2022 and 39 of 113 in 2023, from a previous level of 2 and 17 (of 130 and 120, respectively) in the two years prior.

The drastic shift of attention observed in EC conclusions is reflected but less clearly expressed in the four Commission AWP, as shown in the overview in Figure 2. While increasing attention is given to security issues in the 2023 program adopted in October 2022, it does not outweigh the coverage of the green transition and recovery topics. Screening the content of the AWP, this finding appears plausible as each of the AWP contains a general introductory section followed by a discussion of the six headline ambitions of the Commission. These cover the EGD agenda as the first of six topics in roughly equal length and detail in all four documents compared. As a meso-level of agenda-setting between the broad challenges identified by the EC and action in specific policy fields, the sections on the EGD in each AWP also contain references to quite specific projects such as pesticide use or food and textile waste (European Commission, 2022g, p. 6).

Finally, we present a survey of the three policy documents identified as milestones for EU climate and energy

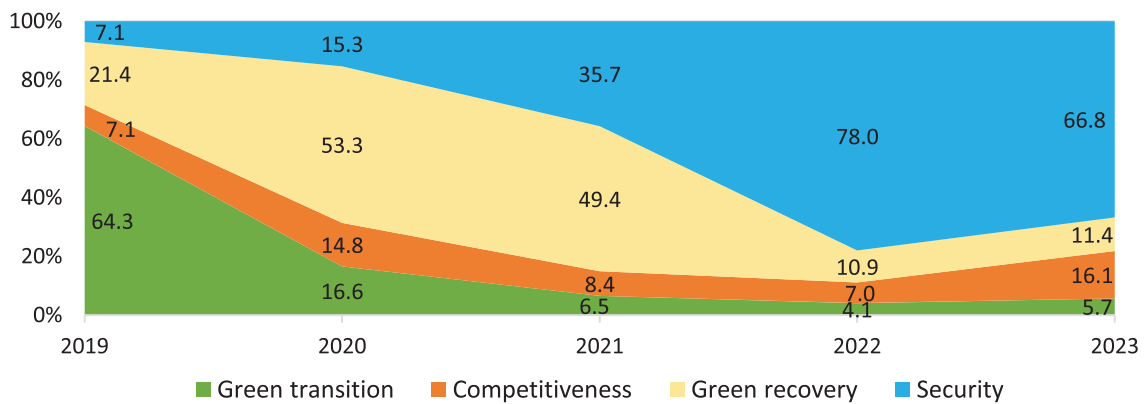


Figure 1. Thematic emphases in EC conclusions.

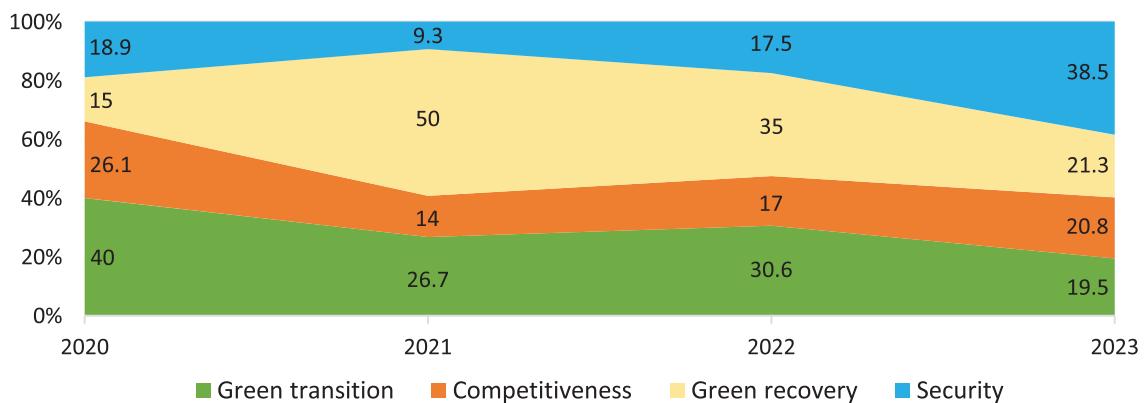


Figure 2. Thematic emphases in AWP of the EU Commission.

governance, shown in Table 1. This survey identifies unsurprising emphases of the EGD on the green transition and the NGEU document on the idea of a green recovery. However, the more relevant finding in this context is that the REPEU document has no such unequivocal thematic emphasis. On the contrary, it includes strong references to security issues and the green transition and recovery, signaling a broader range of issues considered for defining the response to the war in Ukraine (Figure 3).

A first insight from this survey, therefore, is a contrast between the responses to the energy and security crisis at the macro- and meso-political level of the EU, namely, a clear shift of attention towards issues of security at the level of the EC, but a greater degree of continuity and widening rather than replacement of topics in the more policy-specific documents of the Commission. To explore this further, our second step adopts a qualitative approach to zoom in on the REPEU declaration and its policy image created by emotive appeals and empirical information. This review is summarized in Table 1.

Set in context with our previous observations, the review confirms that the policy image at the core of the REPEU agenda has shifted toward security-related issues due to the war in Ukraine. Adopting a more decidedly geopolitical approach, the dual goals of achieving independence from Russian fossil fuels and ensuring the collective action of member states stand out as the key emotive appeals to action. From this point of departure, the most pivotal empirical statements about how to realize this agenda largely refer to already ongoing policy processes, particularly under the two headings of energy

efficiency and renewable energy. In this respect, the communication references a package of EU directives negotiated as part of the Fit for 55 package. Furthermore, the cross-cutting approach of “smart investment” is not introduced as a new mechanism but refers to using a revised and better-funded variant of the RRF established within the NGEU program. In this context, only the goal of diversifying and coordinating the supply and purchase of fossil fuels, particularly LNG, is the main aspect of REPEU that stands apart from and potentially contradicts the previous EGD agenda, particularly by contradicting efforts to move away from fossil fuels.

Summing up this first step, our analysis confirms the significance of the war in Ukraine as an exogenous shock that has re-focused the attention of top EU political institutions but whose effect on policy images is primarily one of broadening and diversification: In addition to a wider geopolitical rationale of climate policy (cf. the contribution of Siddi & Prandin, 2023, in this thematic issue), core elements of the EGD agenda are retained and applied to a broader framework of goals and mechanisms laid out by the Commission. Complete policy-making innovations remain limited to proposals for creating a mechanism for the coordinated purchases of fuels.

4.2. Policy Venues: Widening the Scope of the EU Climate and Energy Governance Process

How does the broadening of the EU’s climate and energy policy image affect its institutional framework and venues of decision-making? In comparison to the

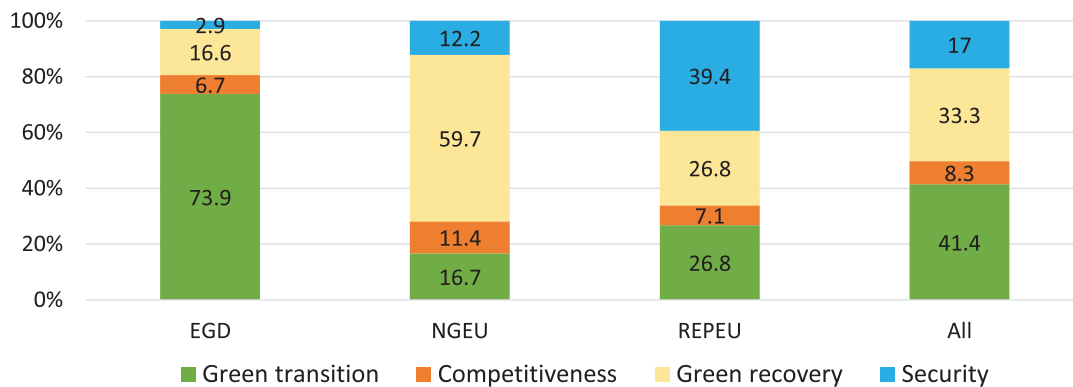


Figure 3. Thematic emphases in COM policy documents.

Table 1. Policy image of EU climate and energy action as specified in the REPEU communication.

| Policy image | Emotive appeals | Empirical information |
|---|---|---|
| Climate action as component of the EU’s geopolitical autonomy | <ol style="list-style-type: none"> 1. Reduce dependence on Russian fossil fuels 2. Ensure collective action and solidarity by member states | <ol style="list-style-type: none"> 1. Three policy priorities to achieve primary goals: promote the clean energy transition; increase energy efficiency; and diversify supplies of fossil fuels 2. Harness and increase funds for “smart investment” (Resilience and Recovery Facility; RRF) 3. Accelerate action for revision of legislation under Fit for 55 |

previous EGD agenda, the wider and more multi-faceted approach of REPEU requires two sets of additions, namely, a framework for governing the “smart investment” principle and ensuring its linkage and coherence with established policy goals of decarbonization and a stronger external dimension to achieve energy independence. This implies that EU climate and energy governance is no longer confined to a single policy subsystem but has expanded to a variety of governance frameworks applied to enact its regulatory, investment, and external action components. A clear implication is that climate action, as defined in REPEU, is not to be identified as a subset of the EU’s environmental policy-making. However, the governance framework applied for enacting these related components preserves policy stability by harnessing extant governance processes and establishing a central role for the Commission, ensured by reliance on subsystems and governance frameworks with strict supranational rules and provisions. In this sense, three separate policy subsystems with distinct policy-making competence and decision-making rules are applied for the enactment of the REPEU agenda:

1. Core climate policy-subsystem: The most significant setting for EU climate policy-making continues to be the framework for the adoption of regulatory policies through the ordinary legislative procedure. This subsystem has strong supranational components through the Commission’s right of legislative initiative; full involvement of the European Parliament (EP); a well-established practice of using trilogue for negotiating legislation; and, particularly, a strong policy-shaping role of environment, public health, and food safety (ENVI) and industry, research, and energy (ITRE) as the most frequently involved EP committees. Major components of EU climate action, such as emissions trading or legislation governing the promotion of renewable energies, have been adopted through this framework, justifying its labeling as a “core” subsystem (cf. Oberthür & von Homeyer, 2023). The REPEU agenda is based to a large extent on the further promotion and revision of legislative acts launched to a considerable part under the previous Fit for 55 package; these are relevant by covering questions of permitting procedures and setting of decarbonization targets for renewable energy, energy efficiency, fuel standards for vehicles and land use (Erbach & Foukalová, 2023). REPEU calls for increased stringency of some regulatory standards negotiated within this framework, particularly increasing energy efficiency targets to 13% in the corresponding directive and raising the target for renewable energy to 45% by 2030. Beyond these specific targets, the core policy subsystem remains central for enacting the REPEU agenda: Two of the three policy priorities proclaimed in the REPEU communication,

namely, renewable energy and energy efficiency, are enacted primarily through regulatory legislation within this policy-making framework.

2. “Smart investment” through executive cooperation: Beyond its three thematic priorities discussed above, the REPEU plan envisages additional investment of €210 billion until the year 2027, to be provided to member states in the form of grants and loans with the overall requirement of spending 37% of funds in climate-friendly projects and infrastructure. This component of the program makes use of the existing governance framework based on the RRF established as a response to the Covid-19 pandemic (European Commission, 2023b) and mainly involves two innovations. First, the requirement for member states to include new chapters in their RRFs covering its more stringent provisions for investment in projects described by REPEU; and second, the provision of additional funds from a mix of sources including the Brexit Adjustment Reserve, revenues from emissions trading and leftover funds from the application of the RRF to the previous stage of pandemic crisis management. These latter innovations are proposed by the Commission but prescribed in a regulation adopted through the legislative procedure involving consent by the EP (EP & Council of the European Union, 2023; cf. D’Alfonso, 2023; EP, 2023), and are further specified in Commission guidance and staff working documents (European Commission, 2022c, 2023a). Building mostly on existing institutional arrangements, revisions envisaged through REPEU are therefore channeled through a decision-making route involving a strong role of the Commission and EP. In this sense, the smart investment pillar of REPEU continues the EU’s approach of governing targeted green investment through a method of “constrained supranationalism” (Buti & Fabbri, 2023, p. 677).
3. Coordinative mechanisms through soft governance: Finally, the REPEU plan involves a range of measures, with no legally binding force, that are based on different forms of policy coordination, both in the realm of EU internal governance and external action. These include the revision of National Energy and Climate Plans as a form of soft governance, recommendations to member states to set incentives for fuel decarbonization through tax revisions, and the establishment of a new EU Energy Platform to coordinate energy purchases by member states during potential shortages (European Commission, 2022d, pp. 4, 5, 18). Further aspects of this category are components of the REPEU plan to be enacted as part of EU external action, such as its External Engagement Strategy (European Commission, 2022d, p. 5) and

components of its hydrogen strategy (Bonciu, 2022). While it would be fully precise to distinguish these different components as various specific subsystems, they are subsumed into one here as an accompanying set of coordinative governance processes to support synergies of action between member states for reasons of space. The only entirely new creation established by REPEU is the EU Energy Platform for coordinating energy purchases.

While this survey demonstrates the scope and complexity of the governance processes covered by the REPEU agenda, it shows that its enactment almost exclusively harnesses extant institutional frameworks. Two of its three policy priorities and the approach of smart investment are enacted by two established subsystems. Only the third of the REPEU targets, the diversification of fuel supplies, requires the creation of new policy-making frameworks while being enacted primarily through soft governance mechanisms.

From the vantage point of our theoretical model, two conclusions follow from this analysis for the evaluation of the REPEU governance process. One is that its diversified framework allows a parallel, rather than sequential, form of decision-making about different and potentially competing goals contained within the REPEU agenda. Instead of competing within the same venue and mode of decision-making, and prompting sequencing of issues at the top political level as envisaged by PET, different components associated with issues of regulatory legislation and investment spending are processed in different institutional formats with no direct link or interaction. This implies that any impacts of change resulting from the proclamation of the REPEU agenda are minimized; this applies particularly to the core climate subsystem, which has a longer and very stable trajec-

tory of decision-making about regulatory components of climate governance. A second insight is that the various components of REPEU are enacted in an institutional framework that preserves policy stability by associating established policies with governance processes that have high levels of supranational competence, legislative authority, and available financial resources. To demonstrate this, Table 2 presents an overview of the main policy measures promoted by REPEU within each of the three policy subsystems and their links to its three main policy priorities (i.e., promoting energy efficiency, a clean energy transition, and diversification of fuel supplies).

As shown in Table 2, the institutional asymmetry between the governance processes involved in the REPEU agenda privileges primarily those policy measures and targets already promoted under the previous EGD agenda. This applies in particular to the contents of the Fit for 55 package of legislative proposals proposed as a follow-up to the European Climate Law. Within this setting, the only immediate effect of REPEU is to add just one additional legislative proposal covering energy efficiency and building standards and introducing a more stringent target for renewable energy (EP, 2022; Wilson & Widuto, 2023), including its solar strategy (European Commission, 2022e). Through this form of legislative restraint, the Commission has used its control over the content and timing of legislation associated with the ordinary legislative procedure in a very targeted way, primarily to pursue and reinforce energy efficiency and renewable energy targets. By contrast, the potentially competing goal of diversifying the supply of fossil fuels is based on soft governance mechanisms and the EU Energy Platform as a coordinative platform for energy purchases.

Within the “smart investment” pillar, a more ambiguous balance between the three thematic priorities of

Table 2. Policy subsystems and related content of REPEU.

| | Policy measures proposed under REPEU (selection of most relevant components) | Related REPEU policy priorities, in order of relevance |
|---|--|---|
| “Core” climate policy (regulatory policy using ordinary legislative procedure) | <ol style="list-style-type: none"> 1. REPEU amendments to Fit for 55 2. Regulation for REPEU chapters in RRs 3. Regulatory aspects of solar strategy | <ol style="list-style-type: none"> 1. Renewable energy and energy efficiency 2. Renewable energy, energy efficiency, diversification of supply 3. Renewable energy |
| “Smart investment” (constrained supranationalism) | Adoption of revised RRs, including REPEU chapters | Renewable energy, energy efficiency, diversification of supply |
| Coordinative and external “soft” governance | <ol style="list-style-type: none"> 1. Energy platform for LNG purchases 2. Adjustment of the National Energy and Climate Plans 3. Recommendations (energy use, taxes) | <ol style="list-style-type: none"> 1. Diversification of supply 2. Renewable energy and energy efficiency 3. Energy efficiency |

REPEU is established, as member state investment through the RRF can, in principle, be used for all three priorities (and therefore, potentially also for investment in infrastructure for fossil fuel supplies). While this aspect can compromise the coherence between the regulatory and investment measures adopted through REPEU, shifts towards emergency measures opposed to the EGD agenda are limited through provisions with strong supranational components, namely, framework legislation governing the structure of new REPEU chapters, particularly in a regulation adopted by the EP on 27 February 2023 and further described in Commission Staff Working Documents (D’Alfonso, 2023; European Commission, 2022c, 2023a; EP & Council of the European Union, 2023). This guidance limits the political discretion to take such measures while safeguarding safeguards for the Commission’s oversight over the allocation of spending.

To summarize, the present analysis suggests that rather than prompting a disruption of existing policy venues and decision-making, REPEU builds on and preserves extant policy subsystems, particularly through three aspects: (a) the parallel processing of different policy-making priorities pursued by REPEU in separate institutional frameworks, (b) higher supranational competence in those areas that strengthen core components of the EGD agenda, and (c) legislative restraint by the Commission, enacted by limiting its proposals to the amendments covering REPEU chapters in revised RRFs and increased stringency of legislation covering renewables and energy efficiency.

4.3. Positive and Negative Feedback: Evaluating Policy Change in the Context of REPEU

Pulling together our insights about policy images, venues, and decision-making on the REPEU agenda, we turn to the review of policy-making results and their evaluation as positive or negative feedback. At the present stage, indications are that the plan has contributed to a moderate increase in the ambition of policies aiming at decarbonization while confirming extant policy-making trajectories rather than prompting disruption or policy shifts. More specifically, the following developments can be identified within each of the three subsystems.

For the first subsystem, regulatory legislation within the core climate policy system, REPEU was proclaimed only after a comprehensive package of legislative proposals was proposed for revision as part of the Fit for 55 package; this set of proposals had been launched as a follow-up to the adoption of the European Climate Law to achieve the interim goal of a 55% greenhouse gas emission reduction by 2030 (Erbach & Foukalová, 2023; Wilson & Widuto, 2023). Comprising 21 pieces of legislation, the package covers all of the aspects addressed in REPEU concerning the promotion of renewable energies and fuels, and measures to increase energy efficiency and energy savings in buildings and vehicles. Most

proposals were already moving towards or had reached the point of legislative agreement through trilogue (EP, n.d.). The main change introduced by REPEU for this ongoing process of legislative decision-making consisted of a single proposal resulting from the Commission’s decision to bundle all revisions envisaged in the three related fields of energy efficiency, energy performance of buildings, and the promotion of renewable energy into one directive. By limiting legislative revisions related to REPEU to a single proposal, the Commission has, therefore, effectively limited the degree of outside interference in ongoing negotiations about components of the Fit for 55 package. Moreover, it was agreed that the targeted proposals to revise legislation on buildings and energy efficiency would be addressed directly in ongoing negotiations rather than through a formal separate proposal by the Commission (EP, n.d.). The substantial effect of REPEU on climate and energy legislation is primarily the proposal to raise the target for renewable energy consumption to 45% by 2030 (up from 40% in the previous Fit for 55 package proposal) and accelerate progress towards greater energy efficiency. Here, the Commission proposal suggests increased reductions of 13% relative to the 2020 EU reference scenario (up from the previous 9% in the Fit for 55 package proposal) by 2030 (Erbach & Foukalová, 2023; Wilson & Widuto, 2023). Targeted amendments to ongoing legislative revisions under the Fit for 55 framework have, therefore, increased rather than reduced the EU’s climate action ambitions. At the time of writing, negotiations on both directives have reached an agreement between EP and Council and passed or are awaiting formal endorsement, in both cases containing more stringent targets than initially envisaged under Fit for 55 (namely, 11,7% energy savings by 2030, and 42,5% of renewable energy relative to overall energy consumption with an additional indicative target of 45%; EP, 2023).

Beyond these modifications specifically initiated through REPEU, other recently negotiated amendments to EU climate policies, such as emissions trading or the effort sharing regulation, have increased ambitions without direct influence by the REPEU package. The only policy modification suggesting a weakening of climate ambition is the decision to sell carbon allowances from the market stabilization reserve of the emissions trading. Its purpose is to raise financial resources to support member state investment under the smart investment pillar through revised RRFs of member states. This aspect is the main indication of an interaction between the regulatory and investment pillars of REPEU. It is also an indicator of a shift from the setting of regulatory constraints on carbon emissions to the provision of positive financial incentives used for investment, observed previously as part of pandemic crisis management (D’Alfonso, 2022; Ekerbout et al., 2020).

Regarding the second subsystem, namely, “smart investment” through executive cooperation, the introduction of REPEU chapters into RRFs submitted by

member states introduces change by setting the target for climate-related investment to 37%. Another aspect that potentially competes with decarbonization targets as discussed above is the possibility of short-term investment into additional infrastructure for ensuring supply with LNG, as detailed in Regulation 2023/435 and a Commission guidance document (European Commission, 2023a). As the final deadline for submission of revised RRP is 31 August 2023, the full extent of modifications effected by these new criteria remains to be evaluated at the time of writing. Two factors, however, limit policy shifts to more incremental change through several provisions. The first is the limited financial resources for financing the initiative, raised from a combination of unspent reserves from the previous NextGenEU program, the Brexit Adjustment Reserve, and the sale of carbon allowances (European Commission, 2022f). The second is that the aspect most likely to prompt a deviation from previous policy-making (the exemption of funding from the “do no significant harm” principle) is limited in the relevant Regulation 2023/435 of 28 February 2023. Here, it is prescribed to apply only with a temporal limit to end in 2026 and after demonstrated efforts by member states to limit potential harm and provide proof for the necessity and proportionality of measures (EP & Council, 2023). Setting a deadline and encouraging member states to submit revised plans by April 2023 adds an incentive to propose additions and complementary measures to ongoing projects, further limiting the probability of abrupt policy shifts.

As for the latter subsystem, coordinative governance, the main element of soft governance introduced by REPEU is the establishment of an EU Energy Platform to coordinate purchases of LNG by member states. However, so far, it has not become a source of major policy change at the EU level, particularly as it is primarily a coordinative and advisory instrument and has no legal authority over how member states decide to organize their energy supply. The question of how decision-making at the national level has affected investment in infrastructure to secure energy supplies and how far it signifies a return of LNG and other fossil fuels is beyond the scope of this article.

To summarize, only a few aspects of the ongoing enactment of REPEU indicate a disruptive shift in policy-making away from key goals of the EGD agenda; policy stability and negative feedback, as defined by PET, prevail over any dynamic of far-reaching policy change through positive feedback, at least on the EU level. Especially when applied to spending and budget policy as a core field of application of PET, the present case study presents itself as one characterized by incremental change rather than punctuation. In a nutshell, the main innovation introduced by the package is a highly targeted and rather punctual addition by the Commission to the ongoing revision of regulatory legislation within the Fit for 55 package, mostly reinforcing policy goals endorsed by the EGD. Another aspect of change is the push towards further climate policy integration into the

investment and economic recovery plans under the RRF, promoted through the incremental expansion of funds and by increasing the stringency of climate-related conditionality in the dedicated REPEU chapters of RRP.

5. Conclusion: Punctuated Equilibrium Meets EU Policy-Making Stability

Applying PET to the present case of EU climate and energy governance is a critical test for understanding policy change in this field of policy-making and for weighing arguments proposed by this theory for explaining the high degree of resilience and continuity observed in the empirical analysis. The present case seems well-suited to test the impact of exogenous events against the resilience of intra-systemic factors: As an external shock, the Russian war of aggression is a disruptive event of unusual magnitude with substantial and ambivalent implications for energy and climate policy involving considerable degrees of uncertainty. However, this shock is exerted on the EU as a political system with relatively strong institutional and political safeguards against abrupt policy shifts; in the present case study, it is also reviewed in a field of policy-making with a strong record of policy stability and past trajectory of policy-making leading to the incremental buildup of regulation aiming at decarbonization. Against this background, the Commission, in particular, can be viewed as an agent with a strong interest in further promoting and maintaining policy stability for the enactment of the EGD agenda as one of its six headline ambitions during the tenure of its current leadership.

Considering these aspects, the present analysis demonstrates both the significance of the war as an exogenous shock and the relevance of intra-systemic factors within the governance system of the EU that mitigate a potential policy shift. As the survey of policy documents shows, the impact of the war on the political attention and agendas of the top EU institutions is clearly expressed but largely absorbed in the more specialized policy subsystem of EU climate policy. Here, the main effect is a moderate push for more stringent regulation and increased funds to promote “green” investment. This resilience of the EU climate and energy governance process is based on three main factors: first, the pivotal role of the Commission as a mediator between the macropolitical level and policy subsystems and, more specifically, its insistence on key components of the EGD agenda and decision to limit revisions to specific, targeted amendments; second, the harnessing of a set of extant governance processes to promote different and even potentially competing policy goals through an approach of parallel processing; and finally, the successful integration of EGD targets into a broad range of economic and energy policies through the adoption of a wider geopolitical policy image. At the theoretical level, all three of these points (the quality of linkages between macro-politics and subsystems,

different forms of information processing, and adaptation of policy images) are considered by PET as factors for explaining ongoing policy stability against punctuation. The present case demonstrates their weight for the case of EU energy and climate governance in a particularly challenging context of disruptive events.

For the future of action against climate change, the implications of this case study are ambivalent. Probably against expectations, the EU continues to strive for carbon neutrality even as increases in military spending are recognized as critical across member states. However, with the growing relevance of “green” investment and the corresponding turn towards a more hybrid and broader approach of the EU to climate action, critical tests lay ahead with regard to the horizontal and vertical coherence of policy-making. This point particularly applies to ongoing and future decisions by member states to shut down the use of fossil fuels and commit to the achievement of zero-carbon targets.

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Conflict of Interests

The author declares no conflict of interests.

Supplementary Material

Supplementary material for this article is available online in the format provided by the author (unedited).

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