The EU will not achieve its climate goals without transition

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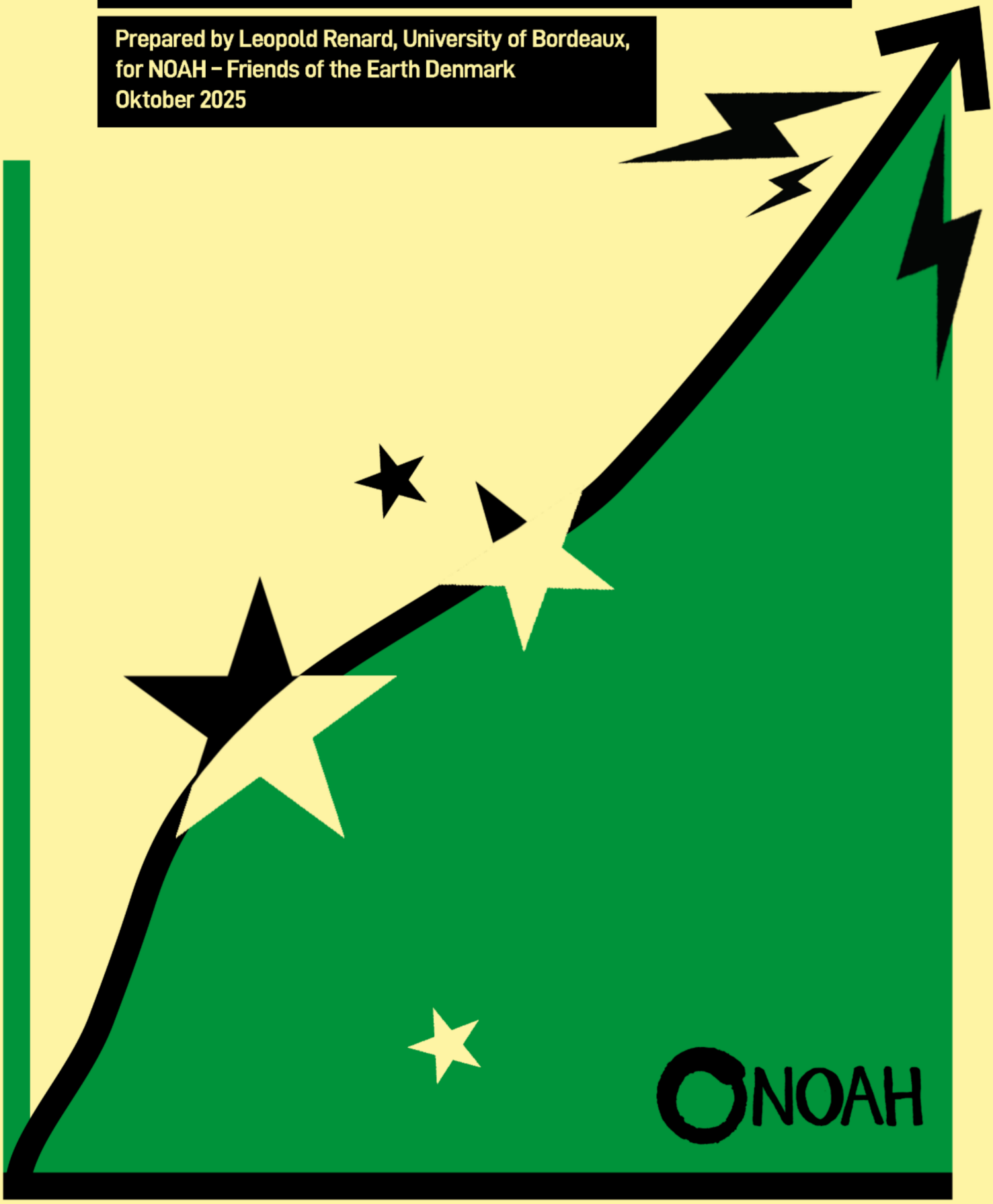

Chapter 1

Liberal environmentalism as an obstacle to the development of ambitious and effective policies

Liberal environmentalism or Green Liberalism : Paradigm that asserts that economic growth and environmental protection are compatible, preferably combined.

Ecomodernism: It is an environmental philosophy which argues that technological development can protect nature and improve human wellbeing through eco-economic decoupling.

Eco-economic decoupling: Refers to the idea that a nation's economic growth (typically measured by GDP) can increase while its environmental impact either decreases or stabilizes.

https://www.cambridge.org/core/journals/global-sustainability/article/liberal-environmentalism-and-climate-change-in-the-polycrisis/01325DB672957A94796E8B1EBCE47F20?utm

1.1 Liberal environmentalism

David Krogmann: Published online by Cambridge University Press 17 March 2025

Article from Romain Felli "Liberal environmentalism and climate change in the polycrisis", published in Global Sustainability (Cambridge University Press).

The author argues that, although climate change has worsened and the limits of international climate governance are evident, the norms of "liberal environmentalism" persist. Rather than being challenged, they are reproduced within institutions..

Extracts:

“Liberal environmentalism – the idea that economic growth and environmental protection are not mutually exclusive, but co-constitutive – has provided the normative basis for international climate governance since the 1990s.”

«This article argues that, contrary to such expectations, the increasingly obvious urgency of climate change has not been met with a rethinking of how global climate policy is carried out between nation states and multilateral institutions. »

The climate governance norms specific to liberal environmentalism are firmly rooted in institutions:

- These norms consistently link economic growth with environmental protection, based on the assumption that it is possible to grow the economy while protecting the environment, without questioning the current economic model.

- They favor market-based solutions like the ETS, which are false solutions.

  The CBAM (Carbon Border Adjustment Mechanism) also poses a problem by focusing primarily on protecting European industry, thereby encouraging a ‘rotectionist approach rather than ambitious international cooperation.

- The strength of the green liberalism doctrine is such that it prevents a radical critique of capitalism and productivism. The logic of growth and the dominance of large corporations are not questioned.

The beginnings of a liberal environmentalism model can be observed as early as the 1990s. The EU liberalized its energy markets (gas, electricity) by removing local public structures. This structural logic favors market interests over citizen initiatives or decentralized collective action.

1.2 The problem of the competitiveness principle in the neoliberal framework:

It becomes a structural obstacle to ecological ambition instead of enabling the design of ambitious and innovative environmental policies.

Economic competitiveness aims to maintain or strengthen the position of European companies in global markets. This implies:

- Cost reduction: in terms of energy, labor, but also regulation. Environmental, social, or fiscal rules can increase costs for businesses. The less restrictive these rules are, the lower the costs.

Solutions:

- This is therefore contradictory with an ambitious ecological transition: to reduce the harmful effects caused by human activity, more stringent regulation is needed (standards, taxes, bans).

- And obviously key sectors of the economy, such as energy and agriculture, must be profoundly transformed to become sustainable.

- Environmental investments often require strong public financial commitment, but such investments cannot materialize within a neoliberal system focused on reducing member states’ budget deficits. (The Stability and Growth Pact acts as a barrier to investment, a pact biased in favor of fiscal austerity)

Summary:

The EU is therefore structurally trapped in the logic of competitiveness; its institutions, treaties, and legal frameworks are built around principles that prioritize competition, market freedom, and fiscal discipline above all else.

As an alternative to this system, what is needed is fair and healthy competitiveness, with a European Union that genuinely acts as a regulator of markets.
Massive investment in environmental projects and policies is essential, but to make this possible, the EU's structure must be profoundly reformed. (see below in another section)

Concrete examples of the perverse effects of the liberal environmentalist system:

https://www.theguardian.com/environment/2025/jun/26/eu-rollback-on-environmental-policy-deregulation-european-green-deal?utm

26/06/2025 Ajit Niranjan

1.2.1 Removal of the legal liability obligation for polluting companies

Extract:

« The Commission's plans [...] delay corporate due diligence rules by one year; remove a requirement to conduct in-depth impact assessments; scrap a civil liability clause that would make it easier to sue companies; and exclude about 90% of businesses from the carbon border adjustment mechanism."

Corporate power as a structural obstacle

1.2.2 Deadline granted to automobile manufacturers to reduce their emissions

Extract:

« In the first six months of the new European Commission mandate, the EU also delayed a law to stop deforestation in supply chains by one year, gave carmakers two extra years to meet pollution targets »

(New commission since 1/12/2025)

Corporate power as a structural obstacle

1.2.3 Abandonment of the ban on greenwashing

The text aimed at banning greenwashing in advertising was abandoned at the last moment during the negotiations.

Extract: “The cancellation of the anti-greenwashing law this week came after EPP and far-right lawmakers separately wrote to the European Commission to withdraw the bill. The EPP later celebrated the bill’s withdrawal as ‘a win for European companies’.”

Political instability that weakens the EU’s action

Chapter 2

regulatory capture

The role of regulatory capture

Regulatory capture occurs when an authority or regulator that is supposed to protect the public interest is influenced, dominated, or co-opted by the industries it is meant to oversee. This concept, formulated as early as 1971 by George Stigler, explains how well-organized industries manage to steer regulation in their favor.

Geroge stigler: was an American economist. He was the 1982 laureate in Nobel Memorial Prize in Economic Sciences and is considered a key leader of the Chicago school of economics.

Extract:

"The concept of regulatory capture, once developed to delineate how monopolistic actors' interests enduringly manage to shape their regulatory environment [...] probably has to be expanded to the political realm as such, today." (p. 11)

Capture mechanisms in the EU

2.1 Creation of standards by industrial actors

Example: the EU ETS system (European carbon market). Private actors (firms, tailored certifiers — MRV intermediaries) are at the heart of governance. This creates risks of regulatory capture because rules are defined or adjusted according to their interests. The ENTSOG's TYNDP (Ten-Year Network Development Plan) can also be mentioned.

2.2 "revolving door"

European officials regularly move into positions within the industries they used to regulate ,creating institutional affinity towards private interests..

Definition:

« the "revolving door" refers to the movement of individuals between public sector roles, like government officials or employees, and private sector positions, often in industries regulated by the government, such as lobbying firms. »

Examples of former officials turned lobbyists:

Marcus Lippold

Former "senior energy economist" at the Commission's DG Energy, previously from ExxonMobil (2008), then put on sabbatical to join Saudi Aramco (2015). He continued to influence the Commission on oil stocks from MOL/Aramco.

Jean Arnold Vinois

Former Director of Energy at the Commission, now a consultant at FleishmanHillard and the Jacques Delors Institute, a think tank close to energy interests.

2.3 Lobbying pressure

Companies have massive technical and financial resources to influence the drafting of regulations, imposing frameworks favorable to their interests (monopolies, disguised subsidies, weak environmental constraints).

Examples:

FTI Consulting, Burson Cohn & Wolfe, Nove (public affairs firms):

These companies received between €300,000 and €700,000 each in 2023-2024 from oil clients such as ExxonMobil, ConocoPhillips, Equinor… to influence energy policies at the EU level, even while defending positions contrary to climate commitments.

https://www.theguardian.com/environment/2025/apr/25/public-affairs-firms-in-europe-enable-pollution-by-lobbying-for-big-oil-says-analysis?utm

CEPS (Centre for European Policy Studies):
A think tank funded by energy giants (Equinor, ExxonMobil). CEPS members held private meetings with European Commission officials in November 2019, three weeks before the announcement of the European Green Deal, to propose changes aimed at reducing emission standards for vehicles and extending the Emissions Trading System (ETS) to road transport.

https://influencemap.org/report/An-InfluenceMap-Note-ExxonMobil-Lobbies-the-EU-Commission-add01200dc694b00e9ac4bebf660227b?utm

Chapter 3

A regulatory capture reinforced by the functioning of the EU

Article: https://link.springer.com/article/10.1007/s10784-024-09651-z?utm

Kyle S. Herman (2024), *"Intermediaries and complexity: assessing emissions-based governance in the European Union's EU-ETS"*

Summary:
The multiplication of intermediaries, such as the MRV (measurement, reporting, verification) system (used within the framework of the Emissions Trading System – EU-ETS), can blur the chain of responsibility, create grey areas, and thus facilitate the influence of private interests on public decision-making (therefore facilitating capture). These intermediaries do not necessarily improve the effectiveness of climate policy control. This leads to a reflection on the real logic of the European system

Extract:

"Some intermediaries are so close to the private sector, there is evidence for potential regulatory capture." (Section 1 & 5.3)

The dispersion of roles (national, European, public, and private actors) within the implementation system of European environmental policies is typical of a fragmented governance in which it becomes difficult to hold anyone accountable.

The concept of "fragmented governance" « Fragmentation refers to a situation where governance arrangements are institutionalized in different centers or arenas without a clear overarching hierarchy. »

A concept attributed to Frank Biermann: a political scientist specializing in global climate governance. He has worked extensively on issues of fragmented governance in the environmental and climate fields.

Examples of private actors: accreditation bodies, audit firms, energy consultants.

Description of intermediaries by Herman

« Consultants R and V: […] KPMG offers carbon management services, including advisory on EU ETS compliance, carbon accounting, and regulatory strategy. PwC provides advisory services for energy and carbon management … Deloitte offers comprehensive advisory services on compliance with emissions trading systems like the EU ETS … »

Chapter 4

Experts' opinions on European environmental policies

https://ieep.eu/wp-content/uploads/2025/06/Green-Deal-Barometer-IEEP-2025.pdf

European Green Deal Barometer 5th edition: Expert insights into the external spillovers of key EU policies June 2025

«IEEP interviewed 165 sustainability experts worldwide via a 15-minute online survey. About four in five (81%, n=133) live in EU countries, and about one in five (19%, n=32) live in countries outside the EU. 73% of respondents work on EU sustainability policies, while 27% work on international policies, policies on countries outside the EU, or on multiregional policies. The stakeholder sample is diverse, with respondents working in different sectors from academia and think tanks (33.9%) to NGOs and foundations (27.3%), from the public administration (14.5%) to the private sector (19.4%). The remaining 5% of respondents work, for example, in media and other uncategorised organisations. »

Inconsistencies of the EU

Extracts: « Only 14% considered the EU external policies to be aligned with the European Green Deal, whereas 29% of expertshold a neutral position »

« When asked about which EU policies should be revised to improve coherence and consistency, the most selected ones are: energy, trade and cooperation for development »

This reveals a major gap between the EU's internal ecological ambitions and its external actions.

Climate justice: the case of Global South countries

- Moreover, 54% of non-European experts believe that the EU is rather closed to external contributions regarding the design and implementation of the Green Deal. Countries of the Global South are excluded from climate governance and cannot participate in decisions that affect them > an inconsistency from the perspective of climate justice.

- The CBAM intended to reduce emissions from imported products, imposes costs on countries of the Global South, which are historically less responsible for climate change.

  "85% of experts believe that CBAM revenues should be recycled to contribute to international climate needs."

"40% of non-European experts feel that the EU is unwilling to cooperate with emerging economies to support their green transition."

The Regulation on Deforestation-free Products

(will enter into force in December 2025)

The goal of the EUDR is to prevent products linked to deforestation and forest degradation from entering the European market. However, this project risks impacting small producers:

“60% of experts identify the main negative effect as small producers lacking the resources to comply with EUDR requirements.”

Similar to the CBAM, there is a risk of a “diversion effect” where producing countries might increase their exports to less regulated markets than the EU, thereby maintaining deforestation, emissions, and biodiversity loss.

The Critical Raw Materials Act (CRMA):

It is an initiative by the European Union aimed at securing the supply of essential raw materials for ecological and digital transitions, while reducing the EU’s dependence on third countries.
“73% of experts believe that the environmental and social impacts are not properly taken into account in the CRMA.”

Chapter 5

Corporate power as a structural obstacle: ENTSOG

https://www.acer.europa.eu/sites/default/files/documents/Official_documents/Acts_of_the_Agency/Opinions/Opinions/ACER_Opinion_05-2024_ENTSOs_Scenarios_TYNDP_Guidelines.pdf

ACER (Agency for the Cooperation of Energy Regulators) calls for improvements in ENTSOs' 2024 draft TYNDP scenarios to comply with its Framework Guidelines

1.10.2024

5.1

ACER report criticizes the compliance of the TYNDP 2024 scenario report produced by ENTSO-E and ENTSOG with the TYNDP Scenarios Guidelines.

Indeed, according to the report, the scenarios developed do not meet either the 2030 emission reduction targets or the 2050 climate neutrality objective, which undermines the credibility of the European Green Deal.

Extract: "The draft scenarios are not compatible with the EU's climate 2030 targets for energy and climate and its 2050 climate neutrality objective."

5.2

The scenarios are based on outdated National Energy and Climate Plans (NECPs), even though new versions were already in preparation. (The data collection for the TYNDP 2024 report was finalized in the first quarter of 2023, before the publication of the updated NECPs expected in summer 2023.)

Definition:

NECPs are the strategic planning instruments that each EU Member State is required to submit to the European Commission. They therefore form the basis for all forward-looking modelling at the European level.

Extract:

https://2024.entsos-tyndp-scenarios.eu/scenario-descriptions-and-storylines/?utm

« For TYNDP 2024, the dataset collection is finalised in 2023 Q1 [2], prior to the publication of the draft updated NECPs, which were due to be published in summer 2023. Consequently, differences between updated NECPs and the datasets are anticipated. »

5.3

The use of outdated data in the TYNDP 2024 report raises several critical issues:

- Revised national ambitions: The updated, more ambitious climate and energy goals of some Member States are not reflected in the report.

- Outdated scenarios: Scenarios that are not up to date produce projections that do not align with current energy realities. Decisions based on such projections risk being ineffective or even counterproductive.

- Democratic transparency issue: There is a lack of respect for decisions that have been debated, voted on, and supported by elected officials and citizens.

- Risk of conflict and distrust: This could fuel tensions between the EU and Member States and contribute to growing scepticism towards the EU.

- Potential manipulation: The report may have been deliberately skewed to serve private interests (this is a plausible theory, although I have not yet done enough research to elaborate on it).

Proposals for TYNDP 2026

https://ember-energy.org/app/uploads/2024/10/Ember-response-to-the-ENTSO-E-ENTSOG-TYNDP-2024-storylines-consultation.pdf?utm

EMBER:

Ember is an independent, not-for-profit energy think tank that aims to shift the world to clean electricity using data. It gathers, curates and analyses data on the global power sector and its impact on the climate, using cutting edge technologies and making data and research as open as possible.

Main Criticism: Problem in the TYNDP Scenario-Building Process
Lack of diversity in the “Green Ambition” driver.

“Green Ambition” refers to the level of political and societal commitment to achieving climate objectives.

Definition: Drivers are key influencing factors used to construct contrasting and realistic scenarios, helping to plan necessary energy infrastructures (such as networks, production capacity, and storage).

In short, drivers are the forces that shape and guide the evolution of the energy system and serve as the foundation for policymakers to prepare for the future.

Current Situation:
The report explains that ENTSOG and ENTSO-E use a top-down method to define political, societal, and technological choices (called high-level drivers).

Definition of top-down: A top-down approach is a method where decision-making and direction come from the top of the hierarchy, typically from leadership or management,and are then passed down to lower levels.
In this specific case, the top-down approach means that ENTSOG's scenarios/drivers are directly aligned with the EU's single climate trajectory, without incorporating alternative assumptions or exploring other potential pathways.

Among these drivers, the « Green Ambition » driver does not reflect multiple possible trajectories, but only a single one: that of the EU's climate objectives (carbon neutrality by 2050 and a 55% reduction in greenhouse gas emissions by 2030).

Consequences:

1. Holding on to the Green Ambition driver and its single trajectory prevents the exploration of more ambitious futures, such as a 90–95% reduction in emissions by 2040. A pathway that would be more in line with the Paris Agreement.
2. From a democratic standpoint, this approach is problematic, as it disregards recent decisions promoted by various countries through democratic processes.

Suggestion: Rethink the scenario-building process.Possibly through a bottom-up approach?

A bottom-up method would start from local data and build a global vision from the ground up.
It would also be valuable to include a variant scenario where emissions reduction occurs more rapidly, with a more ambitious target by 2040 (a 90–95% reduction), which would help limit both:

- Climate risk (by avoiding carbon budget overshoot),
- Technological risk tied to heavy reliance on carbon removal or negative emissions technologies after 2050.

Extract:

"As a result of these constraints, in previous TYNDP cycles it has not been possible to remain within a Paris compatible GHG budget by 2050 (by the ENTSO's own measure) without significant overshoot. We believe that contrasting choices should be applied to this driver in the form of a storyline that more rapidly mitigates

emissions after 2030, minimising the carbon budget overshoot. Such a variant would simultaneously minimise climate risk and the technological risk that is implicit in assuming that large-scale negative emissions can be deployed post-2050.”

Chapter 6

Institutional Inertia

Two key problems:

1. **Path dependence**: is a concept in the social sciences referring to processes in which past decisions or events constrain future decisions and developments.
2. Lack of integration and coordination between political and administrative sectors.

https://www.tandfonline.com/doi/full/10.1080/03932729.2021.1956827?utm

https://wires.onlinelibrary.wiley.com/doi/full/10.1002/wcc.863?utm

EU Member States often layer climate policies on top of one another without this reflecting any deep structural transformation toward carbon neutrality. This behavior aligns with the concept of path dependency, fragmented governance, or a performative logic aimed at displaying climate action without enacting real systemic change.

Examples of Path Dependency in EU Environmental Policies

The Emissions Trading System (ETS)

> Introduced in 2005, it remains the central pillar of EU climate policy.

> Despite its well-known limitations, the ETS continues to dominate emission reduction strategies.

The EU continues to rely on the same core instrument instead of exploring a deeper overhaul of the system.

The continued use of complex legislative packages

Since the 2000s, the European Union has adopted climate policies in the form of “climate packages”: a set of laws, directives, regulations, and targets bundled together and adopted collectively to structure climate action.

Examples:

- The 2020 Climate and Energy Package
- The “Fit for 55”

These packages are highly technical and difficult for the general public to understand. They require legal, economic, and technological expertise to be effectively debated. Moreover, decision-making becomes monopolized by experts, civil servants, and specialized lobby groups.

Problem of sectoral fragmentation (policy silos)
Environmental challenges are systemic in nature:

Climate, biodiversity, pollution, energy, agriculture, and finance are all deeply interconnected.

Yet in practice, ministries, Directorates-General (DGs) of the European Commission, and national agencies still operate in silos , each with its own logic, tools, and timelines.

https://onlinelibrary.wiley.com/doi/full/10.1111/jcms.13388?utm

Journal of Common Market; **Studies Resilience of the Silo Organizational Structure in the European Commission;** Sevasti Chatzopoulou**.**

This article describes how the DGs within the European Commission remain highly autonomous entities, each defending its own sectoral interests.

Even though the article was published in 2022 and some examples may be somewhat outdated, it offers valuable insight into how sectoral governance still operates today.

In 2015, then-Commission President Jean-Claude Juncker launched major organizational reforms within the European Commission. His goal was to strengthen the political role of the Commission by centralizing decision-making.

This effort aimed to address administrative fragmentation and the lack of coherence across EU policies.

Extracts:

“What he [Juncker] meant by a political Commission was a much stronger direct influence of the political level on the work of the services, much stronger than ever before.”

“I want us to overcome silo mentalities by working jointly on those areas where we can really make a difference.”

Juncker introduced top-down reforms, meaning reforms imposed from the top, which aimed to:

- Strengthen the political power of the leadership
- Improve coordination between the Directorates-General (DGs)
- Eliminate silos (i.e., the compartmentalization of DGs working in isolation)
- Promote more integrated and coherent policies

More specifically, the reforms sought:

- To reinforce the political role of the European Commission,
- To centralize power around the President, Vice-Presidents, and the General Secretariat
- To better coordinate actions between the various DGs
- And to break the silo logic, that is, the tendency of DGs to work in isolated ways without real cooperation

Limits and Resistance:

- Silos remain firmly in place: Each DG continues to operate according to its own logic, expertise, networks, and resources.
- Internal resistance: Staff fear losing autonomy, control, and connection with their usual stakeholders.
- Cultural differences between DGs(related to training backgrounds, national origins, or administrative practices)hinder integration.
- Peripheral DGs (like SANTE or AGRI) have struggled to make their voices heard, creating tensions and competition.

In summary, despite the reforms, DGs remained highly attached to their thematic competence (environment, agriculture, health, industry...),Interest networks (NGOs, industry groups, Member States),Administrative identity and area-specific expertise.

This is known as « portfolio logic»: each DG defends its own domain, resources, indicators, and priorities,often at the expense of inter-DG collaboration.

Extract:

“Despite the strong message in the Juncker reform regarding increased collaboration, in reality, collaboration requires a change in organizational culture.”

Certainly, some positive impacts of the Juncker reforms can be noted:services are now required to report to the Vice-Presidents, with stronger political oversight.However, even though there are more interactions between the DGs and with the leadership, the roles and division of tasks within the DGs remain unclear.

This shows that even with internal reforms, the system remains largely unshaken.Therefore, it is necessary to focus on truly alternative solutions.

Chapter 7

Breaking with institutional inertia in the EU: Towards horizontal and cross-sectoral governance

The ineffectiveness of Juncker's reforms can be explained by the fact that they rely primarily on vertical, centralized, and hierarchical governance. Yet a horizontal and cross-sectoral governance model, where collaboration between ministries (or DGs) and local actors is essential, is needed to overcome silos.

To implement this method, a “whole-of-government” approach is needed (a collaborative approach where multiple government agencies and departments work together to address complex issues or achieve common goals.)

Line of thought:

Elinor Ostrom (1933–2012) was an American political scientist and economist. She became the first woman to receive the Nobel Prize in Economic Sciences in 2009 for her analysis of economic governance, particularly of the « commons ».

Definition:
Commons refer to shared resources (whether natural, digital, or social) that are collectively managed by a community according to rules it defines for itself.

Examples: A community forest, or simply an encyclopedia like Wikipedia. In the context of the EU, public policies such as climate policy can also be seen as commons.

Eight key principles for the successful governance of commons:

https://earthbound.report/2018/01/15/elinor-ostroms-8-rules-for-managing-the-commons/

1. **Clearly defined boundaries** – The resource and its users must be clearly identified.
2. **Rules adapted to local needs** – The rules for using the commons should fit local conditions and needs.
3. **Collective-choice arrangements** – Users can participate in modifying the rules.
4. **Monitoring** – Monitors are accountable to the users or are the users themselves.
5. **Graduated sanctions** – Rule violators face graduated penalties depending on the seriousness of the offense.
6. **Conflict-resolution mechanisms** – Quick and low-cost methods for resolving conflicts must be available.

7. **Recognition of rights to organize** – The community's right to self-organize must be respected by external authorities.
8. **Nested enterprises** – For larger commons, governance should be organized in multiple layers, from local to global.

https://library.oapen.org/bitstream/id/2e3f561d-b1f5-4e7c-8da3-ccab0f00501d/UWP-033-REVISED.pdf

Peer to Peer: The Commons Manifesto; Published by University of Westminster Press; Text by Michel Bauwens, Vasilis Kostakis, and Alex Pazaitis 2019

The objective of this manifesto is to promote the concept of Peer-to-Peer (P2P) as a central model in a post-capitalist transition centered on the commons.

The concept of P2P originally comes from the digital world. But since the 2000s, the social sciences have adopted it to rethink society in a new way.

Definitions:

1 In social sciences, "peer-to-peer" (P2P) refers to a system or relationship where individuals or groups interact on an equal footing, sharing resources, information, or support without a central authority or hierarchical structure.

2 Corresponds to the digital definition of peer-to-peer (just for knowledge):

https://eujournalfuturesresearch.springeropen.com/articles/10.1007/s40309-016-0092-2?utm Peer-to-peer work in the digital meaning society 2050

By juho Ruotsalainen, Sirkka Heinonen, Joni Karjalainen & Marjukka Parkkinen:

« Peer-to-peer production can be defined as a distributed network of free participation of equal partners . Participants are engaged in the production of common resources without monetary compensation as the key-motivating factor. Peer-to-peer production creates Commons (shared, free resources), which rely on social relations rather than pricing mechanisms or managerial commands to allocate resources.Because peer-to-peer production is based on informal social relations, its organisation model can be described as *open collaboration of self-organising communities*. »

The manifesto does not detail specific European initiatives, but it outlines a vision and a strategy applicable to European policy that we can use.

If commons-based approaches were applied to environmental governance, they could enable a transition toward a more sustainable ecological model:
> **A regenerative environmental system**, where natural resources (forests, water, energy, biodiversity) are collectively managed and preserved through shared responsibility.
> **Citizens as active stewards of ecosystems**, not just consumers or voters, but engaging directly in conservation, monitoring, and sustainable practices.

> **Institutions become facilitators**, offering technical, legal, and financial support to empower local and regional ecological commons initiatives.
> **Environmental policy becomes horizontal and collaborative**, bringing together different sectors (energy, transport, digital, agriculture, etc.) to co-produce integrated solutions.

Examples:

The Partner State in a European context

The manifesto recommends a state that empowers citizens to directly participate in value creation through the commons, via open public infrastructures, contributive platforms, etc.
In the European context, a commission or a member state could act as a facilitator of commons-based networks, subsidizing digital and ecological commons, rather than merely regulating the market or redistributing resources.

The "commons" imply a profound shift in governance:

Horizontal and cross-sectoral governance:
Directorates-General (DGs) would no longer operate in isolated silos .

Instead, they would adopt networked, project-based working methods, focused on supporting shared commons: local renewable energy, shared mobility, open data, community health, and more.

Transversality and inter-DG cooperation
For example, a public renewable energy platform project would involve:

- DG ENER (energy),DG CONNECT (digital), DG REGIO (regional policy), DG CLIMA (climate), DG GROW (industry), and even DG EMPL (employment) if green jobs are linked to it.

Instead of dividing responsibilities, they would co-produce a common policy, following a principle of functional and collective subsidiarity.

This would not necessarily involve abolishing the current DGs, but rather: Changing the way they operate,encouraging inter-DG units to manage certain ‘European commons’, and Involving citizens, local authorities and associations in decision-making processes.

In summary, this mode of governance enables a holistic approach to environmental challenges. Thanks to the commons-based method, different fields of action and expertise converge toward a common goal, rather than operating in silos.

Moreover, this transformation does not require dismantling existing institutions, but rather rethinking and reshaping their structure. notably by promoting horizontal cooperation, functional subsidiarity, and the co-production of public policies.

In a collaborative context like the commons, the question is not who has the right to act, but rather who is best positioned to act effectively. The role of European institutions would therefore shift from being decision-makers to becoming coordinators of common networks.

Example: An environmental project could be initiated by local actors or community associations. The Commission would provide technical and financial support, and the project would then take shape with various Directorates-General working together in a coordinated way to ensure its success

A side note on the principle of subsidiarity

Definition: Subsidiarity is a principle of social organization that holds that social and political issues should be dealt with at the most immediate or local level that is consistent with their resolution.

There is indeed a principle of subsidiarity within the EU, but in its current form, it is primarily designed as a vertical relationship between the EU and its Member States. Even though the EU explicitly recognises the existence of different levels of governance within Member States (regional, local), in practice ,despite the legal basis, subnational actors are left outside the scope of action.

Article 5, paragraph 3 of The Treaty on Europen Union:

« Under the principle of subsidiarity, in areas which do not fall within its exclusive competence, the Union shall act only if and in so far as the objectives of the proposed action cannot be sufficiently achieved by the Member States, either at central level or at regional and local level, but can rather, by reason of the scale or effects of the proposed action, be better achieved at Union level. »

https://cadmus.eui.eu/server/api/core/bitstreams/6e46b86d-3fb3-5335-8270-65d7c616a188/content

Michèle Finck

Finck highlights that, even after the explicit inclusion of local and regional levels in Article 5(3) of the TEU, European law does not grant a meaningful role to subnational authorities. In practice, subsidiarity remains structured around the Member States, allowing them to retain control over the relationship with the EU.

Extract:

« My short essay challenges this perception of subsidiarity. The main argument that is developed is that the core legal provisions that deal with subsidiarity in EU law do not allocate any meaningful role for subnational authorities (‘SNAs’). 2 This is so, it is argued, because subsidiarity remains anchored in an understanding of the European Union and its legal order as composed of and shaped by the EU and the States to the exclusion of any other actor. »

Subsidiarity vs. Autonomy in the EU:

https://kluwerlawonline.com/journalarticle/European%2BPublic%2BLaw/28.2/EURO2022014?utm: European Public Law; Carlo Panara; 2022

The principle of subsidiarity, as interpreted by the Court of Justice, is not a guarantee of autonomy for Member States or local authorities. Its role is primarily to enhance the efficiency of governance. In practice, autonomy is safeguarded by the Treaties themselves, while subsidiarity is reduced to a secondary principle.

The EU therefore uses the principle of subsidiarity as a criterion of good governance rather than as a guarantee of local democracy.

https://journals.sagepub.com/doi/10.1177/1781685819843248?utm : Subsidiarity in the EU: Reflections on a centre–right agenda; Federico Ottavio Reho; 2017

Subsidiarity is often instrumentalized by the EU to legitimize its interventions, rather than to protect local autonomy. Efficiency arguments are invoked to justify EU action, even when Member States or local authorities could act themselves.

The author cites centre-right parties as an example of those criticizing the use of subsidiarity merely as a criterion of efficiency. However, these parties, like far-right groups, are primarily concerned with the loss of autonomy of Member States and regions for identity-related reasons, whereas environmentalists and progressive groups emphasize the democratic and environmental risks created by the instrumentalization and misapplication of the subsidiarity principle.

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