

Governing by Enabling in Multilevel Systems: Capacity Building and Local Climate Action in the European Union

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Abstract

This article investigates whether, how and under what conditions European Union (EU) capacity-building programmes actually contribute to improving the action capacity of target actors in view of common policy objectives. The empirical analysis focuses on the European Local Energy Assistance (ELENA) technical facility that aims to enhance local authorities' project development and management capacities in the field of renewables and energy efficiency. Our findings show that favourable contextual conditions and the actual functional demand for more capacities cannot explain the implementation dynamics of this programme across EU countries. Conversely, the availability of basic starting resources or the ability to draw from EU funds emerge as key factors behind these dynamics. Evidence is provided demonstrating that the effectiveness of such programmes can be hampered by a persistent capacity trap if barriers to their implementation are not carefully considered in advance.

Keywords: capacity-building; European Union; policy implementation; local climate action

Introduction

The extensive scholarship on policy implementation in the European Union (EU) has brought to light numerous challenges that this multilevel system has faced in order to effectively pursue common policy goals and attain the desired policy outputs. In order to enhance policy convergence, EU implementation strategies based on the logic of steering and compliance have been complemented by more flexible bottom-up mechanisms of policy diffusion, emulation and networking (Heidbreder, 2017; Thomann and Sager, 2017). While existing research provides us with quite a comprehensive view of the transposition of *acquis communautaire* at the different territorial levels – addressing both the issue of legal compliance (Falkner *et al.*, 2007) and practical implementation (Bondarouk and Liefferink, 2017; Gollata and Newig, 2017) – we still know little about EU instruments that aim to affect the behaviour of selected policy addressees by providing them with a range of institutional, financial and relational opportunities (Graziano *et al.*, 2011).

The latter logic appears to be especially relevant for EU capacity-building efforts. These efforts first materialised through the support to institutional reforms in the candidate countries during the 2004 and 2010 eastern enlargements. This support aimed at ensuring the effective application of EU policies and law, targeting particularly national and regional administrations charged with the management of EU funds (Heidbreder, 2014). As the ability to effectively manage European structural and investment funds (ESIFs) has become an issue of general concern (Tosun, 2014), the EU has

intensified its capacity-building measures by including them as a horizontal priority for ESIF programming. Also, several capacity-building programmes have been launched beyond cohesion policy, combining a mix of flexible policy guidance and financial incentives with the purpose of promoting the development of collaborative public-private partnerships and integrated strategies at the local level. The operational design of these programmes reflects the continuing trend of advancing new forms of governance in the EU (Rhodes and Visser, 2011), relying on a system of incentives that enable target groups to improve their capacity to act in the direction of the EU common strategy and priorities.

The functioning and impact of these new instruments has so far been underexplored, whereas existing research has widely documented the pitfalls of EU efforts to increase administrative and institutional capacities in the field of cohesion policy (Bachtler *et al.*, 2014). Likewise, studies on security and cooperation policies have revealed that regardless of a considerable investment of resources, EU capacity-building efforts have struggled to deliver on their goals (Edmunds *et al.*, 2018). Furthermore, evidence exists that EU instruments can produce different capacity-building outcomes, depending on peculiar domestic contexts and starting conditions (Bruszt and Langbein, 2020).

Overall, policy-makers and scholars alike recognize the extreme complexity of capacity related issues, while at the same time emphasising the relevance of local policy and governance capacities for effective policy implementation (Wu *et al.*, 2015). Despite the long-standing debate on capacity building in the EU, there have been few efforts to assess the effectiveness of dedicated programmes and to build conceptual frameworks allowing us to understand their implementation trajectories. A number of important questions still remain unanswered: How successful have EU capacity-building programmes been in mobilising target groups? What factors determine the implementation dynamics of these programmes across different contexts? To what extent do these programmes actually achieve the established goals and enable capacity-building at the local level?

By addressing the above questions, this study aims to improve our understanding of policy implementation and spell out under what conditions EU incentives are actually deployed by policy addressees and thereby increase local governance capacities and enhance multilevel dynamics. Drawing on the EU policy implementation research and the scholarship of capacity issues, we expect the following three sets of variables to affect the implementation dynamics of EU capacity-building programmes: (i) highly compatible policy structures, ensuring the 'goodness of fit' (Cowles *et al.*, 2001) between European and domestic policy settings; (ii) the availability of resources (for example expertise, funding, relations) of target groups; and (iii) the complementarity between overlapping EU policy instruments targeting the same policy addressees. We also elaborate on the phenomenon of what we define as the 'capacity trap', namely the situation in which access to capacity-building instruments is precluded for those who are not able to achieve the established eligibility threshold.

Empirically, our analysis focuses on the European Local Energy Assistance (ELENA) programme that was launched in 2009 as the first EU technical assistance facility targeting local authorities. This programme offered funding for project development and management assistance while requiring project beneficiaries to establish innovative organisational and financial arrangements for climate action, especially in the field of renewable energy and energy efficiency.

Our analysis proceeds as follows. Section 1 presents our theoretical assumptions and the analytical framework we adopted for our study. Section 2 specifies our hypotheses and illustrates the method used in this study. Section 3 then presents and discusses the empirical findings, while Section 4 reflects on the conditions under which the capacity trap arises, hampering the EU's ability to promote policy convergence on the ground.

I. Opening Black Boxes of Capacity Building in the EU

The issue of capacity is far from new to the research on policy implementation in the EU. Its relevance has increased as scholarly attention has shifted from a focus on compliance and legal transposition to a performance-oriented perspective, emphasising the multilevel nature of EU policy-making and its problem-solving potential (Thomann and Sager, 2017). In this context, queries about the practical effectiveness of EU policies arose concerning the properties of EU and domestic policies and institutions, which trigger different implementation dynamics, as well as the processes, mechanisms and motivations underlying patterns of convergence and diversity. As some recent studies have convincingly illustrated, examining local implementers of EU policies and analysing how they use opportunities or if they are capable of effectively doing so is essential to gain a complete picture of EU implementation, although this entails several conceptual and theoretical difficulties (Thomann and Sager, 2017; Bondarouk and Mastenbroek, 2018). Understanding EU impact in the conditions of high discretion for policy implementers, remain major challenges.

Against this backdrop, EU capacity-building programmes represent a particularly promising area for study. Their operational logic cannot be captured by the consolidated conceptions of EU policy implementation, which largely adopt a top-down perspective, focusing on the variation of EU implementation strategies in view of specific objectives to achieve (Heidbreder, 2017). Capacity-building programmes are underpinned by bottom-up mechanisms, largely responding to the rationale of so-called Type II Multilevel Governance (MLG) (Hooghe and Marks, 2001), where targeted groups are expected to be proactive in obtaining EU resources. The number of such programmes has been burgeoning in the field of regional and urban development, education, social and innovation policies, and, more recently, climate change. They often combine a flexible policy guidance with financial support through either EU structural funds (URBACT, the European City Facility) or dedicated thematic programmes (Horizon 2020, Life+, etc.).

Existing studies do not provide a comprehensive analytical framework allowing us to understand the implementation trajectories of these programmes. However, they point out a range of crucial aspects to bear in mind when investigating the conditions under which these programmes can actually mobilize local beneficiaries and enhance their capacity to act, thereby contributing to the achievement of EU policy goals.

Studies on cohesion policy have illustrated that the EU's efforts to promote those specific administrative and institutional capacities required for the management of ESIFs have fallen short of expectations (Heidbreder, 2014). Although domestic administrations widely comply with the EU's operational standards concerning programming, monitoring and evaluation (Milio, 2007; Mendez and Bachtler, 2017), difficulties with the absorption of EU funds and lack of convergence persist (Tosun, 2014). These conclusions echo with the findings of other strands of research, which emphasise the variation in countries'

capacity to benefit from European economic integration. This is rooted in pre-existing policy legacies and results into differentiated patterns of response to further integration opportunities (Schimmelfennig, 2016). Other studies point out the need to differentiate capacity-building strategies in the EU in order to effectively meet the specific developmental demands across countries (Bruszt and Langbein, 2020). Lastly, the burgeoning research on policy and governance capacity has brought to light the multifaceted nature of capacity-building challenges beyond the traditional administrative and institutional domains (Wu *et al.*, 2015). In fact, scholarly and academic attention has gradually shifted to a range of previously neglected capacity drivers, such as learning, networking and training. Interestingly, the findings of existing studies indirectly indicate the existence of a sort of capacity trap; that is, the situation in which the policy actors who need capacity-building assistance the most may not be able to obtain it regardless of the availability of dedicated EU financial resources. This phenomenon has not been reflected upon either conceptually or practically.

During the 2014–20 programming period, the European Commission has promoted a series of new capacity-building instruments, stressing the need to target not only the administrations charged with the management of EU funds but also project beneficiaries, as the capacity to design and implement high-quality projects is considered to be crucial for maximizing the overall impact of EU investments for social, economic and territorial cohesion¹ (European Commission, 2020). Somewhat paradoxically, the availability of such capacity constitutes the condition of access to EU funds, as an eligibility threshold is normally set based on specific quality criteria. However, not all those who experience capacity gaps may be capable of fulfilling these criteria and thus remain stuck in the vicious cycle of the capacity trap.

Drawing on the aforementioned insights, our analysis focuses on the ELENA programme, which nicely exemplifies the logic described above. This programme was launched to enhance innovative climate solutions by filling capacity gaps and promoting novel governance arrangements at the local level. It was intended to operate as a supporting grant scheme for the implementation of the EU Covenant of Mayors (CoM) by offering funding for investments in renewable energy and energy efficiency, urban transport mobility and smart grids. Towards this end, the CoM seeks to engage and support local authorities in committing to reaching the EU climate and energy targets.

The ELENA programme is managed by the European Investment Bank (EIB). Its funding was initially provided by the Intelligent Energy Europe Initiative and then covered by Horizon 2020. Typically, ELENA supports projects above EUR 30 million with a three- to four-year implementation period, but smaller projects are also eligible if they are part of larger investment programmes (EU funding covers up to 90 per cent of technical assistance/project development costs). In order to obtain funding, project beneficiaries have been required to develop innovative policy solutions, establish public-private partnerships, and enhance common understanding and ownership of local actions that may be part of wider local strategies. The ELENA programme has specifically encouraged the application of Energy Performance Contracting (EPC) (Energy Cities, 2015; Lombardi *et al.*, 2016; Boza-Kiss *et al.*, 2017), which is a dedicated financial tool

¹ A detailed list of DG Regio initiatives for capacity building can be found at https://ec.europa.eu/regional_policy/en/policy/how/improving-investment/

established by the Directive 2006/32/CE with the purpose of easing energy efficiency and renewable actions for local authorities through the involvement of an external market actor, typically an Energy Service Company.²

This mix of regulatory and financial components well illustrates the current EU's effort to enhance local action for sustainable energy by increasing local project development capacities in terms of collaborative public-private partnerships and integrated strategies, which are considered crucial for the implementation of the EU's climate agenda. This design does not imply any legislative changes, bringing our attention back to the question posed by policy implementation scholars more than a decade ago about whether and how the EU is able to steer policy change by governing without legislating (Héritier and Rhodes, 2011).

In what follows, we develop an original analytical framework and test a number of hypotheses helping us capture the implementation dynamics of EU capacity-building programmes that aim at advancing MLG designs to promote local project development capacities in the field of climate policies by offering beneficiaries a mix of flexible operational guidance and financial resources.

II. Research Hypotheses and Methods

Scholars of European integration have put significant efforts in understanding how, why and under what conditions policy addressees and implementing bodies conform and commit to EU policy goals and procedures in response to the different multilevel implementation strategies (Heidbreder, 2017). While departing from different analytical angles, existing studies have largely focused on institutional factors as explanatory variables for differentiated implementation performance in the EU (Thomann and Sager, 2017). The role of agency has been increasingly recognized, albeit much more rarely studied (Treib, 2014). In addition, the existence of multilevel mutually reinforcing policy instruments has been underlined as an important driver of implementation dynamics at the sectoral level (Wurzel *et al.*, 2013; Kern, 2019).

Although capacity-building programmes show a number of peculiarities, including a complex policy mix and the high degree of discretion of target groups, we suggest that the aforementioned theoretical insights can be helpful for capturing their implementation trajectories. Accordingly, we formulate and test the following three hypotheses aiming to unveil the interplay of factors that have shaped the implementation of the ELENA programme.

Hence, drawing on the 'goodness of fit' hypothesis (Cowles *et al.*, 2001) that has been widely adopted in EU policy implementation studies, we expect that domestic policy structures strongly account for the programme implementation dynamics across countries. Therefore, the implementation of an EU programme is expected to be smoother in the contexts where domestic policy instruments and frameworks are highly compatible with the EU programme's goals and operational principles, as the usage of EU resources is facilitated by consolidated formal and informal policy provisions reducing uncertainty and

²The value of EPCs in unlocking energy savings and achieving EU climate change objectives has been highlighted in the Energy Efficiency Directive (2012/27/EU). Their importance has been also recalled in the 2016 Clean Energy for All Europeans package and the 2018 Energy Performance in Buildings Directive (2018/844/EU).

adaptation costs for target actors (Thomann, 2015). Accordingly, the first hypothesis we test is as follows.

H1: Participation in EU capacity-building programmes increases as fit improves between the objectives and operational principles established by these programmes and the domestic regulatory and policy framework.

Consequently, we expect that most beneficiaries of the ELENA programme come from countries whose policy settings are highly compatible with the operational logic of the programme. To operationalise this hypothesis, we will analyse the distribution of the programme beneficiaries across EU countries, taking into consideration the degree of adjustment of domestic policies based on EU guidance, in particular in terms of national climate strategies and specific instruments, such as the EPC. We will use data from the Climate Change Performance Index (CCPI) as the main proxy for the former indicator. Drawing on existing research, we also develop a proxy for capturing the favourable/unfavourable policy and regulatory settings for EPC at the national level. The CCPI assesses countries' performance on climate action and policy in the field of renewable energy, energy efficiency, heating, transport and the building sector (Germanwatch, 2019). This index appears to be particularly appropriate to investigate the implementation of ELENA because it covers the sectors targeted by this programme. These include renewables and energy efficiencies, the building sector (especially non-residential), transport sectors and, to a limited extent, heating and smart grid. Moreover, the CCPI is particularly suitable to analyse countries' alignment with EU climate action, as it assesses the most recent developments in domestic climate policy framework from the perspective of the 2015 Paris Agreement.

Taking into consideration that the 'goodness of fit hypothesis' has been recognized as neither a necessary nor a sufficient condition for smooth implementation (Mastenbroek, 2005), we formulate other two alternative propositions. The first proposition builds on an actor-centred approach (Scharpf, 1991; Marks, 1996), according to which actors are able to make autonomous choices within the established institutional context and can even alter constraints by strategic, interpretative and self-reflective actions. Although studies adopting this perspective have been much less numerous, in part because of the methodological challenges it poses compared to the 'goodness of fit' hypothesis, they have provided convincing evidence that actors' characteristics and the way in which policy addressees deploy EU resources – be they political, legislative, financial or relational – strongly affect policy implementation across countries and regions (Jacquot and Woll, 2010; Graziano et al., 2011). These studies have shown that the motivation and resources of policy actors are crucial for them to be proactive in the EU political arena. Therefore, the second hypothesis we test is as follows.

H2: The more that target groups are motivated and equipped with the knowledge and resources required for meeting programme eligibility requirements, the more likely they are to participate in EU programmes, irrespective of their context conditions.

To test this hypothesis, we analyse the policy addresses of ELENA, focusing on municipalities, which are the main target of the programme and represent the largest share

of its beneficiaries. Particularly, we draw on the research on transnational municipal networks (TMNs) for climate. This research illustrated that large and pioneering cities are better equipped for developing innovative climate actions and competing for external funding compared to small and medium-sized cities which often lack the required economic resources and expertise (Kern and Bulkeley, 2009). Accordingly, we expect that most of ELENA beneficiaries come from the group of large, pioneering cities in the field of sustainable energy and climate. To assess this hypothesis, we use as a proxy cities' population and their participation in major European TMNs, namely Energy Cities, C40 and ICLEI (Local Governments for Sustainability).

The other alternative to the 'goodness of fit' explanatory proposition considers the existence of multilevel mutually reinforcing policy instruments in a given policy domain. As recent studies on EU multilevel climate governance have shown, numerous and often-times overlapping policy instruments generate intrinsic triggers for policy change by providing local authorities with multiple opportunities to enhance their capacities in the field of sustainable energy and climate (Jänicke and Quitzow, 2017; Kern, 2019). This reasoning is in line with the findings of the research on new environmental policy instruments (NEPIs) (Wurzel *et al.*, 2013), showing that complementary networks and/or a combination of mutually reinforcing soft and hard regulation measures augment the possibility of achieving the established policy targets. Accordingly, we expect that the intersection of ELENA with complementary EU initiatives will positively affect the participation of target groups in the programme. The third hypothesis we test is as follows.

H3: The more potential beneficiaries are involved in other complementary initiatives and instruments, the higher is the propensity to participate in EU capacity-building programmes.

As mentioned, the EU Commission has launched the ELENA programme in complementarity with the EU CoM so as to offer additional assistance to the Covenant signatories. Therefore, the hypothesis will be confirmed if the majority of ELENA programme participants are actually involved in the CoM and its system of territorial networks.

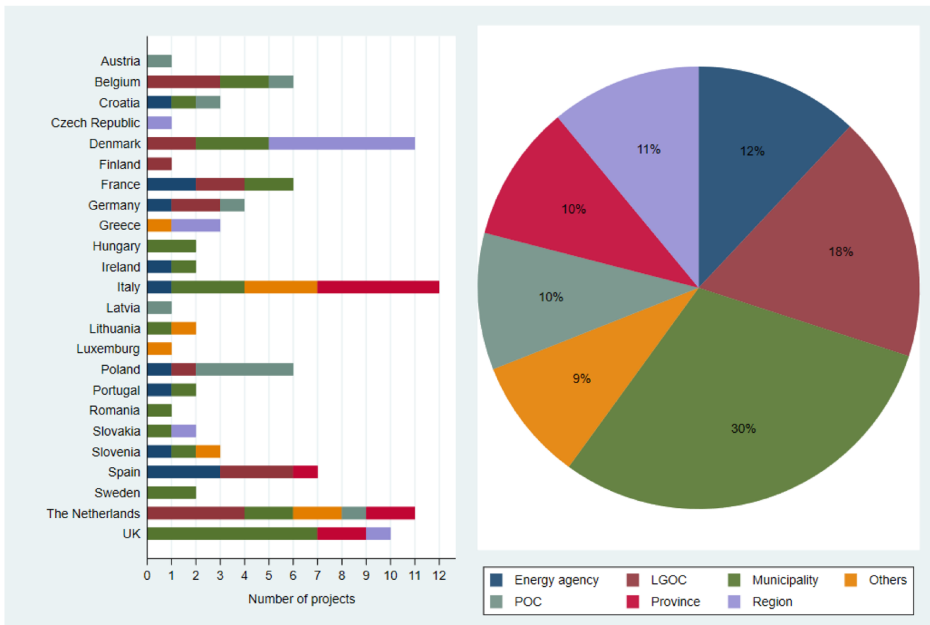
Concerning the method, the empirical findings presented below are based on the analysis of the data on the programme beneficiaries retrieved from the EIB database as well as on 15 semi-structured interviews conducted with the ELENA project beneficiaries. Our interview sample includes local governments and companies owned by local governments that benefited from ELENA funding, covering municipalities of different sizes, which are located in Western, Northern, and Central and Eastern Europe. The questionnaire was built so as to reveal beneficiaries' views on the drivers for and barriers to their participation in the programme in the perspective of potential opportunities and obstacles as suggested by the three hypotheses.

III. Capacity Building and Local Climate Action in the EU Multilevel System

Contextual Drivers and Constraints for the ELENA Programme

From 2009 to 2019, ELENA funded 100 projects with a total expenditure of more than EUR 130 million, which triggered an estimated investment of around EUR 5 billion.³

Figure 1: ELENA Programme Beneficiaries by Country and TypesSource: Authors' Elaboration on the Data from the EIB Website Dedicated to the ELENA Programme, <https://www.eib.org/en/products/advising/elena/map.htm> (Accessed February 2020). [Colour figure can be viewed at wileyonlinelibrary.com]



As Figure 1 shows, the implementation dynamic of the ELENA programme has varied significantly across countries. Most of the projects funded by the programme come from eight of the 24 countries that were home to project beneficiaries. Italy has registered the highest number of projects (12), followed closely by Denmark and the Netherlands (11 projects each), and the UK (ten projects). Seven projects came from Spain and six each from Belgium, France and Poland. Projects coming from this group of eight countries account for almost 70 per cent of all projects funded by the ELENA programme. Except for Germany, which hosts four projects, the remaining countries lag behind, with one to three projects each.

Hence, most of the programme beneficiaries come from 'old' EU member states (EU-15), with the exception of Poland, though it has been a latecomer to the programme: four out of six Polish projects were presented in 2019. In terms of the nature of beneficiaries, as Figure 1 shows, the majority of projects (30 per cent) funded by ELENA were submitted by municipalities, followed by local government-owned companies (LGOCs, 18 per cent), local energy agencies (12 per cent), regional governments (11 per cent), provinces (10 per cent), and privately-owned companies (POCs, 10 per cent) (the remaining 9 per cent have been submitted by other beneficiaries, for example national ministries,

³The data for this section has been retrieved from the EIB website dedicated to the ELENA programme: <https://www.eib.org/en/products/advising/elena/map.htm> (accessed from June 2019 to February 2020). The data covers all ELENA projects (completed and ongoing) as of December 2019.

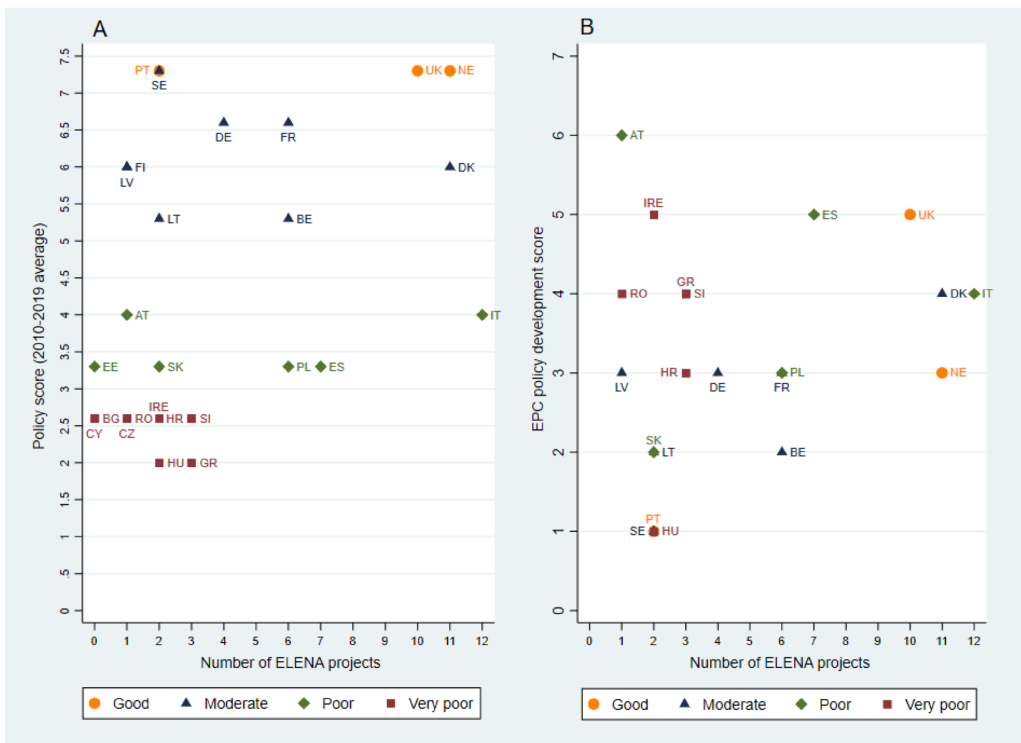
universities, foundations). As for sectors, 47 per cent of projects have been developed in the energy sector (renewables and energy efficiency), 25 per cent residential buildings, 10 per cent street lighting, 8 per cent transport, 6 per cent heating and 3 per cent residential buildings. As for innovations promoted by the ELENA programme, 42 per cent of the projects approved by the EIB provided for the use of EPCs. The remaining projects focus on public-private partnerships (9 per cent), the establishment of local government-owned companies (9 per cent) and the launch of new investment projects (40 per cent).⁴ The latter category includes all the organisational and financial arrangements that fall outside the scope of the first three categories but that are presented by beneficiaries as new ways of implementing investments by local actors (for example innovative ways of procurement, innovative ways to aggregate different public actors, engagement with new stakeholders). Since this category includes a huge variety of forms, the data confirms the link between the ELENA programme and EPCs and supports our decision to further investigate this specific instrument to better understand its implementation dynamics.

As the data reported in Figure 2 shows, the number of beneficiaries coming from the countries with better consolidated climate policies and instruments is not above but below the average. This regards both the general policy framework measured by the CCPI index and the policy development for the EPCs. Only two among the leading countries in the programme (the Netherlands and the UK) are characterized by advanced climate policies that are strongly aligned with EU climate priorities. Italy, Denmark and Spain, which have among the highest number of programme beneficiaries, show moderate (Denmark) or even scarcely developed (Italy and Spain) climate policies. The Italian policy framework for climate policy, in particular, has been underdeveloped during the period under consideration for this study. Only in recent years has the country begun to improve its climate action in accordance with EU requirements (CCPI, 2019). While being ranked as good performers in the field of climate policies, Portugal and Finland have shown rather low number of presented projects. By contrast, Belgium, France and Germany, which are moderate performers, have been rather proactive in the programme. Likewise, there is significant divergence even across Eastern and Central European countries, whose climate policies are largely in the embryonic stage. Several countries from this region (for example Romania, Bulgaria, Czech Republic, Hungary) show a very poorly developed climate policy framework and a low participation in the ELENA programme. However, the number of Polish beneficiaries was the same as those coming from Belgium and France, although the Polish climate policy settings differ significantly from those of these countries. Likewise, very few projects come from Lithuania and Latvia, which have a moderate level of climate policy development. Although Croatia, Greece and Slovenia have rather a poor climate policy framework, three projects have been funded by the ELENA programme in each country.

A similar trend arises from our analysis of the specific policy instrument (EPC) whose operational logic is strongly in line with the ELENA programme setup. Not only may the degree of consolidation of the EPC policy framework in a country not coincide with the development of the overall national framework for climate policy, but it does not seem to facilitate the participation of potential beneficiaries in the programme. In fact, some

⁴We have identified the reported categories based on the detailed description of the ELENA projects, which is available on the EIB website.

Figure 2: Climate and EPC Policy Development and Participation in the ELENA Programme by EU Countries. *Sources and Notes:* Section (A) = Data from the Climate Change Performance Index 2010, 2014 and 2019, section on climate policy, available at <https://www.climate-change-performance-index.org/>. We use the 2019 Climate Change Performance Index categories that slightly differ from those used in the 2010 and 2014 versions: ‘good’ instead of ‘high’, ‘moderate’ instead of ‘medium’, ‘poor’ instead of ‘low’, and ‘very poor’ instead of ‘very low’. To compute a comprehensive Climate Policy Score for the 2010–19 period, we assigned a score for each analysed period according to this metric: good = 8; moderate = 6; poor = 4; very poor = 2; then, we divided the total sum by three (the maximum score is 8 and the minimum 2). The Overall Assessment (OS) of each country’s climate policy is based on the 2010–19 Climate Policy Score according to this metric: $OS < 3$, very poor; $3 < OS \leq 4$, poor; $4 < OS < 7$, moderate; $OS \geq 7$, good. Section (B) illustrates the level of development of the EPC policy framework in the 21 EU member states involved in the ELENA programme (Luxemburg is not included in this figure, as this country is involved in the ELENA programme only because the European Energy Efficiency Fund is formally based in Luxemburg). In order to assess the level of EPC policy development in each country, we considered the number of measures supporting EPC concerning the following six aspects: legal framework, dedicated national financial instruments, information knowledge and advice, registries for EPC providers, EPC contract model and pilot schemes (Boza-Kiss *et al.*, 2017). We have developed our score according to the following scheme: high = from four to six of the aforementioned measures; medium = three measures; low = two or less. [Colour figure can be viewed at wileyonlinelibrary.com]



countries with a 'good' climate policy development, like Portugal, show a very low level of development of the EPC framework. By contrast, countries with a poorly developed climate policy may show a high level of EPC policy development (for example Austria and Ireland). Among the four countries most proactive in the ELENA programme, namely Italy, Denmark, the Netherlands and the UK, only the latter presents a highly developed EPC policy framework, whereas the degree of consolidation of the EPC framework of the first three is scored as medium. Spain ranks fifth for the overall number of ELENA projects, and it has a highly developed EPC policy framework. The remaining countries that have registered from three to six ELENA projects (France, Poland, Germany, Greece, Slovenia and Croatia) show a medium level of development of the EPC policy framework, except for Belgium, which has a scarcely developed EPC framework. Other countries that were not very active in the programme, such as Austria and Ireland, show a highly developed EPC policy framework. Likewise, Czech Republic, Finland, Latvia and Romania have a moderately developed EPC policy framework, but the number of their beneficiaries from the ELENA programme was low. In general, Central and Eastern European countries show a poorly developed EPC framework and comparatively low participation in the ELENA programme.

Overall, the above analysis shows that the explanatory potential of the goodness of fit hypothesis (H1) appears to be limited, as a considerable number of projects come from the countries that lack consolidated climate policies and specific policy instruments. This is especially the case in Italy, which registered the highest number of beneficiaries, and, to some extent, in Spain. In both countries, sub-state governments have not only faced an unfavourable policy framework but have also experienced significant budgetary constraints as a consequence of the 2008 economic crisis. Therefore, they widely perceive EU funding programmes as the most important source of financial support to reinforce their climate action (Jänicke and Quitzow, 2017). Our interviewees confirm this view: especially after 2011, local governments have turned to the EU in order to obtain new knowledge and additional financial resources that were not available at the national level (Interviews 1–3, 12 and 14). By contrast, Central and Eastern European countries, which showed similar context conditions, were not proactive in the programme. Our interviews with beneficiaries from this region (for example Croatia, Lithuania, Romania) have emphasised that ELENA helped to support their local climate action as well as to compensate for a problematic domestic policy context, but local actors from these countries lacked the very basic capacity for meeting the programme's requirements (Interviews 5, 6, 11 and 15). As anticipated, Poland stands as an exception to this pattern. However, not only was this country a latecomer to the ELENA programme, but four out of six Polish projects were presented by POCs (Figure 1). Three of these beneficiaries were international banks, which plausibly could draw on substantial internal resources and expertise to meet the EIB's requirements.

These findings suggest that capacity-building programmes like ELENA may miss their targets whenever its potential beneficiaries lack the minimum amount of capacity to meet the eligibility threshold required for obtaining EU funding. Our interviews have explained that developing projects to present to the EIB was a challenging process, requiring specific knowledge, staff and experience, which were not always available at the local level:

We needed external assistance with the professional side of things; preparing and submitting an application, including ongoing reporting to the EIB. (Interview 11)

Developing the project has been difficult since the beginning. EIB's offices required always more accuracy in the definition of the technical and financial elements of the project proposal. (Interview 3)

Developing the project proposal has been very complex [...] It took two years for us to be able to define the final proposal, including several remodulation of the project in concert with the EIB. (Interview 4)

At the same time, local authorities coming from countries where such resources were previously available at the national level were not proactive at the EU level. This has been the case in Germany, where local governments benefited from a robust combination of funding and capacity-building schemes for local climate action (Jänicke and Quitzow, 2017), but not in the UK, where similar domestic conditions existed. These mixed results make testing our second hypothesis even more compelling.

Climate Leaders and Laggards in the ELENA Programme

As mentioned, municipalities constitute the biggest share of the ELENA programme beneficiaries and previous research provides us with extensive knowledge about how cities develop their climate strategies and why they become proactive in the European arena (Kern and Bulkeley, 2009). Accordingly, we test a number of agency related variables below to understand whether the beneficiaries' experience and resources matter for the implementation trajectory of the ELENA programme.

As Table 1 shows, among 35 municipalities that used the ELENA programme to implement 40 projects (including projects promoted by municipal companies), 23 were cities that participate in at least one TMN. Twelve out of 40 projects came from cities that are part of more than one TMN, while 15 projects came from cities taking part in at least one TMN. Only 13 projects (32.5 per cent) are implemented by 'non-leaders'. These findings are in line with the conclusions of previous research on TMNs, showing that the more cities are engaged with these networks, the better equipped they are in terms of experience, resources and knowledge required for developing sustainable energy and climate policies and projects (Lee and Koski, 2015; Kern, 2019).

Cities' size also appears to be a relevant variable, irrespective of the national context. Twenty-nine projects (72.5 per cent) were promoted by large and very large cities (more than 250,000 inhabitants), that took advantage of their considerable economic, relational and human resources. This aspect is particularly important, considering that ELENA typically supports projects with a budget above EUR 30 million to be invested strategically into city planning sectors, such as energy efficiency, renewables for public buildings, urban mobility or street lighting.

Our interviews largely confirm the relevance of the aforementioned factors as triggers for cities' participation in the programme, especially in those cases where context conditions were less favourable:

Our national policy context is not favourable for developing ELENA project. Our main goal was to build a tramline in the city and there is no national legislation that regulates and determines the rules for the tram traffic, as we do not have trams in Lithuania [...] But ELENA seemed as a great possibility for us [...] we believed that it would be a great incentive to invest in more environmentally friendly public transport in our city. (Interview 5)

Table 1: Leader Cities among ELENA Beneficiaries

City (Country)	Population	TMNs			No. of projects
		EC	ICLEI	C40	
London (UK)	8,800,000			X	3
Berlin (DE)	3,700,000		X	X	1
Madrid (ES)	3,220,000			X	1
Paris (FR)	2,200,000	X		X	1
Bucharest (RO)	1,800,000	X			1
Barcelona (ES)	1,620,000	X	X	X	1
Birmingham (UK)	1,110,000		X		1
Brussels (BE)	1,100,000	X	X		1
Amsterdam (NE)	850,000			X	1
Zagreb (HR)	809,000	X	X		1
Helsinki	648,000	X	X		1
Rotterdam (NE)	623,000		X	X	2
Copenhagen (DK)	613,000		X	X	1
Genoa (IT)	580,000				1
Manchester (UK)	534,000				1
Göteborg (SE)	532,000		X		1
Lyon (FR)	520,000				1
Bratislava (SK)	491,000				1
Bristol (UK)	450,000	X	X		2
Aarhus (DK)	340,000				2
Malmö (SE)	316,000		X		1
Vila Nova de Gaia (PT)	302,000				1
Ljubljana (SI)	290,000		X		1
Venezia (IT)	260,000			X	1
Bordeaux (FR)	246,000	X	X		1
Groningen (NE)	200,000				1
Klaipeda (LT)	185,000				1
Aalborg (DK)	139,000		X		1
Leuven (BE)	101,000	X			1
Sittard-Geleen (NE)	95,000				1
Purmerend (NE)	79,000				1
Kaposvár (HU)	67,000		X		1
Frederikshavn (DK)	60,000	X			1
Paks City (HU)	19,000				1
Campi Salentina (IT)	10,000				1
		10	15	9	40

Source: Author's elaboration on the data from EC, ICLEI and C40 websites (accessed January 2020).

It is also worth noting that most of our interviewees emphasise that political and/or administrative leadership has been crucial for participating in the ELENA programme (Interviews 1–4, 5, 7, 13–15). Interestingly, they also stress that capacity-building effects have been more relevant in smaller municipalities than in large ones, as the former suffered from a substantial lack of resources that prevented them from developing and implementing the required project activities (Interviews 1, 2, 4, 5, 10, 13). As the next section will explain, small cities and towns have been able to take part in the ELENA programme mainly thanks to their participation in the CoM initiative. This was the case of

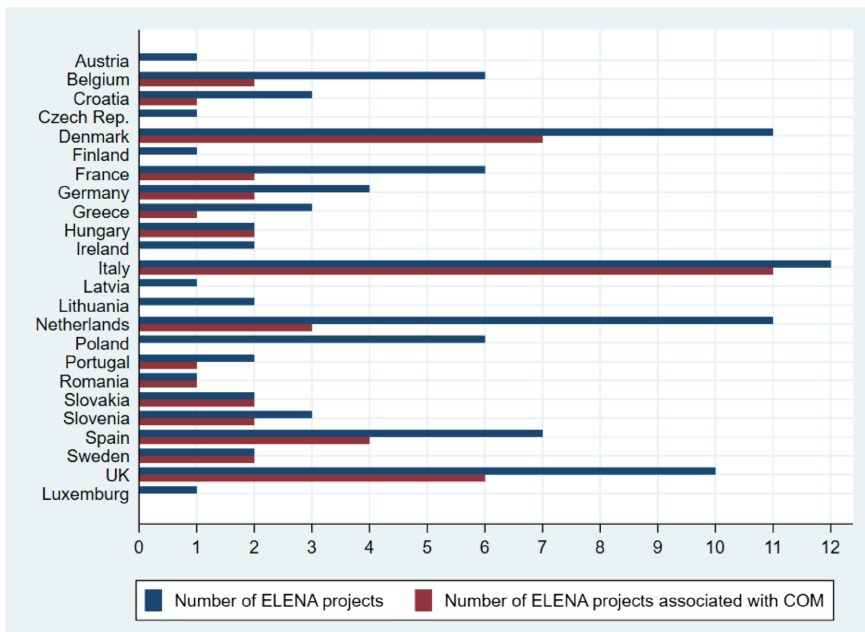
Campi Salentina, in Italy, which was the smallest municipality among the programme beneficiaries (Table 1). Participation in the CoM has been crucial for its involvement in the ELENA programme, as it helped close essential capacity gaps, especially in terms of expertise, knowledge and relational resources (Interview 4).

Complementarity and Synergies between the CoM and the ELENA Programme

Our analysis of the hypothesis suggesting a mutually reinforcing effect between several complementary EU instruments (H3) has also produced mixed findings, although the overlap between the CoM and the ELENA programme seems to have positively affected the participation of small and medium-sized cities. This finding has been largely confirmed by our interviews. In several cases, participation in the CoM initiative has been essential to provide local actors with specific expert knowledge and relational support required to meet the criteria established by the EIB for accessing ELENA funding. Thus, the CoM has been particularly valuable to close the initial capacity gap that would have hindered the participation of smaller cities and climate laggards in the ELENA programme.

As of December 2019, 50 out of 100 projects funded by the ELENA programme were presented by CoM signatories (this indicator increases to 78 per cent in the case of projects presented by municipalities). The geography of this ‘overlapped’ participation is illustrated in Figure 3, and its intensity varies significantly across countries.

Figure 3: ELENA programme beneficiaries involved in the CoM Source: Authors’ Elaboration on the Data from the EIB Website Dedicated to the ELENA Programme, <https://www.eib.org/en/products/advising/elena/map.htm> (Accessed February 2020). [Colour figure can be viewed at wileyonlinelibrary.com]



In Italy, all but one of the ELENA projects have been developed by CoM signatories, and the linkage between the two programmes appears to be relevant also in Denmark, Slovenia, Spain, Hungary, Slovakia, Sweden and the UK. As Table 2 shows, countries that are home to the highest number of ELENA projects count the most numerous memberships in the CoM initiative. Eight among the top ten countries in terms of approved ELENA projects are also in the top ten for the most numerous CoM communities. The exceptions are Germany and Poland, which are in the top ten countries for ELENA beneficiaries and which still rank relatively high (11th and 13th, respectively) in the CoM ranking (Table 2). As our interviews confirm, in Italy and Spain – which are respectively in the 1st and 3rd position of the CoM ranking (Table 2) – complementarity has been decisive for municipalities to take part in the ELENA programme amid unfavourable context conditions (Interviews 1–4 and 14). No country from Central and Eastern Europe is in the top ten of the CoM ranking (Melica *et al.*, 2018), and they were not proactive in the ELENA programme. This hinders the potential for complementarity and mutual reinforcing effects of EU capacity-building efforts for climate action in the region.

Our findings also show that many small cities and towns that are not formal programme beneficiaries have gained access to ELENA-funded actions through supra-local territorial networks related to the CoM initiative (Interviews 1–4 and 14). Previous research on the CoM has already illustrated that medium-sized and small cities have been involved in climate and energy policies thanks to the CoM territorial coordinators support (Lombardi *et al.*, 2016; Melica *et al.*, 2018). Upper-territorial entities (for example regions or provinces) acting as territorial coordinators have provided smaller cities with knowledge and relational resources helping them design and implement innovative climate actions:

When we decided to develop our ELENA project we started from the network and the information gathered within the CoM framework. We could rely on good contacts in each municipality both at the technical and the political level. We helped them providing coordination and expertise [...] thanks to this, in the end, we were able to involve in our ELENA project almost forty small and very small municipalities. (Interview 3)

Table 2: Complementarity: ELENA Projects and CoM Diffusion

	<i>ELENA ranking (Top-10 countries)</i>	<i>CoM ranking (Top-10 countries)</i>
Italy	1	1
Denmark	2	4
The Netherlands	3	9
UK	4	8
Spain	5	3
Belgium	6	2
France	7	10
Poland	8	(13)
Germany	9	(11)
Greece	10	7

Source: The data for the ‘CoM Ranking’ are from Melica *et al.*, 2018. This ranking considers the share of CoM signatories’ inhabitants in relation to national population.

Our interviews have also explained that the participation of small cities and towns in the ELENA programme beyond the CoM initiative has been facilitated by the establishment of informal networks coordinated by the ELENA beneficiaries:

I have been working with district heating in Aalborg for about seven-eight years when we decided to develop our ELENA project. I knew people working in this sector in several smaller municipalities of the region [...] A lot of my work has been to tell them about the programme, find out whether it was possible for them to benefit from the ELENA funded actions and coordinate their activities. (Interview 13)

Overall, an important impact of the programme has been the consolidation of (formal and informal) territorial networks that have strengthened the capacity for climate action in 'laggard' local communities.

Discussion and Conclusions

This study illustrates over again the complexity of EU capacity-building efforts, bringing to light the challenges that programmes aimed at overcoming capacity gaps may face in mobilising their target groups. Far from the ambition to provide an exhaustive explanation of implementation dynamics, our findings prove the relevance of actor-related factors and complementarity in shaping the effectiveness of capacity building measures. By contrast, the 'goodness of fit' hypothesis has been of limited value in predicting the implementation trajectory of the ELENA programme.

More specifically, beneficiaries from the countries with only moderately (or poorly) developed climate policy frameworks (such as Italy and Spain) have been more proactive in the programme compared to those coming from domestic contexts with a more developed climate policy. Likewise, the diffusion of facilitating policy instruments, such as EPC, in domestic contexts does not appear to be decisive for smoother implementation dynamics. The highest number of beneficiaries come from those countries that show a medium level of development of their national regulatory and policy framework for EPCs. Central and Eastern European countries, except for Poland, show lower numbers of beneficiaries than their EU-15 counterparts.

Conversely, the cities' size, along with their experience and resources have mattered significantly for the programme implementation path. Almost two-thirds of ELENA beneficiaries were large cities leading in the field of climate policies, which possess consolidated knowledge and experience allowing them to compete for additional funding at the EU level. The number of small cities or laggards was limited, indicating that the risk of falling into the capacity trap exists for EU capacity-building programmes. Thus, quite in contrast with their mission, these programmes may end up with providing additional resources for leaders rather than helping laggards to catch up. Complementarity has been helpful in this regard. The support of CoM-based territorial coordinators and partnerships has increased the ability of small cities and towns to take part in the ELENA programme, favouring the participation in ELENA of beneficiaries from countries with unfavourable domestic policy structures. However, this has not contributed to reducing the gap between Central and Eastern European countries and their EU-15 counterparts. As the former group of countries was not pro-active in the CoM, there was no possibility to explore the potential of mutually reinforcing effects between EU instruments in this region.

These findings appear to confirm the conclusions of the research on the impact of broader EU capacity-building strategies (Bruszt and Langbein, 2020) as well as those on differentiated integration (Schimmelfennig, 2016). According to the former, a careful calibration of policy instruments is needed in order to make the existing opportunities really available to the intended policy addresses. A too ambitious and generalised design for capacity-building programmes risks missing its targets if it does not take into consideration the availability of basic capacities required to participate. The external resources (knowledge, financial or relational) provided by these programmes may not be sufficient to recover the capacity trap. Avoiding this trap, in turn, is important in order to prevent that capacity-building efforts reinforce differentiated patterns of integration rather closing gaps in policy development across EU regions.

Further research is needed to understand how and under what conditions those who need capacity-building resources the most can be encouraged to join and improve their performance thanks to their participation in EU programmes. Potential synergies and complementarity between different instruments may be helpful to this end, as well as the supporting role of leading territorial actors that may trigger the structuration of collaborative networks that include small cities and towns. However, also in this case the risks of self-reinforcing divergences among EU regions should not be underestimated.

In summary, the evolving EU multi-level policy-making continuously generates methodological and empirical challenges, especially in those areas – which are steadily growing – outside the logic of compliance. With this respect, exploring actor- and instrument related factors pertaining the drivers (and constraints) of the ‘usage of Europe’ (Jacquot and Woll, 2010) appears to be a promising analytical angle in order to understand variations in the implementation trajectories of EU policies which operate through economic incentives or capacity building instruments. A wide-scale comparative analysis would be needed to provide convincing evidence of comprehensive policy outcomes and suggest possible improvements.

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References

- Bachtler, J., Mendez, C. and Oraže, H. (2014) ‘From Conditionality to Europeanization in Central and Eastern Europe: Administrative Performance and Capacity in Cohesion Policy’. *European Planning Studies*, Vol. 22, No. 4, pp. 735–57.
- Bondarouk, E. and Lieferrink, D. (2017) ‘Diversity in Sub-national EU Implementation: The Application of the EU Ambient Air Quality Directive in 13 Municipalities in the Netherlands’. *Journal of Environmental Policy & Planning*, Vol. 19, No. 6, pp. 733–53.
- Bondarouk, E. and Mastebroek, E. (2018) ‘Reconsidering EU Compliance: Implementation Performance in the Field of Environmental Policy’. *Environmental Policy and Governance*, Vol. 28, pp. 15–27.
- Boza-Kiss, B., Bertoldi, P. and Economidou, M. (2017) ‘Energy Service Companies in the EU – Status Review and Recommendations for Further Market Development with a Focus on

- Energy Performance Contracting', Publications Office of the European Union, Luxembourg, JRC106624.
- Bruszt, L. and Langbein, J. (2020) 'Manufacturing Development: How Transnational Market Integration Shapes Opportunities and Capacities for Development in Europe's Three Peripheries'. *Review of International Political Economy*, Vol. 27, No. 5, pp. 996–1019.
- CCPI (2019) 'The Climate Change Performance Index 2019'. Available at <https://www.climate-change-performance-index.org/the-climate-change-performance-index-2019>
- Cowles, M.G., Caporaso, J. and Risse, T. (2001) 'Europeanization and Domestic Change: Introduction'. In Cowles, M.G., Caporaso, J. and Risse, T. (eds) *Transforming Europe: Europeanization and Domestic Change* (Ithaca, NY: Cornell University Press).
- Edmunds, T., Juncos, A.E. and Algar-Faria, G. (2018) 'EU Local Capacity Building: Ownership, Complexity and Agency'. *Global Affairs*, Vol. 4, No. 2–3, pp. 227–39.
- Energy Cities (2015) 'Unlocking Investment in Cities: ELENA-EIB Technical Assistance Facility'. Available at https://energy-cities.eu/wp-content/uploads/2019/01/reviewelena-eib_projects_june2015.pdf
- European Commission (2020) 'Good Governance for Cohesion Policy – Administrative Capacity Building'. Available at https://ec.europa.eu/regional_policy/sources/how/improving-investment/admin_capacity_building_en.pdf
- Falkner, G., Hartlapp, M. and Treib, O. (2007) 'Worlds of Compliance: Why Leading Approaches to European Union Implementation are only "Sometimes-True" Theories'. *European Journal of Political Research*, Vol. 46, No. 3, pp. 395–416.
- Germanwatch (2019) 'The Climate Change Performance Index 2020: Background and Methodology, 9 December 2019'. Available at <https://www.germanwatch.org/en/17383>
- Gollata, J.A.M. and Newig, J. (2017) 'Policy Implementation through Multi-level Governance: Analysing Practical Implementation of EU Air Quality Directives in Germany'. *Journal of European Public Policy*, Vol. 24, No. 9, pp. 1308–27.
- Graziano, O., Jacquo, S. and Palier, B. (2011) *The EU and the Domestic Politics of Welfare State Reforms* (Basingstoke: Palgrave Macmillan).
- Heidbreder, E. (2014) 'Administrative Capacities in the EU. Consequences of Multi-level Policy-Making'. In Lodge, M. and Wegrich, K. (eds) *The Problem-Solving Capacity of the Modern State. Governance Challenge and Administrative Capacities* (Oxford: Oxford University Press), pp. 218–37.
- Heidbreder, E. (2017) 'Strategies in Multilevel Policy Implementation'. *Journal of European Public Policy*, Vol. 24, No. 9, pp. 1367–84.
- Héritier, A. and Rhodes, M. (eds) (2011) *New Modes of Governance in Europe. Governing in the shadow of Hierarchy* (Basingstoke: Palgrave Macmillan).
- Hooghe, L. and Marks, G. (2001) 'Types of Multi-Level Governance'. *European Integration Online Papers (EIoP)*, Vol. 5, No. 11.
- Jacquot, S. and Woll, C. (2010) 'Using Europe: Strategic Action in Multi-level Politics'. *Comparative European Politics*, Vol. 8, No. 1, pp. 110–26.
- Jänicke, M. and Quitzow, R. (2017) 'Multi-level Reinforcement in European Climate and Energy Governance: Mobilizing Economic Interests at the Sub-national Levels'. *Environmental Policy and Governance*, Vol. 27, No. 2, pp. 122–36.
- Kern, K. (2019) 'Cities as Leaders in EU Multilevel Climate Governance: Embedded Upscaling of Local Experiments in Europe'. *Environmental Politics*, Vol. 28, No. 1, pp. 125–45.
- Kern, K. and Bulkeley, H. (2009) 'Cities, Europeanization and Multi-level Governance: Governing Climate Change through Transnational Municipal Networks'. *Journal of Common Market Studies*, Vol. 47, No. 2, pp. 309–32.
- Lee, T. and Koski, C. (2015) 'Multilevel Governance and Urban Climate Change Mitigation'. *Environment and Planning C: Government and Policy*, Vol. 33, No. 6, pp. 1501–17.

- Lombardi, M., Paziienza, P. and Rana, R. (2016) 'The EU Environmental-Energy Policy for Urban Areas: The Covenant of Mayors, the ELENA Program and the Role of ESCos'. *Energy Policy*, Vol. 93, pp. 33–40.
- Marks, G. (1996) 'An Actor-Centred Approach to Multi-level Governance'. *Regional and Federal Studies*, Vol. 6, No. 2, pp. 20–38.
- Mastenbroek, E. (2005) 'EU Compliance: Still a 'Black Hole'?' *Journal of European Public Policy*, Vol. 12, No. 6, pp. 1103–20.
- Melica, G., Bertoldi, P., Kona, A., Iancu, A., Rivas, S. and Zancanella, P. (2018) 'Multilevel Governance of Sustainable Energy Policies: The Role of Regions and Provinces to Support the Participation of Small Local Authorities in the Covenant of Mayors'. *Sustainable Cities and Society*, Vol. 39, pp. 729–39.
- Mendez, C. and Bachtler, J. (2017) 'Financial Compliance in the European Union: A Cross-National Assessment of Financial Correction Patterns and Causes in Cohesion Policy'. *Journal of Common Market Studies*, Vol. 55, No. 3, pp. 569–92.
- Milio, S. (2007) 'Can Administrative Capacity Explain Differences in Regional Performances? Evidence from Structural Funds Implementation in Southern Italy'. *Regional Studies*, Vol. 41, No. 4, pp. 429–42.
- Rhodes, M. and Visser, J. (2011) 'Seeking Commitment, Effectiveness and Legitimacy. New Modes of Socio- Economic Governance in Europe'. In Héritier, A. and Rhodes, M. (eds) *New Modes of Governance in Europe. Governing in the Shadow of Hierarchy* (Basingstoke, Palgrave Macmillan), pp. 104–34.
- Scharpf, F.W. (1991) 'Games Real Actors Could Play: The Challenge of Complexity'. *Journal of Theoretical Politics*, Vol. 3, No. 3, pp. 277–301.
- Schimmelfennig, F. (2016) 'A Differentiated Leap Forward: Spillover, Path-Dependency, and Graded Membership in European Banking Regulation'. *West European Politics*, Vol. 39, No. 3, pp. 483–502.
- Thomann, E. (2015) 'Customizing Europe: Transposition as Bottom-Up Implementation'. *Journal of European Public Policy*, Vol. 22, No. 10, pp. 1368–87.
- Thomann, E. and Sager, F. (2017) 'Moving Beyond Legal Compliance: Innovative Approaches to EU Multilevel Implementation'. *Journal of European Public Policy*, Vol. 24, No. 9, pp. 1253–68.
- Tosun, J. (2014) 'Absorption of Regional Funds: A Comparative Analysis'. *Journal of Common Market Studies*, Vol. 52, No. 2, pp. 371–87.
- Treib, O. (2014) 'Implementing and Complying with EU Governance Outputs'. *Living Reviews in European Governance*, Vol. 9, No. 1. Available at <http://www.livingreviews.org/lreg-2014-1>
- Wu, X., Ramesh, M. and Howlett, M. (2015) 'Policy Capacity: A Conceptual Framework for Understanding Policy Competences and Capabilities'. *Policy and Society*, Vol. 34, No. 3-4, pp. 165–71.
- Wurzel, R.K.W., Zito, A.R. and Jordan, A.J. (2013) *Environmental Governance in Europe. A Comparative Analysis of New Environmental Policy Instruments* (Cheltenham: Edward Elgar).

Interviews

- Interview 1: Province of Chieti (Italy), 18.06.2018, Policy officer.
- Interview 2: Province of Savona (Italy), 24.07.2019, Policy officer.
- Interview 3: Municipality of Venice (Italy), 17.09.2019, Policy officer.
- Interview 4: Municipality of Campi Salentina (Italy), 12.02.2020, Policy officer.
- Interview 5: Municipality of Klaipeda (Lithuania), 30.07.2020, Policy officer.
- Interview 6: Municipality of Bucharest (Romania), 12.08.2020, Policy officer.

Interview 7: Municipality of Bordeaux (France), 05.09.2020, Policy officer.

Interview 8: RMO Public Lighting, Donegal County Council (Ireland), 07.09.2020, Senior expert.

Interview 9: Vereniging van Vlaamse Huisvestingmaatsc (VVH) (Social housing association), (Flanders, Belgium), 08.09.2020, Business Development team.

Interview 10: Frederikshavn Social Housing Association (Denmark), 12.09.2020, Project coordination team.

Interview 11: Central Bohemian Region, Prague (Czech Republic) 21.09.2020, Project coordination team.

Interview 12: Madrid Public Transport Company (Madrid City Council) (Spain) 22.09.2020, Project coordination team.

Interview 13: Municipality of Aalborg (Denmark) 24.09.2020, Policy officer.

Interview 14: Barcelona Provincial Council (Spain) 30.09.2020, Policy officer.

Interview 15: Municipality of Zagreb (Croatia) 05.10.2020, Policy officer.