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RESEARCH

How issue salience and political leadership facilitate policy integration: The adoption of the Energy Performance of Buildings Directive in the European Union

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Abstract
The transition to a decarbonized energy system requires the adoption of climate policy in sectors such as buildings, industry, and transport. This climate policy integration is subject to political processes, but there is a lack of empirical investigations on how these political processes take place and which drivers shape integrative policy change. We address these gaps by conducting an empirical analysis of the 2024 recast of the Energy Performance of Buildings Directive (EPBD) of the European Union (EU), a part of the "Fit for 55" program aimed at integrating climate change mitigation into building policy. Specifically, we ask (1) how did levels of climate policy integration evolve in the policy process and (2) what were the drivers of changes in these levels? Based on a qualitative case study research design, we analyzed six interview transcripts, thirteen policy documents, and 59 newspaper articles. We find that the EPBD represents a significant increase in integration of climate policy with regards to policy objectives and policy instruments, but only a minor increase of integration in governance capacities. Levels of integration differed between policy venues and changed during the policy process, because of issue salience and political leadership. We suggest further research to investigate the role of interlinkages of these drivers for integration processes and derive as a policy implication that policy integration levels need integrative capacities at all stages of the policy process.

Keywords Policy integration · Policy process · Climate change mitigation · Energy transition · Buildings

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Introduction

The reduction of greenhouse gas (GHG) emissions is a complex issue requiring consideration of climate policy across several domains. A major attempt at such "climate policy integration" (CPI) (Adelle & Russel, 2013) is the "Fit for 55" program of the European Union (EU), which aims to mitigate GHG emissions in agriculture, buildings, energy generation, and mobility. While it is somewhat clear what CPI entails in the field of climate change adaptation and energy generation (Biesbroek & Candel, 2020; Kettner & Kletzan-Slamanig, 2020; Rietig, 2013; Schmidt & Fleig, 2018), this is not the case in sectors such as buildings, industry, or transportation. However, it is important to understand the emergence of CPI in these sectors due to their high carbon footprint. Buildings, for example, account for 36% of the EU's GHG emissions and are renovated rather infrequently (European Commission, 2020).

To understand how CPI emerges in the buildings sector, the concept of 'policy integration' from the policy sciences can be helpful. Policy integration is defined as "a collaboration of actors from two or more policy domains in order to integrate aims and concerns derived from one policy domain into another" (Tosun & Lang, 2017, p. 553).[1] Such integration can occur in: (1) policy objectives; (2) policy instruments; (3) governance capacities and (4) implementation and evaluation practices (Candel & Biesbroek, 2016; Cejudo & Trein, 2023a). While early research on policy integration treated it as a one-time output of policy formulation (Mickwitz et al., 2009; e.g. Schout & Jordan, 2005), subsequent studies have recognized it as a process of policy and political change (Adelle & Russel, 2013; Candel & Biesbroek, 2016; Jordan & Lenschow, 2010). This process typically spans several policy sectors, comprising of actors specializing in sector-specific policy issues. Consequently, a departure from sectoral policymaking often makes coordination complicated and rife with political dynamics and tensions (Cejudo & Trein, 2023a).

The increasing awareness of policy integration as a political process has resulted in research examining the drivers of integration. Scholars have found, for example, that external pressure (Kefeli et al., 2023), issue salience (Lambelet, 2023; Sarti, 2023), institutional architecture (Vince et al., 2024), party ideologies (Biesbroek, 2021), policy entrepreneurship (Faling et al., 2019), and the presence of boundary spanners or veto players (Cejudo & Trein, 2023a) all influence policy integration. However, how these drivers evolve and interact over the policy cycle is rarely studied empirically (Trein et al., 2023).

In this study, we addressed this gap through a study of the "Fit for 55" policy of the European Union (EU). The "Fit for 55" policy is a relevant case for such research as it was a core project of CPI at highest political level. It included the recast of the Energy Performance of Buildings Directive (EPBD) (Directive 2024/1275/EU), a key policy for mitigating GHG emissions from the buildings sector in the EU (Björklund et al., 2023; Economidou et al., 2020). Published on May 28, 2024, the EPBD requires Member States (MS) to establish national targets with trajectories for the renovation of the worst-performing residential buildings and minimum energy performance standards for non-residential buildings. Moreover, it introduces a zero-emission standard for new buildings by 2030, which encompasses the calculation of their life cycle GHG emissions. These novel changes in policy objectives and policy instruments qualify the 2024 recast of the EPBD as an exemplary case of policy

[1] Policy integration in this paper has a different meaning than in everyday use in the European Union in which it means the process of EU MS giving more policymaking authority to the EU.

innovation through CPI in the buildings sector (Goyal et al., 2022; Howlett, 2014; Jordan & Huitema, 2014).

Through the case of the EPBD (2019–24), we answered the following questions: (1) What is the level of policy integration in this policy? (2) How did the drivers for integration interact during agenda setting and policy adoption? Although the levels and drivers of policy integration that we identified might be subject to change during implementation and evaluation, a focus on integration during agenda setting and policy adoption merits theoretical attention as integration levels at these stages are likely to influence integration levels during implementation. Once the implementation and evaluation of the EPBD is completed, our findings may provide a basis for a subsequent assessment of integration in the EPBD.

To conduct the study, we developed an analytical scheme synthesizing integration dimensions and drivers based on the literature on policy integration. While this scheme guided our analysis, we followed an abductive approach to allow for openness and surprises beyond what has been identified in existing research. As our analysis highlighted the importance of the politics of policy integration, we focused on this aspect in depth subsequently. With this focus, our work contributes to a better understanding of policy integration as a political process (Cejudo & Trein, 2023b) and CPI in the buildings sector (Dupont, 2016; Steurer et al., 2020).

This paper is structured as follows. To understand what research has already been done, we outline recent research of the policy integration literature (Sect. "Conceptual framework"). The Sect. "Research design" presents the case study research design, the methods for data collection, and the qualitative analysis. The results of the analysis are presented in the Sect. "Results". In the Sect. "Discussion and conclusion", we discuss our key findings and present the conclusions.

Conceptual framework

There is a growing consensus that policy integration is an ongoing process (Candel & Biesbroek, 2016; Cejudo & Trein, 2023a; Tosun & Lang, 2017), with asynchronous and multidimensional change in policy and institutions that is driven by agency (Candel & Biesbroek, 2016, p. 217). When studying this process, it is important to focus on what has been integrated (integration dimensions) and why this change happened (drivers for integration).

Integration dimensions

While different categorizations for the object of integration have been developed (see Candel & Biesbroek, 2016; Cejudo & Trein, 2023a), these are broadly comparable. We adapt the categorization of Cejudo and Trein (2023a), according to whom integration can occur in the following: (1) the policy objectives; (2) the policy instruments set in place to reach those objectives; (3) the capacities needed to make the policy work; or (4) practices of implementation and evaluation. Here, (1) and (2) represent policy outputs, (3) is an attribute of the actors and institutions involved, and (4) pertains more to the policy process. Given the scope of this study, we exclude (4) from the discussion below.

Integrated policy objectives

Firstly, integration can occur in the objectives of a policy (Cejudo & Trein, 2023a). These objectives may vary in their level of specificity, for example, from broad policy goals such as decarbonization to more specific targets such as the number of buildings renovated (Howlett & Cashore, 2009).

Integrative policy instruments

Further, integration can occur in the selection of policy instruments (Candel & Biesbroek, 2016). There are substantive policy instruments that influence the behavior of policy targets directly, for example through taxes, regulation, or information campaigns (Hood, 1983). Further, policy instruments can be procedural and influence the conduct of the policy process, for example, through coordination mechanisms, procedural requirements, and involvement of stakeholders (Bali et al., 2021).

Integrative governance capacities

To make policy objectives and instruments work, organizations and individuals need skills and competences (Wu et al., 2015), which can be more or less integrative (Biesbroek, 2021; Cejudo & Trein, 2023a; Vince et al., 2024). Integrative capacities involve the creation and exchange of holistic knowledge through cross-sectoral structures and flexible coordination mechanisms. (Candel, 2021). While administrations often have formal structures for coordination, these often aim to avoid negative spillover rather than facilitate systematic integration of policy objectives (Cejudo & Trein, 2023a; Scharpf, 1994).

The changes of integration levels in objectives, instruments, and capacities may occur simultaneously, and result in an increase or decrease of integration (Biesbroek & Candel, 2020). Whether integration occurs in any of the dimensions largely depends on "actors and agencies coordinating across different policy subsystems" (Cejudo & Trein, 2023a). Traditionally, policymaking is organized in sectors, creating inertia at every stage which needs to be overcome to enable policy integration (Cejudo & Trein, 2023a).

Drivers of policy integration

Several factors that drive policy integration have been distinguished that work at different policy stages of the policy process, i.e., agenda-setting, decision-making, implementation, and evaluation. They result from partly different approaches and emphases. Dupont (2016) for example identifies drivers based on theories of European integration, Biesbroek (2021) from literature on institutional capacities and Cejudo and Trein (2023a) derive theirs from theories of the policy process. We focus mainly on drivers that are relevant for political processes, as they are important to understand the process of policy integration (Cejudo & Trein, 2023a). While not an exhaustive list, some of these drivers are external pressures, issue salience, problem frames, political ideology, institutional structures, and actors.

External pressure

External pressures and focusing events can catalyze changes in policy integration (Cejudo & Trein, 2023a; Princen et al., 2025). Such dynamics may originate from domestic phenomena such as elections or social movements or from transnational phenomena, such as negotiations of the United Nations Framework Convention on Climate Change (UNFCCC) (Rietig, 2021).

Issue salience

However, these pressures typically require high issue salience or public attention to influence policy integration (Hartlapp, 2018) and should be framed to emphasize interlinkages that necessitate a holistic governance approach (Candel & Biesbroek, 2016; Cejudo & Trein, 2023a). In addition, integrative policy frames should appeal to and be compatible between policymakers across domains (Biesbroek & Candel, 2020; Rietig, 2019).

Institutional setting

Public administrations act within an institutional structure and follow procedures and rules. These often determine the degree of interaction, and coordination between departments from different policy domains (Biesbroek, 2021; Princen et al., 2025). Hustedt and Seyfried (2016) posit that informal interactions and procedures, in fact, account more for integrated outputs than formal structures.

Political ideology

The position of political parties has implications for policy integration (Biesbroek, 2021). For example, center-left wing government coalitions lean towards integrated policy frames (Jordan & Lenschow, 2010). Political positions can change around elections, and elections can change the government agenda and policies.

Actors

Lastly, policy actors are central for the process of policy integration and may drive integrative change through coalition building, or social learning (Candel & Biesbroek, 2016; Mickwitz et al., 2009). For example, policy entrepreneurs are found to catalyze policy integration by proposing integrated policy alternatives (Faling et al., 2019; Rietig, 2014; Svensson, 2019). Next to them, public leaders – such as heads of governments, ministers, and high level public officials (Biesbroek, 2021) – might be the most significant actors for policy integration due to their ability to implement broader governance reforms, influence policy networks, and reshape narratives in an integrative manner (Cejudo & Trein, 2023a; Rietig & Dupont, 2021). In order to exercise this integrative political leadership (Candel, 2021), they need to develop integrative capacities (Biesbroek, 2021; Domorenok et al., 2021). On the contrary, incumbent, sectoral actors might aim to reinforce sectoral governance capacities and veto efforts at policy integration (Cejudo & Trein, 2023a).

Table 1 summarizes the factors identified above. In the remainder of this article, we investigate how these dynamics interact with each other in the process of policy integration.

Research design

Case selection

We adopted a case study design to explore a single case of policy integration as the basis for theoretical reflection (Yin, 2018). We selected the EPBD as an exemplary case of policy integration in a politicized context. The buildings sector is rarely studied thus far and provides a novel context for theoretically grounding policy integration. In addition, it brings attention to the heating transition, a central but understudied aspect of decarbonization (Abbasi et al., 2021). Further, a focus on the EU level instead of the local level typically studied in case of buildings (for exceptions, see Boasson and Wettestad (2013) and Dupont (2016)) is appropriate because of its increasing importance for national and subnational policies.

The final version of the Directive (EU) 2024/1275 of the European Parliament and of the Council on the EPBD (recast) was adopted on April 24, 2024. Historically, the EPBD was considered as an energy efficiency policy with synergies for climate change mitigation. However, with this recast, the main goal of the policy shifted to the decarbonization of the building sector. This is illustrated by the following changes that significantly increased CPI:

- The "national building renovation plans" required more specific targets and instruments for the national decarbonization and renovation pathways (Art.3).
- All new buildings had to be "zero emission buildings" by 2030 (Art. 7, Art.11).
- The life-cycle global warming potential of new buildings had to be calculated (Art. 7).
- To spur renovations, minimum energy performance standards now applied to existing building stock, too (Art. 9).
- Requirements for solar energy installations, sustainable mobility, and the smart readiness of buildings were reinforced (Art. 10, Art. 13, Art. 14, Art.15).

Data collection

For our qualitative analysis, we collected policy documents, newspaper articles, semi-structured interviews, and secondary literature. News articles provided an overview of the debates on the policy in a public realm. Further, they aided in developing the interview

Table 1 Drivers that influence the process of policy integration

Factor	Present in Literature
External pressure	Crises, elections, international negotiations, social movements
Issue salience	Perceived importance of the issue, problem framing
Political ideology	Position of a party on a certain issue
Institutional structure	Procedural rules, coordination structures
Actors	Policy entrepreneurs, political leadership, and veto players

Adopted from Cejudo and Trein (2023a), Candel et al. (2023), and Biesbroek (2021)

guide and triangulating information obtained from the interviews. In total, we collected 59 news articles that were published between November 2019 and May 2024 (i.e., post the adoption of the policy) from the websites of Euractiv, EUobserver and Politico (supplementary material, ANNEX 1). Our search including articles containing "EPBD" or "Energy performance of buildings directive" on each website. In addition, we gathered thirteen documents from the websites of the EU organizations. From this we elicited the major events and main policy changes in the policy process that had implications for policy integration.

After establishing an overview of the policy processes, we conducted six semi-structured interviews with seven policy officials in the European Commission to inquire about the factors influencing the internal integration process. Although based on an analytical framework, the questions were formulated in an open-ended manner way to allow for insights beyond it (supplementary material, ANNEX 2). These interviews covered public officials from the Directorate-General for Energy (DG ENER), the Directorate-General for Climate Action (DG CLIMA), DG for Employment, Social Affairs and Inclusion (DG EMPL), and the Secretariate General of the European Commission (SG) and lasted about 45–60 min each. Access to the Council, the Parliament, and MS was a constraint, and we reflect on such limitations in Sect. "The political process of policy integration". During our data analysis, we added scientific publications to support and provide context to our findings.

Data analysis

After conducting and recording the interviews, transcripts were generated. Then, interviews, documents and media articles were coded abductively in a consistent manner in Atlas.ti 9.0.18 for Windows (Scientific Software Development GmbH, 2023). We read the texts line by line and selected quotations referring to (1) the policy output, (2) the integration process, (3) actors, (4) the policy process more in general, (5) issues that were connected to the policy, and (6) elements of the policy. Following a round of open coding, we regrouped and categorized codes iteratively (see supplementary material, ANNEX 3 for the resulting code book). Then, we elicited text from the codes about the changes in policy output to arrive at the levels of CPI, first compared to previous EPBDs (supplementary material, ANNEX 4), and then compared with the different process stages in the 2024 recast of the EPBD (see supplementary material, ANNEX 5 for a detailed explanation of determining levels of CPI). This was based on the code group "output integration" and "actors". Second, we reconstructed the policy process based on the codes in the code groups "integration process", "policy process", "output integration", "policy elements", and "policy issues". From this text, we identified the CPI levels for governance capacities, and we identified drivers of policy integration.

Results

The policy process of the EPBD 2024 recast can be divided into two phases. In the first phase, the EPBD was set on the agenda by the European Commission after the elections for the European Union in 2019. The publishing of a proposal placed the EPBD formally on the policy agenda of the Council and the Parliament and initiated the adoption phase. In this second phase, the Council, and the Parliament each developed their positions, before

negotiating an inter-institutional agreement in the so-called Trilogues between the Council, the Parliament, and the Commission. Finally, the EPBD was adopted by Council and Parliament in May 2024. By the end of this investigation, implementation phase had not yet begun and is outside the scope of the analysis.

Levels of policy integration in the policy process of the EPBD

The levels of policy integration varied during the policy process and across policy venues (Fig. 1). First, the proposal of the Commission contained moderate to high levels of policy integration in objectives and instruments, consisting of the proposal of several important new elements to achieve climate change mitigation. MS were required to establish detailed "renovation action plans" with stricter and more specific renovation targets. A renovation wave of the worst-performing buildings should be stimulated by "Minimum Energy Performance Standards" (MEPS). Finally, new buildings were required to estimate their life-cycle emissions and fulfil zero-emission standards (EU Commission 2021b). Earlier drafts of the Commission's proposal contained even higher levels of integration (Taylor 2021b). The governance capacities in the Commission generally remained the same (Interview 2), based on the EU's guidelines for "Better Regulation" (Radaelli, 2018). These included coordination procedures for policy formulation, such as interdepartmental consultations, interservice groups, and interservice consultations (see Sect. "Agenda setting") (Selianko & Lenschow, 2015). Nevertheless, integrative capacities might have increased slightly as DG ENER became more supportive of climate change mitigation (Interview 2).

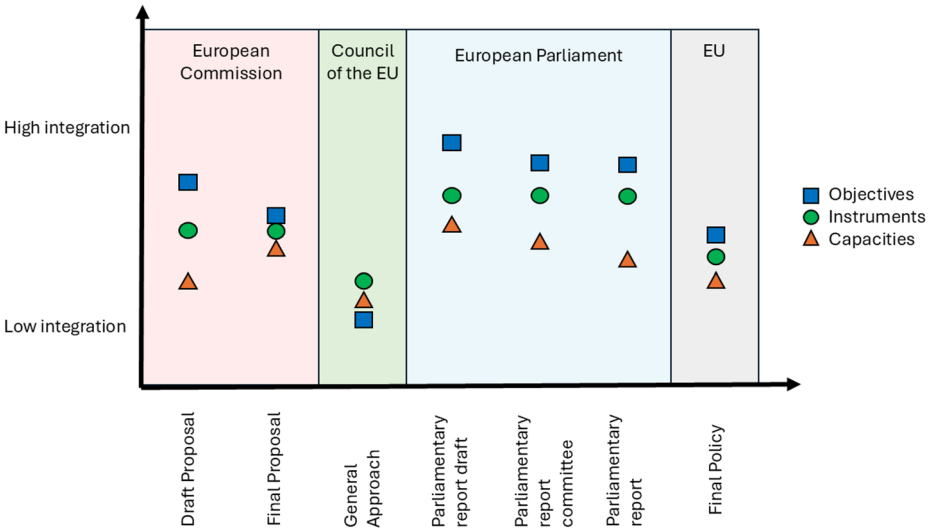

Fig. 1 Integration Levels during the Policy Process. Shown are levels of integration for policy objectives, policy instruments and the integrative capacities of each process step. (see Sect. "Integration dimensions" for detailed explanation). These levels are differentiated by process stages (see Sect. "Agenda setting" and "Policy adoption" for detailed explanation) and by the venue that was involved. These levels result from our own assessment and are meant as an indication of the trends for the levels of policy integration relative to each other (see supplementary material, ANNEX 5 for a detailed explanation of our assessment methodology)

Later in the adoption phase, the Council planned to weaken some of the proposed goals and instruments. Therefore, its proposal contained a low degree of policy integration. MS would be allowed to set own national trajectories for renovation plans. MEPS goals were lowered in ambition and residential homes were excluded from them (Council of the European Union 2022a). On the contrary, the Parliament proposed moderate to high levels of policy integration. Envisioning more ambitious MEPS than the Commission, it introduced a phase-out of fossil fuel heaters by 2035, offered more support for rooftop solar energy (PV), and adopted instruments for a stronger social protection, for example, against rent increases (EU Parliament 2023a; EU Parliament 2023b). Whether these divergent CPI levels resulted from different governance capacities was hard to assess due to limited information regarding the policy processes in these venues. Governance capacities in the Council and the Parliament would conceivably be lower than in the Commission, given their constrained administrative capacity. However, the high levels of integration in the objectives and instruments in the Parliament as well as the activities of the rapporteur indicate higher levels of individual capacities in that venue, thus also indicating moderate capacities there.

The compromise between Council and Parliament in the final EPBD then balanced out to a low to medium level of integration in objectives and instruments, albeit below the initial level of integration of the proposal of the Commission. Residential homes remained excluded from MEPS, but the national trajectories were made stricter; phase-out of boilers were included with a later deadline of 2040, and solar rooftops were mandated on new residential buildings by 2030 (EU Commission 2024b). The low levels of integration in governance capacities of the final EPBD correspond to the Trilogues. It is estimated that they inhere lower capacities than in the Parliament and Commission, and higher capacities than in the Council, based on the integration levels of objectives and instruments in the final EPBD. Beyond integration levels in the current EPBD, these final levels represent an increase of integration in objectives and instruments, and a likely small increase in capacities compared to previous EPBDs (Dupont, 2016).

Agenda setting

Issue salience of climate change at the European elections 2019

A crucial factor that enabled the overall acceleration of policy integration was issue salience of climate change mitigation around the 2019 European elections (Interview 2, 3, 5, Dupont et al., 2024). After years of climate policy stagnation due to the migration crisis and opposition from the Visegrad countries (Poland, Czechia, Hungary and Slovakia) (Rietig, 2021; Skjærseth, 2021), large parts of Europe faced heat waves and droughts in 2018 and 2019. Simultaneously, Europe witnessed the rise of social movements, most notably “Fridays for Future”, in which the youth demanded faster political solutions to the climate emergency (Interview 3). Consequently, political parties across the spectrum started incorporating climate policy into their agendas (Interview 3).

In the political guidelines for her candidacy for the 2019–2024 presidency of the European Commission, Dr. Ursula von der Leyen adopted an ambitious climate policy agenda “the European Green Deal” (Von der Leyen, 2019). Among other measures, the Green Deal included increasing the emission reduction target for 2030 from then 40% to at least 50%. Moreover, von der Leyen proposed to “review and […] to revise where necessary, all rel-

evant climate-related policy instruments" (von der Leyen, 2019). After becoming president, the Commission formulated a proposal for the European Green Deal (European Commission 2019), in which it designated a key role to the built environment (Oroschakoff 2019; Deleu and Odgaard 2021). Officials in DG ENER referred to building renovations as "one of the flagships of the new Commission" (Simon 2019). Subsequently, the Commission raised its target for energy savings and building renovations (Politico 2020) and developed the strategy "A renovation wave for Europe – Greening our buildings, creating jobs, improving lives" (EU Commission 2020; Chu 2020), which recognized the implementation of the 2018 EPBD amendment as insufficient and proposed to formulate a recast of the EPBD (i.e. a replacement by a single new act) (Interview 5; Sánchez-Nicolás 2020).

Formulation of the proposal of the European commission

While the policy formulation process and coordination mechanisms did not deviate much from existing procedures, as had been laid out by the Better Regulation Guidelines (Radaelli, 2018), DG ENER had become more supportive of climate change mitigation (Interview 2). In leading the process, it held regular meetings with members from other DGs (interservice groups) for an interdisciplinary perspective and discussion on impact assessment (Interview 5). In this process, DG ENER still retained most control:

> *"There is typically no brainstorming, where we, you know, from scratch say what do we want to do with buildings." (Interview 4)*

> *It is not that [policy officers from DG ENER] come to us and discuss with us in all detail what they want to do, […] in the end of the day they make their own impact assessment, […] they go into service consultations, they do present what the kind of ideas are to put on the table, and we react on them. (Interview 2)*

After creation of the draft proposal, the process entered interservice consultations, where other DGs had the opportunity to provide written comments (Interview 1, 2). These consultations were held in a fast-track mode, reducing policy formulation from the typical one-and-a-half years to one year (Interview 1). Additionally, units were often already busy with their own files for the "Fit for 55" package (Interview 4). Furthermore, COVID-19 resulted in extra work for staff members (Simon 2020, Taylor 2021c), who partly became overworked (Interview 4). This lack of time and capacity posed a barrier to integrative coordination, although overall the process in the Commission was considered straightforward and trustful, and based on established relationships from previous policy processes (Interviews 1, 6).

The interservice-consultations resulted in lower levels of CPI, for example in the MEPS for residential buildings, which were lowered from class C by 2033 (Taylor 2021b), to class E by 2033 (Taylor 2021a). Yet, coordination was also beneficial for CPI to some extent, which can be seen for example by the inclusion of social justice through DG EMPL in Article 15(12) to generate social acceptance of CPI: "Financial incentives shall target as a priority vulnerable households, people affected by energy poverty and people living in social housing" (Interview 4, 5).

The Commission finally put forward a proposal for a Directive "on the energy performance of buildings" on 15th December 2021 (European Commission 2021b, Simon 2021a, Kurmayer 2021b, Mathiesen and Hernández-Morales 2021) as part of the "Fit for 55" package (European Commission 2021a, Oroschakoff 2021, Sánchez-Nicolás 2021). Compared to earlier EPBDs, this proposal included major new elements: the mandatory renovation of existing, worst-performing buildings (MEPS); decarbonization pathways in the national building renovation plans; zero-emission standards for new buildings; renovation passports; and measurement of the life-cycle emissions of new buildings. The proposal triggered backing from consumer and industry groups, and concerns of some MS over the costs for the public sector, building owners, and tenants (Mathiesen and Hernández-Morales 2021).

Policy adoption

Shortly after the Commission published its proposal, Russia invaded Ukraine on February 24, 2022. This catalyzed the energy crisis in Europe (Giuli & Oberthür, 2023; Homeyer et al., 2022), causing a shortage in gas supply and spike in energy prices. As a response, the Commission developed the REPower EU program to attain independence from Russian fossil fuel imports (Simon and Taylor 2022, Kurmayer 2022g, Kurmayer 2022h) and "invite[d] the Parliament and Council to enable additional savings and energy efficiency gains in buildings" (European Commission 2022). Despite this framing of the energy crisis as an opportunity for a more ambitious EPBD, cautious voices surfaced about the politically sensitive nature of obligations to renovate and the high costs on the citizenry of implementing the EPBD (Taylor 2022a).

Readings in the council: opposition to climate policy integration

In the Council, seventeen MS formed a "flexibility coalition" following Italy's and Poland's push to introduce more flexible regulations regarding residential MEPS (Kurmayer 2022b; Björklund et al., 2024). The Czech presidency was somewhat in line with this (Kurmayer 2022e), and EU countries in favor of a more ambitious EPBD (i.e., France, Germany, Spain, Austria, Luxembourg, Denmark, and Ireland) were far from forming a qualified majority in the Council. A reason for this flexible position of many MS was concerns about financing of the renovations despite the unprecedented volume of the EU Recovery and Resilience fund (Simon 2020, Taylor 2021c). MS were not willing to provide sufficient additional funding (Interview 4; Kurmayer and Romano 2023). Instead, they highlighted the costs that homeowners would have to pay and warned about 'renovictions', when rent increases following a renovation forces tenants to move out (Kurmayer 2022f).

On October 25, 2022, the Council reached agreement on its position, leaving more room for MS to implement the EPBD (Council of the EU, 2022a): It removed mandatory renovation for the worst-performing buildings and required MS instead to set up national renovation trajectories to achieve an average of class D for the whole residential buildings stock by 2033 and a nationally determined class by 2040. Further, it allowed for exemptions for individual buildings and postponed the timelines for non-residential MEPS (Kurmayer 2022b; Council of the EU 2022a).

Readings in the parliament: political leadership for climate policy integration

In the Parliament, the Committee on Industry, Research and Energy (ITRE) appointed rapporteur Ciarán Cuffe from the Greens/European Free Alliance (Greens/EFA) to create the parliamentary report (Kurmayer 2022a). Cuffe drafted an ambitious report, but national governments continued to raise concerns about building heritage and costs for citizens. Matteo Salvini, the far-right wing Italian Minister of Infrastructure and Transport in the newly elected Meloni government, commented on the EPBD:

> *"We will oppose it, in the name of common sense and realism, as a government but above all as Italians. A house is a precious good, the fruit of a life of sacrifices, a place of memories and affections." (Kurmayer and Romano 2023).*

To retain cross-party support, Cuffe adopted compromises such as the inclusion of hydrogen as a non-fossil heating source (Kurmayer 2023b, Jack 2023, van Gaal 2023b) and exemptions for heritage buildings. Subsequently, ITRE adopted the report on February 9, 2023 (Kurmayer 2023a, van Gaal 2023a). Next, the EPBD faced further opposition in the parliamentary readings, mainly through amendments from the far-right Identity and Democracy (ID) and the nationalist European Conservatives and Reformists (ECR), but also some members from conservatives and liberals (Kurmayer 2023j, Kurmayer 2023k).

Finally, the European Parliament adopted the report on March 14, 2023, with a stable majority (Taylor 2023). Despite the compromises, it represented even higher levels of climate integration than the proposal by the Commission. The report included more ambitious MEPS (renovation of residential homes to at least class D by 2030), and exemptions from them for social housing, and in case of a lack of skilled labor, technical, or economic infeasibility of a mandatory renovation. Further, the report excluded buildings with conservation and heritage values from MEPS. The date for mandatory net zero emission buildings was also brought forward to 2028 and fossil heat sources were to be phased out by 2035. Lastly, hydrogen was added as a sustainable heating source (European Parliament 2023a, European Parliament 2023b). In the end, Cuffe managed to produce a parliamentary report that enjoyed wide political support from parties across the spectrum and served as a strong basis for negotiation in the Trilogues. This highlights the importance of political leadership for policy integration.

Trilogues and adoption

During the Trilogues, several factors complicated and delayed progress on the EPBD. The cost crisis in the building sector intensified due to the energy crisis from 2021 to 2023, increasing the uncertainty regarding the long-term return of investment from the reduced energy consumption after renovation (Interview 5). Heritage concerns continued to be a contentious topic because buildings with heritage value that are not listed would still fall under mandatory renovation. This would have resulted in high costs for owners and threatened the heritage status (Messad 2023, Kurmayer 2023g). Additionally, due to low social acceptance of their national building energy performance legislation "Gebäudeenergiegesetz" (Buildings Energy Act) (Kurmayer 2023e, Kurmayer 2023f, Von der Burchard and Karnitschnig 2023), the German government withdrew support for MEPS (Kurmayer

Table 2 Comparison of factors identified in the literature and in the EPBD recast

Factor	Present in literature	Present in EPBD recast
External Pressure	Crises, elections, social movements, global climate negotiations	Extreme weather events, social movements, elections, COVID-19 energy crisis, cost-of living-crisis
Issue Salience	Perceived importance of content, problem framing	High importance of integrated climate change mitigation, emphasis on renovation costs
Political ideology	Position of a party on a certain issue	EU elections led parties to focus on climate change mitigation
Institutional Structure	Procedural rules, meeting structures	Trustful coordination process, time constraints, subsidiary principle
Actors	Political leadership	Political leadership from the president of the Commission and the rapporteur of the parliament
Actors	Veto players	Flexibility coalition of MS; right wing-parties in Parliament

2023d, Alipur 2023, Kurmayer 2023h). Moreover, both the Swedish and Spanish presidencies showed little motivation to close the EPBD file (Politico 2022, Kurmayer 2023h).

Eventually, a preliminary agreement between the Council and Parliament was settled on December 7, 2023 (Council of the EU 2023, Kurmayer 2023c, Kurmayer 2023l, Kurmayer 2023m, Hernández-Morales and Coi 2023). The EPBD was finally adopted on April 24, 2024 (Kurmayer 2024a, Kurmayer 2024b, European Commission 2024), with Croatia, Czechia, Poland, Slovenia, and Sweden abstaining, and Hungary and Italy voting against it (Kurmayer 2024c). Its most notable change for CPI was the requirement for MS to establish national buildings renovation plans. They needed to include MEPS for non-residential buildings and trajectories for the renovation of worst-performing residential buildings. Also, new buildings were required to calculate their life-cycle carbon emissions and fulfil zero-emission standards by 2030. In addition, new fossil fuel heat boilers were to be phased out by 2040 (see supplementary material, ANNEX 4 for more information).

The adopted EPBD received criticism from NGOs, who argued that "the new rules are unlikely to spark additional efforts by EU countries to bring renovation rates above the current average of 1% annually" (Kurmayer 2023m). Nevertheless, the significance of the EPBD should not be underestimated:

> *"If you would go to the first version [of the EPBD], it is an energy efficiency policy, it is about renovating your house, or the warmth that you need to put into your house is as small as possible and therefore you've saved energy.[…] We've now come to the point that says: No, your house should simply have no emissions coming out of your smoke stacks. […] I think that was from our perspective an important evolution over time, eh maybe making the EPBD in its central deliverable become more climate policy than an energy efficiency policy." (Interview 2)*

Over the course of this process, we identified several drivers of the policy integration process (Table 2).

Discussion and conclusion

Levels and drivers of CPI in the EPBD

In this study, we set out to answer the following questions: (1) What is the level of policy integration in the EPBD (2019–2024)? (2) How did the drivers for integration interact during its agenda setting and adoption?

Regarding integration levels, we found that the 2024 recast of the EPBD represents a moderate, yet significant increase of CPI that differs between different integration dimensions. We observed significant increases of integration in the dimensions of policy objectives and policy instruments, but not in capacities. The increases concern stricter measures for the renovation of existing buildings, and the introduction of zero-emission standards for new buildings. However, these significant increases of CPI still cast doubt on whether EU climate targets will be reached, and higher levels of CPI face barriers of sufficient funding, social justice and building heritage. Furthermore, integration levels varied between policy stages and policy venues. During agenda-setting, the proposal of the Commission represented overall medium levels of integration. In the adoption phase, integration levels varied between low levels in the Council and medium to high levels in the Parliament, which finally balanced out to low to medium levels in the final policy.

The main drivers of this integration process were issue salience and political leadership. We found that the EPBD was put on the agenda in times of the European Elections in 2019 because of a high issue salience of climate change following extreme weather events and social movements. During the adoption phase, the energy crisis caused an increase in construction costs, making the additional costs of the EPBD for homeowners, tenants, and MS a salient topic. However, the energy crisis impacted integration levels differently depending on political leadership in the policy venues. In the Council, a flexibility coalition formed that was critical of the proposed changes in the EPBD, for example regarding residential MEPS. In the Parliament, the rapporteur Ciarán Cuffe negotiated a parliamentary report with high levels of CPI and cross-party support.

Our findings contribute to academic debates in several ways. They provide a better understanding of CPI in the building sector and at EU level (Sect. "Integration of climate change mitigation in EU policymaking on buildings"), and they give insights on policy integration as a political process with particular emphasis on the interactions of issue salience and political leadership (Sect. "The political process of policy integration").

Integration of climate change mitigation in EU policymaking on buildings

One important contribution is the empirical insight into CPI in the building sector, and the EU's "Fit for 55" package. A previous analysis of Dupont (2016) on the 2002 and 2010 EPBD assigned low levels of CPI for policy instruments and objectives, and low to medium levels of CPI to integrative governance capacities. While this might indicate only a small progress of the new EPBD, it is worth noticing that our assessment of integration levels differs from Dupont (2016). Our assessment likely skews levels towards the lower end because it emphasizes relative differences of CPI levels within the current EPBD process, rather than absolute levels of CPI compared to a climate neutrality benchmark. Thus, the progress of integration in the current EPBD is still significant. Overall, the distinction of integration

dimensions, as suggested by Candel and Biesbroek (2016) and Cejudo and Trein (2023a) proved useful in providing nuance to these different integration dynamics.

What is striking about our results is that integration advanced in objectives and instruments, but not in capacities. There are some integrative capacities in the coordination mechanisms of the Commission and the Council that acknowledge cross-cutting issues in their decision-making (Hustedt & Seyfried, 2016; Selianko & Lenschow, 2015; Thaler, 2016). In the case of the Parliament these mechanisms are less clear, and likely more dependent on the expertise of (shadow) rapporteurs and their assistants (Laloux & Delreux, 2021; Servent & Panning, 2019). Nevertheless, these mechanisms have not been altered for the current EPBD in order to enable more CPI. Considering the failure to reach higher overall CPI levels for objectives and instruments, this begs the question whether higher CPI necessitates higher levels of integrative capacity, as suggested by scholars addressing policy integration (Domorenok et al., 2021).

In order to provide recommendations for increasing integrative capacity, it is useful to detail the existing capacities in each EU institution. In the Commission, integrative capacities consisted of inter-service groups with members from different DGs. They coordinated broad topics of the new proposal informally, and in a proactive way during policy formulation. Later in the formal interservice consultations, DGs then provided comments that went beyond preventing consequences on their own policy agendas but instead aimed at improving the quality of the Commission's proposal. This reflects dynamics that Candel et al. (2023) term incremental coordination. The integrative capacity of these coordination mechanisms could then be strengthened through a more interdisciplinary education of existing policy staff, or more interdisciplinary staff within DG ENER. Further, it could be achieved through integrative presidential leadership styles (Rietig & Dupont, 2021), or more integrative coordination mechanisms between DGs.

For the integrative capacity in Council and Parliament, the lack of access to interviewees prevents a deeper analysis of capacities. In general, the administrative capacity in the Parliament and the Council is smaller than in the Commission. In the Parliament, the high levels of CPI in objectives and instruments in the parliamentary report might suggest high individual integrative capacity of the rapporteur, contrary to previous EPBDs (Dupont, 2016). Beyond the rapporteur, previous findings suggest otherwise low levels of integrative capacities in the Parliament (Dupont, 2016). Therefore, CPI could also benefit from higher integrative capacity in the Council and the Parliament. However, increasing integrative capacities in the EU institutions requires additional resources of personnel, education, or coordination practices, which demands a balanced deliberation about the expediency of policy integration (Candel, 2021). In any case, the politicized context in favor of climate action alone failed to achieve a high degree of CPI.

The political process of policy integration

A second significant contribution of this study relates to the literature on policy integration processes. Our research has highlighted the importance of distinguishing integration levels between policy venues and policy stages, as an addition to the integration dimensions. This way, we could identify that the lack of CPI in the EPBD results from a lack of CPI in the Council, rather than Commission or Parliament, and lack of CPI in policy adoption rather than agenda-setting. In this context it should be noted that boundaries between policy stages

are not always clear. For example, agenda-setting continued during the adoption phase when Parliamentarians introduced building heritage as a concern. Overall, the different integration levels in the stages highlight the need to consider policy integration throughout the entire policy process.

Further, our findings point out that the integration of a specific issue, such as climate change mitigation, requires thoughtful consideration and integration of other crucial issues related to this topic. In the case of the EPBD, consideration of building heritage, budgetary concerns and social justice have proven to be crucial for achieving increased levels of CPI. Therefore, it is important to clearly define what type of integration is the topic of concern. While the general policy integration is increased by adding the above concerns to the policy debate, its outcome on CPI depends on the way that this integration of issues takes place.

The most compelling contribution of our study relates to the importance of issue salience and political leadership as drivers of policy integration. While we identified several drivers that changed the course of integration, issue salience was a dominant factor for the dynamics in the integration process of the EPBD. The fact that climate change mitigation was salient during the 2019 European Elections catalyzed political leadership in the Commission and allowed for medium levels of integration in the proposal of the Commission proposal. This is in contrast to Dupont's (2016) analysis of integration processes of earlier reforms of the EPBD, which were outcomes of shifts in technological framing and the more internal ambition of the EU for political leadership in climate policy (Boasson & Wettestad, 2013). Back then, these drivers only allowed for low levels of policy integration (Dupont, 2016). This supports our finding that external events that increase issue salience can trigger changes in the levels of policy integration (Cejudo & Trein, 2023a).

However, even in the presence of strong issue salience, agency is another crucial driver of policy integration (Goyal et al., 2020). When rising costs in the construction sector introduced additional burden on owners and investors, a lack of political leadership in the Council led to a decrease in policy integration. This is similar to previous EPBD processes in 2002 and 2010, where the Council has been found to be the main blocking force for more policy integration (Dupont, 2016). On the contrary, the Parliament faced similar pressures but managed to elevate integration levels through the political leadership of the parliamentary rapporteur (see also Goyal et al., 2021). These different outcomes reveal that while varied factors influence pathways to integration it is important to understand their interactions in shaping integration levels. The example of the Parliament highlights how political leadership can even mitigate issue salience that counteracts policy integration (Cejudo & Trein, 2023a). This political leadership is different from policy entrepreneurship, which has been identified in previous studies on policy integration (Rietig, 2014; Svensson, 2019). While there policy entrepreneurs presented new policy ideas to increase integration, in our case political leaders mobilized public opinion, or influenced negotiations in favor of integrative proposals (see also Herweg et al., 2015; Roberts and King, 1991).

Limitations and future research

While the present study rests on a solid methodological conduct and stable evidence base, some limitations must be borne in mind. First, we had limited access to representatives of the Council, Parliament, and MS, possibly biasing our assessment of integrative capacities and drivers of policy integration. Second, our focus on EU institutions meant that the role of

other (non-EU) actors, such as businesses or environmental organizations, may have been underrepresented (Kefeli et al., 2023; e.g. Solorio et al., 2023).

First, a more extensive examination of politicized contexts is needed to clarify the role between issue salience, political leadership, and policy integration in more detail. Several new research questions can be raised. For example, under which conditions does issue salience lead to policy integration? How does issue salience shape the interactions of actors that integrate climate policy in the building sector? Finally, how can climate change mitigation of the building sector be brought back on the agenda under current unfavorable issue salience?

Additional research is also needed to understand how policy integration evolves in the implementation and evaluation stages. Did the EPBD succeed at trickling down to national and subnational levels of government, or did noncompliance prevail at the MS level? How do new procedural tools at the EU level such as the Governance Regulation (Directive 2018/1999/EU) with its National Energy and Climate Plans (NECPs) – which detail how EU MS plan, coordinate, and report on climate and energy policies – influence CPI levels in implementation? Are there implementing actors that managed to depoliticize the negative concerns about building decarbonization, and how did they deal with the changing external factors of rising renovation costs and lowering issue salience of climate change mitigation?

Despite these limitations and avenues for future research, our study marks a crucial step towards understanding the political dimension of policy integration. Our research showed that the case of the EPBD 2024 represents a moderate, but significant increase in CPI, mainly in objectives and instruments, and less in capacities. Further, it showed the usefulness of recognizing policy integration as a dynamic process, during which the levels of integration vary across policy venues and between policy stages. Finally, it shed light on the interactions of political drivers of policy integration and highlighted the importance of both issue salience and political leadership to advance levels of policy integration.

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Declarations

Competing interests The authors declare no competing interests.

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