


# Policy dismantling at EU level: Reaching the limits of 'an ever-closer ecological union'?

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Having explained their adoption, analysts are now trying to understand how EU environmental policies have subsequently evolved over time. In 2003, David Vogel famously speculated that having overtaken the US in the environmental race to the top, EU policies would also eventually succumb to policy gridlock, that is, neither expanding nor dismantling. Empirical research has since confirmed that EU policy expansion is in decline, but less is known about why dismantling has also been very limited. This article breaks new ground by reconfiguring dismantling—a concept developed for national policy systems—to explain the various dismantling strategies deployed at EU level (1992 to 2016). It finds that the absence of significant dismantling is due both to the symbolic nature of early dismantling attempts and the failure of more recent attempts to build coalitions that overcome institutional obstacles to policy change in the EU.

## 1 | INTRODUCTION

Leadership in the development of new policies has been a longstanding theme in environmental policy analysis. The conventional wisdom is that until the 1980s, the US was the world's environmental lead state. Its environmental policies were demonstratively more ambitious than the EU's. But in a highly influential article published in 2003, Vogel argued that things started to change after 1990. His core claim—that throughout the 1990s the European 'tortoise' gradually caught up and, in many respects, overtook the American 'hare' as political opposition to new policies grew—has been repeatedly confirmed by subsequent developments (Vogel 2012). Into the early 2000s, the EU continued to move seemingly ineluctably towards what Weale et al. (2002) termed an 'ever closer ecological union'. And in international negotiations, evidence of the EU exerting its power to push up international standards has continued to accumulate (Selin and VanDeveer 2015)—such as in the area of climate change (Oberthür and Groen 2017).

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Meanwhile, Vogel argued that weakened support for new policies in the US after 1990 also went hand in hand with political demands for what he termed policy roll-back—or what is now more commonly referred to as policy dismantling, that is, ‘the cutting, diminution or removal of existing policy’ (Jordan et al. 2013, p. 795). These demands were amplified in the subsequent W. Bush and Trump administrations (Layzer 2012; Klyza and Sousa 2013; Bomberg 2017). When Vogel completed his 2003 article, attempts to achieve dismantling were also running into political opposition, this time from pro-environment interests. The net result of limited expansion and limited dismantling was what he termed policy gridlock (Vogel 2003). Vogel concluded his article with a bold prediction: that having caught up with the US, the EU would continue to follow in its footsteps, gradually moving in a less environmentally ambitious direction. Crucially, he claimed that the state of policy gridlock in the US after 1990 would ‘at some point occur in Europe’ (Vogel 2003, p. 580). But has it?

EU environmental legislation has grown from a few dozen laws in the 1970s to over 400 pieces (Delreux and Happaerts 2016). This growth has been at the heart of the EU’s emergence as an environmental ‘Regulatory State’ (Majone 1999) and has attracted the attention of many policy scholars. Their work has revealed that after three decades of significant policy expansion, the Commission significantly reduced the number of new policy proposals after the late 2000s. Policy sectors such as the environment and health were particularly heavily affected (Kassim et al. 2017). This pattern of events has confirmed the first part of Vogel’s prediction: that policy expansion would stall.

What about the other part: that policy dismantling would fail? The rapid rise up the EU’s agenda of new discourses of better regulation and ‘fitness checking’ has certainly attracted the attention of analysts (Gravey and Jordan 2016; Steinebach and Knill 2017). But studies of environmental policy dismantling at the EU level have been much more limited. Dismantling has generally been studied at the national, rather than at the EU level. Over three decades ago, Hanf (1989), for example, analysed the deregulation of environmental policy in the Netherlands. More recently Jordan and Turnpenny (2012) and Bernauer and Knill (2012) have studied dismantling in the UK and Germany, respectively. Initial studies of the content of policies at the EU level have, however, suggested that significant dismantling is not occurring at the EU level. Various studies (e.g., Schaffrin et al. 2015; Gravey 2016; Steinebach and Knill 2017; Burns et al. 2019) have, for example, pointed out that in spite of multiple political demands for and the discourse of policy dismantling, EU environmental policies have not been dismantled across the board. In fact, in some cases the policies targeted for reform have become more not less stringent (Benson and Jordan 2014).

Hence, growing political demands for policy dismantling in the EU are not (yet) translating into significant policy change. What we do not really understand is why. In this article we make an original contribution by investigating how far the observed absence of significant policy dismantling can be explained by analysing the various dismantling strategies that have been deployed, that is, the ‘mode[s], method[s] or plan[s] chosen to bring about a desired dismantling effect’ (Bauer and Knill 2014, p. 37). We address the puzzling coexistence of growing dismantling discourses but limited dismantling of policy outputs by paying closer attention to the intervening process: namely the selection and implementation of dismantling strategies. We do so by analysing the selection and deployment of dismantling strategies at the EU level over an extended period of nearly 25 years (1992–2016). This period extends from the ratification of the Maastricht Treaty up to the 2016 UK referendum, prior to which the Cameron government listed policy dismantling as one of its four main demands in order to preserve the UK’s membership (Cameron 2015).

Section two briefly reviews what has been learnt—both empirically and theoretically—about dismantling since Vogel’s article. It sets out how we will analyse different dismantling strategies and, more specifically, how we will differentiate between them empirically. We claim that the explicit and visible attempts to dismantle noted above align with two distinct strategies developed by Bauer et al. (2012): active dismantling and symbolic dismantling. We investigate whether the absence of notable dismantling is best explained by the deployment of active dismantling strategies that fail (i.e., an active decision to dismantle that nevertheless yields no policy dismantling) or the use of symbolic dismantling strategies (i.e., dismantling in name only), by identifying and testing three possible explanations. Drawing on Pierson (1996) and Bauer et al. (2012), a first explanation would be that decision-makers failed to

assemble a sufficiently large winning coalition on what and how to dismantle—in effect foundering on the various hurdles in the EU's hyper consensual system. A second possible explanation is that although politicians managed to agree what and how to dismantle, they subsequently faced opposition from interest groups and voters (what Vogel claimed had happened in the US after 1990). A third possible explanation is that the commitment to dismantle was only ever symbolic. Symbolic dismantling refers to a situation in which explicit commitments to dismantle are deliberately not followed through by decision-makers, being limited to symbolic activities such as 'relabeling policies [and] ... commissioning consultations/evaluation reports' (Bauer and Knill 2012, p. 46).

Section three presents our empirical findings, encompassing the selection and deployment of dismantling strategies at the EU level. Finally, section four discusses our findings in relation to Vogel's predictions about the long-term relationship between expansion and dismantling and arrives at some conclusions with regard to how far EU environmental policy has, like the US, succumbed to a form of policy gridlock. It also reflects on the implications of our findings for future research on policy dismantling, EU integration and environmental policy leadership.

## 2 | STUDYING POLICY DISMANTLING: THE NEGLECTED ROLE OF REFRAMING AND VENUE-SHOPPING

Since Vogel's article on US environmental policy gridlock was published in 2003, other analysts have tried to add more fine-grained empirical detail. For example, Klyza and Sousa (2010) argued that the US environmental policies adopted in the 1960s, 1970s and 1980s created a supportive policy regime—a 'Green State'—that opposed dismantling in Congress. Thus, pro-environmental actors had 'simply to play defense to protect old commitments, typically an advantageous position in the American political system' (2010, p. 445). This broadly equates to our Explanation 1. It also echoed both Vogel's findings and (incidentally) Pierson's earlier arguments (1996) about how policy feedback sustains the welfare state (Jordan and Matt 2014).

Vogel concluded by pointing to the way in which dismantling was increasingly being blocked by Congress, but more recent studies have underlined the need to look 'beyond legislative gridlock' (Klyza and Sousa 2013) and examine attempts both to strengthen and weaken policies across multiple venues—that is, in the courts, in different states, etc. Korte and Joergens (2012) have usefully shown how a particular venue—the executive branch—can be used to weaken policies in the absence of congressional support, through budget cuts and political appointments. Hence, when, as in the US, governance is multi-levelled, analysts should be alive to the possibility that dismantling advocates (and opponents) may choose to switch their strategies to venues that are more (or less) conducive to the building of coalitions of support.

Finally, in exploring the agenda-setting stages of the policy process, Layzer (2012) emphasized that advocates of dismantling must also win the battle for attention just as advocates of policy expansion must, for example by emphasizing particular frames or ideas. She argued that after the 1980s, the US environmental movement lost the battle of ideas with conservatives, who reframed the issue into one of how to boost economic growth by dismantling existing policies and cutting 'red tape'. In the similarly multi-levelled governance context of the EU, frames and venues are potentially even more important than in the US; they are a means to 'gain ... attention' and 'build ... credibility' (Princen 2011, p. 928)—necessary conditions that have to be satisfied to achieve a winning coalition in favour of policy change, including dismantling.

In summary, the US literature suggests that venue-shopping and/or reframing are likely to be central to the pursuit of policy dismantling in the EU. Crucially, the vagaries of agenda setting explain why 'retrenchment opportunities wax and wane while institutional arrangements change slowly or not at all' (Sheingate 2000, p. 336). For EU analysts, the US literature also underscores the need to think about how pro- and anti-dismantling coalitions are built and sustained over time, including via the selection and deployment of different dismantling strategies, as these will be central to our Explanation 1.

**TABLE 1** Four ideal-types of dismantling strategy

	Low visibility (Blame avoidance strategies)	High visibility (Credit claiming strategies)
<b>No dismantling decision</b>	Dismantling by default	Symbolic dismantling
<b>Passive dismantling strategies</b>	<i>De facto reduction of environmental protection by refraining from adjusting existing levels to changing external conditions.</i>	<i>Political actors very deliberately declare their intentions to dismantle existing policies ... however, political declarations do not lead to respective outputs.</i>
<b>Active dismantling decision</b>	Dismantling by arena shifting	Active dismantling
<b>Active dismantling strategies</b>	<i>Transfer the whole policy (possibly with a different budget) to a different arena such as another government level (i.e., decentralization).</i>	<i>Exhibits high visibility with a strong and clear preference to dismantle. Politicians may not only want to be perceived as dismantlers; they may actually wish to dismantle existing policies.</i>

Source: Based on Bauer and Knill (2014, pp. 39–40).

In their study of national policy, Bauer and Knill (2014) suggested that there are, in principle, four ideal-types of dismantling strategy (see Table 1). These are based on two questions: first, whether the ‘political decision to dismantle is actively and consciously taken or not’; and second, to what extent ‘political actors wish to hide or reveal their dismantling activities’ (2014, p. 38). This creates two cleavages: between active and passive dismantling (i.e., whether politicians actively pursue dismantling or let it happen during their term of office without engaging with it); and between open and hidden dismantling (i.e., whether politicians try to avoid blame or claim credit).

As this article focuses on explaining the puzzling coexistence of dismantling talk and very little dismantling in practice (Gravey and Jordan 2016), we are particularly interested in the distinction between active dismantling and symbolic dismantling. Bauer and Knill (2014) suggest that these two are ideal-types: symbolic dismantling is evidenced by the commissioning of reports and/or the announcement that cuts will be made in future; by contrast, active dismantling is evidenced by cuts to the number of or the stringency of policies. But how can we distinguish between them empirically? And more specifically, how can we distinguish between failed active dismantling and symbolic dismantling? We do so by conceptualizing the strategies as two opposite points on a continuum of dismantling types, ranging from no or very limited initiative to pursue dismantling to a number of concrete policy initiatives (successful or not) to cut, remove or weaken policy outputs (see Table 2).

As one moves from the ‘symbolic’ to the ‘active’ end of this continuum, the empirical indicator is the growing number of deliberate policy initiatives, such as attempts to reframe dismantling in a new way or change the venue in

**TABLE 2** Indicative example of symbolic/active dismantling continuum

Symbolic dismantling		Active dismantling	
←		→	
Member state commissions report on dismantling policy	Report is supported by other member states	Report topic is put on the Council's agenda by the rotating Council presidency	Report recommendations are supported in Council meeting conclusions
European Commission sets up advisory panel to study policy ambition in a given policy area	Advisory panel recommends policy dismantling in given policy area	European Commission communication echoes advisory panel recommendations	European Commission yearly work plan includes dismantling specific policy instrument
Member of European Parliament calls for policy dismantling	Rapporteur calls for dismantling of precise instrument	Parliamentary Committee supports Rapporteur call for dismantling	Parliamentary plenary supports it

which it is pursued in order to increase support for (or decrease opposition to) it. This relates to what Princen (2011, p. 933) has described as linking policy initiatives with established overall values that are held to be central to the EU's 'purpose and identity' or with 'stated policy priorities and commitments' to garner sufficient support. Hence, a member state strategy of commissioning a report on EU 'red tape' would be considered symbolic. But if the member state subsequently followed up on that by building a political coalition to turn 'tackling red tape' into an EU-wide effort it would move towards the more active end of our continuum.

The rest of this article analyses the environmental policy dismantling strategies that have been employed at EU level from 1992 to 2016. How dismantling is framed by political actors and in which venues it is pursued are explored using two types of historical data. First, documents from the Commission, Parliament and member states, as well as reports from think tanks and civil society organizations were collected and coded using NVIVO. These data were used to identify the relationship between particular political actors, the targets of policy dismantling and the associated frames and venues. Second, we undertook 17 elite interviews with actors in the EU institutions (in the Commission, member states and Parliament) and in wider civil society (e.g., environmental NGOs, business lobbies, etc.).

### 3 | ENVIRONMENTAL POLICY DISMANTLING: A LONG-TERM PERSPECTIVE

On 2 June 1992, the Danish people voted down the Maastricht Treaty—the first time that voters had openly voted against deeper European integration. The EU Presidency at the time (July–December 1992) was held by the UK. It was tasked with bringing Denmark back into the fold. The UK eagerly seized this opportunity to advocate the dismantling of a range of (mostly environmental) policies which were causing it implementation difficulties at home (Jordan 2003). It did so by reframing dismantling as being consistent with subsidiarity, a principle that had long been discussed at EU level but was only formally integrated into the EU Treaties, alongside proportionality, by the Maastricht Treaty (Golub 1996). The UK calculated that such reframing would be a more successful dismantling strategy if it was perceived to achieve 'stated policy priorities and commitments' (Princen 2011, p. 933) by deepening European integration through securing Danish ratification.

However, its attempts at reframing were only partly successful. Reacting to the Danish 'no', the June 1992 European Council adopted a moderate interpretation of subsidiarity, that is, that 'all future legislative proposals' should be subsidiarity-proofed (ENDS Report 1992). Inside the European Parliament, the UK Chair of the Environment Committee, Ken Collins, expressed grave concerns that subsidiarity would be used to dismantle the entire environmental *acquis* (Agence Europe 1992a). These concerns were later echoed by the European Parliament's President, Egon Klepsch, who argued that the Parliament would 'energetically oppose any attempt to misuse the principle of subsidiarity in order to return to national policies or to intergovernmental cooperation' (Agence Europe 1992b). Conversely, the UK's Commissioner Leon Brittan supported the UK government approach and argued that the Commission should show greater 'self-restraint' in future (Agence Europe 1992c). The 1992 UK Presidency thus followed a two-pronged approach: subsidiarity should be applied to both new proposals (as already agreed in June) and to the most problematic parts of the existing *acquis*.

The UK's preferred dismantling strategy was to draw up lists of policies that the EU should agree to dismantle. However, the key venue for dismantling would be the Commission (as it held a monopoly over new EU legislative proposals), not the Council. Therefore, the UK Presidency invited the Commission President Jacques Delors to draw up an EU-wide hit-list (*Independent* 1992). However, as a venue, the Commission was not especially conducive to dismantling. The Commission, particularly under Delors, was emphatically pro-integration. Unsurprisingly, the Commission's list contained 20 proposals for new legislation—among them one (on zoos) that was only indirectly environmental—that could be removed, not items of the existing *acquis*. However, the Commission made somewhat vague and symbolic promises to update rather than dismantle existing legislation. Dissatisfied with Delors' list, the

UK Presidency produced its own list (*Financial Times* 1992). Leaked to the press shortly before the Edinburgh summit, it listed 37 directives and regulations (plus 34 proposals for new policy) for dismantling. Among the environmental items on that list, the UK suggested that one directive be completely repealed (shellfish waters) and five others weakened (relating to wildlife habitats, hazardous waste, bathing, drinking and ground-water, respectively).

In effect, the lack of political agreement at the EU level (our Explanation 1) spawned two parallel processes, each focused on a particular venue. First, a Commission-led process centred on the production of annual reports on the implementation of the subsidiarity and proportionality principles (European Commission 1993). Second, the UK, France and, eventually, Germany engaged in more listing activities. The UK and France produced a combined hit-list in 1993, targeting a mixture of new proposals and existing policies (covering habitats, zoo animals and environmental impact assessment) (Reuters 1993). Germany followed up with its own hit-list (with a sole environmental target: the proposal for a zoos directive) which received little support. However, Germany profoundly changed its tactics during its 1994 Council Presidency (Wurzel 2002) by reframing dismantling in terms of the pursuit of proportionality and competitiveness. It also pushed for a venue change. Writing on agricultural policy dismantling, Sheingate argued that clear 'jurisdictional boundaries' and the use of the unanimity rule renders venue-shopping within the EU much harder than in the US (2000, p. 357). The German Presidency tried to circumvent these obstacles by forming a new, independent ad hoc group to review the entire *acquis*. Known as the Molitor group, it was the first EU-wide effort to investigate the scope for dismantling the entire *acquis*. Although invoking different frames (i.e., proportionality instead of subsidiarity), Germany continued in the UK's footsteps by arguing that dismantling was 'pro-European' and would also bring the EU closer to its citizens (Agence Europe 1994).

The next (Santer) Commission openly supported Germany's attempt to reframe dismantling. It pledged to 'look-out for rules that are cumbersome, excessive and archaic' (European Commission 1995, p. 10). It supported the Molitor group and when that eventually ran out of steam through lack of active support from France (ENDS Report 1995) and the European Parliament, it developed new dismantling processes including consulting industry stakeholders (SLIM) and national experts (BEST) (European Commission 1998a). The Commission duly removed over 130 existing proposals and sharply reduced the number of new ones (European Commission 1998b). Santer's determination to do 'less but better' led him to advocate that each member state should set up its own better regulation unit (European Commission 1998a). Nevertheless, he resisted UK calls to establish one inside the Commission, suggesting that his personal commitment to dismantling was rather symbolic (House of Commons 1998)—in line with our Explanation 3.

The Commission subsequently came under added pressure when an internal political scandal in 1999 led to the resignation of the entire Commission. Santer's successor, Romano Prodi, embarked on a fresh round of reforms spurred on by the European Council, which in 2000 claimed that 'further efforts are required to lower the costs of doing business and remove unnecessary red tape' and called for better regulation (European Council 2000, p. 4).

Better regulation has been understood from 'three general perspectives' which can involve '(1) technocratic (evidence-based) policy-making; (2) deregulation or (3) participatory policy-making' (Bunea and Ibenskas 2017, p. 593). Hence, while Prodi's plans for better regulation are often viewed through the narrow prism of impact assessment (Radaelli and Meuwese 2009), that is, increasing the evidence-base of new policy-making, it is also important to remember that it was originally framed as a means to 'simplify ... existing legislation, in both qualitative and quantitative terms' (European Commission 2001, p. 4). This simplification was presented as 'an absolute necessity for the future of the European Union' (European Commission 2001, p. 2). Thus, policy dismantling was in effect being reframed, this time into a means of delivering better regulation. The Commission duly set itself wildly ambitious targets, such as to reduce the number of existing policies by 25 per cent by 2005 (European Commission 2001), to remove proposals if amendments through the legislative process were disproportionate or undermined subsidiarity (European Commission 2001, p. 18), and to create 'a new administrative and political culture' at EU level (European Commission 2001, p. 9). The Prodi Commission eventually failed to meet its 25 per cent reduction target, which it blamed on the lack of political support from the Council and the European Parliament (European Commission 2004, p. 10).

The struggle to achieve sufficient political support appeared to ease when, in 2004, a larger coalition of member states (Ireland, the Netherlands, Luxembourg and the UK—later joined by Austria and Finland) (Six Presidencies 2004) coordinated their Presidencies of the EU to push for much deeper regulatory reform. Crucially, they managed to agree on a single hit-list (Council of the European Union 2004) for ‘simplification’—a term which effectively brought more states on board. This list comprised a much larger number of environmental policies (five out of 17), all dealing with waste policy dismantling. Examples of dismantling included cutting policy instruments (obligation to inform citizens, compliance checks on public administrations) framed as reducing excessive administrative burdens. In addition to targeting specific policies, the Six Presidencies also attempted to reframe the better regulation agenda onto the narrower issue of administrative burden reduction (Six Presidencies 2004), an approach originally developed by the Netherlands and subsequently adopted by other member states, such as the UK and Germany (Wegrich 2009).

The start of the first Barroso Commission (Barroso I) was overshadowed by yet another political shock in 2005—the French and Dutch ‘no’ votes against the Constitutional Treaty. As with the Danish ‘no’ to Maastricht, this shock event was quickly seized on by some member states to pursue their pre-existing dismantling plans. For example, the UK 2005 Presidency again framed dismantling as something that would save Europe from itself:

We need to have allies for this approach, we need to build up alliances in the European Union, and we are determined to do so because we are doing it very much from a pro-European perspective. To be honest, if we approach it from any other perspective ... it will disappear. (John Hutton MP, in House of Lords EU Committee 2005, p. 22)

The Commission relaunched its better regulation strategy in 2005, but, in an effort to avoid blame, stressed that it was not about deregulation (Agence Europe 2005). In 2007 it initiated a new programme to reduce administrative burdens (with the old target of a 25 per cent reduction accompanied by a new deadline—2012), but stressed that it would really focus on *unnecessary* burdens (European Commission 2007). It also organized a new group (a High Level Expert Group on Administrative Burdens) chaired by Edmund Stoiber. One interviewee remarked that it was ‘a tool in the hands of the Commission, to show outside support for this reduction of administrative burdens agenda’ (Interview: Environment NGO November 2014). Inside support was beginning to grow in the higher echelons of the Commission and in DG Enterprise too. Its Commissioner Günter Verheugen was placed in charge of burden reduction (*European Voice* 2006), but he struggled to construct a political coalition (note, Explanation 1) as he had no direct authority over the legislative activities of other DGs (Interview: Business Lobby February 2015). Verheugen’s effort to limit policy expansion similarly floundered when Verheugen’s and Barroso’s joint attempt to prevent the adoption of new environmental policy strategies failed in the College of Commissioners when the then Environment Commissioner, Stavros Dimas, won the support of his fellow Commissioners (ENDS Report 2005).

Despite supporting Verheugen during his first term, Barroso’s focus on better regulation greatly increased in his second term (when he ‘suddenly woke up to better regulation’ (Interview: UK Official, January 2015), and, for the environmental movement, it ‘clearly got worse under Barroso II’ (Interview: Environment NGO, November 2014b)). Barroso reformed the Commission when he launched his ‘smart regulation’ initiative in 2010, bringing all better regulation activities together in the Secretariat General, under his ‘direct responsibility’ (European Commission 2010, p. 2). This changed the dynamic because the body overseeing policy dismantling now had ‘some formal power and a lot of informal power’ (Interview: Commission official, February 2015)—and used it to enforce Barroso’s political priorities (Zaun 2014) over the legislative DGs which remained ‘not very supportive with very few exceptions’ (Interview: Commission official, November 2014). Thus pro-dismantling advocates within the Commission did not stop at venue-shopping (i.e., shifting dismantling responsibilities from one DG to another) but also engaged in venue-shaping and even venue-creation, with the creation of numerous expert groups (from Molitor to Stoiber) and the empowerment of the Secretariat (Kassim et al. 2017).

The second Barroso Commission (Barroso II) further reframed dismantling attempts—moving beyond administrative to also include regulatory burdens through its EU Regulatory Fitness (REFIT) programme. Legislation and proposals which were deemed unfit would either be revised or repealed/withdrawn. Crucially, while REFIT initially targeted ‘unnecessary’ regulatory burdens (European Commission 2012, p. 2), in 2014 this caveat was removed and pledges were made to ‘cut red tape, remove regulatory burdens’ (European Commission 2014b, p. 2).

Although EU environmental policy was not expanding significantly around this time (ENDS Europe 2013), existing policies nonetheless still ranked high on many stakeholder hit-lists (Business Taskforce 2013; European Commission 2013). This led a Commission official to remark that ‘when people are talking about Brussels legislation they always pick on the environment’ (Interview: Commission Official, February 2015b), and an environmentalist to contend that when it came to cutting ‘red tape’, ‘the environment is being singled out, particularly at the European level’ (Interview: Environmental NGO, November 2014b). Out of nine active policy proposals withdrawn under REFIT (European Commission 2014a), two were flagship environmental proposals: one on access to justice; the other on soils. Environment Commissioner Potočnik was by this point ‘very isolated inside the Commission ... always in a minority position’ (Interview: Commission official, June 2015) and saw his proposals on plastic bags and the circular economy repeatedly delayed (ENDS Europe 2014).

Outside of the Commission, certain member states argued that REFIT was not going far enough. In 2013, the Dutch government reinvoked the subsidiarity framing, stating that it was ‘convinced that the time of an “ever closer union” in every possible policy area is behind us’ (Ministerie van Buitenlandse Zaken 2013, p. 1). Conversely, David Cameron questioned the validity of the Commission’s work, its review process, and requested Treaty change (Foreign & Commonwealth Office 2012; Business Taskforce 2013). He tried to build coalitions in the Council to upload the UK’s preferred dismantling model—a one[policy]-in, one-out rule. While such a move was supported by the Stoiber group (High-Level Group on Administrative Burdens 2014) and business (Business Europe 2014), it only received support from seven other member states. In France, President Hollande decried ‘blind regulation’ (*L’Expansion* 2013), while in Germany, Chancellor Merkel extolled the ‘exceptional contribution’ of the Commission’s REFIT plan (Bundesregierung.de 2013). Thus, by the end of the Barroso II Commission, and recalling Explanation 1, there was still no EU-wide dismantling coalition capable of bridging the gap between Commission-led reform efforts and the alliance of states demanding radical dismantling.

While Barroso II had already put greater emphasis on better regulation and dismantling than Barroso I, the early years of the Juncker Commission marked ‘a change from “saying to doing”’ (Interview: Commission Official, February 2015). Inside the College of Commissioners, Juncker furthered Barroso’s centralization of power and created the position of First Vice-President of the European Commission, with responsibility for better regulation. These changes sought to strengthen the ability of central services ‘to shut down whatever they don’t find politically convenient’ (Interview, Environment NGO, November 2014c). Juncker, echoing Santer, also severely reduced the Commission’s future work programme—there were only 23 proposals in the 2015 programme compared to an average of 150 per year under Barroso. This went hand in hand with a conscious effort not to automatically carry forward proposals from the previous Commission (under a new principle of political discontinuity) which resulted in the removal of 80 proposals. This attempt to reduce policy expansion was strongly criticized by environmental NGOs, the European Parliament and 11 member states. Subsequently, the Commission was forced to partially back-track (Politico.eu 2014). In addition, Juncker wrote in the Environment Commissioner Karmenu Vella’s appointment letter that his main priority was to ‘overhaul the existing environmental legislative framework to make it fit for purpose’ (Juncker 2014, p. 4), including undertaking fitness checks on the 1979 Birds and 1991 Habitats Directives. These two directives had recently been attacked by the UK government for ‘placing ridiculous costs on British businesses’—claims later contradicted by the UK government’s own review (*Guardian* 2012).

Once again, policy dismantling was being framed as pro-EU, a way to ‘make sure the overall project is not going to be fundamentally threatened by a relatively negative discussion that we now see in a number of member states’ (Interview: European Commission, November 2014). But this time, pushing for dismantling was perceived as being specifically linked to ‘the UK ... referendum and the opt-outs’ (Interview: European Commission, November 2014).



Hence, Cameron's renegotiation letter requested the Commission to continue its work of 'scaling back unnecessary legislation', asking specifically for 'a target to cut the total burden on business' (Cameron 2015, p. 3). Environmentalists argued that cutting EU red tape was Cameron's 'only strategy to keep the UK in the EU' (Interview: Environment NGO, November 2014c), and that 'the most rational explanation for Juncker's extreme deregulation agenda is the need to keep the UK in' (Interview: Environment NGO, November 2014b).

Critically, the REFIT of the Birds and Habitats Directives did not proceed smoothly, for the UK or the Commission. Environmental NGOs across the EU mobilized their supporters to respond to the Commission's consultation; eventually over 500,000 respondents sided with the NGOs, thus illustrating the relevance of our Explanation 2. This mobilization (the largest ever to a Commission consultation) included around 100,000 respondents from the UK (Guardian 2016). Eventually, Cameron changed tactics and instead argued that both directives were a reason to vote for Remain in the EU referendum (Birdlife.org 2016). The Commission finally confirmed that the directives were 'fit for purpose' in December 2016.

## 4 | DISMANTLING STRATEGIES AT THE EU LEVEL: ANALYSIS AND CONCLUSIONS

Between 1992 and 2016, there has been an ongoing debate among a growing cast of actors about when, why and how to dismantle environmental policy. Yet recent studies (Gravey and Jordan 2016; Steinebach and Knill 2017; Burns et al. 2019) have shown that large-scale policy dismantling has not actually taken place. Building on Pierson (1996) and Bauer and Knill (2014), we have argued that there are potentially three explanations for this failure to dismantle: (1) a failure to assemble a sufficiently large winning coalition on what and how to dismantle; (2) a failure to implement an agreement to dismantle because of opposition from interest groups and/or voters; or (3) symbolic dismantling where dismantling was never seriously intended by politicians. We tested these explanations by examining the various dismantling strategies deployed by various actors at the EU level. We did so by taking Bauer and Knill's (2014) distinction between active and symbolic dismantling strategies and reconceptualizing them as representing two ends of a continuum of types. We argued that analysts can determine whether a dismantling strategy is indeed 'active' or simply 'symbolic' by investigating the number and type of policy initiatives (such as attempts to reframe dismantling or change venue).

We found notable changes in the dismantling strategies employed over time. The strategies deployed in the 1990s tended towards the 'symbolic' end of the continuum (i.e., Explanation 3); they could be described as either paying lip-service to dismantling (such as the yearly reports from the Commission) or as short-lived and unable to summon majority support (e.g., hit-lists from a handful of member states). In the 2000s and 2010s, the dismantling strategies moved away from the 'symbolic' to the more 'active' end of our continuum. They were sustained over longer periods of time and, one by one, the institutional obstacles to dismantling in the Council and the Commission were challenged. Within the Council, the idea of dismantling became less controversial: by 2004, the Dutch Presidency had managed to unite states around a single hit-list. Moreover, by coordinating across Presidencies, member states were able to pursue dismantling beyond their own six-month term of office. Convincing a sufficiently large number of member states to dismantle a particular policy output nevertheless remained exceedingly difficult, given the vagaries of the issue attention cycle (Explanation 1). But certain frames—namely furthering competitiveness (especially after the Eurozone crisis) and pro-EU reform—and certain venues (Competitiveness Council, Commission Secretariat General) appeared much more conducive to successful coalition-building than others. The Juncker Commission marked a further step change—both in its increasingly active support for dismantling (aiming to 'cut red tape and remove regulatory burdens' (European Commission 2014c)) and in terms of public opposition to dismantling. Significantly, the Nature Alert campaign against the REFIT of the Birds and Habitats Directives marked the first and thus far only failure to implement dismantling due to opposition from interest groups and, in that case, civil society (i.e., corresponding to Explanation 2).

This finding, coupled with new research showing how policy expansion at the EU level has levelled off (Kassim et al. 2017; Steinebach and Knill 2017; Burns et al. 2019), vindicates Vogel's (2003) core prediction, namely that EU environmental policy would follow the same path as the US and become steadily more gridlocked, with the environmental movement devoting more of its time and energy to playing a defensive game. Time will tell whether this marks the beginning of the end of the steady transition to what Weale et al. termed an 'ever closer ecological union' (2002) or is a temporary hiatus. However, it definitely casts doubt on one of Vogel's more recent claims, namely that the 'American policy tools of cost-benefit analyses and regulatory impact assessment' have had 'little impact on the actual regulatory policies adopted by the EU' (Vogel 2013, p. 321).

What do our findings tell us about the more general phenomenon of policy dismantling? Bauer et al. (2012) hypothesized that dismantling advocates would pursue open 'credit claiming' strategies instead of more hidden 'blame-avoidance' strategies to dismantle green rules. Although the dismantling strategies we detected were open, actors often framed their arguments to avoid blame, stressing that dismantling was not deregulation, or arguing that dismantling would strengthen European integration. In that respect, environmental policy dismantling at the EU level is an example of the ongoing politicization of the EU level, which has 'affected all EU actors' actions and interactions, making for a "new" dynamics of EU governance that is more political in every way' (Schmidt 2018, p. 1548). Our findings show that the politicization of policies at the EU level can also be used by some to defend the EU's polity. This defence can be linked both to Explanation 1—some member states struggling to build a sufficiently large coalition because their peers view dismantling as anti-EU—but also, gradually, under Explanation 2, where civil society becomes more involved in shaping the implementation of dismantling 'on the ground'. The Nature Alert campaign in 2016 prevented the Commission from dismantling the nature directives; time will tell whether this campaign was an anomaly or a harbinger of things to come.

Our central focus in this article has been on the strategies used by actors to achieve or to block dismantling. More research is needed into the preferences driving policy dismantling—and on how opposition to the EU interacts with policy preferences. For example, are the greener member states favouring local over EU-level action, lest the latter succumbs to dismantling? The Commission's policy preferences certainly warrant further attention. Since the Danish 'no' vote, a profound culture change appears to have taken place inside that organization. The dominant frame in EU policy-making now appears to be that of 'self-restraint', but it has taken a long time to take root (it was first espoused by Sir Leon Brittan back in 1992 (Agence Europe 1992c)). The US experience of dismantling provides some possible explanations for this change. Layzer has argued that US Conservatives had built 'a compelling antiregulatory storyline to counter the environmentalist narrative' (Layzer 2012 p. 4). A similar framing has become pervasive in Brussels: '[e]verybody is talking the language of red tape ... [it] has become the dominant narrative to the point that even the people who disagree with it are using the same language, like the left-wing parties in the Parliament or the NGOs' (Interview: Environment NGO, November 2014b). This suggests that the Commission may have changed from actively opposing and/or delaying dismantling through symbolic measures (Explanations 1 and 3) to openly supporting more active dismantling. This finding is significant because it goes against standard assumptions that the Commission is hard-wired to oppose dismantling as it is a threat to its *raison d'être*—advancing European integration (Löfstedt 2007). It is also not the case that (see Steinebach and Knill 2017) the Commission has simply engaged in 'dismantling by default', that is, allowing a de facto reduction of environmental standards by failing to update them to changing environmental conditions (Bauer and Knill 2014). It is also different from the argument that the environmental *acquis* has reached such a mature stage that the Commission's main task is to revise and update existing policies (Burns et al. 2019). Rather, our research reveals something new—the Commission is actively engaging in a sustained campaign to limit new and dismantle existing regulations as part of an explicit pro-European integration strategy. It extends to all areas of its work, not just DG Environment (Kassim et al. 2017).

The changes in the Commission may change policy dynamics at the EU level. In the past, dismantling was advocated by states but opposed by the Commission and the Parliament (Explanation 1). However, if the Commission henceforth moves from opposing to supporting dismantling, then the remaining opponents will be the greener member states and the Parliament—a much-diminished coalition. It is also worth remembering that as well as making

policy dismantling more likely at the EU level, the Commission's complete control over the legislative agenda also means that its change of attitude may also make the risk of gridlock much more likely—and give it a particularly European flavour. Thus, unlike the US, gridlock would not come from opposing forces during the legislative stage (Explanation 1)—but through the removal of policy proposals at the pre-legislative stage, making it difficult for green states and the European Parliament to prevent it:

... if the Commission wants to withdraw a proposal, it withdraws a proposal and that's it. Parliament can show they are unhappy about it but they can't do anything. (Interview: Environment NGO, November 2014c)

Finally, the growing support for dismantling within the European Commission raises questions not only about the future of the *acquis* but about the very nature of the EU itself. Should the EU even be considered a regulatory state if the Commission actively dismantles the regulatory *acquis*, perhaps heralding the start of a new era of European disintegration by stealth?

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## REFERENCES

- Agence Europe (1992a). EP has reservations on subsidiarity in environmental field (1 July). Brussels: Agence Europe.
- Agence Europe (1992b). Birmingham summit: Klepsch calls for trilogie to be organised on subsidiarity (17 October). Brussels: Agence Europe.
- Agence Europe (1992c). Subsidiarity in the Constitution of the European Community (18 June). Brussels: Agence Europe.
- Agence Europe (1994). Mr Rexrodt explains and justifies German initiative in favour of a certain 'European deregulation' (8 September). Brussels: Agence Europe.
- Agence Europe (2005). EU/Informal Competitiveness Council: Günter Verheugen takes stock of progress in 'better regulation' initiative launched in March (14 July). Brussels: Agence Europe.
- Bauer, M. W., Jordan, A., Green-Pedersen, C., & Héritier, A. (Eds.) (2012). *Dismantling public policy*. Oxford: Oxford University Press.
- Bauer, M. W., & Knill, C. (2012). Understanding policy dismantling: An analytical framework. In M. W. Bauer, A. Jordan, C. Green-Pedersen, & A. Héritier (Eds.), *Dismantling public policy* (pp. 30–51). Oxford: Oxford University Press.
- Bauer, M. W., & Knill, C. (2014). A conceptual framework for the comparative analysis of policy change. *Journal of Comparative Policy Analysis: Research and Practice*, 16, 28–44.
- Benson, D., & Jordan, A. (2014). Explaining task allocation in the EU: 'Retooling' federalism for comparative analysis. *JCMS: Journal of Common Market Studies*, 52, 794–809.
- Bernauer, D., & Knill, C. (2012). When the dismantling of an ineffective policy becomes increasingly costly: Default strategies, arena-shifting, and symbolic action in German waste policy. In M. W. Bauer, A. Jordan, C. Green-Pedersen, & A. Héritier (Eds.), *Dismantling public policy* (pp. 155–175). Oxford: Oxford University Press.

- Birdlife (2016). UK's David Cameron supports EU nature laws, says they are reason to stay in the EU. Retrieved from: <http://www.birdlife.org/europe-and-central-asia/news/uks-david-cameron-supports-eu-nature-laws-says-they-are-reason-stay-eu>
- Bomberg, E. (2017). Environmental politics in the Trump era: An early assessment. *Environmental Politics*, 26, 956–963.
- Bundesregierung.de (2013). Cutting red tape: Fitness programme for Europe. Retrieved from: <http://www.bundesregierung.de/Content/Archiv/EN/Archiv17/Artikel/2013/10/2013-10-30-refit.html>
- Bunea, A., & Ibenskas, R. (2017). Unveiling patterns of contestation over Better Regulation reforms in the European Union. *Public Administration*, 95, 589–604.
- Burns, C., Eckersley, P. & Tobin, P. (2019). EU environmental policy in times of crisis, *Journal of European Public Policy*. <https://doi.org/10.1080/13501763.2018.1561741>
- Business Europe (2014). *10 priorities to boost investment, growth & employment: What companies expect from the new Commission*. Brussels. Retrieved from: <http://www.businesseurope.eu/DocShareNoFrame/docs/4/JIELFPDBHAMDHGKLLHBOBKAIIPDWK9DBGTN9LTE4Q/UNICE/docs/DLS/2014-00976-E.pdf>
- Business Taskforce (2013). *Cut EU red tape: Report from the Business Taskforce*. London: HMG.
- Cameron, D. (2015). EU reform: PM's letter to President of the European Council Donald Tusk. Retrieved from: <https://www.gov.uk/government/publications/eu-reform-pms-letter-to-president-of-the-european-council-donald-tusk>
- Council of the European Union (2004). Council document. Brussels 15017/04 COMPET 194, 23 November. Brussels: Council of the European Union.
- Delreux, T., & Happaerts, S. (2016). The evolution of EU environmental policy. In T. Delreux & S. Happaerts, *Environmental policy and politics in the European Union* (pp. 12–40). London: Macmillan.
- ENDS Europe (2013). Green measures blocked by top EU official—sources (1 March). Retrieved from <http://www.endseurope.com/30858/green-measures-blocked-by-top-eu-official-sources>
- ENDS Europe (2014). Stalled green policies 'ready to go'—Potočník (5 September). Retrieved from: <http://www.endseurope.com/36856/stalled-green-policies-ready-to-go-potočník>
- ENDS Report (1992). *EC environmental policy in the melting pot* (June). Retrieved from: <http://www.endsreport.com/index.cfm?go=517>
- ENDS Report (1995). *Deregulation in the EC: Molitor cocktail or damp squib?* (June). Retrieved from: <http://www.endsreport.com/2568/deregulation-in-the-ec-molitor-cocktail-or-damp-squib>
- ENDS Report (2005). *Dimas wins first round in battle over EU green strategies* (August). Retrieved from: <http://www.endsreport.com/14225/dimas-wins-first-round-in-battle-over-eu-green-strategies>
- European Commission (1993). Commission report to the European Council on the adaptation of community legislation to the subsidiarity principle—COM (93) 545 final. Brussels: European Commission.
- European Commission (1995). Better law-making: Commission report to the European Council on the application of the subsidiarity and proportionality principles on simplification and on consolidation—CSE (95) 580. Brussels: European Commission.
- European Commission (1998a). Better lawmaking 1998: A shared responsibility—COM (1998) 715 final. Brussels: European Commission.
- European Commission (1998b). Legislate less to act better: The facts—COM (1998) 345 final. Brussels: European Commission.
- European Commission (2001). Communication from the Commission: Simplifying and improving the regulatory environment—COM (2001) 726 final. Brussels: European Commission.
- European Commission (2004). Commission staff working document: 2nd report on the implementation of the framework action 'updating and simplifying the Community acquis'. SEC (2004)774. Brussels: European Commission.
- European Commission (2007). Action programme for reducing administrative burdens in the European Union—COM (2007) 23 final. Brussels: European Commission.
- European Commission (2010). Smart regulation in the European Union—COM (2010) 543 final. Brussels: European Commission.
- European Commission (2012). Communication from the Commission: EU regulatory fitness—COM (2012) 746 final. Brussels: European Commission.
- European Commission (2013). Communication on a clean air programme for Europe—COM (2013) 918 final. Brussels: European Commission.
- European Commission (2014a). Commission staff working document accompanying the document Regulatory Fitness and Performance Programme (REFIT): State of play and outlook—SWD (2014) 192 final. Brussels: European Commission.
- European Commission (2014b). Communication from the Commission: Regulatory Fitness and Performance Programme (REFIT): State of play and outlook—COM (2014) 368 final. Brussels: European Commission.
- European Commission (2014c). A new start: European Commission work plan to deliver jobs, growth and investment, IP/14/2703. Brussels: European Commission

- European Council (2000). Lisbon European Council 23–24.3.2000, Conclusions of the Presidency. Brussels: European Council.
- European Voice (2006). Verheugen's rant could backfire on Barroso (11 October). Retrieved from: <http://www.politico.eu/article/verheugens-rant-could-backfire-on-barroso/>
- Financial Times (1992). Burning the house Jacques built. *Financial Times*, December.
- Foreign & Commonwealth Office (2012). Review of the balance of competences. Retrieved from: <https://www.gov.uk/review-of-the-balance-of-competences>
- Guardian (2012). Osborne's claim wildlife rules too costly for business challenged by own review (Damian Carrington). Retrieved from: <https://www.theguardian.com/environment/2012/mar/22/conservation-business-review>
- Guardian (2016). I'm starting to hate the EU. But I will vote to stay in. (George Monbiot). (10 February). Retrieved from: <https://www.theguardian.com/commentisfree/2016/feb/10/eu-in-health-wildlife-european-union>
- Golub, J. (1996). Sovereignty and subsidiarity in EU environmental policy. *Political Studies*, XLIV, 686–703.
- Gravey, V. (2016). *Does the European Union have a reverse gear? Environmental policy dismantling, 1992–2014*. Doctoral thesis, University of East Anglia.
- Gravey, V., & Jordan, A. (2016). Does the European Union have a reverse gear? Policy dismantling in a hyperconsensual polity. *Journal of European Public Policy*, 23, 1180–1198.
- Hanf, K. (1989). Deregulation as regulatory reform: The case of environmental policy in the Netherlands. *European Journal of Political Research*, 17, 193–207.
- High Level Group on Administrative Burdens (2014). *Cutting red tape in Europe: Legacy and outlook*. Brussels: European Commission.
- House of Commons (1998). UK response to Commission communication on promoting entrepreneurship and competitiveness (the Commission's response to the BEST (Business Environment Simplification Taskforce) report and its recommendations). London: House of Commons.
- House of Lords EU Committee (2005). Ensuring effective regulation in the EU: 9th Report of Session 2005–2006. London: House of Lords.
- Independent (1992). Delors to get key role on subsidiarity. 13 October.
- Jordan, A. (2003). The Europeanization of national government and policy: A departmental perspective. *British Journal of Political Science*, 33, 261–282.
- Jordan, A., Bauer, M. W., & Green-Pedersen, C. (2013). Policy dismantling. *Journal of European Public Policy*, 20, 795–805.
- Jordan, A., & Matt, E. (2014). Designing policies that intentionally stick: Policy feedback in a changing climate. *Policy Sciences*, 47, 227–247.
- Jordan, A., & Turnpenny, J. (2012). From dismantling by default to symbolic dismantling: Water policy in the United Kingdom. In M. W. Bauer, A. Jordan, C. Green-Pedersen, & A. Héritier (Eds.), *Dismantling public policy* (pp. 176–199). Oxford: Oxford University Press.
- Juncker, J.-C. (2014). Mission letter: Karmenu Vella, Commissioner for Environment, Maritime Affairs and Fisheries. Brussels: European Commission. Retrieved from: [http://ec.europa.eu/commission/sites/cwt/files/commissioner\\_mission\\_letters/vella\\_en.pdf](http://ec.europa.eu/commission/sites/cwt/files/commissioner_mission_letters/vella_en.pdf)
- Kassim, H., Connolly, S., Dehousse, R., Rozenberg, O., & Bendjaballah, S. (2017). Managing the house: The Presidency, agenda control and policy activism in the European Commission. *Journal of European Public Policy*, 24, 653–674.
- Klyza, C. M., & Sousa, D. J. (2010). Beyond gridlock: Green drift in American environmental policymaking. *Political Science Quarterly*, 125, 443–463.
- Klyza, C. M., & Sousa, D. J. (2013). *American environmental policy beyond gridlock* (2nd ed.). Cambridge, MA: MIT Press.
- Korte, S., & Joergens, H. (2012). Active dismantling under high institutional constraints? Explaining the Bush administration's attempts to weaken US air pollution control policy. In M. W. Bauer, A. Jordan, C. Green-Pedersen, & A. Héritier (Eds.), *Dismantling public policy* (pp. 81–102). Oxford: Oxford University Press.
- L'Expansion (2013). Duel Cameron-Hollande sur la dérégulation européenne (25 October). Retrieved from: [http://lexpansion.lexpress.fr/actualites/2/actualite-economique/duel-cameron-hollande-sur-la-deregulation-europeenne\\_1462213.html](http://lexpansion.lexpress.fr/actualites/2/actualite-economique/duel-cameron-hollande-sur-la-deregulation-europeenne_1462213.html)
- Layzer, J. A. (2012). *Open for business: Conservatives' opposition to environmental regulation*. Cambridge, MA: MIT Press.
- Löfstedt, R. E. (2007). The 'plateau-ing' of the European Better Regulation agenda: An analysis of activities carried out by the Barroso Commission. *Journal of Risk Research*, 10, 423–447.
- Majone, G. (1999). The regulatory state and its legitimacy problems. *West European Politics*, 22, 1–24.
- Ministerie van Buitenlandse Zaken (2013). NL 'subsidiarity review': *Explanatory note*. The Hague: Ministerie van Buitenlandse Zaken.
- Oberthür, S., & Groen, L. (2017). The European Union and the Paris Agreement: Leader, mediator, or bystander? *Wiley Interdisciplinary Reviews: Climate Change*, 8, 1–8.
- Pierson, P. (1996). The new politics of the welfare state. *World Politics*, 48, 143–179.

- Politico.eu (2014). Ministers urge Commission not to drop environment proposals (1 December). Retrieved from: <https://www.politico.eu/article/ministers-urge-commission-not-to-drop-environment-proposals/>
- Princen, S. (2011). Agenda-setting strategies in EU policy processes. *Journal of European Public Policy*, 18, 927–943.
- Radaelli, C. M., & Meuwese, A. C. M. (2009). Better regulation in Europe: Between public management and regulatory reform. *Public Administration*, 87, 639–654.
- Reuters (1993). French and British work together on subsidiarity (29 June 1993). Reuters.
- Schaffrin, A., Sewerin, S., & Seubert, S. (2015). Toward a comparative measure of climate policy output. *Policy Studies Journal*, 43, 257–282.
- Schmidt, V. (2018). Rethinking EU governance: From 'old' to 'new' approaches to who steers integration. *JCMS: Journal of Common Market Studies*, 56, 1544–1561.
- Selin, H., & VanDeveer, S. D. (2015). Broader, deeper and greener: European Union environmental politics, policies, and outcomes. *Annual Review of Environment and Resources*, 40, 309–335.
- Sheingate, A. D. (2000). Agricultural retrenchment revisited: Issue definition and venue change in the United States and European Union. *Governance*, 13, 335–363.
- Six Presidencies (2004). Advancing regulatory reform in Europe: A joint statement of the Irish, Dutch, Luxembourg, UK, Austrian and Finnish Presidencies of the European Union. Retrieved from: <http://collections.europarchive.org/tna/20050217120000/http://www.hm-treasury.gov.uk/media/95A/52/6presidencies.pdf>
- Steinebach, Y., & Knill, C. (2017). Still an entrepreneur? The changing role of the European Commission in EU environmental policy-making. *Journal of European Public Policy*, 24, 429–446.
- Vogel, D. (2003). The hare and the tortoise revisited: The new politics of consumer and environmental regulation in Europe. *British Journal of Political Science*, 33, 557–580.
- Vogel, D. (2012). *The politics of precaution: Regulating health, safety and environmental risks in Europe and the United States*. Princeton, NJ: Princeton University Press.
- Vogel, D. (2013). A more sophisticated understanding of the politics of precaution. *European Journal of Risk Regulation*, 1, 321–324.
- Weale, A., Pridham, G., Cini, M., Konstadakopulos, D., Porter, M., & Flynn, B. (2002). *Environmental governance in Europe: An ever closer ecological union?* Oxford: Oxford University Press.
- Wegrich, K. (2009). *The administrative burden reduction policy boom in Europe: Comparing mechanisms of policy diffusion*. LSE Centre for Analysis of Risk and Regulation Discussion Papers, 52, March, 1–27.
- Wurzel, R. K. W. (2002). *Environmental policy-making in Britain, Germany and the European Union: The Europeanisation of air and water pollution control*. Manchester: Manchester University Press.
- Zaun, N. (2014). Mapping the European Commission today: How the institution has changed (or not) over time. *Journal of European Integration*, 36, 427–433.

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