

## Review

# Strategies and Impacts of Policy Entrepreneurs: Ideology, Democracy, and the Quest for a Just Transition to Climate Neutrality

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**Abstract:** The concept of policy entrepreneurs has gained increasing attention in studies of policy change, including climate policy and governance. It foregrounds the role of agency in understanding policy change. However, agency of policy entrepreneurs in the policy process is political and conceals the power that shapes how public problems and policies are framed and defined. Thus, policy entrepreneurs should be confronted with the challenge of generating legitimacy, accountability, and justice in their actions and the implementation of their targeted policy change. Drawing on political–philosophical theories of liberal and deliberative democracy as well as environmental and ecological democracy this paper outlines a conceptual framework for critical analytical as well as normative research on strategies and impacts of policy entrepreneurs on democratic governance, primarily in climate policy but also more generally. Empirical research on the strategies and impacts of policy entrepreneurs in recent policymaking on climate change mitigation in the EU and Sweden identifies several deficits related to the democratic principles of legitimacy, accountability, and justice. It is found that policy entrepreneurs from different social spheres use cultural–institutional entrepreneurship to influence beliefs and perceptions on problems and policies. In addition, it is found that public sector policy entrepreneurs use structural entrepreneurship on ideological grounds to change existing power relations in climate governance. In all, the paper brings ideology and politics into research on policy entrepreneurs. It is suggested that not only the strategies used, but also the ideologies of the actors that use them, are decisive for the impacts of policy entrepreneurs, and thus, whether their advocacy will adhere to democratic norms and facilitate or hamper a just transition to climate neutrality and sustainability. The paper ends with proposals on how policy entrepreneurs can act more democratically, how to deal with populist policy entrepreneurs wanting to erode democracy, and conditions for climate justice movements to take responsibility and act in a more entrepreneurial way.

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## 1. Introduction

Simply put, politics in democracies is about translating values and beliefs into narratives about public problems and viable policy solutions, and further into political proposals on goals, strategies, governance arrangements, and policy instruments. Having framed problems and potential solutions, policy actors try to establish a monopoly on political understandings concerning the policy of interest and the institutional arrangement reinforcing that understanding [1]. Advocacy activities of organizations and interest groups (IGs) have increased dramatically since the mid-1980s [2]. Organized as lobbyists, policy entrepreneurs, intermediaries, or advocacy coalitions, different stakeholders aim to influence agenda-setting and other policy actors' beliefs and preferences in the policy

process, and thus, policy outcomes, as well as the structure of democratic institutions [3–10]. More pervasive public policy issues such as product safety, sustainable development, fair trade, civil rights, and climate change make public executives and legislators more open for advocacy of stakeholders from different sectors and social spheres to ensure their interests are taken into consideration in public policies by presenting potential solutions and policy options related to a certain problem framing [8,11–13].

### 1.1. Governance for a Just Transition

The current climate emergency [14] and other crises related to sustainability has led to calls for ‘climate justice’ [15,16] and a ‘just transition’ to reach the Paris Agreement’s temperature targets, national and regional targets on climate neutrality, and the United Nations (UN) Sustainable Development Goals (SDGs), e.g., [17–24]. Climate justice can be defined as [15] (p. 163):

“the ethical and human rights dimensions of global warming, the disproportionate burden of legacy pollution, the unsustainable rise in energy costs for low-income families, and the impacts of energy extraction, refining, and manufacturing on vulnerable communities”.

With the focus on a just transition, and an increasing presence of non-state actors in global climate governance and governance of the UN SDGs, scholars have raised the importance of analysing and evaluating climate and sustainability policy and governance not only from the perspective of cost-effectiveness advocated by economists [25,26], but also from perspectives of democracy, with a focus on legitimacy, accountability, and justice as guiding principles [27–31]. The transition to climate neutrality and sustainability must be fair and unite environmental and social justice issues [21,32]. It must provide justice to all parties, regardless of who you are, where you work, or where you live—while reducing emissions quickly enough [20,23,33]. The costs and benefits of the transition must be distributed fairly, alleviating poverty, and sustaining and enhancing human freedom. Moreover, the transition must be socially inclusive [17,34]. Do all interested parties, not least those who risk being hit the hardest by climate change and climate policies, have the opportunity to participate and make their voices heard in the policy processes? It is important that people have insight and the opportunity to influence how the transition takes place.

### 1.2. Policy Entrepreneurs—Key Actors in Climate Governance?

Political science offers a variety of theories, frameworks, and concepts to explain policy processes and the roles of policy actors in influencing decision-making on public policy, including on climate and sustainability policy. One such concept is the policy entrepreneur, introduced by Robert A. Dahl in the 1960s [35] and popularized by John W. Kingdon in the 1980s, who defines them as “advocates who are willing to invest their resources—time, energy, reputation, money—to promote a [policy] position in return for anticipated future gain in the form of material, purposive, or solitary benefits” [36] (p. 179). The concept is attractive since it highlights the role of agency in understanding policy change [37–40]. In the view of Kingdon’s Multiple Streams Framework [36], policy change occurs when the multiple streams of problems, policy options, and politics are connected by policy entrepreneurs [8], who, as individuals or collectives, attempt “to transform policy ideas into policy innovations and, hence, disrupt status quo policy arrangements” [40] (p. 945). They are central actors in political agenda-setting and for policy change as they ‘soften’ the political system for certain ideas and make sure there are packages of problems and policies ready when there is a policy window of opportunity to put the problem on the agenda [38].

Leading scholars on policy entrepreneurs stress, to my opinion uncritically, as will be discussed in Section 1.3, the need for more actors to become policy entrepreneurs, to “step forward and catalyse change processes” [41] (p. 307), and that research concerning policy entrepreneurship will contribute to guidance for advocacy practices, e.g., in climate policy and governance [42]. Section 2 describes who can be policy entrepreneurs, their

motives and strategies, and factors explaining success or failure. But first, I will present a critique of conventional research on policy entrepreneurs and call for more critical analytic as well as normative research on policy entrepreneurs, which I argue is needed for policy entrepreneurs to be able to contribute to a just transition, which should follow certain democratic principles.

### *1.3. A Call for Critical Research on Policy Entrepreneurs*

Conventional research on policy entrepreneurs assumes that they are a political fact; that they are active in and (should) contribute to the policy process in democratic or non-democratic regimes, whatever our thinking about them is, whether positive or negative, intended or unintended, impacting democratic processes and outcomes. Thus, the model of policy entrepreneurship fails to address issues like legitimacy, accountability, and justice—issues paramount in the debate on a just transition to climate neutrality and sustainability. This paper argues that a different, more critical analytic and normative, approach should be added to the research on policy entrepreneurs, addressing questions like: What impacts do policy entrepreneurs have on democracy and democratic policy processes? How should policy entrepreneurs act in ways compatible with democratic norms and principles? As will be presented and discussed in this paper (Section 6), evidence from climate policy processes in the EU and Sweden saw public sector policy entrepreneurs intentionally acting in violation of democratic norms, aiming for technocracy and autocracy. How could such behaviour be stifled?

Weiss argues that many political decisions are taken in non-transparent and complex ways [43]. Many small decisions taken by different persons and organizations taken together form a larger decision. Thus, policy actors without formal decision-making power, like policy entrepreneurs, can take the role of political decision-makers. Policy entrepreneurs are often part of the elite in their specific field, and their role in the policy process can be criticized [44,45]. This is particularly so since an important strategy of policy entrepreneurs to reach their aims of structural entrepreneurship is to use factual and scientific information in a smart and strategic way [46], either by manipulating who receives what information if information is asymmetrically distributed and there is scarce information [47,48], or by strategic manoeuvring, such as providing as little information as possible to the likely opponents [49]. This may influence procedural justice and legitimacy as well as transparency and accountability, and the right to justification in policy processes and decision-making. Other key activities of policy entrepreneurs like problem framing and policy formulation are always political. Framing is the most important strategy for a policy entrepreneur, both in structural and cultural-institutional entrepreneurship [46]. Framing and the creation of meaning is important for making people favourable to the ideas coming from the policy entrepreneur, and unfavourable to existing and/or competing policy or governance arrangements proposed by others [50]. What is going on in the problem stream frames the conditions for coupling to the policy stream and the politics stream undertaken by policy entrepreneurs [51]. How a condition is framed as a public problem influences how we think about the problem, which enables coupling to certain public policies, but not to others [52]. As Copeland and James put it, framing is about “strategic construction of narratives that mobilize political action around a perceived policy problem in order to legitimize a particular solution” [53] (p. 3). Framing also “involves the manipulation of dimensions to represent solutions to specific problems as gains or losses” [48] (p. 156). Most policy entrepreneurs are not elected politicians, which raises questions about their agency giving the impression of an elitist or technocratic approach, leading to opacity in policymaking. If there is lack of transparency, the agency and power of policy entrepreneurs in the policy formulation process conceals the authority that shapes how public problems and policies are framed and defined, which decreases accountability and legitimacy. Just like lobbyists, experts, and intermediaries, policy entrepreneurs should be confronted with the challenge of generating legitimacy, political accountability, and justice in their actions and the implementation of their targeted policy change; cf. [45,54–

56]. This is partly a theoretical question for scholars aiming to develop theory on policy entrepreneurship, partly a practical question for the public and those involved in policy-making. But the concept of policy entrepreneurs is a theoretical concept used by scholars analysing advocacy and little known by actors in the policy process and the public, which is why it is hard to know if they will call for legitimacy, accountability, and justice of policy entrepreneurs. In comparison, lobbying, to which policy entrepreneurship is related, is a well-known concept and there is a vital debate in the EU on regulation of lobbying [13,57]. Given the role of policy entrepreneurs in policy processes, as understood by scholars, scholarly research on policy entrepreneurship should be combined with a more popular discussion on policy entrepreneurs and policy entrepreneurship—spreading the word [55]. On this theme, leading scholar on policy entrepreneurs Michael Mintrom has written a guide on how policy actors can start acting as policy entrepreneurs [41].

In the wake of the Reagan liberalization of the US administration and economic policy, Bellone and Goerl claimed that agency of public sector policy entrepreneurs “need to be reconciled with the fundamental democratic values of accountability, citizen participation, open policymaking processes, and concern for the long-term public good (stewardship)” [58] (p. 131). Their call was immediately criticized by Terry, who claimed that the public sector policy entrepreneur “seems to be a wolf in sheep’s clothing” —that they do not exist [59] (p. 395). However, contemporary research shows plenty of evidence of public sector policy entrepreneurs, such as the European Commission, the Council of the EU, the European Central Bank, national, regional, or local governments and authorities, e.g., [38,60–68]. Since the debate in the 1990s, only three studies of public sector policy entrepreneurs have addressed aspects of democracy, focusing on accountability of individual agency employees in the US state government [69], the legitimacy of Swedish local authorities [70], and the accountability of the European Central Bank [65] as policy entrepreneurs. Some scholars have admitted that policy entrepreneurs can have implications regarding trust, legitimacy, and accountability [45,71–74], but they did not analyse it. This critical perspective is not included in the future research agendas suggested on policy entrepreneurs in general [40], and on policy entrepreneurs in climate governance [42,46,75].

In all, there is a lack of systematic research on whether the presence of policy entrepreneurs has a positive or negative impact on democracy and different democratic values and norms; cf. [55,56]. Thus, I call for critical policy studies on the interests and agency of policy entrepreneurs from different sectors in establishing “a monopoly on political understandings concerning not only the policy of interest, but also the institutional arrangement that reinforces that understanding” [1] (p. 6). Relevant questions are:

- What impacts do policy entrepreneurs have on democracy and democratic policy processes?
- How can a policy entrepreneur be held accountable to the ‘public space’ for a certain problem framing and/or a policy proposal decisive for a policy or governance arrangement?
- How are problem narratives and policy options proposed by policy entrepreneurs justified? Are they legitimate?
- Who are allowed to participate in a policy process dominated by policy entrepreneurs?
- Does the policy option proposed by a policy entrepreneur cater for justice in treating the public problem?
- How should policy entrepreneurs act to be aligned with democratic policy and decision-making?

To guide such systematic research, this paper aims at outlining a conceptual framework for critical analytical as well as normative research on the policy entrepreneur–democracy nexus (Section 5). To reach the aim, I review (i) the literature on policy entrepreneurs (Section 2); (ii) theories on the environment/climate–democracy nexus (Section 3); (iii) theories on the lobbying–democracy nexus (Section 4); and (iv) the literature on the

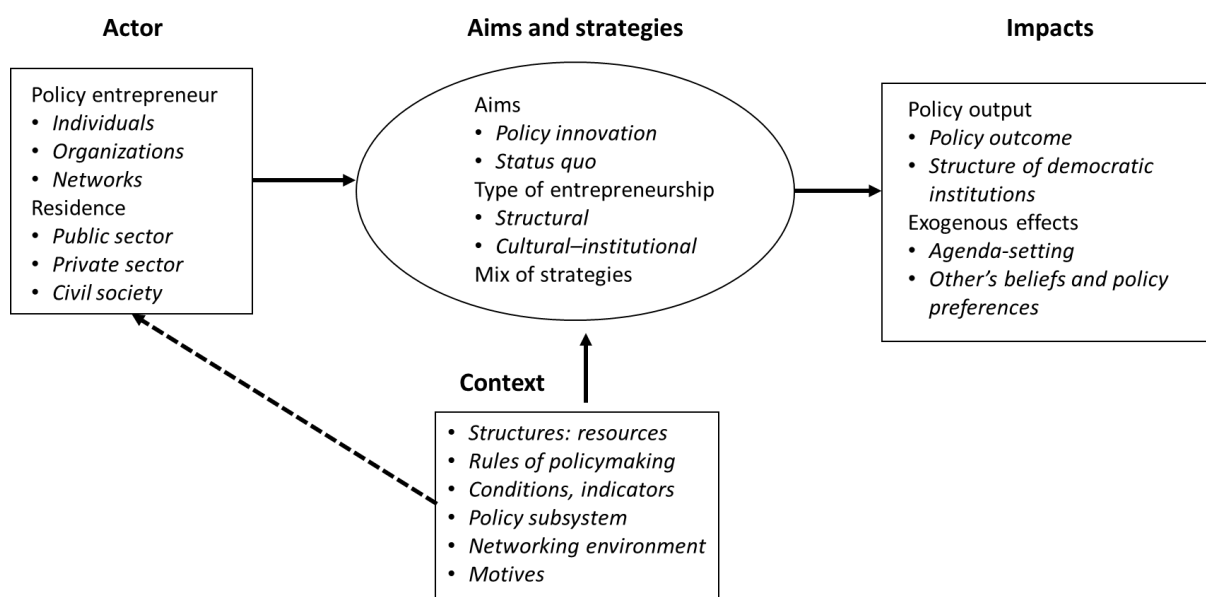
democratic norms of legitimacy, accountability, and justice (Section 5). There are different models and theories of democracy [76], which is why I will not only refer to hegemonic liberal democracy theory, but also deliberative democratic theory, which is adhered to by many green parties and environmental and climate justice movements.

When dealing with democracy and advocacy of policy entrepreneurs, it is important to remember whether we are doing this as policy analysts, trying to understand and study how things work in practice in an analytical–descriptive manner, or as political philosophers, trying to imagine how things should work in a normative–prescriptive manner. Since the interaction between the two fields can be strong, there is often a need to iterate between normative and analytical studies [77]. This paper primarily focuses on the normative–prescriptive perspective—the norms that policy entrepreneurs should adhere to. But a normative theory cannot only build on theoretical reasoning. What happens in reality is important. In addition to the normative aspects presented within the conceptual framework, the paper presents results from empirical studies of actual impacts of policy entrepreneurs on democratic climate governance in two cases (see Section 6): (i) policy processes on innovative climate legislation in the EU for decarbonizing maritime shipping, and (ii) policy processes on a radical shift of climate policy and governance in Sweden. The empirical cases are not used to conclude that all policy entrepreneurs have impacts on democracy but serve to illustrate how they can impact democracy, and thus, as input to develop a theory on how to understand strategies and impacts of policy entrepreneurs and further the normative framework on how they should act in democracies. Policy entrepreneurs are a fact, although they may not use the concept to describe their own agency. If some of them turn out to act antidemocratically, the solution is not to ban policy entrepreneurs, but to shape norms as for how they should behave in democratic regimes, even enhancing democracy.

The paper will contribute conceptually and empirically to the literature on policy entrepreneurs (summarized in Section 2) by addressing the dual relationship of policy entrepreneurs to democratic policymaking. This is an important new topic of the research agenda on policy entrepreneurship. It also intends to contribute to the literature on democratic climate governance and sustainability governance for a just transition, as well as democracy theory in general. As for climate and sustainability governance theory and democracy theory, the paper adds knowledge about and normative principles for democratic behaviour of a certain category of powerful policy actors so far neglected in the literature—policy entrepreneurs—that influence the just transition to climate neutrality and sustainability, as well as governance in other policy areas.

## 2. What We Know about Policy Entrepreneurs in the Policy Process

Based on the literature reviewed in this section, my understanding is that diverse types of actors from different spheres of society can act as policy entrepreneurs, who are actively engaged in influencing the public policy process and/or public policy change, often with a focus on innovative policies. They can have different aims and deploy different strategies. Who chooses to be acting as a policy entrepreneur, what aims they have, and what strategies they use are contextually determined, at the macro-level, the more policy-area-specific meso-level, and the personal level. Impacts are mainly analysed in terms of influence on agenda-setting, changing others' beliefs, and changing of policies, but also effects on other policy areas and governance measures such as reporting. As mentioned, impacts on democracy is not a question in contemporary research. Figure 1 presents the conventional model of policy entrepreneurs, their strategies, and outcomes, where strategies are viewed as the causal mechanism that links actors to outcomes [75]. The components of this model are further described in the remainder of this section.



**Figure 1.** Conventional model of strategic behaviour and impacts of policy entrepreneurs in democratic policy processes (based on [46,71,78]).

### 2.1. Defining Policy Entrepreneurs

The policy entrepreneur concept has been accused of fuzziness, meaning different things to different scholars, even within the same discipline [62,79,80]. Initially, and still in the US, only individuals were considered as policy entrepreneurs, but research on policy processes in the EU has added organizations as policy entrepreneurs. Thus, policy entrepreneurs include not only individuals—such as elected politicians, public officials, academics, and experts—but also companies, business associations, non-governmental organizations (NGOs), think tanks, other IGs, political parties, and public institutions, e.g., the EC, the Council of the EU (Council), the European Central Bank, the European Investment Bank, and national, regional, and local governments and authorities [38,61–63,65,66,68,81,82]. Zito even refers to “collective entrepreneurship”, in which advocacy coalitions act as policy entrepreneurs to formulate individual policies in a certain policy area [83,84]. In all, policy entrepreneurs can come from the public and private sectors as well as civil society.

But what distinguishes policy entrepreneurs from other policy actors? Boasson and Huitema argue that “privileged actors in powerful positions deploy[ing] the regular tools at their disposal and merely do their job” are not demonstrating entrepreneurship [46] (p. 1351). This is not to say that privileged persons or organizations in powerful positions, like cabinet ministers, EU commissioners, EU institutions, or national governments, cannot be policy entrepreneurs. Policy entrepreneurship can be deployed by actors in and out of government at different levels, and in different domains, if they are “persistent and skilled actors who launch original ideas, create new alliances, work efficiently or otherwise seek to ‘punch above their weight’” [46] (p. 1344) [75]. For instance, the current president of the European Commission, Ursula von der Leyen, and former EU commissioner Frans Timmermans have been described as policy entrepreneurs for launching the ‘European Green Deal’ (EGD) in 2019 [74,85], and the EU High Representative for Foreign Affairs and Security Policy, Federica Mogherini, acted as a policy entrepreneur and pushed for policy change in the EU’s foreign and security policy [86,87]. In all, acting as a policy entrepreneur depends on a “set of behaviours in the policy process, rather than a permanent characteristic of a particular individual or role” [88] (p. 78).

## 2.2. Motives and Strategies of Policy Entrepreneurs

Drawing on Kingdon's definition of policy entrepreneurs [36], most scholars have assumed that they are instrumentally rational [77], motivated by a "desire for power, prestige and popularity, the desire to influence policy, and other factors in addition to any money income derived from their political activities" [89] (p. 11) or "satisfaction from participation, or even personal aggrandizement" [90] (p. 123). However, policy actors are boundedly rational and motivated by cognitive rationality, i.e., their beliefs and ideas [91,92]. Policy entrepreneurs may engage in policy advocacy to prevent opponents with conflicting beliefs from securing 'evil' policies, triggering a 'devil's shift' [93]. Arnold argues that "[o]ppositional factors, by triggering a value-laden, devil shift-influenced fear of a threat to a desired policy goal, can catalyze policy entrepreneurship" [94] (p. 26).

The strategies employed by policy entrepreneurs are the lines of action taken to reach their aims, which fall into two categories [46]:

- *Structural entrepreneurship*: acts aimed at overcoming the structural barriers to enhance governance influence by altering the distribution of formal authority and factual and scientific information;
- *Cultural–institutional entrepreneurship*: acts aimed at altering or diffusing people's perceptions, beliefs, norms and cognitive frameworks, worldviews, or institutional logics.

The literature tells us that policy entrepreneurs work in an energetic, sometimes activist, strategic manner with the intention to innovatively change political alignments [95,96]. Analysing the scholarly literature, Aviram et al. (2020) identified twenty strategies and three traits of policy entrepreneurs: trust building, persuasion, and social acuity [97]. These may vary with respect to the target audience, level of government at which the policy entrepreneurs operate, sector, and the policy entrepreneurs' professional roles, timing, number and types of actors involved, relationship to development of international politics, etc. Brouwer and Huitema proposed four categories of strategies [72] (Table 1).

**Table 1.** Strategies of policy entrepreneurs (based on [37,72,95]).

| Approach to Policy Change                | Strategies Used by Policy Entrepreneurs                                                                                                                                                                       |
|------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Attention and support seeking strategies | Problem framing; idea generation.<br>Strategic dissemination of information.<br>Lead by example; use demonstration projects.<br>Rhetorical persuasion; media attention.<br>Exploitation of focusing event(s). |
| Linking strategies                       | Coalition and team building with bureaucratic insiders and policy influencers outside of government.<br>Issue linking.<br>Game linking.                                                                       |
| Relational management strategies         | Networking by using social acuity.<br>Trust building.                                                                                                                                                         |
| Arena strategies                         | Venue shopping.<br>Timing.                                                                                                                                                                                    |

For structural entrepreneurship, three strategies are particularly important: (i) creating and working in networks and advocacy coalitions, (ii) strategic use of decision-making processes, and (iii) strategic use of information [46]. Through networking, a policy entrepreneur learns the worldviews "of various members of the policymaking community" [98] (p. 739), which enables the policy entrepreneur to persuade policy actors with prominent levels of legitimacy or authority to join in [99]. As for strategic and smart use of decision-making procedures and venues, this relates to timing, and thus, launching the policy idea when there is an open policy window [36]. Finally, policy entrepreneurs can reach their aims by assembling new evidence and making novel arguments [100], carrying ideas [101] that serve as 'coalition magnets' [102] to convince an appropriately powerful

coalition of supporters to back the proposed changes [42,46]. This is achieved either by manipulating who receives what information, if information is asymmetrically distributed and information is scarce [47,48], or by strategic manoeuvring by providing as little information as possible to one's opponents [49].

As for cultural–institutional entrepreneurship, making people favourable to the ideas coming from the entrepreneur, and unfavourable to existing and competing policy or governance arrangements, framing of problems and policy options is the most important strategy [46]. Framing is about “strategic construction of narratives that mobilize political action around a perceived policy problem in order to legitimize a particular solution” [53] (p. 3). To persuade others, policy entrepreneurs must consider the perspectives of various actors and create meanings and frames that appeal to them [50].

Importantly, Braun et al., in a recent comparative study, found that policy entrepreneurs employ different strategies over time when interacting with their contexts in attempting to facilitate policy change [103]. They co-create with policymakers to shape their ecosystems and society at large. This echoes the critique of mainstream research on policy entrepreneurs, that “in contrast to widely held view that policy entrepreneurs promote ideas and operate outside decision-making processes [104], policy entrepreneurs are endogenous to policymaking processes” [78] (p. 469). Policy entrepreneurs deploy ‘outsider tactics’ by shaping public discourse on problems and policy solutions, or ‘insider tactics’ by working with policymakers to design regulations [10,105].

### 2.3. Success and Failure of Policy Entrepreneurs

Successful policy entrepreneurship is defined in diverse ways. For some, a policy entrepreneur is successful if the advocacy leads to changes in other policy actors’ beliefs, policy preferences, and norms [71,106]. This can be compared to policy-oriented learning [107]. For others, a policy entrepreneur is successful if influencing agenda-setting in such a way that policymakers consider the policy entrepreneur’s pet issue [98,108]. Yet another view is that policy entrepreneurs are successful if they have actual influence on policy and governance arrangements [46], e.g., adoption of specific policy measures the policy entrepreneur sought [98,104,109,110].

Green also suggests analysing expansive effects of policy entrepreneurship, “looking beyond the specific goal or target of an individual entrepreneur”, to examine “the extent to which entrepreneurship influenced a larger set of actors than originally intended, or helped catalyze broader effects” [75] (p. 1478). Examples include demonstration effects of private regulators in voluntary markets, normative changes, and changes in governance practices. However, the latter two are considered basic objectives of public policy advocacy [3] and have been included in traditional goals of policy entrepreneurs since the 1990s, e.g., [89,95,106], which is why I only consider demonstration effects to be an expansive effect. Concrete examples of demonstration effects are the increasing reference to international standards such as ISO 50001 on energy management systems [111] and ISO 14001 on environmental management systems [112] in EU legislation on energy efficiency and industrial emissions, and the inclusion of private disclosure standards into existing international public policy arrangements [113]. Since international standards are developed and adopted in non-democratic governance settings, where only those who pay to participate have a say, this practice raises questions about the legitimacy, accountability, and justice of the actions and effects of policy entrepreneurs.

What is deemed success depends on the aim of the policy entrepreneur agency. It is assumed that success is more likely for a policy entrepreneur who has more characteristics of a policy entrepreneur, or who employs entrepreneurial strategies with greater frequency or intensity [37,114]. Most policy entrepreneurs strive for policy innovation, which consists of initiation, diffusion, and the evaluation of effects that such innovations create, the latter requiring analytical capacities [115]. These challenges are central to the work of policy entrepreneurs. It is their willingness to use their positions for leverage and for

aligning problems and solutions that increase the likelihood of policy change [37]. A policy entrepreneur is more likely to succeed in promoting policy innovation if they use their skill at identifying relevant competencies, and developing and effectively deploying them [116,117]. In addition, a successful policy entrepreneur must understand the concerns of actors they seek to persuade, use social acuity to build teams, networks, and coalitions, be knowledgeable to strategically disseminate information, and be organized, corresponding to political activation, and involved in civic engagement [37,39,97]. Anderson et al. adds that the influence of policy entrepreneurs lies not only in their ability to define problems and build coalitions, but also in their ability to provide new and reliable information to elected officials [118].

Categorizing characteristics, goals, and strategies of successful policy entrepreneurs, Arnold [39] suggests three archetypes. ‘Activists’ are highly active and display several entrepreneurial characteristics and deploy a wide range of strategies to reach several policy goals. ‘Advocates’ have similar characteristics as activists, but are less active, using fewer strategies and focus primarily on one ambitious policy goal. ‘Concerned citizens’ manifest few characteristics and tend to lobby for restrictive/ambitious measures with relatively little facility or effort. Activists and advocates were found to be successful, while concerned citizens had no or a negative impact. An interesting implication of this is that “it may not be necessary for an actor interested in securing a policy goal to go ‘all in’ as an activist, deploying a wide range of strategies and pursuing a range of related goals. Policy change can potentially be achieved through more modest, accessible advocacy” [39] (p. 985).

#### 2.4. Context of Policy Entrepreneurship

Success is not only determined by the characteristics, actions, and strategies of policy entrepreneurs, but also the context which shapes their actions. Bakir and Jarvis have criticized mainstream research on policy entrepreneurs for focusing only on the meso-level context of policy change (i.e., the immediate context of a particular policy) in policy formulation, and dismissing the macro and micro contexts within which a policy entrepreneur is embedded [78]. They demonstrate that context impacts policy entrepreneurship and institutional entrepreneurship, at least in the public sector. Agency of policy entrepreneurs is “most likely to generate policy and institutional changes when they are reinforced by complementarities arising from context-dependent, dynamic interactions among interdependent structures, institutions and agency-level enabling conditions” [78] (p. 465). Acknowledging Giddens’s concept of ‘duality’ between agency and structure [119], policy entrepreneurs and context “should not be viewed in isolation but as linked through strategy” [120] (Zahariadis & Exadaktylos, 2016, p. 62).

The macro-level context consists of formal and informal institutions, i.e., a relatively stable collection of rules and practices, embedded in structures of resources and meaning that enable and constrain policy entrepreneurs’ agency; cf. [121]. The micro-level context includes the social position and motives of the policy entrepreneur, who, no matter if they are individuals or organizations, can hold several social positions with different identities and motives in various parts of the policy process. This facilitates policy entrepreneurs working in different ideational realms, programmes, and discourses, building coalitions and generating consensus [92].

### 3. Theories on the Environment–Democracy Nexus

The climate crisis poses a major challenge to governance and democracy. Failures in contemporary climate governance expose a systemic failure in liberal democracy [122] as well as other types of political regimes. To analyse the roles and impacts of policy entrepreneurs on democracy, with a focus on climate governance, it is relevant to review theories on the environment–democracy nexus.

When liberal democracy and cosmopolitanism were on the rise in the 1990s, the political theory of ‘ecological democracy’ emerged. It builds on the thoughts of deliberative democracy, where citizens use public deliberation to make collectively binding decisions,

e.g., [76,123,124]. It sought to criticize and institutionally expand the coordinates of liberal democracy—space, time, community, and agency—to bring them into closer alignment with a cosmopolitan ecological and deliberative democratic imaginary. A second wave of ecological democracy emerged in the 2010s, reflecting a significant shift in critical normative horizons, focus, and method [125]. It connects ecology and democracy through local participatory democracy from a more critical communitarian perspective. Willis et al. conclude that deliberation-based reforms to democratic systems, including but not limited to deliberative mini-publics (DMPs), are a necessary and potentially transformative ingredient in climate action [126]. Ecological democracy is often advocated for by left-wing and particularly green parties and the climate justice movement [127–129].

In addition to ecological democracy, ‘environmental democracy’ has also developed as a political theory, drawing largely on the thoughts of liberal democracy [76]. In liberal democracies, political decisions are made by elected politicians, based on free and fair multiparty elections. Liberal democracy includes principles such as guarantees of access to justice, transparent enforcement of the law, and upholding of liberal principles of respect for personal liberties, the rule of law, and legal and legislative limitations on executive power [76]. Environmental democracy focuses on reforming, rather than transforming, existing institutions of liberal democracy and capitalism. Environmental democracy thus includes ideas of green liberalism [130] or liberal environmentalism [131] and is more anthropocentric in its outlook [132]. The discourse of ecological modernization is a prominent approach of environmental liberalism, usually heralded by social democrats, liberals, and liberal-conservatives [133,134].

By distinguishing ecological and environmental democracy, we can categorize theories of the environment–democracy nexus [135]. Ecological democracy is more critical of existing liberal democratic institutions—particularly those associated with capitalist markets—and more ecocentric. Ecological democracy stresses the importance of ensuring that the interests of non-humans and future generations are represented in decision-making [136].

Compared with ecological democracy, environmental democracy tends to set less demanding normative standards, both in terms of environmental protection and democratic inclusion. As further discussed in Section 5—analysing the conceptions of democratic principles such as legitimacy, accountability, and justice according to liberal and deliberative democratic theory—ecological democracy focuses on the inclusion of ‘all’ parties in decision-making, while environmental democracy focuses on inclusion of ‘all affected’ parties, i.e., stakeholders. The two concepts represent two ideal types along a spectrum, and hybrid versions are possible. Some versions of ecological democracy give greater prominence to the state, e.g., [136], while others emphasize the transformative potential of civil society and discourse, e.g., [124,137].

Despite their differences, political theories of ecological and environmental democracy have in common a shared interest in whether democratic processes can be compatible with strong environmental outcomes, as opposed to more technocratic approaches to policymaking and governance with experts taking decisions [125]. Both emphasize “the need for transformative change, particularly by reconfiguring the relationships between local, national and global decision-making, and rendering public deliberation more inclusive of citizens’ voices and more attuned to environmental values and realities” [135] (p. 10). Reviewing the literature on the climate–democracy nexus, Lindvall and Karlsson found that democracies tend to generate better climate policy outputs than autocracies, but the empirical evidence that democracy leads to larger decreases in greenhouse gas (GHG) emissions is weak [138]. But none of the reviewed studies provide any evidence suggesting that autocratic regimes perform better on climate policy than democracies.

Neither ecological democracy theory nor environmental democracy theory has proposed their own, specific considerations on different democratic norms, such as legitimacy, accountability, and justice, referred to in the democracy literature and political debates (see Section 5). However, Dryzek and Stevenson outline six elements of governance

in ecological democracy, including (i) public space, (ii) empowered space, (iii) transmission, (iv) accountability, (v) meta-deliberation, and (vi) decisiveness [139].

Biermann and Gupta [28] propose a research framework on accountability and legitimacy in earth system governance, to which climate governance belongs. Their framework draws from both liberal and deliberative democratic theory. Global environmental change, e.g., climate change, poses challenges of developing effective systems of climate governance, as well as challenges for securing the accountability and legitimacy of governance systems—globally, supranationally, nationally, and locally [28]. These challenges include (i) spatial interdependence, (ii) functional interdependence, (iii) scientific uncertainty and normative contestation, (iv) temporal interdependence (future generations), and (v) extreme events. For instance, accountability is affected by mismatches between those who seek to hold others accountable and those who are to be held accountable [139]. The former could be stakeholders in the Global South, and the latter actors in the Global North. Functional interdependencies refer to the diverse sectors of global production and consumption, which make the assessment of the accountability and legitimacy of rule-making dependent on the boundaries to be drawn around the ‘stakeholders’ included [28].

#### 4. A Conceptual Framework for Critical Research on the Policy Entrepreneur–Democracy Nexus

Policy entrepreneurs are similar to lobbyists, and lobbyists can act as policy entrepreneurs. Scholars have shown interest in the role and impacts of lobbyists on democracy and democratic norms and values for some years, and proposals have been made of normative frameworks for regulating lobbying in the EU, e.g., [6,13,57,140]. Critical studies of the relationship between policy entrepreneurs and democracy can learn from this area of research, and should include analytical descriptions of reality and normative prescriptions of reality; cf. [6]. The first part focuses on ‘politics of interest’, analysing the role and strategies of policy entrepreneurs in influencing policymaking, while the latter focuses on a ‘political philosophy’ of policy entrepreneurship.

##### 4.1. *Politics of Interest*

The reality of politics can be seen as the political society, consisting of a multiplicity of IGs competing for power or competing for influencing those with power [1]. In this perspective, democracy is the formal institutional framework where this competition takes place. The role of political scientists is to overcome appearances and formalities to study the actual behaviour of the various actors in a given political environment, e.g., a political subsystem, with a focus on empirical evidence to build theories on political behaviour. This branch is not discussing if policy entrepreneurship is good or bad or how it should be regulated, but analysing how it works, assuming that policy entrepreneurship is a political fact; cf. [6]. But, as argued in Sections 1.2 and 1.3, analytical–descriptive research on policy entrepreneurs should not only analyse the behaviour of the change agents, but also their impacts on policymaking and policy outcomes, and on democratic regimes, norms, and principles.

Focusing on democratic regimes, be they purely liberal, liberal with deliberative strains, or liberal with technocratic or autocratic strains, policy analysts study the types of relationships of various organizations, IGs, and experts with various institutions of modern democratic systems, e.g., legislative assemblies, executive branches, but also different public administration offices, independent agencies, and supranational or intergovernmental bodies such as the European Commission, the Council of the European Union, or the United Nations Framework Convention on Climate Change, e.g., [8,9,31,141,142]. Some studies also try to interpret and explain the dynamics of the policy process itself and the interaction between different policy actors, e.g., [67,143–147]. Contemporary research on policy entrepreneurs and policy entrepreneurship (see Section 2) falls in this category. In all, these studies have come to different findings about, e.g., the weight of different policy actors or about the power balance in a political environment. As a result, different

conclusions have been drawn about the characteristics of modern democracy and its relationship with IGs as lobbyists or policy entrepreneurs, and experts, e.g., elitism, epistocracy, pluralism, neo-corporatism, neo-pluralism, or the policy networks theory [6,148].

#### 4.2. Political Philosophy of Democratic Policy Entrepreneurship

The second branch focuses on whether policy entrepreneurship is good or bad in our vision of an ideal democratic regime. According to Bitonti [6,7], the answer to this question depends on the conception of the Public Interest adopted, as this shapes the way democracy is conceived and the role of policy entrepreneurship, lobbying, and expertise within it [141]. He identifies five ideal-typical conceptions of the public interest: formal (technocratic), substantive (populist, autocratic), realist (with no ethics for democracy), aggregative (liberal), and procedural (deliberative). Each conception can be associated with a particular vision of democracy, with particular beliefs on human epistemic conditions, anthropology, and economic and institutional ideal designs. Out of the five conceptions, two appear strongly against lobbying and policy entrepreneurship (the substantive and the procedural), one moderately against (the formal), one neutral (the realist), and one strongly supportive (the aggregative).

The aggregative and procedural conceptions are particularly important in discussions on policy entrepreneurs in climate governance and democracy since they relate to liberal environmental democracy and deliberative ecological democracy, respectively. Liberal democracy is hegemonic in current democracies, but green parties and the environmental and climate justice movement advocate more deliberative democracy [127–129]. Given the increased growth of far-right populist parties within the EU, which deny climate change and explicitly want to repeal the EU's recently adopted climate targets and legislation in the EGD, i.e., the 'European Climate Law', and the 'Fit for 55' legislative package, it is also relevant to relate to the substantive, populist view of the public interest.

The aggregative conception of the public interest can be considered a liberal democratic conception. It supports a limited amount of ethical content, e.g., equality of individuals and their freedom. And it does so in a less demanding way than the substantive conception, with no claims on the Ultimate Goal or the Truth. It is quite relativistic, and only prescribes the aggregation and coexistence of various political visions and of various IGs in a political society [149]. Recognizing the existence of these different groups, it says it is a good thing that different opinions keep existing and oppose each other, according to a corporatist, majoritarian liberal-democratic constitutional scheme [150–152]. According to this conception, the public interest is represented by the rules of the game themselves, i.e., the competition of interests. This conception has a positive stance on stakeholder advocacy like policy entrepreneurship and lobbyism, considered to be a legitimate way of advancing one's interests in a democratic and open competition for consent, addressing both the actual decision-makers and the grassroots at the base.

According to the procedural conception, the public interest is the outcome of a procedure of rational deliberation taking place between rational actors. They weigh pros and cons of each option on the table and reduce any bias to favour a final agreement on what is the best option. Only such an option can be deemed as being in the public interest. The focus here is on the procedure of the consensualistic deliberation itself [150–152]. It is an open-ended conception, which theoretically may go extremely far as concerns moral prescriptions. It is the conception embodied by the model of deliberative democracy [153]. Here, we find a negative view of stakeholder advocacy by policy entrepreneurs and lobbyists, as it would represent a channel of distortion and interference in front of purely rational decision-making emerging from the deliberation process, which takes place in an ideal discursive space [154].

The substantive conception of the public interest focuses, as the name suggests, on content, not processes or rules. This view is associated with populism and autocracies (totalitarian regimes), where one or more self-appointed interpreters have the answer to the Only Truth or the Ultimate Goal. Individuals' interests or rights may be sacrificed for

the good of society [155]. Populists are ideologically strongly negative to pluralism, and thus, political advocacy in competition through lobbying and policy entrepreneurship, as it would negatively affect them as legitimate interpreters of the ‘truth’. They themselves have the answer to what is in the public interest.

To summarize, the question of whether policy entrepreneurs are good or bad for democracy is theoretically a question of normative approaches to democracy and the conception of the public interest. The aggregative conception of the public interest, which is related to liberal environmental democracy, has a positive attitude towards lobbyists and policy entrepreneurs, regarding them as a democratic right. The existence of policy entrepreneurs is seen as a legitimate means of promoting their interests in a democratic and open competition for consent; cf. [6]. On the contrary, the procedural conception of the public interest, related to deliberative ecological democracy, has a negative view of lobbying and policy entrepreneurship, regarding them as a distortion of, and undue interference with, the deliberative democratic process, and focuses its attention on the power of IGs, who are ‘farm traders’ in political advocacy and corrupt actors twisting the democratic game to their own interests, using resources to influence or distort the decision-making process, instead of a purely rational decision that comes out of a deliberative process, and that takes place in an ideal discursive space. The substantive conception of the public interest, related to populism, views policy entrepreneurs negatively, as it is averse to pluralism that threatens populists’ self-proclaimed interpretive preference for the Only Truth. However, van den Dool and Schlauffer have identified studies on policy entrepreneurs in autocracies, suggesting that future research ought to bring existing literature on authoritarianism and authoritarian politics into policy process research to test existing and new hypotheses [156].

This said, I do not intend to rule if policy entrepreneurs are good or bad for democracy. The intention is to identify principles to be included in a conceptual framework for analytical research on policy entrepreneurs’ impacts on democracy, as well as normative research on how policy entrepreneurs should act to not violate the important democratic norms from liberal as well as deliberative perspectives on democracy.

#### *4.3. Fundamental Norms in the Framework*

Not surprisingly, Bitonti argues that the aggregative conception of the public interest is the only one that engages positively in an ethical justification of the rules of modern liberal democracy in constructive terms [6]. A liberal view on the public interest is what fits a liberal democracy. It is from this view that Bitonti draws theoretical lessons for a normative regulation of lobbying in developed modern liberal democracies, pointing out four fundamental principles that are particularly plausible for such a framework: (i) accountability, (ii) transparency, (iii) openness, and (iv) impartiality [6]. Of these, accountability is overarching and the other three contribute to fulfilling accountability. By accountability, Bitonti means the obligation of decision-makers and lobbyists to justify their proposals and decisions to the public. To achieve this, decision-makers and lobbyists need to be transparent about how they develop and formulate their policy proposals, what basis is used, and the access of those concerned to this information on an equal basis. There must also be openness and impartiality in the matter of contributing to political decisions. Parties concerned must be able to communicate with decision-makers and lobbyists (and policy entrepreneurs) without discrimination and corruption; cf. [157].

But with a broadened perspective on who is undertaking political advocacy, and with an increasing interest in deliberative democracy in environmental and climate policy research and political debates, these norms are also plausible for analysing the role and outlining norms of the behaviour of policy entrepreneurs in modern democracies in relation to the procedural conception of the public interest and deliberative (ecological) democracy. This broader view, focusing on policy entrepreneurship instead of lobbyism, widens the scope of actors addressed. It includes policy actors from all spheres of society – private

sector, public sector, and civil society—addressing not only interest groups, but also political parties, political executive institutions, and public authorities. The norms suggested by Bitonti are important also in deliberative democracy, but sometimes with other connotations, e.g., publicity, equality, and fairness (see Section 5). In light of research on climate governance and democracy, accountability and its sub-norms transparency, openness, and impartiality need to be supplemented with legitimacy and justice as normative principles [28,31,135] as a basis for a normative theory on democratic policy entrepreneurship. Legitimacy, which, among other concepts, includes perspectives on justice, is furthermore a central norm in general democracy research [157–162]. This is consistent with the view of Mollona and Faldetta, whose framework for analysing justice in relation to lobbyism includes organizational and normative justice that relates to the legitimacy and accountability of policy actors [140]. The former includes subjective distributive justice and descriptive procedural and interactional justice, while the latter draws on both Rawls’s liberal and Habermas’s deliberative ethics [149,154], as well as utilitarian and Kantian ethics. With these additions, the conceptual framework for analysing and providing norms for the policy entrepreneur–democracy nexus becomes broader and includes different ethics for critically analysing policy entrepreneurship and its impact on democratic norms. Utilitarian and Kantian ethical principles are suited to provide [different] assessments of the material content of policy entrepreneurs’ strategic agency, while Rawlsian and Habermasian ethical principles support the assessment of the context in which policy entrepreneurship is conducted; cf. [140]. Bitonti also seems to agree, as he recently revised his normative framework of lobbying to include equal access and accountability for decision-makers [57], drawing on philosophies of open government [163] and deliberative democracy [164].

Against the above background, it is suggested that critical research on the role of policy entrepreneurs in, and their impact on, liberal and deliberative democracies should analyse the relationships of policy entrepreneurs to six interrelated democratic norms and principles: (i) legitimacy, (ii) accountability, (iii) transparency (publicity), (iv) openness (equality), (v) impartiality (fairness), and (vi) justice (Table 2). Of these, researchers on climate policy and democracy, as well as liberal and deliberative democracy in general, assert that legitimacy and accountability are overriding; cf. [28,30,31,45,76,150,162,165,166]. With an increased focus on climate justice in the policy debate, justice could be seen as an overarching norm; but justice, in the form of procedural justice and distributive justice, is often seen as norms that contribute to legitimacy and accountability. Justice and the other three sub-norms and principles (transparency/publicity, openness/equality, and impartiality/fairness) are therefore seen as subcategories that contribute to legitimacy and accountability, although justice can be said to have an intermediate position. Figure 2 illustrates the interlinkages between legitimacy, accountability, and justice, as well as transparency, openness, and impartiality. Openness and impartiality contribute to transparency, accountability, justice, and legitimacy. Impartiality also contributes to openness. Transparency contributes to accountability and legitimacy. Justice contributes to legitimacy and accountability, and accountability contributes to legitimacy.

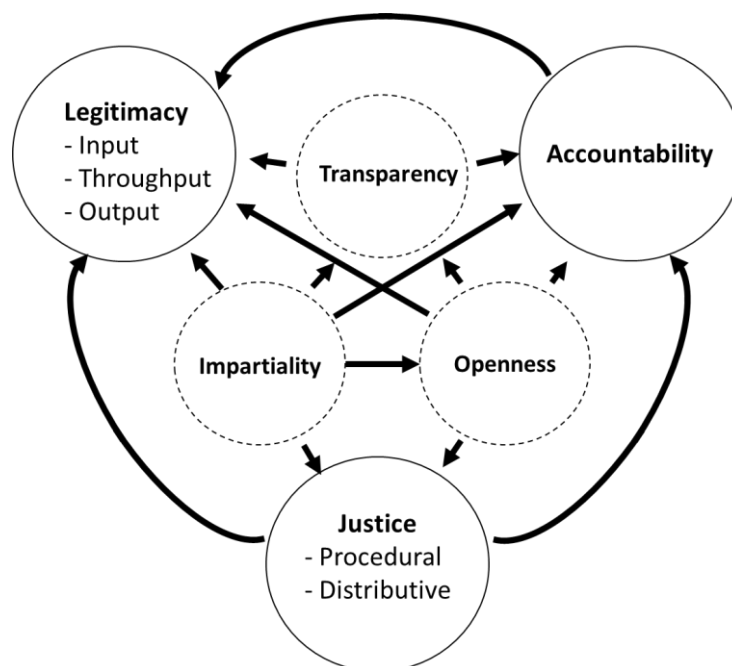
**Table 2.** Normative principles for critical analytical and normative research on the behaviour of policy entrepreneurs in democratic policymaking <sup>a</sup>.

| Legitimacy                 |                                                                                                                             | Accountability                                                                                                                                                                                                |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Transparency and publicity | <i>Input legitimacy</i>                                                                                                     | Allowing public monitoring and greater accountability, e.g., ‘civil regulation’ of corporate accountability with respect to climate change. Governance of the private sector through civil society oversight. |
|                            | Transparency so that citizens can understand how decisions are made and on which grounds, and who are responsible for them. | Right to justification.                                                                                                                                                                                       |
|                            | Right to justification.                                                                                                     | Corporate self-governance of corporate social responsibility and corporate political action.                                                                                                                  |
| Openness and equality      | <i>Throughput legitimacy</i>                                                                                                | Habermasian ethics: Guaranteeing equal opportunity of access to information for ‘all’.                                                                                                                        |

|                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                  |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                           | Channels of communication with all stakeholders affected by a decision, providing information and expertise and actively be engaged in the realization of a public decision.<br>Right to justification.                                                                                                                                                                                                                                                                                                                                                                                                                | Rawlsian ethics: Guaranteeing equal opportunity of access to information for ‘all affected’.<br>Right to justification.                                                                                                                                                                                          |
| Fairness and impartiality | <i>Throughput legitimacy</i><br>Access and possible participation of citizens and stakeholders in the decision-making process takes place in fair conditions, without unjustifiable privileges or distortions.<br>Absence of corruption, discrimination, and similar violations of the principle of impartiality in exercising political power.                                                                                                                                                                                                                                                                        | Freedom of individuals and groups to mobilize (when they have a stake), to support their interests and preferences in front of public decision-makers.<br>Maintaining a critical distance between relevant stakeholders and the empowered space of decision-making to empower other stakeholders’ participation. |
| Justice                   | <i>Throughput legitimacy</i><br>Procedural justice: How policy entrepreneurs generate agency, gain access, and alter allocations and distribution of power. Avoid allocation of financial resources that provide specific groups with an advantage, or an oligopolistic position, in the competition to influence policymaking. Right to justification.<br><i>Output legitimacy</i><br>Distributive justice: Benefits and costs of the proposals put forward by policy entrepreneurs are distributed in a just and equitable manner, reducing inequalities rather than exacerbating them, and respecting human rights. | Justice of the interpersonal transactions policy entrepreneurs encounter with others. It includes informational justice, referring to explanations and social accounts, and interpersonal justice, referring to respectful consideration and sensitivity.<br>Right to justification.                             |

<sup>a</sup> Based on [6,27,28,30,31,34,57,58,139,140,148–151,153,154,157–160,164–169].

Legitimacy and accountability concerns are central to both liberal and deliberative democratic governance but are not confined to non-regulators or quasi-regulators (i.e., non-governmental actors performing governmental functions). However, they should be extended to policy entrepreneurs and other actors influencing public policy, “who in much broader terms are seen as exercising significant amounts of power over those both inside and outside organizations, including for profit corporations” [165] (p. 141). Legitimacy and accountability have dialectical relationships which are socially and discursively constructed, and which are contested. Accountability is a route for validating pragmatic and moral/normative legitimacy claims. The construction and contestation of legitimacy claims by decision-makers and policy entrepreneurs, respectively, to those affected by politics and policies, are dependent on accountability relations. The latter define how the various actors seek to ensure that their legitimacy claims are met and that their evaluations of the legitimacy of those in power are valid [165,170].



**Figure 2.** Interrelations of legitimacy, accountability, and justice as democratic norms.

Neyer argues that from the perspective of deliberative democracy, formal criteria to analyse democracy do not suffice [166]. He asserts that deliberate democracy is a process of self-governance of a people centred on free and unconstrained discourses among the individuals and groups of a society and emphasizes equality and an unrestricted public sphere. Nevertheless, Neyer argues, like Mollona and Faldetta [140], that from a perspective of deliberate democracy one should focus on justice and the right to justification rather than democracy, as it helps to increase legitimacy and answers many questions inherent in the concept of accountability [166]. The idea of justice as a right to justification is established on the assumption that we have a human right to demand and receive justification from all those individuals or organizations which restrict our freedom [166]. This includes not only decision-makers but also those who frame problems and propose related policies. As discussed in Section 5, political theory on deliberative democracy has evolved, and now, includes elaborated views also on legitimacy and accountability.

In critical studies of policy entrepreneurs, one should thus focus on the policy entrepreneurs' legitimacy and accountability, but also how their strategies and agency affect the legitimacy and accountability of other policy actors and democratic institutions, as well as how the legitimacy of a certain policy and policy instruments is affected. The conceptual framework suggested is intended to be applicable in both liberal and deliberative democracies. However, liberal democracy is hegemonic and policy entrepreneurs are mainly to be found in liberal democracies. Thus, empirical research will focus on policy entrepreneurs in liberal democracies, although part of the governance process may be deliberative.

Having outlined the conceptual framework, the next section presents and reflects in more detail how legitimacy, accountability, and justice are conceived of in liberal and deliberative democracy theory and how they can sometimes be in conflict. This is to give an in-depth account of the theories upon which the framework builds.

## 5. Reflections on Central Norms and Principles in the Framework

### 5.1. Legitimacy

Legitimacy is a multifaceted concept, with different connotations depending on theoretical perspectives on democracy. Legitimacy has been defined as “a generalized perception or assumption that the actions of an entity are desirable, proper, or appropriate within some socially constructed system of norms, values, beliefs, and definitions”

[171,172] (p. 574). Being socially constructed, legitimacy claims can be contested by those evaluating political regimes, policies, and policy entrepreneurs. Thus, legitimacy lies both in the values, interests, expectations, and cognitive frames of those who are perceiving or accepting the governance regime, a policy entrepreneur, or a policy, and in the regime, policy entrepreneur, or policy itself; cf. [165]. It can differ significantly across time and space, and between actors, systems, and contexts. Moreover, different people's perceptions of whether a policy entrepreneur or policy is legitimate are not necessarily based on the same types of evaluations. Ideology and the view of democracy play an important role. A regime or a policy that is deemed legally valid is not necessarily legitimate. Thus, "identifying the 'legitimacy' of governance regimes or organizations within them, trying to do so by identifying legal validity will often be irrelevant, or at least unproductive" [165] (pp. 144–145). In addition, Black argues that not all organizations will be perceived as legitimate in performing political roles in policy processes. This implies that legitimacy is particularly relevant when considering the role of non-state policy entrepreneurs.

#### 5.1.1. Legitimacy in Liberal Democracy

In liberal democracy, legitimacy focuses on social credibility and acceptability, including (i) to what extent policy regimes, policies, and policy actors conform to established rules; (ii) the exercise of power is justified by reference to the beliefs of both majorities and minorities (both of which can be represented by policy entrepreneurs), and there is evidence of support or consent from the minority; (iii) openness and a fair, impartial, and unbiased opportunity for impacted citizens and other stakeholders to participate in the policy process; and (iv) the ability of the political system and/or policy instrument proposed by a policy entrepreneur to solve collective problems for citizens in a just way [150,151,157–161,167,173,174]. In policy analysis, the model of Scharpf and Schmidt [160,161,167], differentiating between input, throughput, and output legitimacy prevails.

#### 5.1.2. Legitimacy in Deliberative Democracy

In deliberative democracy, "legitimacy means that there are good arguments for a political order's claim to be recognized as right and just; a legitimate order deserves recognition" [175] (p. 178). The central point of this view is that the political order contains rules and procedures that build on the requirement that collective decisions be criticized and defended with reasons and good arguments. Later theorists of deliberative democracy expanded the view: that the outcomes of a political regime are legitimate to the extent they receive reflective assent through open participation in authentic deliberation by 'all' those subject to the decision in question [176,177]. In a similar manner, Benhabib claims that "legitimacy in complex democratic societies must be thought to result from the free and unconstrained deliberation of 'all' about matters of common concern" (highlight added) [178] (p. 68). This focus on participation of 'all' has been criticized by other scholars of deliberative democracy, since in real-world political deliberations, not all of those interested appear to participate [179,180]. They argue that deliberative democracy cannot live up to its own standards of legitimacy, and thus, that legitimacy should not be a value and norm. More empirically oriented scholars increasingly question the validity of this 'inclusiveness paradigm', pointing at the limited deliberative capacity of private multi-stakeholder governance [181]. Other theorists have elaborated the view of legitimacy in deliberative democracy that a part of exercising legitimate democratic authority is a requirement for decision-makers, administrative agencies, and appointed experts to justify their reasons and policy proposals and demonstrate that their suggestions and decisions can reasonably be expected to serve the common interests of free and equal citizens [166,182–184]. As mentioned, Neyer argues that this focus on right to justification, rather than democracy, would be the basic principle to assess policy and political actors in deliberative democracy, as it helps to increase legitimacy and answers many questions inherent in the concept of accountability [166].

In summary, the main difference between the liberal and deliberate democracy perspectives on legitimacy lies in the view of who should be involved on impartial grounds in the ‘open’ policy process, and thus, able to express their views and concerns: only those affected by a policy, or everyone concerned; in what spatial and temporal scope; citizens, humans, or even non-humans?

## 5.2. Accountability

Accountability is an important mechanism to create legitimacy for the agency of policy entrepreneurs in liberal democracies [31,65]. It covers a moral and institutional liability to publicly justify actions in such a way that decision-makers and policy entrepreneurs can be evaluated, judged, and held ‘politically’ accountable in front of the public for their behaviour and outcomes related to something for which they are responsible, e.g., a policy or a governance structure [45,185,186]. This is closely related to the principle of justice as the ‘right to justification’ [166]. Among other things, this requires free media that can scrutinize those with power. Accountability relationships are a “critical element in the construction and contestation of legitimacy claims by both policy entrepreneurs and legitimacy communities, as they are the means by which legitimacy communities seek to ensure that their legitimacy claims are met, and that their evaluations of the legitimacy of regulators are valid” [165] (p. 149).

### 5.2.1. Accountability in Deliberative Democracy

Political accountability was not an important norm in early writings on deliberative democracy theory [54]. Due to the limited oversight capacity of most legislatures, Hunold proposed a deliberative model of accountability that would have significance beyond public administration for the study of democracy more generally, and also liberal democracy [187]. It focuses on accountability through public deliberation, where it is a challenge to link administrative institutions and their decisions to “interlocking and overlapping networks and associations of deliberation, contestation, and argumentation” [123,178] (p. 74). Hunold’s model builds on three concepts: publicity, equality, and inclusiveness [187]. Publicity requires that administrations transparently release proposed policies and legislation for public discussion and criticism. Citizens shall be able to participate based on equality with administrative officials and technical experts such as policy entrepreneurs. In practice, this means that “all participants of policy deliberations should have the same chance to define issues, dispute evidence, and shape the agenda” [187] (p. 158). For this to happen, weaker participants should be compensated for serious power disparities, e.g., by providing opportunities for education and preparation on policy issues [188,189]. Finally, inclusiveness, where fairness and impartiality of representation and democratic accountability rest on collective decision-making processes being open to all citizens. To Dryzek and Stevenson, questions of inclusion and exclusion are prominent regarding accountability and legitimacy in deliberative democracy, and mean that the ‘empowered space’ of political decision-making is held accountable to the ‘public space’ of deliberation [139]. Who decides who is to be included in the ‘empowered space’ of decision-making? Whose voices carry more weight in the ‘public space’ of deliberation?

### 5.2.2. Accountability in Liberal Democracy

Accountability in liberal democratic theory also focuses on publicity, equality, and fairness, but in terms of transparency, openness, and impartiality [6], as principal–agent accountability between the elected politicians and the public. In comparison to the deliberative model, the liberal model champions the probing of volition among a smaller number of affected groups and actors. While accountability in liberal democracy is based on pluralist adversarial norms and more closed ‘open’ structures of interest representation, accountability in deliberative democracy champions collaboration and inclusiveness of more, sometimes all actors. This difference is important when it comes to climate governance.

Climate governance increasingly includes different type of actors: states, local government, bureaucracies, companies, NGOs, and other IGs. Accountability is treated differently in different organizations, which calls for a distinction between internal and external accountability [190]. In internal accountability, the “principal and agent are institutionally linked to each other; and in external accountability, those whose lives are impacted, and hence who would desire to hold to account, are not directly (or institutionally) linked to the one to be held to account” [28] (p. 1857).

### 5.3. Justice

As for justice, the literature distinguishes procedural justice from distributive justice [140,166]. The former is related to throughput legitimacy, while the latter is related to output legitimacy. Liberal democratic theory has mainly focused on distributive justice, while deliberative democratic theory has mainly focused on procedural justice. Both perspectives are important.

#### 5.3.1. Justice in Deliberative Democracy

Early scholars of deliberative democracy limited the theory to procedural justice and were critical of incorporating substantive principles, e.g., individual liberty or equal opportunity, to assess procedural outcomes beyond what is necessary for a fair democratic process. Deliberative democracy means fair and just procedures, not right outcomes. Citizens in democracies, not democracy theorists, should evaluate and endorse the content of laws. In addition, the political sovereignty of citizens should not be exercised through theoretical reasoning but through actual democratic decision-making. A deliberative democratic theory that contains substantive principles would constrain the democratic decision-making process and the process of deliberation itself [153,164,175,184,191].

This view has been contested by Gutmann and Thompson, who argue that the value of reciprocity can be a principle of justice that guides thinking in the ongoing process in which citizens as well as theorists consider what justice requires in the case of specific laws [182]. They claim that “reciprocity is to justice in political ethics what replication is to truth in science. A finding of truth in science requires replicability, which calls for public demonstration. A finding of justice in political ethics requires reciprocity, which calls for public deliberation. [182] (p. 4)” Deliberation is a process of seeking mutually justifiable reasons and reaching a mutually binding decision based on those reasons. Thus, the process presupposes some principles with substantive content. For instance, few would dispute that deliberative justifications should completely ignore the values expressed by liberal substantive principles such as liberty and equal opportunity. Including both substantive and procedural principles in a deliberative democratic theory inevitably increases the potential for conflict. But democratic politics is full of conflict among principles, and a democratic theory that tries to avoid conflict by limiting the range of principles it includes is likely to be less relevant for recognizing and resolving the disagreements that democracies typically confront [182].

#### 5.3.2. Climate Justice

In climate governance, claims are made for climate justice, both among scholars [15,16,23,192] and social movements [128,129,193,194]. The concept emerged from the merging of the environmental movement and the human rights and social justice movement [16,128,194]. Climate justice scholarship traditionally demonstrates how climate change is a moral and ethical issue, not just a scientific, techno-economic, or finance issue [15,16,23,192]. Climate justice addresses how climate change affects people differently, unevenly, and disproportionately, normatively aiming to reduce marginalization, exploitation, and oppression as well as enhance equity and justice of humans across regions and generations. Climate justice also addresses, descriptively and normatively, the distributive effects of policies to mitigate climate change, thus the call for a just transition

[19,20,22,24]. In more recent years, climate justice scholars have included insights from a range of academic theories (such as feminist, anti-racist, anti-capitalist, post-colonial, and decolonial scholarship), to develop a more critical climate justice scholarship [195]. This development has made accountability and obligations, as well as ethics and human rights, more integral to climate justice. This also involves re-evaluation of global political economic systems that produce and reinforce socio-spatial injustices. Compared to climate justice scholars, the critical climate justice perspective also focuses on procedural justice of vulnerable and marginalized groups. In all, critical climate justice addresses both procedural and distributive justice.

#### 5.4. Potential Conflicts between Norms

These norms could theoretically and empirically be in conflict, particularly procedural norms and substantive norms [182]. Consider, for instance, consensus rules, which would maximize the procedural justice as well as input and throughput legitimacy by giving all stakeholders a voice. However, this increase in input and throughput legitimacy can reduce the output legitimacy, distributive justice, and effectiveness of the decision-making system. The collective accountability of decision-makers in deliberative democracy based on consensus hinges on the veto powers of a few decision-makers that “seek special benefits, pursue minority political agendas, or reap economic benefit from non-decisions and a persistence of the status quo” [28] (p. 1863). Accountability and legitimacy of climate governance vis-à-vis the interests of a majority of humankind will be reduced. Conflicts between different democratic norms and principles could be dealt with if substantive norms to varying degrees are morally and politically provisional. A normative theory on policy entrepreneurs based on deliberative democratic theory can avoid usurping the moral or political authority of democratic citizens, while making substantive judgments about the policies they propose, since it claims provisional status for the principles it defends.

### 6. Empirical Findings from Europe

Using the framework proposed above, the influence of policy entrepreneurs on democratic policy processes has been analysed in two case studies [196]: (i) the development of new EU legislation to decarbonize international shipping (part of EGD and the legislative package ‘Fit for 55’), and (ii) the radical reform of Swedish climate policy since the change of government after elections to the Swedish parliament (Riksdag) in September 2022. The elections implied a shift of government, from eight years with a coalition of the Social Democrats (S) and the Green party (MP), to a coalition of the liberal-conservative Moderates (M), the Christian Democrats (KD), and the Liberals (L), supported by the far-right populist nativist Sweden Democrats (SD). The cases are selected for their theoretical relevance, i.e., their ability to generate as many properties as possible of the phenomenon under study [197]. Both the EU and Sweden have long since been seen as pioneers in climate policy [198,199], with the EU aspiring to hold leadership in global climate governance and using ambitious EU climate policies to act as an ‘exemplary leader’ [169]. But recent studies show that EU climate policy fails to address climate justice, and that the EU’s role as exemplary leader is questioned [67,199,200]. Sweden’s role as an international leader is currently questioned due to the new government’s policy changes [201], and it has been widely criticized for increasing GHG emissions in the middle of a climate emergency when emissions, according to climate science, must be reduced drastically in a short time [202–204]. This makes policy entrepreneurship in the EU and Sweden particularly relevant to analyse from a democracy perspective. Each case has been presented in more detail elsewhere [67,145,201,205] and is summarized below.

But what made the policy actors policy entrepreneurs? As mentioned in Section 2.1, privileged actors in powerful positions deploying the regular tools at their disposal merely do their job and are not demonstrating entrepreneurship. But in these cases, the European Commission, through the Directorate General for Mobility and Transport (DG MOVE), the European confederation of green mobility NGOs, *Transport & Environment*

(T&E), SD, and the M–KD–L government did “punch above their weight” [75] (p. 1473) to radically change EU and Swedish climate policy. The Commission is generally considered a central and ‘natural’ policy entrepreneur in EU politics and governance through its monopoly on presenting legislative proposals [66]. In the first case, the Commission and T&E proposed innovative legislation that for the first time ever regulates GHG emissions from maritime shipping [67,145]. In the second case, SD, M, KD, and L aimed for a paradigm shift in Swedish climate policy [206] and had to use plenty of resources and strategies to reach their aim [201]. But they did not advocate innovative policy change from a positive perspective, new policies that would drastically reduce GHG emissions. Instead, they proposed policies that would slow down the clean energy transition and drastically increase GHG emissions in the short term [207]. Nevertheless, their policy proposals and policies adopted are innovative in the sense that they turn previous climate policy upside-down.

### *6.1. Public Opinion on Climate Policy in Sweden and the EU*

Before presenting results of the two case studies, it is relevant to dwell on the opinion on climate policy in the EU and Sweden. This is to show that the reasoning is not only theoretical, that there is a stealth public to which I am appealing. In contrast, climate change is an issue high on the agenda for EU and Swedish citizens, even very high in Sweden, and the public have opinions on democracy, EU, and Swedish institutions. In the following sub-sections, I refer to and discuss results of recent polls as well as the outcome of the EU elections held on 7–9 June 2024.

#### *6.1.1. Polls on Climate Change and Democracy*

The latest polls of the Eurobarometer, from May 2024, report that 78% of Europeans agree that environmental issues including climate change have a direct effect on their daily life and their health, and 84% of the respondents agree that EU environmental legislation is necessary for protecting the environment in their country [208]. EU citizens have more trust in the EU than in national governments, but only 49% have trust in EU institutions, although this has been rising steadily since 2015 [209]. A total of 62% are optimistic and 35% are pessimistic about the future of the EU. Among young people aged 15–30, only 38% think that voting in local, regional, national, and EU elections is the most effective way to make their voices heard by decision-makers [210]. But about 64% intend to vote in the EU elections in June 2024. Engaging in social media and social movements, including activism, is also considered important by around 30%. Only 25% mention participation in public consultations.

Recent polls in Sweden (June 2023 to March 2024) show that a majority of Swedes (75–80%) (i) consider the climate issue to be very important [211]; (ii) think that the government has an important role in pursuing an ambitious climate policy [212]; and (iii) have little confidence in the Tidö parties’ climate policy and that greater trust is placed in EU and Swedish companies [213]. In addition, 75% of the M, KD, and L voters are critical of the government’s climate policy [214]. A total of 87% of Swedes think that liberal democracy is the best governance model [215]. However, 20% of Swedes, particularly younger persons and people with low education and low income, tend to favour autocracy with a strong leader to solve today’s most pressing issues [215]. As for climate governance, most Swedes think that climate policy should be based on science instead of populism [216], and there is a tendency among green voters and voters with high education and high income to call for technocracy in climate policy, if balanced with the will of the people [215]. The distrust in the current government’s climate policy, disregarding climate science and people’s will, and increasing emissions, is an important factor. People think it is hard to influence Swedish policymaking, but even harder to influence EU policymaking. The EU is seen as technocratic and suffering from a democratic deficit [215].

### 6.1.2. Outcomes of 2024 Elections to the European Parliament

The results of the EU elections show that the broad centre of liberal-conservatives and social democrats retains its majority in the European Parliament, with 56% of the seats, while liberal, green, and left-wing parties are declining, with the Greens party group losing almost 25% of their seats in the Parliament. In addition, the far-right populist nativist parties are increasing their support, but not as much as polls predicted. Far-right parties were most successful in Hungary, France, Italy, Austria, Germany, and the Netherlands. Among the reasons for the losses of the Greens, discontent with EU climate policies having too much impact on some groups, such as farmers, is mentioned. The increasing support for far-right parties and extremists in some countries relates more to discontent with the EU at large, discontent with EU support to the Ukraine, and discontent with the EU and national governments, where far-right populist parties are not collaborating with the government to handle migration and the economic crisis, with increased inflation following the Russian war in Ukraine.

Contrary to the voting results in the EU at large, the left-wing and green parties were successful in the EU elections in the Nordic countries. In Sweden, they more than doubled their votes compared to the national elections in 2022, collecting almost 25% of the votes in total. In all, the opposition to the Tidö parties collected almost 57% of the votes, while the Tidö parties only received 41% of the votes, compared to 50% in the national elections. Far-right populist and climate sceptical SD dropped from 20.5% in the national elections to 13% in the EU elections, for the first time ever getting reduced support in a nationwide election. Their sibling parties in the Nordics also lost votes. The reason for the success of the red-green parties in the Nordics was the high interest in climate policy among the voters, ranking it as a top three issue in the elections.

In all, this indicates that a large majority of citizens in Sweden think that environment and climate change are important public policy issues that EU and Swedish decision-makers should deal with urgently and ambitiously. But at the same time, a lot fewer think that EU and Swedish governance regimes manage these issues in a proper way. They want more democratic policymaking in climate policy. This is the case in the EU too, where voters chose populist parties instead of green parties. This can be seen as a proxy for the public being interested in holding policy entrepreneurs and decision-makers accountable for the policies proposed and adopted, and that policies and policy processes should be legitimate and just. But the EU-sceptical parties increased their support in many MSs and the EU, indicating that at least some voters do not want the EU to adopt ambitious climate policies. In addition, climate change is a global problem, which is why issues of legitimacy, accountability, and justice in the agency of policy entrepreneurs and its outcomes are not only a question for citizens in the EU and Sweden, but all over the world. Climate justice and a just transition to reach the Paris Agreement goals and the UN SDGs are topics explicitly discussed in global governance [30,31]. For instance, accountability is affected by mismatches between those who seek to hold others accountable and those who are to be held accountable, the former which could be stakeholders in the Global South, and the latter actors in the Global North, including policy entrepreneurs [139].

### 6.2. Policy Entrepreneurs Violating Democratic Norms

All policy entrepreneurs in the two cases used cultural-institutional entrepreneurship. The Commission, SD, and the Tidö government also used structural entrepreneurship to influence power relations. All policy entrepreneurs, including the civil society organization T&E, showed a democratic deficit from both liberal and deliberative democratic perspectives, although it is most obvious and conspicuous in the case of Swedish climate policy. In all, the findings contradict conclusions by Brouwer and Huitema that the strategic behaviour of policy entrepreneurs in the public sector is not about “double-dealing or playing nasty tricks” [72] (p. 1271). They argue that public sector policy entrepreneurs are generally ambitious and honest in relation to the public interest and not to

themselves, so they “should not be seen as a threat to the accountability of public sector organizations, but first and foremost as an opportunity” (p. 1271), especially for climate change. However, the public interest can be interpreted in diverse ways, depending on democratic views and ideology.

#### 6.2.1. The European Commission and Transport & Environment

In the first case, the European Commission, through DG MOVE, and T&E, acted as policy entrepreneurs [67,145,205]. Both tried to influence the perceptions and beliefs of EU member states in the Council of the EU and political groups in the European Parliament. Employing structural entrepreneurship, the Commission also acted to advance its own positions of power as a supranational institution in European integration at the expense of member states’ flexibility in the central issue of subsidiarity, and thus, about an increased technocratization of climate policy.

For T&E, deficits were related to a lack of transparency and lack of focus on distributive justice. For the Commission, deficits related to a lack of transparency, low legitimacy, and procedural as well as distributive justice (Table 3). The more technocracy, the more possibilities to demand accountability are undermined. Both T&E and the Commission failed to include climate justice and just transition, taking into account participation and impacts on affected actors outside the EU. This is remarkable since the need for decarbonization will increase the cost of shipping by 2050—about 7% in the EU and 17.8% in third countries [67]. This shows that third-country parties will be hit harder by the new legislation, but they were not invited to the policy process. As argued by Shaw and De Beukelaer, “shipping decarbonization would likely make raising living standards for the world’s poorest difficult, costing development opportunities, as already limited resources would be consumed by higher shipping costs” [217]. In comparison, the issues of a just transition are discussed in the International Maritime Organization (IMO) as part of the discussions on policy measures to reach the new IMO target on climate neutrality by mid-century.

**Table 3.** Democratic deficits of policy entrepreneurs in the EU policy processes on decarbonizing maritime shipping.

|                                                | Legitimacy                                                                                                                                                                                                                                                                      | Accountability |
|------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Transparency                                   | <i>Input legitimacy</i>                                                                                                                                                                                                                                                         |                |
|                                                | No disclosure by the Commission about the interest groups that influenced European Commission proposals on FuelEU Maritime.                                                                                                                                                     |                |
|                                                | No disclosure by the Commission on the development of policy proposals. Expert-driven process for agenda setting.                                                                                                                                                               |                |
|                                                | The Commission acted intentionally as an ‘opportunist’ in interpreting rules and procedures to expand its reach and power (competence creep), reducing influence and flexibility of member states and the Council. The Commission also strengthens its ‘implementation powers’. |                |
|                                                | Limited disclosure by T&E on their influence on the European Parliament and member states regarding their alternative proposal on FuelEU Maritime.                                                                                                                              |                |
| Openness, impartiality, and procedural justice | Hidden negotiations in the Council of the EU and in trilogues.                                                                                                                                                                                                                  |                |
|                                                | <i>Throughput legitimacy</i>                                                                                                                                                                                                                                                    |                |
|                                                | European Commission consultations with targeted stakeholders only, often in closed fora. Third-country actors excluded.                                                                                                                                                         |                |
| Distributive justice                           | <i>Output legitimacy</i>                                                                                                                                                                                                                                                        |                |
|                                                | Energy, climate, and social justice not included in problem framings and policy proposals of the European Commission and Transport & Environment on FuelEU Maritime. Reduces accountability from perspectives of spatial and functional interdependence.                        |                |

#### 6.2.2. The Sweden Democrats and the Tidö Government

In the second case, SD acted as a policy entrepreneur to influence the perceptions and beliefs on problems and policy options of the three parties in the government, but also to change power relations [205]. SD has no seats in the government cabinet but has political

staff in the Prime Minister's Office and participates in most political negotiations, including on climate policy which was included in the Tidö agreement [206] reached by M, KD, L, and SD for SD to support the government [205]. The Tidö agreement includes six policy areas that should undergo a rapid paradigm shift, public health, climate and energy, criminality, migration and integration, education, and economic growth, and household economy [206], of which criminality, migration, and climate change are deemed the most important [218]. Climate change was included since SD is vocal as a climate change denier [201,219,220]. The so-called Tidö government then tried to influence the political opposition in the Riksdag, business, authorities, environmental organizations, voters, and the media on a radical change in Swedish climate policy.

The actions of SD and the Tidö government as policy entrepreneurs in reforming Swedish climate policy are largely aimed at slowing down progress and systematically hindering and silencing critics from participating in the democratic conversation. This is achieved with limited or no debate and increases the influence of structural governance by changing the distribution of formal power, redefining democratic concepts and manipulating factual and scientific information. This can lead to reduced trust in the rule of law and lower legitimacy for democracy in general.

Regarding accountability, it has long been suspected that SD runs a 'troll factory', using anonymous accounts on social media to shape opinion for their positions and against their political opponents with misleading information, often conspiracy theories, also regarding climate change. This was recently verified by undercover journalism, leading to widespread criticism in the media and the opposition of the non-transparency of SD being a threat to Swedish liberal democracy. The Prime Minister and other representatives of the government were also critical. It was shown that SD even ridiculed the government, with which it collaborates. But the critique from the Prime Minister and other leaders in the government was tame. They asked for an excuse and demanded that SD stop ridiculing the government but let them continue to spread disinformation and conspiracy theories anonymously.

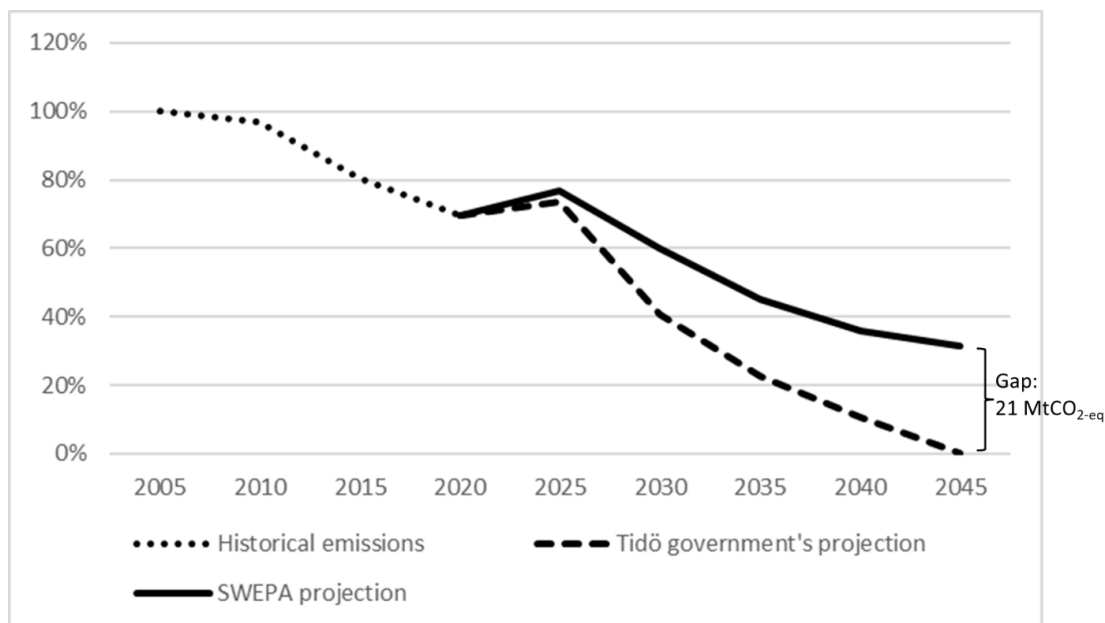
The climate minister has refused to talk to environmental journalists, and the government repealed financing of left-wing and green independent media, making it harder for journalists to scrutinize the government and inform people of their actions. This reduces the possibility for the people to hold SD and the government accountable for their actions.

On openness and impartiality, important for throughput legitimacy, procedural justice, and accountability, only established organizations like business associations and state agencies as well as economists participated in referrals, policy fora, and meetings about problem framing and the design of climate policy and policy instruments. The Tidö parties actively prevented participation of climate scientists and environmental NGOs in discussions on climate policy through discrimination, making it harder for them to criticize their politics. In addition, the Tidö parties use 'nasty rhetorics' [221] to delegitimize their opponents, particularly climate activists. The Prime Minister and the climate minister and leading people in M and SD accused them on social media of being 'totalitarian', 'terrorists', and 'a threat to Swedish democratic processes'. The minister of legal affairs and a leading SD politician intimidated climate activists, saying they should be 'sent to prison'. Some people working for SD media went as far as incitement, reporting openly on social media that climate activists should be executed, which made far-right extremists physically attack a group of climate activists. SD has infiltrated climate justice movements, filmed and taken photographs of individuals, and displayed their photos, names, and addresses on the internet to threaten them to silence. Nasty rhetoric, with hate, orchestrated by SD, led the former party leader of C to resign, and led to a murder in 2022. This nasty rhetoric and increased repression of climate activists, brought to court for sabotage instead of civil disobedience, negatively impact throughput legitimacy and procedural justice as well as accountability.

Practising civil disobedience means to engage in a battle over legitimacy and is a performative act aimed at a target audience that seeks to delegitimize opponents [222]. Failure to understand these manifestations considering the right to demonstrate is a mistake

in a potentially dangerous and antiliberal democratic direction, where constitutional rights are at stake. The right to demonstrate is a central building block in every democratic society. In Sweden, it is protected in the constitution and through several international conventions. Even civil disobedience is covered by the right to demonstrate if violence is not used. Human rights experts have warned that climate activists who temporarily stopped traffic through demonstrations suddenly began to be prosecuted for sabotage. A similar development has been seen in other European countries, e.g., Austria, France, Germany, Spain, and the UK. Recently, the UN special rapporteur for the rights of environmental organizations according to the Aarhus Convention, Michel Forst, claimed that “by categorizing environmental activism as a potential terrorist threat, by limiting freedom of expression and by criminalizing certain forms of protests and demonstrators, these legislative and policy changes contribute to the shrinking of civic space and seriously threaten the vitality of democratic societies” [223] (p. 11).

As for transparency, the Tidö parties claimed that they are the first to present a trustworthy Climate Action Plan [207] with policies that will lead to GHG emission reductions to reach the Swedish target on climate neutrality by 2045. Showing a graph with an emission trajectory with zero emissions in 2045, the Prime Minister and climate minister said that Sweden for the first time has a plan to reach all the way down to net-zero emissions by 2045. However, the Swedish Environmental Protection Agency presented its own calculations of emission reductions of existing policies and policies proposed by the Tidö government [204]. These show a gap of almost 50% of current emission levels to reach the target on climate neutrality by 2045, clearly indicating the government’s manipulation of information (Figure 3). It turned out that the government calculated effects on emission reductions from a policy instrument they had just repealed. Both the Swedish Climate Policy Council and the Swedish Finance Policy Council [202,203], tasked with scrutinizing the government’s policies, claimed that “the government lacks a coherent and comprehensible strategy to reach both the Swedish and the EU’s climate targets by 2030. Actions have been taken that in themselves increase emissions, while emission reductions are postponed to the future” [203] (p. 15).



**Figure 3.** Emission reduction gap to fill with new policy instruments to reach Swedish target on climate neutrality by 2045. Source: data from the Swedish Environmental Protection Agency (SWEPA) and the Swedish government [204,207].

Interestingly, the Tidö parties stress the need for Swedish climate policy to be ‘popularly legitimate’ and accepted by the ‘people’. As for distributive justice, the Tidö parties

have taken measures to reduce costs of fossil fuels for cars and for aviation, with a skewed reference to ‘climate justice’ and ‘legitimacy’ but have actively decided not to take measures to reduce costs for public transport, which have increased much more than fuel prices. This is despite 57% of Swedes wanting to ban short-haul flights and 74% wanting the government to invest more in public transport [215]. Critics have claimed that the cost reductions for fossil fuels do not benefit the groups who are most vulnerable [202,203]. Research shows that earmarking of revenues from taxes used for subsidies to vulnerable households would increase justice and maintain effectiveness, thus improving legitimacy [224–227]. In addition, the Tidö parties duck the topic of increasing energy poverty and related social injustice in Sweden caused by the clean energy transition [228]. This is confirmed by Fischer et al. who found that justice was discursively treated in Swedish policy debates on the green transition in a way that essentially stifled change rather than improved transition governance [229]. Thus, the framing of justice arguments contributes to politicizing transition governance in ways that render some policy options impossible. The situation is similar in Swedish government agencies [230], who mention energy and climate justice at a general level in different documents, without effecting concrete policy proposals.

Output legitimacy and distributive justice are also limited by the Tidö parties’ focus on legitimacy among Swedish citizens only. Climate change is a global issue. According to liberal environmental democratic theory [131], distributive justice also includes people in other countries, companies, and organizations, and according to deliberative ecological democratic theory [125,136], also justice for future generations, animals, and nature. The Tidö parties’ focus on popular legitimacy and justice for citizens thus has limited anchoring in theories of the environment–democracy nexus [135] and liberal as well as deliberative democracy theories on legitimacy and justice in general. In all, it appears that a ‘popularly legitimate’ climate policy is based on a very narrow definition of legitimacy, which is not associated with liberal and deliberative legitimacy and democracy, rather a policy associated with illiberal far-right climate denying populism.

Summing up, the policy entrepreneurs in the Swedish government and SD are elected politicians and their parties, including the Prime Minister and cabinet ministers. Since the ministers and spokespersons of SD are politically elected, there is a demos that can hold them accountable in the next election. Three out of four parties in the opposition voted for the setting aside of the climate minister in a motion of no confidence following the government’s budgetary bill for 2024 and the Climate Action Plan—for lack of credible policies but also for systematically acting manipulatively and deceptively. The vote was lost, but support for the Tidö parties has decreased in polls for the EU elections in June 2024. So, even though they are actively taking measures to avoid accountability, there is a possibility that the Tidö government and SD will be held accountable for its climate policy in the next general elections to the Riksdag in September 2026 (Table 4).

**Table 4.** Democratic deficits of policy entrepreneurs for radical reform of Swedish climate policy and governance.

|                           | Legitimacy                                                                                                                                                                                                                          | Accountability |
|---------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|
| Transparency              | <i>Input legitimacy</i>                                                                                                                                                                                                             |                |
|                           | Limited disclosure by the Swedish government and SD on considerations for the Climate Action Plan.                                                                                                                                  |                |
|                           | Reduced time for inquiries, with limited possibilities to analyse consequences and stakeholders to analyse and respond to public consultations. Violation to the Swedish constitution.                                              |                |
|                           | No disclosure by the prosecutors, judiciaries, the government or SD on suggestions for stricter charges and repression of climate activists.                                                                                        |                |
|                           | Abolishment of financial support to independent media and active choice by the minister for climate and environment not to talk to environmental journalists restricts possibilities to scrutinize the government’s climate policy. |                |
| Openness and impartiality | Manipulation of data concerning potential GHG emission reductions of policies in the Climate Action Plan.                                                                                                                           |                |
|                           | <i>Throughput legitimacy</i>                                                                                                                                                                                                        |                |

|         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |   |
|---------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|
|         | <p>Government consultations with targeted stakeholders only. Partial discrimination of climate scientists, environmental media and environmental movements from climate policy discussions.</p> <p>Climate scientists and the environmental and climate justice movements actively excluded by the Swedish government from consultations on the Climate Action Plan.</p> <p>Prime minister and minister for climate and environment smearing and delegitimizing the climate justice movement as being ‘totalitarian’ and a ‘threat to Swedish democratic political processes’. Members of M in the Riksdag accusing climate activists of being ‘terrorists’. The government and SD called for and welcomed that climate activists temporarily blocking the traffic are charged for sabotage and sentenced to prison. Persons connected to SD proposed that climate activists should be executed.</p> <p>Abolishment of financial support to civil society organizations restricts possibilities to facilitate civic education and citizens’ preparation on policy issues to enable them to participate in climate policy discussions.</p> |   |
| Justice | <p><i>Throughput legitimacy: procedural justice</i></p> <p>Structural entrepreneurship, aimed at enhancing power of SD and Swedish government by altering the distribution of formal authority and factual and scientific information.</p> <p>Structural entrepreneurship, aimed at silencing media and critics of the Swedish government’s climate policy by altering the distribution of formal authority and factual and scientific information.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | - |
|         | <p><i>Output legitimacy: distributional justice</i></p> <p>Redefinition of the concepts of legitimacy and climate justice to serve the purpose of the Tidö parties and make them look democratic.</p> <p>Swedish government and SD favour citizens using private cars before public transport. Disregards energy poverty, humans in other countries, future generations, non-human. Lack of policies which would make industry invest in the green transition, despite the claim by the prime minister that industry would gain competitiveness from first mover advantage.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | - |

### 6.3. Explaining the Democratic Deficits

The lack of focus on distributive energy and climate justice by all policy entrepreneurs in both cases has implications on both the legitimacy and accountability of the four policy entrepreneurs and climate governance, which are affected by the resulting mismatches between those who seek to hold others accountable and those who are to be held accountable; the former of which could be stakeholders outside Sweden or the EU, and the latter, actors in Sweden or the EU; cf. [139]. Functional interdependencies refer to the diverse sectors of global production and consumption, which make the assessment of the accountability and legitimacy of rule-making dependent on the boundaries to be drawn around the ‘stakeholders’ included [28].

#### 6.3.1. Neo-Corporatism and Ecological Modernization

In both cases, the democratic deficit of policy entrepreneurs can be linked to the neo-corporatist nature of relations between executive authorities and other policy actors in Sweden and the EU, and in close relation to this, the idea of ecological modernization. The nature of stakeholder relations in these contexts is generally consultative, but it is a centralized and elitist top-down, exclusive type of consultation, where decision-makers engage with a few policy actors of a comprehensive nature, often resulting in representative monopoly, non-transparency, and other democratic deficits [231–233]. The EU is not and can probably not become a democratic entity. It has only multiple transnational epistemic communities, expert networks, and sporadically emerging publics, and should be seen as a ‘demoiocracy’, with multiple national demoi [234]. A demoiocracy can be understood as a “union of peoples, understood both as states and as citizens, who govern together but not as one” [235] (p. 351). The EU demoiocracy has several power asymmetries that distort justice, legitimacy, and accountability [166], vertical, horizontal, and anarchy, of which vertical power asymmetries between citizens and the Commission matter for policy entrepreneurs. Vertical asymmetries arise from the fact that the Commission acts as a gatekeeper for policy proposals and that it often has a monopolistic influence over setting the EU

policy agenda. This asymmetry can be exacerbated by resourceful policy entrepreneurs and lobbyists. In their analyses of legitimacy in EU governance, Scharpf and Schmidt argue that the EU has low input legitimacy because citizens do not directly participate in the legislative process [160,161,167]. While political choices in national politics are structured by partisan electoral conflicts, EU politics takes place through competition between national and European bureaucratic interests and interest groups—a situation that Schmidt characterizes as ‘politics without polity’ [161].

A close reason for the lack of justice perspectives and violation of throughput legitimacy in the policy processes in both the EU and Sweden is that the Commission, the Swedish government, and the economic elite have long been guided by the ecological modernization discourse [236–239]. It is a political theory of social change and practical discourse on environmental policy presented as a means for capitalism to deal with the environmental challenge—that reformist environmental policy and growth go hand in hand [133,134]. It focuses on market rationality, the role of technology, efficiency, and business in environmental policy, leaving out issues such as environmental/climate justice and social inclusion that are discussed in deliberative ecological democracy [135]. This paradigm is unsympathetic to alternative approaches, knowledge, values, and experiences [240]. Despite high-level political commitment to urgent transitional change, current policies still reflect an understanding of sustainability that is steeped in techno-economic narratives of innovation and market rationalities [241].

EU climate policy, within the framework of the EGD, is well anchored in the ecological modernization discourse [239]. It is a new growth strategy that aims to transform the EU into a fair and prosperous society, with a modern, resource-efficient, and competitive economy where there will be no net GHG emissions by 2050 and where economic growth is decoupled from resource use. In Sweden, the starting point for ecological modernization was taken when the prime minister to be, Göran Persson (Social Democrat), launched ‘The Green Welfare State’ in 1996 as a social democratic program for growth with, among other ideas, more ‘environmentally friendly’ housing [242]. Ecological modernization is the core of the ‘Fossil-free Sweden’ initiative to develop roadmaps for fossil-free competitiveness, which was initiated by the Social Democrat (S) and Green Party (MP) government in 2015 and continued by the current Tidö government. That ecological modernization is a perspective in the Tidö government’s environmental and climate policy was also evident in Prime Minister Ulf Kristersson’s (M) speech at the government’s national climate meeting in June 2023, where he called business the ‘heroes in the green transition’ and the ‘new environmental movement’.

Through regulation and financial instruments, following the ideals of (neo)liberal environmental democracy and ecological modernization, the Commission and Swedish governments want to stimulate the market to innovation of green technology and increased competitiveness for business. This has led to a continued strong focus on the interests of business when developing environmental and climate policy, while civil society, with environmental, climate, and youth organizations, is often left out; cf. [243,244]. The situation was similar for T&E and their allies, focusing on innovative zero-carbon fuels for the EU shipping industry to achieve leadership in the race towards a hydrogen economy. They were looking for transformative technology change, while the Commission was rather looking for incremental technology change. The winners in this process are of course business in the EU and Sweden; cf. [240]. The losers are all those groups that do not address the market and technological aspects of environmental policy: solidarity groups and other groups working to realize sustainable development and climate justice according to deliberative ecological democracy [244–246]. Contrary to Bitonti’s view [6], lobbyists and policy entrepreneurs in liberal environmental democracies with a focus on ecological modernization apparently fail to include grassroots in policy processes. The relatively slow pace of the institutional reforms proposed by ecological modernization and liberal environmental democracy is out of sync with the higher pace of today’s environmental

change, not least climate change. Countering climate change is not only about techno-economic industrial changes, but about societal changes.

Ecological modernization also leaves out distributive justice for the most vulnerable. Crespy and Munta [200] as well as Dupont et al. [199] (p. 7), argue that “policies and tools associated with the just transition inside the EU do not lead to a just transition that adequately addresses environmental and social problems”. The setup and institutional design of EU institutions hamper their implementation of a just transition [247]. Especially in areas where the EU does not hold much legal competence, such as social affairs policy, they have limited ability to overcome the institutional factors that hamper implementation of a just transition [247,248]. In the EGD, the just transition is seen broadly as a transactional and financial transfer policy, through the ‘Just Transition Mechanism’ and the ‘Social Climate Fund’, with targeted financial support to affected regions [249].

### 6.3.2. Far-Right Populism and Neoliberalism

In the second case, the radical policy change was driven by the far-right populist party SD, formed in 1988 as an extremist and violent party with the aim to stop immigration by non-Europeans and repatriate non-ethnic Swedes. Inspiration came from the post-World War II fascist organization the New-Swedish Movement and the British National Front [250]. But with the election of the current party leader in 2005, SD tried to distance itself from its neo-fascist past and erect a more respectable façade to gain legitimacy [251]. However, SD has continued to combine populism and anti-pluralism and authoritarianism with nativism—the longing for a homogeneous nation state; cf. [252,253]—and propose populist and illiberal policies in many areas, not only migration but also social and environmental policy. In recent years, SD has even hailed Victor Orbán’s Hungary, the worst example of autocratization in the EU [250,252–254], as a role model regarding public governance. In the run-up to the EU elections in June 2024, they are once again pushing hard for repatriation of non-ethnic Europeans and claim that the Social Democrats lead a population exchange, a view that the SD party leader in 2023 claimed was a rhetoric of neo-Nazis and not related to SD. SD has long been vocal as a climate change denier [219,220], wanting to abort EU and national climate targets and climate policies. They are critical of renewable energy, particularly wind power, destroying the Swedish landscape.

Climate change tends to be discussed as a technical issue, a transnational issue, and an issue that invites alternative ways of living and post-material values—in all, the very opposite of a populist issue and perfect for populist negation imaginary [255,256]. But White finds another important explanation—the discourse of emergency—that it is something necessitating an urgent response [257]. Framing climate change as an emergency casts politics about responding to external demands as a ‘politics of necessity’ rather than ‘politics of choice’. The possible options for political agency to choose among are drastically narrowed. As claimed by White, “populists are well placed to draw support by defining themselves against the necessity-centred discourses of the national and supranational mainstream” [257] (p. 8), and present an opposing problem framing and policy option triggered by a value-laden, devil-shift-influenced threat; cf. [44]. In addition to this ‘anti-emergency’ politics, there is also an ‘alter-emergency’ politics, in which far-right populists argue that authorities are dealing with the wrong emergency, e.g., climate change instead of migration [257].

In 2006, SD won 2.9% of the votes in the elections to the Riksdag, which made them eligible for public funding. Since 2010, when they won 5.7% of the votes, SD has been established in the Riksdag. In 2018, SD won 17.5% of the votes and became the third largest party. In the 2022 elections, M, KD, and L collected 29.1% of the votes together, holding 103 of 349 seats in the Riksdag. SD, collecting 20.5% of the votes and 73 seats, overtook for the first time M’s long-time place as the second largest party in the Riksdag. SD has no seats in the government cabinet but has political staff in the Prime Minister’s Office and participate in most political negotiations, including on climate policy, which was included in the Tidö agreement [206]. With the success in the 2022 elections, now being the second

largest party in the Swedish Riksdag, a window of opportunity opened for SD to gain powers over the right-wing government that wanted to take power from S and particularly MP. With populist nativist SD holding a veto position in the collaboration with the Swedish government to support it, the violation of democratic norms in the climate policy reform in Sweden can also be explained by an ongoing autocratization of Swedish politics since 2022. All signs of how SD and the government as policy entrepreneurs violate democratic norms are common strategies identified in democracies undergoing processes of autocratization [250,253,258]. Climate policy was purposefully included by SD in the Tidö Agreement since they wage a cultural war on climate policy. This is further discussed in Sections 7.1 and 7.4.

The long-term cultural–institutional entrepreneurship of SD to deny climate change as a political problem despite overwhelming evidence from climate scientists, has borne little fruit in the Swedish population. As presented in Section 6.1, a vast majority consider climate change to be a major and acute problem that must be addressed by the government. But the mainstreaming of SD follows structural as well as cultural–institutional entrepreneurship to change power relations and political and public discourses; cf. [259]. Being the largest of the Tidö parties, they have been able to influence the Swedish government to take a similar tack on substance as well as process in many policy areas, including climate policy. The party leaders of M and L (current Prime Minister and current minister for employment and integration) both claimed before the elections in 2022 that they would under no circumstances collaborate with SD. But without the support from SD, the M–KD–L government would have been in a significant minority and not been able to form a government. And SD receives support from the government, who allow them to use anonymous accounts on social media to spread hatred, disinformation, and conspiracy theories on immigrants, climate change, political opponents, and climate activists. While the parliamentary bourgeoisie in Germany has supported a broad popular opposition to the exclusionary right-wing nationalism represented by Alternative für Deutschland, that was recently ruled to show signs of “anti-democratic aspirations” and of working against “the human value of certain groups” by the Upper Administrative Court in Germany, the three bourgeois government parties in Sweden are instead doing everything to satisfy SD’s growing appetite [260]. Even the Swedish Social Democrats have a role in the normalization of SD [261].

Ekberg and Pressfeldt analysed how neoliberal thought leaders financed by the oil and gas industry initiated a climate change denialist movement in Sweden in the 1980s [262]. Journalists have revealed that the neoliberal *Atlas Network* (AN) has orchestrated lobbying on behalf of the oil and gas industry, to cast doubt on climate science and climate policy, attack climate activists, and influence politicians [263,264]. The University of Technology, Sydney, organized a research seminar on the AN, big oil, and climate disinformation in late 2023 [265]. In the 1990s, AN initiated a collaboration with the neoliberal think tank *Timbro*, the think tank of the *Swedish Confederation of Enterprise*, where current Swedish Prime Minister and minister of justice, both from M, worked at the time. In addition, eight ministers in the current government, including the climate minister, were educated at Timbro. Channelled through the AN, the oil and gas industry began financing Timbro in the late 1990s to question climate science, slow down climate policy, and demonize and criminalize climate activists engaged in *Fridays for Future* (FFF) and *Extinction Rebellion* (XR). The link between climate-denying think tanks and ministers in the Tidö government is obvious. So is the use of nasty rhetoric against climate activists. The agency of the Tidö government on climate policy is not only formed by populism, but also neoliberalism, that goes hand in hand with their critique and counteraction against a ‘politics of necessity’ [257]. In fact, many strategies and actions of far-right populists around the world ascend from libertarian philosophy and neoliberal economics and the ‘There is no Alternative’ (TINA) narratives used to support it [266].

## 7. Discussion

### 7.1. Ideological Beliefs and Motives Shape Policy Entrepreneurship

In the case of Swedish climate policy reform under the Tidö government, it is not only path dependency linked to neo-corporatism and ecological modernization, but political ideology, that explains the democratic deficit of the policy entrepreneurs. The same also applies to a certain extent to the Commission's actions. What they have in common is that they acted with structural entrepreneurship, which can be linked to political ideological perspectives influencing their actions.

#### 7.1.1. Aims for Autocratization

While the Commission, in the matter of legislation for decarbonizing shipping [67,145], and the previous S-MP government of Sweden in the matter of legislation for decarbonizing buildings [68], out of neo-corporatist habit failed to include several stakeholder groups in the policy processes, the Tidö government actively discriminated several stakeholder groups, especially environmental organizations, climate scientists, and environmental journalists, from participating in discussions about Swedish climate policy [205]. The Prime Minister, the climate minister, and other leading politicians from M and SD accused and intimidated the climate justice movement as 'totalitarian', 'terrorists', and 'a threat to democratic political processes' that should be 'sent to prison'. People working for SD media went as far as incitement, reporting openly on social media that climate activists should be executed. Furthermore, the Tidö government has taken active measures to reduce transparency and make it more difficult to demand accountability, e.g., through manipulation of information, rapid public inquiries, quick referrals, abolition of press support, and revision of guidelines for public service.

The radical change we are now seeing in the climate policy area in Sweden follows the same pattern of autocratization that we see in other parts of Swedish politics and society; cf. [250,258]. It is not a result of the process of autocratization, but a central part of it. Like other right-wing populist parties in Europe, SD is waging a 'cultural war' on ambitious climate policy [267] as a response to the 'politics of emergency' advocated by climate scientists, the climate justice movement, and leading politicians in the EU and Sweden [257]. Through its significant voter base, SD has had a great opportunity to influence the government to adopt the same 'anti-emergency' climate policy. SD deliberately included climate policy in the Tidö agreement that frames which policy areas that should undergo a paradigm shift for SD to support the M-KD-L government, thus giving SD a veto [205]. SD's top candidate in the 2024 elections to the European Parliament, as well as the SD environment and climate policy spokesperson, want to repeal the EU's new climate legislation Fit for 55 and the EGD climate strategy.

When the far-right is part of the ruling elite, such as SD in Sweden, it uses democratic institutions and concepts to dismantle democratic functions, e.g., censorship of the media, imposing restrictions on civil society, harassment of activists, protests, and creating polarization through not respecting counterarguments and pluralism [252,253,258,268]. This includes acting as a structural and cultural-institutional policy entrepreneur to frame problems, propose solutions, and set the political agenda, even though nationalist populists have a material conception of the public interest, not an aggregative or procedural one like liberal and deliberative democrats; cf. [6,141]. They are ideologically strongly negative to pluralism as it would negatively affect them as legitimate interpreters of the Only Truth and the Ultimate Goal [269]. But acting as a policy entrepreneur when SD themselves have a powerful position implies that the end justifies the means. Strategic manipulation by distorting democratic concepts like legitimacy and climate justice, distorting information when framing problems and possible solutions [47,48], and strategic manoeuvring by giving as little information as possible to one's opponents [49], as in the case with the Swedish climate action plan, are among the most common strategies used by policy entrepreneurs [46]. SD, with the active support of the government, hijack concepts such

as democracy, legitimacy, and climate justice to appear legitimate and democratic, but are in fact acting illegitimately, illiberally, and antidemocratically. This confirms the findings of Lührmann et al. that populist rhetoric includes democratic concepts to help anti-pluralists conceal how dangerous their ideas are for democracy—they claim to stand for ‘true democracy’ while their actions are likely to undermine it [270]. The Tidö government explains the ongoing paradigm shift in Swedish climate policy and governance with reference to the need for a ‘popularly legitimate’ climate policy. An issue which, according to sources in the Government Offices of Sweden, was driven by SD [201]. But ‘popular legitimacy’ should not be understood as legitimacy from the perspective of the majority, and thus, not associated with liberal and deliberative legitimacy and democracy, but as legitimacy from a far-right populist perspective [205]. Just like other populist far-right parties, SD refer to a homogeneous ‘people’ (the popular) as a counterpoint to the ‘elite’ that created the social problems they see today. Populists may invoke the values of democracy, but usually do not advocate mass involvement in decision-making. Nor is it always the will of ‘the people’ they invoke. While sometimes talking the language of ‘the people’, such figures do not merely present themselves as responsive to popular will. They present themselves as acting as much on their own will and invite their audience to identify with them for exactly that [257]. The acts of the Tidö parties are not quite an assertion of popular agency—voluntarism would be the better description. According to themselves, SD is the true interpreter of the ‘popular’ will. There is alpha-male egotism as well as a sense of socio-political superiority at play. As recently described by Vahter and Jakobson, SD tend to “sacralize their core ideas and use predominantly virtue-ethical justification strategies and position themselves as morally superior to other parties” [271] (p. 1).

#### 7.1.2. Aims for Technocratization

As indicated, there was also an ideological feature in the Commission’s actions as a structural policy entrepreneur regarding shipping. The Commission pushed for legislation in the form of an EU regulation with homogeneous requirements instead of an EU directive with flexibilities for member states when transposing a directive into national legislation. This reduces the influence of member states. New reporting requirements increase the Commission’s implementation power [272,273]. In addition, the legislation extends outside the EU, as all ships that enter EU ports, regardless of flag state, are covered by the requirements. The Commission, therefore, increases its power in an area that is normally regulated by IMO. Dreger argues that the Commission’s problem formulation powers are used strategically to technocratize subsequent policy debates [274]. The way the problem is formulated leaves room for some solutions, but not others; cf. [51]. This creativity of the Commission to be a successful structural policy entrepreneur, to act as a ‘purposeful opportunist’ in interpreting rules and procedures in an increasingly complex and contested EU, has also been highlighted by Copeland [275] and Becker [74]. While some applauded the Commission for pushing member states to engage with the EGD, especially if they saw it as promoting the public interest, others felt that the Commission overstepped its mandate [74].

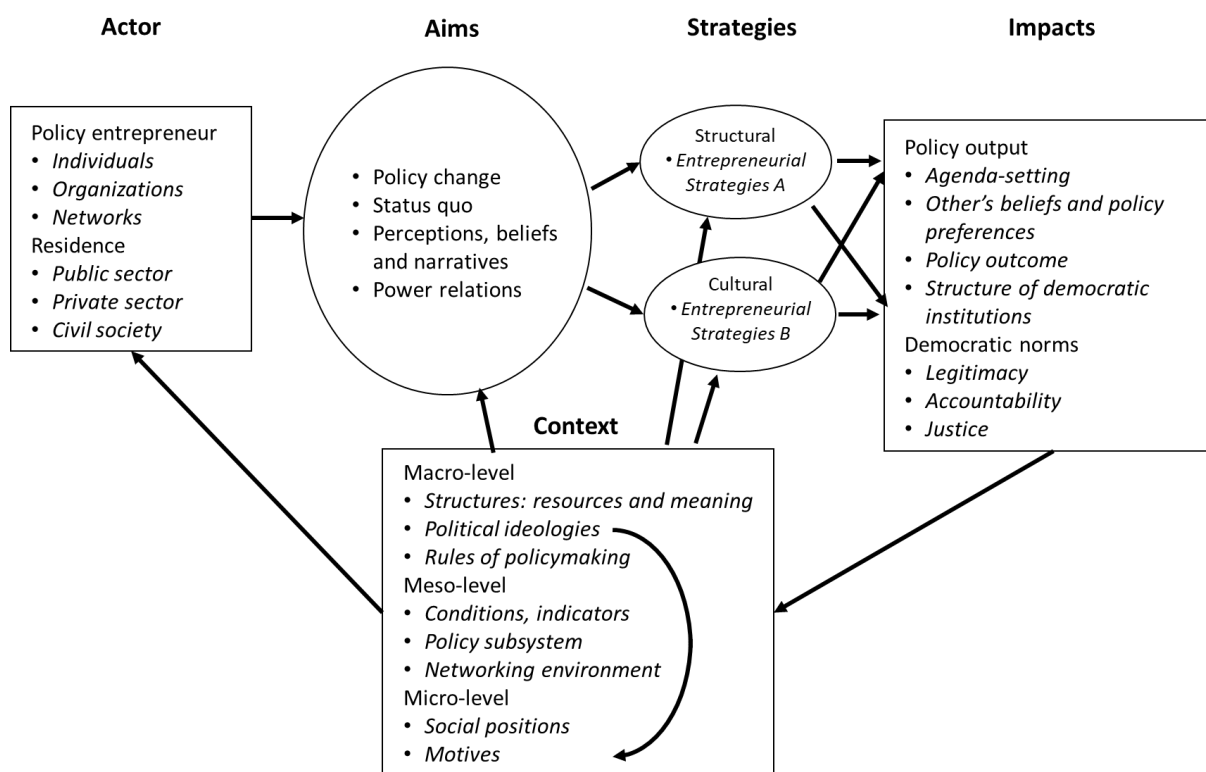
Also linked to climate policy, von Malmberg et al. showed how the Commission tries to extend its reach to areas where the EU does not according to the Lisbon Treaty on the functioning of the EU, such as buildings and social policy, through energy policy [276]. For the Commission, energy policy is a Swiss army knife that can solve many different problems. From the critics’ perspective, it is a Trojan horse, where the Commission non-transparently tries to sneak in new policies, so-called ‘harmonization by stealth’, by disguising them as energy policy. All to increase the EU’s and the Commission’s powers in relation to national governments. This phenomenon of ‘competence creep’, where the Commission acts outside of its powers and slowly expands its competences beyond what is conferred upon it by its members, informally increasing the powers of the Commission while reducing the powers and flexibility of member states, has been acknowledged for centuries [277]. With the Lisbon Treaty, attempts were made to combat ‘competence

creep’, but several flaws in the Treaty still allow it to occur [278]. Despite being legal, the ‘competence creep’ comes with democratic deficits related to accountability and legitimacy and should be combated to reinstate and reinforce the position and powers of both the national and European legislator in taking the important decisions that impact, directly or indirectly, the lives of European citizens [279].

### 7.2. Revising the Model of Policy Entrepreneur Strategies and Impacts

Green argues that research on the impact of policy entrepreneurs on climate policy should separate policy entrepreneurs from the strategies they employ—being a policy entrepreneur is not the independent variable, rather the chosen strategy [75]. Therefore, Green argues, strategies should be seen as the causal mechanism linking policy entrepreneurs to outcomes [75].

Based on a literature review, the conceptual framework for critical research on policy entrepreneurs and findings from the two case studies in this paper, policy entrepreneurs do not only impact agenda-setting, policy preferences, and policies and their outcomes, but also procedures and normative principles of liberal and deliberative democratic governance—positively or negatively, intentionally or unintentionally. This is an important new topic of the research agenda on policy entrepreneurship. Figure 4 presents a revised model of the strategic behaviour and impacts of policy entrepreneurs in democratic political processes, which brings dynamics and political ideology into research on policy entrepreneurship; cf. [44].



**Figure 4.** Revised model of strategic behaviour and impacts of policy entrepreneurs in democratic policy processes.

Compared to the original model (Figure 1), political ideology needs to be added to the macro-level context, and the internal relations of macro-, meso-, and micro-level contexts need to be accounted for. As shown, ideology shapes the motivation and aims of policy entrepreneurs, and later on their strategies. The macro-level context influences the micro-level context, hence the arrow within the context box. As shown in this paper, a far-

right populist–nationalist party denying climate change chose both structural and cultural–institutional entrepreneurship to advance its ideas to demount Swedish climate policy and silence its opponents in an autocratic way. With the far-right populist parties in Europe, currently waging a cultural war on climate policy and aiming to demount EU climate policy [267], gaining power in the 2024 EU elections, we could end up with a similar situation in the EU as in Sweden if the Christian Democrats in the European Parliament choose to collaborate with the far-right instead of continuing to collaborate with the social democrats and the liberals in the centre. Similarly, the European Commission as a policy entrepreneur uses its powers strategically to technocratize policy debates [74,274,275]. Thus, it is suggested that not only the strategies used, but also the ideologies of the actors that use them, are the causal mechanism that links the policy entrepreneurs to the outcomes, and thus, whether their advocacy will facilitate or hamper a just transition to climate neutrality and sustainability.

I also argue that context not only may influence (indicated by the broken line in Figure 1) but actually influences who may consider themselves as policy entrepreneurs. Adherents of liberal democracy may be more prone to take on policy entrepreneurship than adherents of deliberative democracy. Populists would be negative, unless they are in power and use liberal democratic functions to dismantle democratic institutions; cf. [56,253,258]. In addition, feedback from policy output and impacts on democracy to the context must be added to the original model. Mainstream research on policy entrepreneurs is ahistorical in nature, disregarding that “previous policies affect current debates and institutional innovation, or institutional contexts that shape how, why, and where policy reforms take place” [92] (p. 573). Impacts of policy entrepreneurial agency today, be it on policy or democracy, will affect the context of future policy change as well as the rules of policymaking.

### 7.3. A Strong Theory on Policy Entrepreneurs

The above analysis has identified several rather severe negative impacts on the democracy of the Commission, the Tidö government, and SD as public sector policy entrepreneurs. Many of these are because of intended actions. But how can the democratic deficits in these public sector policy entrepreneurs identified be overcome?

What would an EU and Sweden that gives full effect to the right to justification, legitimacy, accountability, and justice look like? It would guarantee citizens’ right to freedom and safeguard that any restriction of that freedom is subjected to good reasons. It would guarantee transparent decision-making procedures by providing permanent public access to all institutions with law-making competence. Neither the European Council, the Council of the European Union, or the European Commission, nor the Swedish government and its supporting parties, would conduct their deliberations behind closed doors but would have to work under full scrutiny of the media; cf. [166].

In the EU, there are rules on transparency regarding who carries out lobbying and advocacy [13]. Lobbyists and policy entrepreneurs in Brussels, except EU institutions, should be registered in the EU Transparency Register. It is possible to identify who carried out advocacy on a certain issue, especially when it comes to influencing the European Parliament. All lobbyists, intermediaries, and policy entrepreneurs that have met with the Parliament’s rapporteur are listed in their report on the proposed policy. However, the Commission, the European Parliament, and the Swedish government are bad at disclosing which external actors have influenced problem framing and policy proposals [68,280]. But there are no EU or Swedish rules on disclosure of who said and proposed what. In fact, Sweden is one of the countries in the EU with the most lax legislation on political advocacy [281].

Transparency rules in the EU and Sweden should thus be expanded to include who said what, and to not only include companies and IGs, but also the Council, the European Council, and particularly the Commission, being a ‘natural’ and central policy entrepreneur in all EU policymaking, whose deliberations are hidden. Supranational structures

would tie individuals, companies, IGs, policy entrepreneurs, lobbyists, national governments, and EU institutions together in a multi-level legal structure in which the legal requirement to justify and give reasons is codified, and could be enforced by both EU and domestic courts; cf. [166]. In this structure, individuals/citizens would not only be mere subjects of governments, and policy entrepreneurs would have enforceable rights and duties which carry as far as good arguments can be produced.

This resembles the early suggestion of Bellone and Goerl for ‘civic-regarding policy entrepreneurs’, when they called for reconciling public sector policy entrepreneurship and democracy [58]. A strong theory of civic-regarding policy entrepreneurs and democracy “should be participatory or one where the citizenry have greater opportunities to participate in the design and delivery of their public goods and services”; cf. [58] (p. 132) [282]. A civic-regarding entrepreneurship can be seen to embrace political community, self-aware citizens, and more adaptable and responsive government, aiming at raising citizen trust in government, citizens’ sense of efficacy, and a shared conception of the common good [58].

Legitimacy of private sector policy entrepreneurs in climate governance remains contested. Bäckstrand et al. claim that “multi-stakeholder participation was long hailed as the ‘gold standard’ of legitimate private rule-making” [30] (p. 346), ideas originating from deliberative democratic theory, with its focus on stakeholder participation and unconstrained dialogue [283]. Other theorists have elaborated the view of legitimacy in deliberative democracy, that a part of exercising legitimate democratic authority is a requirement for politicians, administrative agencies, and appointed experts, such as policy entrepreneurs, to justify and explain their reasons and demonstrate that their demands can reasonably be expected to serve the common interests of free and equal citizens [182–184,284]. Neyer stresses that this focus on right to justification, rather than democracy, would be the basic principle to assess policy and political actors in deliberative democracy, as it helps to increase legitimacy and answers many questions inherent in the concept of accountability [166].

Establishing accountability for private sector and civil society policy entrepreneurs in climate governance remains a major challenge. Companies, business associations, think tanks, and NGOs are “typically self-selected, and there are no demos available to hold them accountable. For these reasons, principal-agent accountability—the main mechanism in liberal democracies—does not work in this context” [30] (p. 346). Thus, transparency is often suggested as an alternative, where transparency can breed accountability in private governance through (i) market pressures, (ii) discourse, and (iii) self-reflection. Civil regulation of transparency, fitting ecological democracy, would permit the public to hold private sector and civil society policy entrepreneurs to account for their policy framings and policy proposals; cf. [27,285]. A less coercive model, fitting policymaking in liberal democracies, is based on self-regulation to resolve public policy issues and advancing corporate social responsibility and corporate political activities; cf. [168,286].

Other theorists have elaborated the view of legitimacy in deliberative democracy, that a part of exercising legitimate democratic authority is a requirement for politicians, administrative agencies, and appointed experts, sometimes acting as policy entrepreneurs, to justify and explain their reasons and demonstrate that their demands can reasonably be expected to serve the common interests of free and equal citizens [182–184,284]. The focus on right to justification would be the basic principle to assess policy and political actors in deliberative democracy, as it helps to increase legitimacy and answers many questions inherent in the concept of accountability [166].

Inclusive, fair, and impartial participation is important for both legitimacy and accountability. Deliberative democracy requires that citizens participate based on equality with administrative officials and technical experts such as policy entrepreneurs. In practice, this means that “all participants of policy deliberations should have the same chance to define issues, dispute evidence, and shape the agenda” [187] (p. 158). For this to happen, there should be a means of compensating weaker participants for serious power disparities, e.g., by providing opportunities for civic education and preparation on policy issues [188,189].

The responsibility for widening participation in EU and Swedish climate governance primarily rests with EU and Swedish law-making institutions such as the Council, the European Parliament, and the Riksdag, but more importantly with public sector policy entrepreneurs like the Commission, the Swedish government, and the Government Offices of Sweden, who invite policy actors to public consultations and discussions on new, or changes to, policies and legislation; cf. [57,140]. They need to broaden their view on who is given the opportunity to participate and express themselves in the climate policy debate, without unjustifiable privileges or distortions. Intersectionality in climate governance and the possibility for young people, indigenous people, and people of colour to participate in policy processes has been widely discussed, e.g., [287–289].

#### *7.4. Dealing with Populist Policy Entrepreneurs*

The above suggestions primarily relate to policy entrepreneurs in liberal democracies with deliberative elements. In this case, one of the policy entrepreneurs is obviously illiberal and has influenced, and sometimes forced, the other policy entrepreneur to propose illiberal and sometimes antidemocratic policy, including climate policy. How can such signs of autocratic policy entrepreneurship be curbed?

To be clear, policy entrepreneurs would not be allowed in truly autocratic societies since they take part in the competition for power or for the influence of those with power [1] and contrast the role of rightful interpreters of the Only True populist vision and the Ultimate Goal of autocratic populist governance [253,268]. What we find in this study is illiberal and antidemocratic actors using democratic institutions and functions to reach their Ultimate Goal. Curbing or restricting antidemocratic policy entrepreneurs aiming at autocratization is thus a question of disrupting the autocratization sequence and building democratic resilience, defined as “the ability of a political regime to prevent or react to challenges without losing its democratic character” [290] (p. 872). Populism is not so much a cause of current problems, but more the symptom of a malfunctioning liberal democracy, an undemocratic liberalism [253,291]. It has been ‘depolarized’, ‘depoliticized’, and ‘technocratized’ for decades [46,292], into a phase of ‘post-politics’ [158]. With depoliticization, linked with the ‘politics of necessity’ related to climate change, policies are taken out of the political (electoral) arena, e.g., through privatization, politically independent ‘expert’ committees, or by killing the political debate with reference to the TINA narrative [253,257,266]. Thus, “the real question is not how we defeat populism, but how can we strengthen liberal democracy?” [253] (p. 581), and considering this paper, how can policy entrepreneurs act to strengthen liberal democracy?

Merkel and Lührmann suggest that democratic resilience constitutes three dimensions: functionalist, structural, and actor-centred [290]. The functionalist perspective includes the ability to withstand, adapt, or recover from autocratic changes. The structural dimension includes rules and institutions relevant for the survival and democratic quality of the regime, particularly the institutional relationships between the legislature, the executive, and the judiciary. Below these macro-institutions, we have the political parties. The more democratic parties and actors dominate the competitive dynamic of the party system, the more resilient is democracy. Next, citizens’ attitudes and behaviours are also relevant for democratic resilience. The more widespread and anchored democratic values and attitudes are in a society and the more vital and active civil society is, the more immune is democracy to external shocks and external challenges. The fourth and most fundamental level concerns the political community of citizens.

Boese et al. distinguish between ‘onset resilience’ and ‘breakdown resilience’ [293]. The former means that democratic regimes resist episodes of autocratization right from the beginning, while the latter describes the potential of a democracy already on the slippery slope of autocratization to resist regime breakdown. The current situation in Sweden calls for both approaches. Boese et al. suggest that a strong legislature is important for safeguarding democracy and providing onset resilience, where the judicial control works as “democracy’s last line of defence” against breakdown, fighting against autocratizers in

the executive [293]. Laebens and Lührmann further suggest that established parties and politicians are afraid to be voted out of power, and that fear sometimes constrains their autocratic ambitions while in government [294]. However, this claim is countered by the current situation in Sweden. The party leaders of M and L (current Prime Minister and current minister for employment and integration) as well as the climate minister all claimed before the elections in 2022 that they would under no circumstances collaborate with SD. Yet, they are all ministers in a government collaborating with SD, eroding Swedish democracy through governance in different policy areas, including climate policy. But recent polls show a drastically decreasing support for L and KD, who are both well below the threshold to make it into the Riksdag. Also related to political parties, negative partisanship with a deep and strong antipathy and rejection of the populist radical right can be a counterweight to autocratization [252]. The main protesters against the Tidö government are C, V, and MP, e.g., raising a motion of no confidence in the Swedish climate minister. The Social Democrats are also critical of the process of autocratization led by SD and the Tidö government, but they have been accused of being part of the normalization of SD, and thus, a cause of increasing populism [261].

To foster democratic awareness, knowledge, and commitment among citizens, civic education is an important tool [188,189,295]. Civic education and engagement are key pillars of external democracy promotion activities [296], but public support for such education was recently demounted by the government. Protest, unrest, or an organized monitoring civil society, making clandestine autocratization apparent to a wider public, may also prevent or stop the autocratic ambitions of the government [294]. Furthermore, independent media play an important role in raising awareness, which is why the first actions of autocratizers are often directed against NGOs and the media. As presented, this was the case in Sweden. In all, Laebens and Lührmann argue that a strong accountability mechanism may prevent the breakdown of democracy if institutional constraints work together with civil society [294]. This brings us on to the role of the climate justice movement.

To defeat or at least disturb far-right populist climate policy, White proposes two main strategies which could be used also to deal with populist policy entrepreneurs in the realm of climate policy [257]. In response to the ineffective and illegitimate climate policy presented by the Tidö government, opposing political parties should not just criticize the Tidö parties, but act as policy entrepreneurs and present alternative problem framings and policies that are not cast merely as a constraint. If they “focused more on the normative questions at stake and the potential to transform societies in positive ways, they could potentially weaken the appeal of those who appropriate the issue in this way, as well as make progress on climate mitigation itself” [257] (p. 18). These policies need also to genuinely address issues of social injustice. The prospects for populism depend significantly on the actions of non-populist parties. Second, there is a question of timing, finding the policy window of opportunity for ambitious climate policy. Populist ‘anti-emergency’ rhetoric may have less resonance when the impacts of climate change become more severe and feel closer to home, when “popular suffering is acute and unmistakable, e.g., in the form of displacement, malnutrition or unemployment” [257] (p. 19). Temperature increases due to global warming are higher in the northern hemisphere, including Sweden and Europe, than the Global South. Given the negative impacts of the Tidö parties’ strategies on democracy, particularly throughput legitimacy and procedural justice by discriminating and threatening political opponents to silence, and on accountability by reducing possibilities for media to scrutinize those in power and for people to hold politicians accountable, there is also a need for ‘alter-emergency’ politics in tandem with stronger climate policies. To the extent that parties of the centre left fail to develop a convincing position, climate change can be a fascist issue too [257].

### 7.5. A Role for the Climate Justice Movement?

Advocates for strong and urgent climate governance and representatives of climate justice and ecological democracy also have a role to play in relation to participation, throughput, and output legitimacy, and procedural and distributive justice.

Liberal democratic views on participation are based on pluralistic adversarial norms and closed structures of interest representation. By comparison, deliberative democratic theory advocates cooperation and the probing of wills among a larger number of concerned groups and actors. This difference is important when it comes to climate policy. There is a difference in how environmental groups attempt to reform environmental and climate policy. Some see the movement as challenging the prevailing social paradigm through confrontation and violence, while others rely on conventional styles of political persuasion [297].

The environmental and climate justice movement is less likely than established environmental organizations to engage in institutionalized forms of collaborative governance [187]. According to Weber, only those who have the power to block or prevent political outcomes are invited to sit at the negotiating table [298]. This condition favours the inclusion of established NGOs such as T&E, *Swedish Society for Nature Conservation* (SSNC), *World Wide Fund for Nature*, and the *European Climate Foundation* over politically more radical, and thus, relatively powerless environmental and climate justice movements such as FFF and XR. A prominent example is the former secretary-general of the SSNC, who was appointed national coordinator of the Fossil Free Sweden initiative by the S-MP government in 2015 and still holds the position. Many new organizations and networks with a focus on climate justice, e.g., FFF and XR, address the problem of climate change as an emergency and demand strong action from politicians, business leaders, and other decision-makers, but rarely offer technical–legal elaborate solutions to the problem [128,222]. If they fail to present concrete solutions, they lack institutionalization and responsabilization [299]. Institutionalization is process of professionalization and formalization, completed when a movement has become part of society’s organizational structure. Responsibilization is a development process that involves an increased emphasis on market mechanisms.

Policy entrepreneurs from different sectors drive their pet issues. By building coalitions with people and organizations that work for climate justice, they could include these issues and organizations in agenda-setting, problem formulations, and solution proposals. There are many IGs and networks but no policy entrepreneurs for climate justice and ecological democracy. Many new organizations and networks in the climate justice area, e.g., FFF and XR, but also established ones such as *Greenpeace*, demand strong and urgent action from politicians, business leaders, and other decision-makers with activist methods, but rarely offer technical–legal elaborate solutions to the problem [128,129,193,222]. Failing to present viable solutions to the problem, they fall short of institutionalization and neoliberal responsabilization [299]. Consequently, they are not invited to liberal democratic fora to discuss climate policy. If they were to produce solutions, either by themselves or in collaboration with other policy actors, the situation may change.

But would new climate justice organizations want to take responsibility and engage in problem-solving and become policy entrepreneurs as we know them today? Policy entrepreneurs, like lobbyists, are established actors in liberal (environmental) democracies, and fulfil a clear function in elitist, top-down policy processes, deemed as a legitimate way to advance one’s interests in a democratic and open competition for consent. Advocates of climate justice are more rooted in deliberative ecological democracy, advocating a non-elitist bottom-up perspective with broad participation, actively promoting emancipatory, communicative, and deliberative approaches to designing and evaluating public environmental policy; cf. [127,297]. Based on a study of environmental movement organizations in Sweden, Thörn and Svenberg argue that the focus on institutionalization and responsabilization of the environmental movement, following the transformation of the Swedish model of welfare capitalism under the influence of neoliberal discourse and the rise of the

ecological modernization discourse, has involved a depoliticization of environmental issues, in the sense that it engages political actors in a moral discourse and a technocratic practice that suppresses the (potential) articulation of social conflict through consensus building among the elite [299]. The depoliticization, or 'post-politicization', of climate politics is a global phenomenon [300]. This conflicts with deliberative ecological democracy, which is why some environmental movement organizations resist the discourse that encourages them to take on certain responsibilities for technical, legal, and administrative issues of policies. Until climate politics is re-politicized, focusing on the urgency of the zero-carbon transition including social conflicts, they will continue to view the movement as challenging the prevailing social paradigm through confrontation, civil disobedience, or peaceful activism. Thus, there are two competing views of democracy, policy entrepreneurs, and the role of environmental and climate movement organizations, of which liberal environmental democracy is hegemonic. Here, we find a dilemma. On what platform should the two viewpoints meet for a fruitful democratic discussion on a just transition in climate policy and governance? While liberal environmental democracy is hegemonic, the climate justice movement will likely continue to use its liberal democratic right to confront the power, among other means, through confrontative or peaceful activism and civil disobedience. But the widespread critique from different quarters of the Tidö government's climate action plan, heavily influenced by the illiberal, anti-deliberative, and populist SD, e.g., regarding the lack of short- and medium-term measures to curb climate change, may be a game changer for climate politics. There is no longer consensus on the need for urgent action.

With SD in power, liberal environmental democracy is in question, not by deliberative ecological democracy, but by increasingly autocratic and populist environmental politics. This may open the way for 'transformative repolarization' [301] and a genuine political space of disagreement and conflict that could see advocates of deliberative ecological democracy and climate justice taking on the role of policy entrepreneurs, either by themselves or by shaping and creating broad discourse and/or advocacy coalitions with more institutionalized NGOs, academics, think tanks, progressive companies, authorities, and politicians at local, regional, national, supranational, or international level; cf. [67,297–299]. This was confirmed in my dialogue with leading persons in several climate activist movements in Sweden. Such re-politicization and repolarization may be successful if it "seeks to change the axis of polarization away from the Manichean line emphasized by the polarizing incumbent and toward one that is more flexible and programmatic, such as those based on democratic or social justice principles" [301] (p. 19). What we need is more rather than less politics. While it might sound odd, populism can only be defeated by re-politicizing politics. But politics should once again become 'responsive', meaning that governments and parties do what their voters want [302], not be 'responsible', as in the neoliberal era shaping ecological modernization, meaning that governments and parties do what they (or rather neoliberal economic theory and the whims of markets) believe is 'responsible'.

In this respect, increasing experimentation with citizens' assemblies or deliberative mini-publics (DMPs) in climate policy is promising [126,303]. It was practiced in France and Ireland in relation to the EGD [304], and the first DMP on climate policy in Sweden has recently provided its output [305]. But as argued by Ainscough and Willis, the next step for climate DMPs is to focus on specific climate policy challenges, not just climate policy in general, and to embed and routinize their use in existing policymaking institutions [303]. DMPs must be more responsible and institutionalized to have an impact on climate policy and decision-making. If they achieve this, DMPs could act as policy entrepreneurs, addressing problems and advocating policies that deal with climate change in a transparent, legitimate, and just way. There is a role for the climate justice movement and convenors of DMPs, often academics, to make them accepted and legitimate in conventional climate governance.

## 8. Conclusions and Future Directions

The concept of policy entrepreneurs has received increasing attention in policy studies because it highlights the role of policy actors in understanding policy change. However, research on policy entrepreneurs assumes that they are a political fact that exists and acts regardless of what we think of them, in democratic and non-democratic regimes. Most actions of policy entrepreneurs are political in nature, raising questions about their role in and influence on democratic policy processes. Just like lobbyists, experts, and intermediaries, policy entrepreneurs should face the challenge of creating legitimacy, accountability, and justice for their actions and the implementation of their targeted policy change. Thus, this article has called for critical analytic and normative research on policy entrepreneurs and their dual role in democratic policy processes, with positive as well as potentially negative effects on various democratic norms.

To guide such critical research from a systematic perspective, the article has proposed a conceptual framework including six interrelated democratic norms: legitimacy, accountability, transparency, openness, impartiality, and justice. Addressing climate governance, with calls for energy and climate justice and a just, equitable, and socially inclusive transition towards climate neutrality and sustainable development, the framework draws on liberal and deliberative democratic theories as well as normative theories of the environment–democracy and the lobbying–democracy nexuses. The conceptual framework was developed with a focus on policy entrepreneurs from different sectors within climate policy and governance, but empirical research can show whether it can also be applied in other policy areas and whether normative guidelines for policy entrepreneurs should be differentiated depending on which sector they come from.

Empirical studies of policy entrepreneurs from the public sector and civil society in European and Swedish climate policy and governance indicate that agency of policy entrepreneurs from all sectors has an intended or unintended negative impact on democratic norms and democracy in general. These effects are particularly obvious when it comes to policy entrepreneurs from the public sector, who use both structural and cultural–institutional entrepreneurship. In the EU, the Commission acts for technocratization. In Sweden, the Tidö parties act for autocratization. This shows that policy entrepreneurs' ideologies affects their motivations and choice of strategies, and above all the influence on politics and policy, both in substance and process, and democracy. Against this background, the model for understanding the strategic agency of policy entrepreneurs and their impacts is developed. The paper also discusses how policy entrepreneurship can be more democratic, how populist antidemocratic policy entrepreneurship can be avoided, and what is required to make the climate justice movement more responsible and act as policy entrepreneurs.

The paper suggests that a normative framework for how policy entrepreneurs should act in order not to violate democratic norms is particularly important for policy entrepreneurs from the public sector, but more comparative studies are needed. Overall, this brings to life the question of more democratic policy entrepreneurship in the public sector that was posed by Bellone and Goerl more than 30 years ago [58], but which died instantly because Terry argued that there were no policy entrepreneurs in the public sector—they were a wolf in sheep's clothing [59]. If a normative framework, potentially a normative regulation, for democratic policy entrepreneurship should focus on actors in the public sector, research on democratic policy entrepreneurship regarding actors from the private sector and civil society, based on the framework proposed, should contribute to the further development of normative regulation of private sector and civil society lobbying that is ongoing in the EU; see [6,57,140].

In all, the paper contributes to the literature on policy entrepreneurs by addressing the dual relationship of policy entrepreneurs to democratic policymaking on climate change mitigation. Policy entrepreneurs do not only impact agenda-setting, policy preferences, and policies and their outcomes, but also procedures and normative principles of democratic governance—positively or negatively, intentionally or unintentionally. Politi-

cal ideology and related visions and intentions, shaping the motivations of policy entrepreneurs, influence the strategies used and outcomes of entrepreneurship; cf. [306,307]. Thus, the paper brings ideology and politics (back) into research on policy entrepreneurs. Policy entrepreneurs can come from within the political system [308]. Similar findings were recently reported by Jarrodi et al. regarding the role of political ideology for shaping motivations in social entrepreneurship [309]. This is an important new topic of the research agenda on policy entrepreneurship. In close relation, the paper proposes how policy entrepreneurs can act more democratically, how to deal with populist policy entrepreneurs wanting to erode democracy, and conditions for the climate justice movement to take responsibility and start acting as policy entrepreneurs. The paper also contributes to climate and sustainability governance theory and to liberal and deliberative democracy theory. It adds new perspectives about a certain category of powerful policy actors so far neglected—policy entrepreneurs—that influence the just transition to climate neutrality and sustainability as well as democratic governance in other areas of public policy and governance. When it comes to participation of IGs in climate governance and democratic governance in general, the literature focuses on accountability, legitimacy, and justice in private governance arrangements, e.g., voluntary certification schemes, or when IGs are part of the decision-making community. So far, with the exception of lobbyists and bureaucratic experts, policy actors that not only influence policy decisions but frame the problems and propose policies that are adopted in ‘democratic’ processes have largely been neglected in the governance literature.

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