



Karolina Pawiłowicz-Białas\*

## EU Climate Policy as a Regionally Relevant Policy

### [Polityka klimatyczna UE jako polityka regionalnie relewantna]

#### Abstrakt

W artykule podjęto temat polityki klimatycznej UE jako polityki regionalnie relewantnej, mając na celu pokazanie, że zmiany klimatu powinny być postrzegane również jako kwestia regionalna. Opisano wysiłki podejmowane przez władze regionalne w obszarze łagodzenia zmian klimatu, wraz z przykładami konkretnych działań. Autorka podkreśla znaczenie podwójnej roli regionów jako realizatorów i kreatorów polityk klimatycznych, wskazując podstawy prawne dla takich działań w ramach prawa krajowego i unijnego. Na koniec szczegółowo zbadano wzajemne powiązania między unijną polityką klimatyczną a innymi politykami UE, w tym polityką spójności.

**Słowa kluczowe:** polityka klimatyczna UE, region, wielopoziomowe zarządzanie.

## Introduction

EU climate policy is often described as one of the most important areas of EU activity in recent years, considering its strategic importance.<sup>1</sup> In 2021, with the introduction of the European Green Deal, the EU made climate neutrality, the goal of zero net emissions by 2050, legally binding in the EU. It set an interim target of 55% emission reduction by 2030. But before that, European climate policy has been built up step by step and learning-by-doing has turned out to be a key feature.<sup>2</sup> EU started building its climate policy in the 1990s and then was heavily influenced by the international undertaking, better known as the Kyoto Protocol.<sup>3</sup> It is in-

\* **Karolina Pawiłowicz-Białas** – prawniczka, doktorantka, pracownik naukowo-dydaktyczny Katedry Prawa Międzynarodowego i Europejskiego na Wydziale Prawa, Administracji i Ekonomii Uniwersytetu Wrocławskiego; ORCID 0000-0002-2184-7847.

<sup>1</sup> S. Mrozowska, Rola polityki spójności Unii Europejskiej (2014–2020) w przeciwdziałaniu negatywnym skutkom zmian klimatycznych, „Roczniki Nauk Społecznych” 2017, 9(45), p. 3.

<sup>2</sup> J. Delbeke, P. Vis, *EU Climate Policy Explained*, Routledge, London 2015, p. 1.

<sup>3</sup> UNFCCC (1997) Kyoto Protocol to the United Nations Framework Convention on Climate Change adopted at COP3 in Kyoto, Japan, on 11 December 1997.

teresting however, especially for the topic of this article, that when it comes to the evolution of EU climate policy, there appeared a trend of the ‘out-sourcing’ of responsibility for achieving emission reductions on behalf of the EU and its Member States.<sup>4</sup>

It seems correct to state that the first EU policy that comes to mind relative to regions, would be the regional policy. However, the regional impact on the EU only starts there. In its resolution of 24 June 2021,<sup>5</sup> European Parliament noted that local and regional authorities implement and use around 70% of EU legislation. What is obvious, this statement applies not only with regards to regional policy, but i.a. climate policy. This article aims to successfully characterize UE climate policy as a regionally relevant one. To somehow explain myself and clarify on the matter, regionally relevant policy would be considered as an EU policy (a) having a regional dimension (b) in which regions are considered as important implementers, but also (c) active contributors to its shape and content, undertaking the role of regulators. Region in this case, without entering here in lengthy deliberations concerning the nature of this definition, for the purpose of this article should be treated as a territorial unit located directly below the state and having a self-government with political power, able to represent the region’s interests outside the state.<sup>6</sup> As an example, in case of Poland it would be *województwo*, in Germany – *Länder* and in Spain – *Comunidad Autónoma*.

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### **Climate change as regional issue and not only global or national one**

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Some tend to perceive climate change solely as a global problem, completely forgetting about its regional dimension and are concentrated on finding the best combat strategy only within international law and its instruments. However, some authors are undertaking a different approach (maybe going even a step further), characterizing climate change

<sup>4</sup> J. Scott, *The multi-level governance of climate change* [in:] P. Craig, G. de Burca, *The evolution of EU law*. Second Edition, Oxford University Press, Oxford 2011, p. 806.

<sup>5</sup> European Parliament resolution of 24 June 2021 on European Union regulatory fitness and subsidiarity and proportionality — report on Better Law Making covering the years 2017, 2018 and 2019 (2020/2262(INI)) OJ C 81, 18.02.2022, pp. 74–81.

<sup>6</sup> F. Skawiński, *Reprezentacja interesów regionów w Unii Europejskiej*, Polski Instytut Spraw Międzynarodowych, Warszawa 2008, p. 18.

as a *glocal*<sup>7</sup> since it combines global and local characteristics. It is worth underlying that even the EU itself believes that climate change is territorially determined, meaning that its effects vary considerably from region to region, as regions perceive and deal with climate change differently, reflecting their geographical environmental, social, cultural, and economic specificity.<sup>8</sup> European regions are in fact very diversified, not only when it comes to their internal structure or competences, but also in terms of geographical diversification and location. That is why problems appearing because of climate change would be different for north and south-located regions. For example, in Spanish southern regions could appear fires in forests and in Finland on the other hand – severe winters or high water levels. The strategy and methods of mitigation would of course substantially differ in these cases.

Moreover, also it is at the local level where the effects of climate change are mostly experienced.<sup>9</sup> Therefore, it seems logical to state that the appropriate governance scale is at the level of the resource user and their management of the climate-impacted natural resource or livelihood source, rather than a global commons.<sup>10</sup> For example, it is precisely at the local level that consumption patterns at homes can be influenced.<sup>11</sup> Also, in practice the majority of measures undertaken in relation to climate protection are in fact concentrated in the self-governing mode.<sup>12</sup> EU bodies are also aware of this trend – The European Parliament's 2019 resolution<sup>13</sup> declared the climate crisis and at the same time aimed to identify actions that are necessary from a regional perspective. There is a significant debate when it comes the importance of bringing climate change policies closer

<sup>7</sup> J. Gupta, K. van der Leeuw, H. de Moel, *Climate change: a 'glocal' problem requiring 'glocal' action*, „Environmental Sciences” 2007, 4 (3), pp. 139–148.

<sup>8</sup> Dyrekcja Generalna ds. Polityki Regionalnej i Miejskiej (Komisja Europejska), *Inwestycje na rzecz wzrostu gospodarczego i zatrudnienia. Promowanie rozwoju i dobrego rządzenia w regionach UE i miastach. Szósty raport na temat spójności gospodarczej, społecznej i terytorialnej*, Bruksela: Komisja Europejska 2014, p. 100.

<sup>9</sup> J. Gupta, K. van der Leeuw, H. de Moel, *op. cit.*, p. 142.

<sup>10</sup> W. N. Adger, *Scales of governance and environmental justice for adaptation and mitigation of climate change*, „Journal of International Development” 2001, 13, p. 924.

<sup>11</sup> C. Mullaly, *Home energy use behaviour: a necessary component of successful local government home energy conservation (LGHEC) programs*, „Energy Policy” 1998, 26(14), pp. 1041–1052.

<sup>12</sup> H. Bulkeley, K. Kern, *Local Government and the Governing of Climate Change in Germany and the UK*, „Urban Studies” 2006, 43(12), p. 2242.

<sup>13</sup> European Parliament resolution of 28 November 2019 on the climate and environment emergency (2019/2930[RSP]) OJ C 232, 16.06.2021, pp. 28 and 29.

to the citizen to improve its effectiveness.<sup>14</sup> The positive impact of regional climate change initiatives is also visible on sub-national economies, sustainable growth, and innovation.<sup>15</sup> Decisions on the regional level are also easier to be made, the proximity to its citizens helps the regional authorities to come up with more tailored ideas, considering regional interests that are on stake.<sup>16</sup> We cannot forget that the ability of local authority to provide a forum for change is often a function of statutory obligation and power.<sup>17</sup>

The abovementioned aspects should directly influence the decision-making process and point out the model of governance that should be introduced regarding climate change. In the literature two key approaches are presented. The first one would be top-down approach,<sup>18</sup> suggested by von Homeyer. Some policies are in fact being taken from global through to the local level, however, these policies are not necessarily the result of top-down translation of measures to local level but are also often the result of external influences from epistemic communities or networks, through which local communities are galvanized into developing possible policy options.<sup>19</sup> The second approach is characterized as a polycentric one accompanied by multi-level governance response. The basis for this approach is the fact that climate change occurs at multiple levels and therefore the authority that should be dealing this problem should automatically include multiple levels as well. Hence, the governance debate should not be about which is the most appropriate level, but about how can policies be developed, and initiatives be taken simultaneously at different levels effectively.<sup>20</sup> Authors are also underlining, that rather than only a global effort, it would be better to adopt a polycentric approach to gain

<sup>14</sup> European Economic and Social Committee, 'Opinion of the European Economic and Social Committee on Meeting the Challenges of Climate Change – The Role of Civil Society' (14 September 2006) 2006/C 318/7 [2006] OJ C318/102, A.2. A.3.

<sup>15</sup> Committee of the Regions, 'Opinion of the Committee of the Regions on Climate change mainstreaming and the future EU budget' (outlook opinion) [2 February 2011] 2011/C 259/05, [2011] OJ C 259/26, 6.

<sup>16</sup> H. Bulkeley, M. Betsill, *Cities and climate change: urban sustainability and global environmental governance*, Routledge Studies in Physical Geography and the Environment, London 2003, p. 35.

<sup>17</sup> S. Rezessy, K. Dimitrov, D. Urge-Vortsatz, S. Baruch, *Municipalities and energy efficiency in countries in transition: review of factors that determine municipal involvement in the markets for energy services and energy efficient equipment, or how to augment the role of municipalities as market players*, „Energy Policy” 2006, 34, pp. 223–237.

<sup>18</sup> I. von Homeyer, *The Evolution of EU Environmental Governance* [in:] J. Scott, *Environmental Protection: European Law and Governance*, Oxford University Press, Oxford 2009, p. 10.

<sup>19</sup> J. Gupta, K. van der Leeuw, H. de Moel, *op. cit.*, p. 143.

<sup>20</sup> J. Gupta, K. van der Leeuw, H. de Moel, *op. cit.*, p. 144.

benefits at multiple scales as well as to encourage experimentation and learning from diverse policies adopted at multiple scales.<sup>21</sup> It seems that EU is trying to take on the second approach. On February 24, 2021, Parliament's Committee on Regional Development adopted an own-initiative report<sup>22</sup> on cohesion policy and regional environment strategies in the fight against climate change in which called for a multi-level dialogue between national, regional and local authorities on the planning and implementation of climate measures. As a side note, the report also highlights the key role of regional authorities and encourages them to adopt regional climate strategies that translate EU-level objectives into specific local objectives.

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### **Regions as implementers and creators of climate policy – a double role**

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The fact that regions are implementers of climate policy is rather clear and not creating any doubts. The double role, however, for regions being at the same time implementers and creators is not that straightforward. The first argument in favour of the second statement could derive from the first statement itself – as regional governments are often the main implementing bodies for agreements on climate change policies, it is a very good ground for considering them for the position of creators.<sup>23</sup> They are aware of regional up-to-date problems and specifics, which are very important in the process of drafting new effective policies. It may happen that national legislation would not take these into account due to the lack of knowledge about them in the first place. In other words, regions would be more fit to create tailored policies, which of course due to their nature would have higher chances for successful realization.

There are also more arguments in favour of considering regions for the role of creators of climate policy. Regions may play a very important role in the consultation processes with the citizens, a step that is very important in the creation of new effective policies, at the same time, bringing

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<sup>21</sup> E. Ostrom, *Polycentric systems for coping with collective action and global environmental change*, „Global Environmental Change” 2010, 20, p. 556.

<sup>22</sup> European Parliament. Committee on Regional Development, *Report on cohesion policy and regional environment strategies in the fight against climate change* 4.03.2021 (2020/2074[INI]).

<sup>23</sup> I. Galarraga, M. Gonzalez-Eguino, A. Markandya, *The Role of Regional Governments in Climate Change Policy*, „Environmental Policy and Governance” 2011, 21, p. 168.

the decision-making process closer to the people. Therefore, the society would have greater impact on the shape of policies. The role of regions is also beneficial in order to achieve coherence of climate regulations in general. There are voices that the EU should involve regional authorities more systematically in EU policymaking to ensure coherent action on climate change.<sup>24</sup> Some authors also point out for regions being perfect testing grounds for policies to be implemented later at national level and highlighting the fact that regions can address market failures that are not addressed by national policies.<sup>25</sup> Taking these arguments into account, it would be great to see now how regions act in practice.

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### **Regional efforts in combating climate change**

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European regions do undertake climate change mitigation action on their own as well, sometimes without national or European impulse. It can take place due to the specific construction of competences of many EU regions. In decentralized countries, environmental policies are present in the set of regional competences, allowing regional governments to implement policy actions for both adaptation and mitigation in the area of climate change mitigation.<sup>26</sup> In such scenario there is even a possibility that national governments, without the help and commitment of regions could not be able to successfully implement any environmental policies (and not to mention comply with international obligations) due to its internal state system. At the domestic level, the distribution of powers in relation to climate change is often called a black box<sup>27</sup> as different countries have different domestic systems and power is shared accordingly. For example, in Germany, environmental policy is a shared competence between the federal government and regions.

Due to the realities presented above, there is of course the need for cooperation. The cooperation between regions and member states may include two types of cooperation for multi-level governance – Teasdale<sup>28</sup>

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<sup>24</sup> H. Grabbe, S. Lehne, *Climate Politics in a Fragmented Europe*, Carnegie Europe, Brussels 2019, p. 13.

<sup>25</sup> E. Ostrom, *A Polycentric Approach for Coping with Climate Change*, World Bank Policy Research working paper no. WPS 5095, The World Bank Development Economics 2009, p. 99.

<sup>26</sup> I. Galarraga, M. Gonzalez-Eguino, A. Markandya, *op. cit.*, p. 164.

<sup>27</sup> H. Bulkeley, M. Betsill, *op. cit.*, p. 35.

<sup>28</sup> P. Teasdale et al., *Cities, Climate Change and Multilevel Governance*, OECD Environment Working Papers, 14, OECD 2009, p. 8.

differentiates vertical and horizontal cooperation. Vertical cooperation recognizes that national governments cannot effectively implement national climate strategies without working closely with regional and local governments and that regional governments depend on legal and institutional frameworks at higher levels. On the other hand, horizontal cooperation is based on the opportunity for learning, information sharing and cooperation between all levels of government. The way and extent of cooperation is of course determined by the internal distribution of competences between member states and region. Opportunities for that to happen are of course higher in case of federal or regional states, where respective regions have wider scope of competences in general. The motivation of regional actions may be dual – firstly, an action may include the need to implement national policy, but secondly it may be based on regional concerns with respect to climate change, when regions act *ex officio*.<sup>29</sup> The second scenario is not that unusual, and regions are eager to actively make use of their competences. Regions consider their own action to be complementary to efforts at the national and supranational level, sometimes undertaking them also in areas in which national governments are inactive.

In general, it is observed that regions in Europe seem to have either accepted the targets of the corresponding Member States or adapted the sharing of the burden to their particular circumstances following the same active principles as in EU burden-sharing criteria.<sup>30</sup> However, some regions have their own ideas and individually set goals, deciding to take more ambitious path than the national one, as in case of Catalonia or Wallonia. Some of these undertakings even take the form of extensive regulations and ambitious plans, such as Climate Change Strategy of the Basque Country to 2050 (Spain).<sup>31</sup> Also, many regions have set precise goals regarding renewable energies.<sup>32</sup> It is clear that many European regions decided to take not only passive, but also an active role in climate change mitigation, using the competences given to them by the respective countries.

<sup>29</sup> R. Abler, *Global change and local places: estimating, understanding, and reducing greenhouse gases*, Cambridge University Press, Cambridge 2003, p. 52.

<sup>30</sup> I. Galarraga, M. Gonzalez-Eguino, A. Markandya, *op. cit.*, p. 170.

<sup>31</sup> Gobierno Vasco, *Estrategia vasca de cambio climatico – KLIMA 2050*, Vitoria-Gasteiz, 2015.

<sup>32</sup> M. Flick, *Above and Below the Surface: The Status of Sub-National Authorities in EU Climate Change Regulation*, „Journal of Environmental Law” 2014, 26, p. 454.

On the other hand, it is also worth mentioning one case study relating to regions in Spain. With the current division of powers between regional, local, and central governments, the autonomous communities and municipalities are responsible for reducing more than 65% of the CO<sub>2</sub> emissions that Spain currently releases into the atmosphere, through mitigation measures, efficiency, savings and adaptation. According to the latest report from the Life Unify project, in which SEO/BirdLife participates and which analyzes decarbonisation paths in the EU,<sup>33</sup> Spain must improve the coherence of its multi-government response to climate change. In particular, the study draws attention to the role of the regions, given that not all of them still have autonomous decarbonisation plans by 2030 and their degree of ambition is not fully consistent with national and European objectives. Here we have a negative example of a situation that regions are not complying with the goals set for them. One might ask on the other hand, whether these goals were set in a realistic way and regions were included in the decision-making process that led to setting such expectations.

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## **EU Framework**

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The legal order of the EU is based on – on one hand EU and its institutions and on the other hand on member states. This interaction is based on certain rules relating to competences, which can be divided into: exclusive competences of the EU, shared competences and supporting competences. EU law does not give any explicit competences to regions located within member states, leaving this aspect for member states to decide, in line with the principle of institutional autonomy.<sup>34</sup> Pursuant to Article 4(2)(e) TFEU the environment is a shared competence and, on this basis, both the EU and member states are able to legislate and adopt legally binding acts. Member states exercise their own competence where the EU does not exercise, or has decided not to exercise, its own competence. Taking this view into account it seems hard at the first sight to establish a significant role of regional entities within the EU framework as it is characterized

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<sup>33</sup> LIFE Unify, *Taking Stock & Planning Ahead: National Energy and Climate Plans as a tool to achieve climate safety and energy security*, 2022, <https://seo.org/wp-content/uploads/2022/08/necp-report-taking-stock-planning-ahead.pdf> [accessed: 16.09.2022].

<sup>34</sup> Judgment of the Court of 13 May 1971 – NV International Fruit Company and others v Commission of the European Communities. Joined cases 41 to 44-70, ECLI:EU:C:1971:53.



strictly as a bi-centric model. However, it can be stated, that in general climate change regulation in the EU is a very specific area that constitutes a mosaic, composed of a multitude of policies, formulated at various levels, which interconnect and intertwine. In this regime, there is a place for regions to play a central role.<sup>35</sup>

In fact, the EU legal framework leaves quite a significant space for possible actions to be undertaken by regions in the area of climate policy. M. Flick observes that on the basis of Article 114(5) TFEU as well as Article 193 TFEU, regions enjoy the same status of autonomous regulators as Member States do, if they are empowered to do so pursuant to domestic arrangements.<sup>36</sup> At first, this view may seem precipitated since both Article 114(5) and Article 193 TFEU<sup>37</sup> do not mention regions in their wording, concentrating on competences given explicitly only to member states. However, in case of these legal provision, the Court of Justice of the European Union decided to take upon an interpretation favoring the position of regions in its rulings, allowing them (of course under certain circumstances) to be considered as autonomous regulators, just as member states.<sup>38</sup> When it comes to EU secondary law, it is worth analyzing in detail the position given to regions by directives. Firstly, regional bodies are often responsible for implementation of directives, so are in fact making possible in practice the ideas developed at the EU level. On the margin, I would like to point out an interesting aspect regarding liability for lack of proper implementation of directive. Due to the current wording of Article 258 TFEU, there are no mechanisms that could allow to undertake certain actions against regions themselves as implementers; the actions can only be undertaken in regards to a member state within which such region is located. Sec-

<sup>35</sup> M. Flick, *op. cit.*, p. 444.

<sup>36</sup> M. Flick, *op. cit.*, p. 471.

<sup>37</sup> Art. 114(5) TFEU – Moreover, without prejudice to paragraph 4, if, after the adoption of a harmonisation measure by the European Parliament and the Council, by the Council or by the Commission, a Member State deems it necessary to introduce national provisions based on new scientific evidence relating to the protection of the environment or the working environment on grounds of a problem specific to that Member State arising after the adoption of the harmonisation measure, it shall notify the Commission of the envisaged provisions as well as the grounds for introducing them. Art. 193 TFEU – The protective measures adopted pursuant to Article 192 shall not prevent any Member State from maintaining or introducing more stringent protective measures.

<sup>38</sup> For Art. 114(5) TFEU – Judgment of the Court of 13 September 2007 – Land Oberösterreich and Republic of Austria v Commission of the European Communities, joined cases C-439/05 P and C-454/05 P ECLI:EU:C:2007:510. For Art. 193 TFEU – Judgment of the Court (First Chamber) of 21 July 2011– Azienda Agro-Zootecnica Franchini sarl and Eolica di Altamura Srl v Regione Puglia, case C-2/10 ECLI:EU:C:2011:502.

only, when a directive aims to impose solely a minimal standard for all member states, regional bodies can interpret it in a stricter way, exceeding minimal standards provided by a directive in line with their internal climate change mitigation policies.

I would like to also point out one specific example, concerning Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings.<sup>39</sup> Directive itself underlines the crucial role of regions, stating that regional authorities are critical for the successful implementation of this Directive, they should be consulted and involved, as and when appropriate in accordance with applicable national legislation, on planning issues, the development of programmes to provide information, training and awareness-raising, and on the implementation of this Directive at national or regional level.<sup>40</sup> Also, methodology for calculating the energy performance of buildings shall be adopted at national or regional level<sup>41</sup> and the member state's detailed application in practice of the definition of nearly zero-energy buildings, reflecting their national, regional or local conditions.<sup>42</sup> It is underlined that the role of regions is necessarily limited considering the need for the efficiency of the directive, the latter cannot be said to stand for bi-centricity and strict divisions of competences but rather for cooperation between various scales that share a common goal.<sup>43</sup>

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### **Direct connection with other UE policies**

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Moreover, it is interesting how the climate policy interconnects with other EU policies, mainly thanks to its wide scope. Due to its nature, policies regarding mitigation of climate changes sometimes automatically enter the scope of other EU policies, in different areas such as transport, energy, industry, waste, housing etc. For example, limitations of emissions based on introducing green zones in bigger cities impact transport policy. The same goes for the process of decarbonization, which directly reflects on energy policy. Goals of energy policy regarding enhancing

<sup>39</sup> OJ L 153, 18.6.2010, pp. 13–35.

<sup>40</sup> Motive 28 of Directive 2010/31/EU.

<sup>41</sup> Art. 3 of Directive 2010/31/EU.

<sup>42</sup> Art. 9.3 of Directive 2010/31/EU.

<sup>43</sup> M. Flick, *op. cit.*, p. 464.

green sources and renewable energy are also dictated by the climate policy. There is therefore a strong correlation between these policies. Sometimes there is also a need for common effort, of different policies working towards the same goal. Taking that into account, it is also possible that with establishing such connection between policies, there would be a basis for investigating those other policies in the light of being regionally relevant as well.

Here, I should also mention the relationship between EU climate policy and cohesion policy, which contributes to strengthening economic, social, and territorial cohesion in the European Union. In the current budget (years 2021–2027) a significant impact was given to climate actions, as 30% of the funding is allocated for that goal. What is especially important, according to the European Parliament briefing in 2020 entitled *Climate spending in EU cohesion policy*, regional funding in the new period takes even greater account of climate and environmental considerations, and regional policy can play a key role in achieving the EU's climate goals and enable green transformation.<sup>44</sup> It means that the role of regions will be reflected in the allocation of funds as well, creating grounds for their realistic involvement. Without the allocation of funds, it would be extremely hard for regions to undertake climate change mitigation actions on their own.

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## Conclusions

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In this article I was aiming to prove that EU climate policy may be in fact perceived as a regionally relevant policy. Without doubt, due to its characteristics, climate change has a regional dimension as well, which automatically calls for regional participation in climate change mitigation. Regions are undertaking actions on their own, due to the competences given to them by respective national bodies, but also undertake an important role of implementation of EU law in this matter. Moreover, regions are taking a step further as well, stepping up for the role of regulators, even in the area reserved for European cooperation, bi-centric in nature. Although some methods of regional participation are not

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<sup>44</sup> A. Widuto, *Cohesion policy and climate change*, EPRS (European Parliamentary Research Service), PE 690.514 – March 2021.

blatantly visible, as for example possibility of undertaking measures provided in Article 114(5) TFEU as well as Article 193 TFEU, it seems that the UE is trying to give a back door access for regions to become more active participants in creating common EU climate change policy. Their factual involvement seems crucial from the point of view of multi-level governance.

When it comes to ideas for further participation of regions, some authors are suggesting that it may be possible for regions to be officially recognized as part of national delegations, with some real negotiation capabilities within national strategies and participation in the decision-making process.<sup>45</sup> This view seems reasonable, considering that full and autonomous regional representation could be hard to achieve in practice due to the high number of European regions and their diversity, also with regard to their decision-making powers. In addition, one cannot forget about other forum that could be used by regions as a place for debate – the Committee of Region.

In my opinion, the position of region will only strengthen in the future, together with development of climate change mitigation strategies on different levels, having in mind the need for the approach multi-level governance. According to the UN, recently regions participate in global dialogue as never before. More regions are now shaping policy nationally and internationally than ever in history.<sup>46</sup> There is also visible a strong steer from central government that local authorities should use their planning powers to address climate change.<sup>47</sup> The force, that without doubt is contributing to developing position or regions are in fact national government themselves, as they are allowing such participation in the first place and providing quite extensive area for that.

<sup>45</sup> I. Galarraga, M. Gonzalez-Eguino, A. Markandya, *op. cit.*, p. 181.

<sup>46</sup> UN and Regions Partnership for Sustainable Development and to Address Climate Change. UNDP, Brussels 2008 UNDP-UNEP-EMG-ISDR.

<sup>47</sup> H. Bulkeley, *A changing climate for spatial planning?*, „*Planning Theory and Practice*” 2006, 7 (2), pp. 203–214.

## Abstract

The article addresses EU climate policy as regionally relevant, with the aim of showing that climate change should also be seen as a regional issue. The efforts made by regional authorities in the field of climate change mitigation are described with examples of concrete actions. The author highlights the importance of the dual role of regions as implementers and creators of climate policies, pointing out the legal basis for such actions under national and EU law. Finally, the inter-linkages between EU climate policy and other EU policies, including cohesion policy, are examined in detail.

**Keywords:** EU climate policy, region, multi-level governance.

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