



BARRIERS TO IMPLEMENTING EU GREEN POLICIES

Behavioural insights from a workshop with the Expert Group on Public Administration and Governance

EU Policy Lab

BEHAVIOURAL INSIGHTS

POLICY IMPLEMENTATION

GREEN POLICY

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EU Policy Lab

The EU Policy Lab is a space for cross-disciplinary exploration and innovation in policymaking. We apply collaborative, systemic and forward-looking approaches to help bringing the scientific knowledge of the Joint Research Centre into EU policy making.

We experiment with the new, the unprecedented and the unknown. We seek to augment our understanding of the present, challenge and reinvent the way we think about the future.

The EU Policy Lab is also a mindset and a way of working together that combines stories and data, anticipation and analysis, imagination and action. We bring new practical and radical perspectives to tackle complex problems in a collaborative way. Together, we explore, connect and ideate to create better



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Abstract

This report summarises the findings of a workshop session organised by the EU Policy Lab of the Joint Research Centre in the context of the 8th High-level meeting of the Expert Group on Public Administration and Governance of the European Commission to explore barriers to implementing EU green policies, with a particular focus on behavioural dimensions. The workshop brought together representatives of ministries responsible for horizontal policies of public administration and coordination services from across EU Member States to collectively identify key implementation obstacles, reflect on their behavioural drivers, and develop hypotheses on how these drivers might contribute to the barriers. Key barriers identified included lack of political will, insufficient resources and infrastructure, limited awareness and expertise, public resistance to change, governance complexity, and business resistance and lobbying. The workshop marked the launch of a broader project aimed at mapping the implementation journey of EU green policies, identifying leverage points, and designing behavioural interventions to improve policy outcomes. The insights gathered provide a crucial starting point for addressing the human factors that influence the success of EU green policy implementation.

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1. Introduction

The implementation of EU green policies plays a crucial role in achieving the European Union's ambitious goals for sustainability and climate action. These policies encompass a broad spectrum of initiatives under the European Green Deal and sector-specific legislation targeting areas such as energy efficiency, biodiversity, circular economy, sustainable agriculture, and water conservation. Effective implementation, defined as the process of adopting these policies, applying them in national contexts, and ensuring compliance, is essential to translating policy into impact. However, this process is often hindered by various barriers, which this workshop sought to better understand, particularly through the lens of behavioural insights.

The workshop kicks off a new JRC project on barriers to implementing EU green policies with a behavioural perspective. The workshop was built around two interconnected research interests: (1) improving the implementation of green transition policies in EU Member States and (2) applying behavioural insights in the context of innovative policymaking. These focus areas reflect a growing recognition of the behavioural dimensions of policy implementation, an area that has received limited attention so far.

This project was inspired by findings from the Water Resilience Experiment, a 2023–2024 initiative by the EU Policy Lab aimed at identifying systemic solutions for EU water policy (Arrigoni et al., 2025). A key insight from this project was collected in a workshop with EU policymakers providing their perceptions on barriers to implementation of water policies in Member States. Among these barriers, behavioural barriers emerged as particularly significant, prompting a need for further exploration. A comparison of EU policymakers' perceptions with official implementation reports on the Water Framework Directive and the Flood Directive revealed a striking gap: while behavioural factors were identified as critical by workshop participants, they were almost entirely absent from official documentation, except for a rare mention of citizen acceptability in Germany. The present workshop was designed to help fill that gap by exploring the behavioural drivers of implementation barriers from the perspective of Member State public administrations.

The opportunity to run this workshop arose through the support of DG REFORM, which hosted a high-level meeting of the [Expert Group on Public Administration and Governance](#). This platform brought together representatives of ministries responsible for horizontal policies of public administration and coordination services from across EU Member States. Although the representatives of the Member States were in most cases generalists, the workshop provided an ideal forum to initiate a focused exploration of the behavioural dimensions of implementation barriers, particularly in the context of the green transition.

The workshop aimed to: (1) identify implementation barriers by collaboratively mapping out obstacles to implementing EU green policies as experienced by Member State public administrations, (2) introduce behavioural insights, building awareness of how behavioural science can inform public policy and organisational change and (3) explore behavioural drivers by developing and discussing hypotheses about how behavioural factors contribute to implementation barriers, with a focus on understanding the role of human behaviour in shaping or exacerbating these challenges.

By integrating these goals, the workshop sought to advance knowledge on the interplay between behavioural dynamics and structural obstacles, offering a fresh perspective on a critical challenge for the EU green transition. The insights generated from this workshop will inform the broader JRC project on mapping the implementation journey of EU laws, identifying leverage points, and developing behavioural interventions to improve policy outcomes.

This report summarises the findings from the workshop, offering valuable insights into the behavioural dimensions of implementation barriers and setting the stage for further research and action.

2. Workshop organisation

2.1 Participants

On October 1-2, 2024, DG REFORM's Unit B2 - Governance and Public Administration hosted a high-level meeting of the Expert Group on Public Administration and Governance in Ispra, Italy. The meeting had three main objectives: (a) to update participants on the implementation plan for [ComPAct](#) (on enhancing the European administrative space) and discuss the upcoming ComPAct conference; (b) to apply innovative techniques for designing and implementing public policies, such as evaluating megatrends affecting public administrations and identifying behavioural barriers to the implementation of EU policies; and (c) to promote awareness of best practices in inclusive policymaking and participatory approaches through citizen engagement.

Sixteen Member States (Austria, Czechia, Germany, Greece, Spain, Croatia, Hungary, Ireland, Italy, Lithuania, Latvia, Malta, the Netherlands, Portugal, Romania, and Slovakia) were represented in person by 22 participants. Additionally, ten Member States (Portugal, Belgium, Bulgaria, France, the Netherlands, Luxembourg, Denmark, Sweden, Cyprus, and Poland) were represented online, alongside participants from various European Commission services, totalling approximately 35 virtual attendees. Nonetheless, only 4 online participants effectively engaged in the behavioural insights workshop session activities alongside in-person participants.

2.2 Activities

A key workshop session from the high-level meeting focused on exploring the barriers to implementing EU green policies in Member States, with a particular emphasis on identifying the behavioural drivers behind commonly recognised barriers such as financial, governance, and political obstacles. This is the focus of this report. The session aimed to uncover how human behaviour might influence these barriers. The session was divided into three main parts (see workshop choreography in **Annex I**). First, participants wrote down the barriers they had encountered or were familiar with in their respective countries on post-its. They then shared these in small groups, clustering similar barriers together, before reporting to the plenary. During the plenary, participants placed their barriers on a commonality scale to indicate how widespread they thought these issues were, and then voted using stickers to highlight the barriers they felt most hindered the implementation process.

In the second part, the EU Policy Lab introduced the concept of behavioural insights and explained how they can contribute to public policy and organisational change (**Figure 1**). A survey was sent to participants prior to the workshop: half of the participants received one version of the questions, while the other half received a different version. The responses to these two versions were then compared graphically to introduce participants to the concepts of loss aversion,¹ overconfidence,² and the sunk cost effect,³ which are well-known behavioural biases. The EU Policy Lab's Water Resilience Experiment Project was also presented, illustrating the relevance of behavioural drivers in overcoming

¹ People tend to prefer avoiding losses over acquiring equivalent gains, meaning the pain of losing is psychologically more impactful than the pleasure of gaining.

² Individuals often overestimate their knowledge, abilities, or the accuracy of their predictions, leading to overly optimistic decisions.

³ People tend to continue investing in a project or decision due to prior investments of time, money, or effort, even when it is no longer rational to do so.

barriers to the implementation of water policies such as the Water Framework Directive and the Floods Directive.

Figure 1. Presentation of behavioural insights and the Water Resilience Experiment project



Source: Picture taken by the authors.

In the third part of the workshop, participants reviewed the mapped barriers together, to assess whether the barriers were primarily related to human behaviour. Barriers that were not explicitly behavioural but had potential behavioural links were assigned to individual tables for further analysis. Each group used behavioural cards representing common cognitive biases (**Figure 2**) to explore the behavioural drivers behind their assigned barriers and identify which stakeholders in the implementation process were most likely to be influenced by these biases.

Figure 2. Behavioural cards used in the workshop session



Source: Picture taken by the authors.

Finally, a short presentation was given on the next steps. The focus was on how the outputs of this workshop would contribute to the EU Policy Lab's project aimed at mapping the journey of an EU law from its adoption to its application and enforcement. This project seeks to capture all stakeholders involved in the implementation process, map their level of influence on the law, and understand the relationships between these stakeholders. By doing so, the goal is to identify key leverage points where barriers to implementation arise and where interventions could mitigate or remove these barriers. Ultimately, the project will focus on developing and testing targeted interventions at these critical points to improve the effectiveness of EU policy implementation.

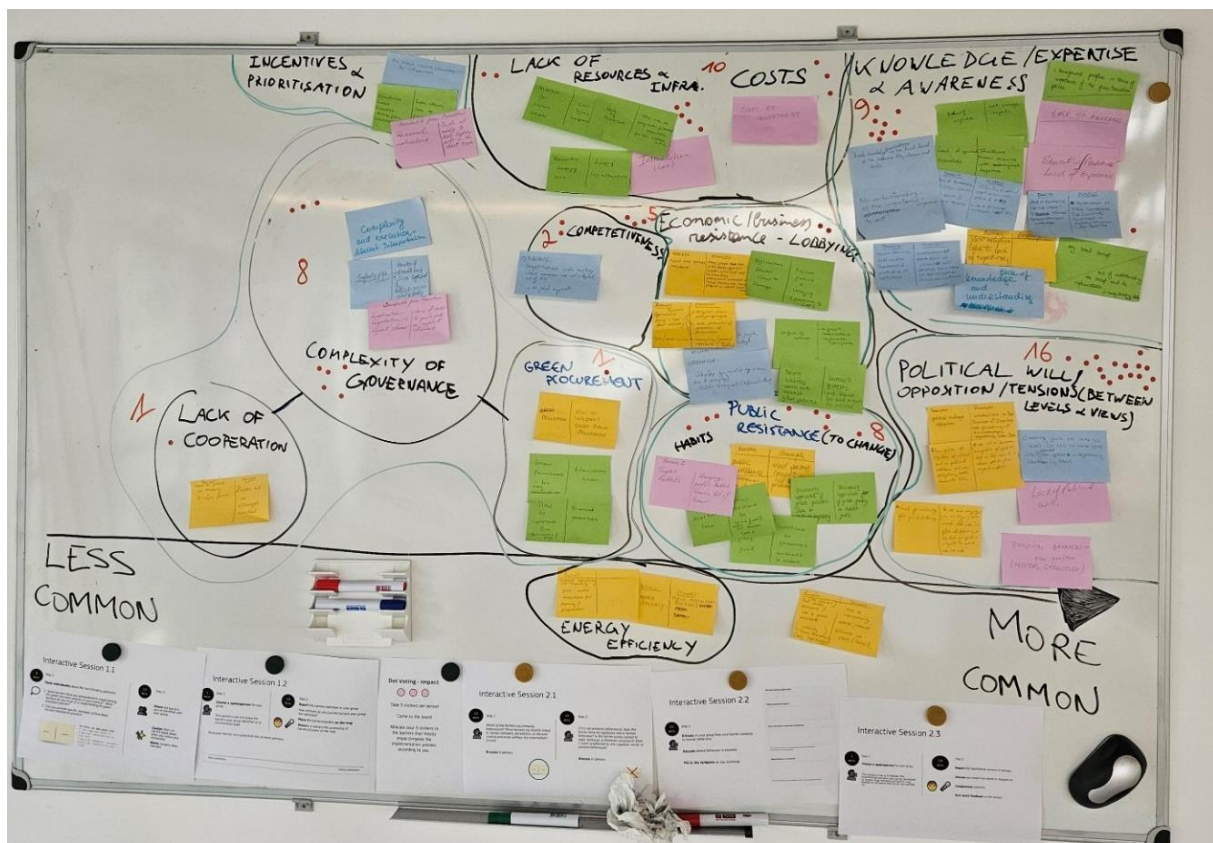
3. Workshop results

Four groups of five to six people were formed in the workshop room while there was only one group of four people that could be formed online given the non-participation of several virtual attendees to our specific session. The results in the following sections gather the insights from all five groups.

3.1 Common implementation barriers

Each group in the room reported implementation barriers to a white board where a facilitator helped cluster the barriers, resulting in the 11 clusters displayed in **Figure 3**. The resulting clusters were: lack of political will, lack of knowledge, expertise and awareness, lack of resources, cost and infrastructure, public resistance to change, business resistance to change and lobbying, complexity of governance, green procurement, energy efficiency, competitiveness, lack of cooperation, lack of incentives and prioritisation.

Figure 3. Clustering of implementation barriers



Source: Picture taken by the authors.

After analysing the clusters identified during the workshop session and eliminating overlaps, we consolidated the clusters ex-post into six main categories. In particular, we redistributed participants' inputs on Competitiveness, Lack of cooperation, Green procurement, Incentives and prioritisation, and Energy efficiency across the new clusters. We summarise the inputs from participants (both online and in the room) in each new cluster in **Table 1**. The third column of the table, "Impact Attributed", shows the number of stickers (red dot on the white board in **Figure 3**) participants assigned to each cluster, reflecting the extent to which they believed the barrier impedes or slows down the implementation process. Barrier clusters are presented from highest to lowest impact in the table.

Table 1. Input from participants on each barrier cluster and its impact on implementation

Barrier cluster	Description	Input from participants	Impact attributed
Lack of political will	<i>This cluster examines the challenges arising from varying levels of political commitment and support for implementing EU green policies. It includes political opposition, inconsistent prioritisation of environmental goals, and conflicts within national or regional agendas that can undermine progress.</i>	- Political opposition and obstruction, including the spread of disinformation about the Green Deal within legislative bodies. - Lack of recognition and commitment from political leadership regarding emissions-related legislation and obligations. - Non-compliance with agreed standards and targets following their adoption. - Insufficient political will to prioritise environmental initiatives. - Divergent national priorities leading to inconsistent implementation across member states (e.g., differing green targets among neighbouring countries). - Lack of continuity after government changes - Federal structures prioritising different issues over green initiatives. - Environmental goals losing prominence on the government's agenda. - Difficulty competing with countries outside the EU that have not adopted equivalent environmental measures.	18
Resource and infrastructure constraints	<i>This cluster addresses financial, infrastructural, and human resource limitations that hinder the implementation of green policies. High costs, insufficient long-term funding, and limited infrastructure often slow down the implementation progress.</i>	- Environmental initiatives are no longer a government priority due to resource constraints. - Market limitations, such as the inability to allocate funds through carbon credits. - Insufficient infrastructure to support a diverse renewable energy mix. - High upfront costs associated with green technology investments. - Lack of long-term financial resources to support sustainable actions. - Limited capacity and resources within civil services, restricting the ability of public servants to engage in green transition projects. - Reluctance to bear additional costs linked to the transition, such as investments in electric vehicles. - Financial burden on municipalities and national governments to acquire green transport solutions, such as electric buses.	10

		- Energy efficiency limitations due to outdated and restrictive planning regulations. - Poor public transport infrastructure, leading to over-reliance on personal vehicles. - Insufficient human resources across public administrations, leading to difficulties in prioritising green initiatives. - Lack of sufficient incentives and resources to promote policy implementation.	
Governance Complexity	<i>This cluster explores the structural and administrative complexities involved in implementing green policies. Challenges include the intricate nature of regulatory frameworks, fragmented legislation, and the need for coordinated efforts across multiple governance levels.</i>	- Balancing reduced licensing procedures with maintaining adequate compliance checks and controls. - Variability and complexity in regulatory interpretation and execution. - Lengthy and complex permitting processes for renewable energy infrastructure. - Fragmented and intricate legislation and support schemes, with limited skills among participants to navigate these systems. - Challenges in improving energy efficiency in public administration buildings. - Challenges related to implementing green public procurement. - Excessive administrative burden due to complex, interconnected policies. - Insufficient coordination across governance levels and among countries (e.g., lack of charging infrastructure for electric buses). - Coordination challenges among various ministries and policy levels.	10
Knowledge, expertise, and awareness gaps	<i>This cluster highlights deficits in expertise, awareness, and education related to green policies and their implementation. It emphasises the lack of specialised knowledge, limited access to relevant data, and insufficient training among key stakeholders.</i>	- Delayed implementation due to a lack of specialised expertise. - Limited understanding and knowledge of green policy concepts, including their practical implementation. - Shortage of specialists with the required expertise within public administration and the broader market. - Inadequate awareness of the importance and urgency of climate action. - Absence of effective public counselling and educational resources to support individual investments in energy efficiency. - Low awareness among local-level employees of relevant legislation and tools. - Lack of awareness among public servants of climate tagging and DNSH (Do No Significant Harm) guidelines, leading to inconsistencies in reporting. - General disbelief or indifference towards climate change. - Poor availability and quality of data, including emissions data tied to procurement processes and production, particularly when involving international suppliers.	9

Public resistance to change	<i>This cluster focuses on the behavioural and cultural resistance to change observed among citizens and communities. Such resistance can slow or block the adoption of green policies and is often driven by habits, economic concerns, or cultural norms.</i>	- Reluctance among the public to reduce personal car use. - Opposition to renewable energy installations, such as wind turbines, when sited near residential properties. - Cultural and habitual resistance to changes, such as the continued use of traditional fuels. - Decline in public support for green policies during periods of economic hardship. - Limited public communication on the consequences of inaction regarding climate transition. - Individual behaviours that hinder the green transition, driven by personal habits and consumption patterns. - Public resistance to higher short-term costs associated with green measures.	8
Business resistance and lobbying	<i>This cluster considers the influence of industry and business lobbying, which may seek to delay or obstruct green policy implementation. It also covers economic interests that conflict with environmental goals, leading to barriers in policy adoption.</i>	- Strong social and economic resistance from business sectors opposed to the EU Green Deal. - Heavy industry representatives lobbying to delay or block green initiatives. - Conflicts arising from agricultural and agri-food policies that may contradict environmental goals. - Influence of lobbying and political groups on policy outcomes, potentially slowing green policy adoption. - High costs for individuals, public administrations, and companies to adopt green measures (e.g., purchasing compliant vehicles, upgrading infrastructure). - Farmers' protests and lobbying to slow down or mitigate the impact of EU policies. - Resistance from dependent industries, such as mining, against decarbonisation efforts.	5

Source: Created by the authors.

3.2 Behavioural drivers of implementation barriers

The discussion on the nature of barriers clusters revealed that most implementation barriers had a behavioural root according to participants, including public resistance to change, political resistance to change, lack of cooperation, business resistance and lobbying, lack of knowledge and awareness and incentives and prioritisation.

The four barriers with most impact on implementation (**Table 1**, third column) were selected for an in-depth analysis with the support of a template (**Figure 4**) and allocated to the four groups in the room. While participants online focused on business resistance and lobbying (first template to the top left), participants in the room worked on either lack of political will, lack of understanding, awareness and expertise, resources and infrastructure constraints or complexity of governance. The template prompted respondents to name and describe the barrier they were assigned, reflect on how this barrier is linked to behaviour (using behavioural cards for guidance), and identify whose behaviour is involved.

Figure 4. Templates for reflection on behavioural drivers of implementation barriers

The figure displays five examples of completed templates for reflecting on behavioural drivers of implementation barriers. Each template follows a structured format:

- Barrier name:** A short, clear name for the barrier.
- Description of the barrier:** A brief explanation of the barrier.
- How the barrier is connected to behaviour:** A list of behavioural tendencies that explain the barrier.
- Whose behaviour is involved:** A list of stakeholders whose behaviour is relevant to the barrier.
- How the barrier is connected to the implementation process:** A list of implementation steps that are affected by the barrier.

The examples are:

- Barrier name:** POLITICAL WILL
Description: LACK OF POLITICAL WILL - THINGS NOT DONE
Behavioural connections: POLITICIANS FOLLOW INSTEAD OF LEAD, LACK OF AWARENESS (VALUING PROGRESS), LACK OF INFORMATION, LACK OF INTEREST, CONFIRMATION BIAS (SEEKING INFORMATION THAT CONFIRMS BELIEFS), FEAR (LOSING VOTE), VOTING BEHAVIOUR, POLICY MAKER, VOTERS/CITIZENS, GOVERNMENT/POLITICAL PARTY, IMPLEMENTOR OF POLICY, LOBBYISTS/COMPANIES, MARKETING OF NEEDS.
- Barrier name:** LACK OF AWARENESS
Description: LACK OF AWARENESS - THINGS NOT DONE
Behavioural connections: LACK OF AWARENESS (VALUING PROGRESS), LACK OF INFORMATION, LACK OF INTEREST, CONFIRMATION BIAS (SEEKING INFORMATION THAT CONFIRMS BELIEFS), FEAR (LOSING VOTE), VOTING BEHAVIOUR, POLICY MAKER, VOTERS/CITIZENS, GOVERNMENT/POLITICAL PARTY, IMPLEMENTOR OF POLICY, LOBBYISTS/COMPANIES, MARKETING OF NEEDS.
- Barrier name:** LACK OF INFORMATION
Description: LACK OF INFORMATION - THINGS NOT DONE
Behavioural connections: LACK OF AWARENESS (VALUING PROGRESS), LACK OF INFORMATION, LACK OF INTEREST, CONFIRMATION BIAS (SEEKING INFORMATION THAT CONFIRMS BELIEFS), FEAR (LOSING VOTE), VOTING BEHAVIOUR, POLICY MAKER, VOTERS/CITIZENS, GOVERNMENT/POLITICAL PARTY, IMPLEMENTOR OF POLICY, LOBBYISTS/COMPANIES, MARKETING OF NEEDS.
- Barrier name:** LACK OF RESOURCES
Description: LACK OF RESOURCES - THINGS NOT DONE
Behavioural connections: LACK OF AWARENESS (VALUING PROGRESS), LACK OF INFORMATION, LACK OF INTEREST, CONFIRMATION BIAS (SEEKING INFORMATION THAT CONFIRMS BELIEFS), FEAR (LOSING VOTE), VOTING BEHAVIOUR, POLICY MAKER, VOTERS/CITIZENS, GOVERNMENT/POLITICAL PARTY, IMPLEMENTOR OF POLICY, LOBBYISTS/COMPANIES, MARKETING OF NEEDS.
- Barrier name:** LACK OF MOTIVATION
Description: LACK OF MOTIVATION - THINGS NOT DONE
Behavioural connections: LACK OF AWARENESS (VALUING PROGRESS), LACK OF INFORMATION, LACK OF INTEREST, CONFIRMATION BIAS (SEEKING INFORMATION THAT CONFIRMS BELIEFS), FEAR (LOSING VOTE), VOTING BEHAVIOUR, POLICY MAKER, VOTERS/CITIZENS, GOVERNMENT/POLITICAL PARTY, IMPLEMENTOR OF POLICY, LOBBYISTS/COMPANIES, MARKETING OF NEEDS.

Source: Created by the authors.

Table 2 matches implementation barriers with the behavioural tendencies (reported on the behavioural cards) that could explain these barriers according to participants.

Table 2. Behavioural tendencies associated to implementation barriers

	Political resistance	Resource and infrastructure constraints	Knowledge, expertise and awareness gaps	Governance complexity	Business resistance
Valuing past investments	X				X
Avoiding uncertainty			X	X	X
Preference for familiar approaches			X	X	X
Focus on immediate concerns	X	X	X		X
Group dynamics influencing decisions	X	X	X		X
Information overload		X	X		
Seeking information that confirms beliefs	X				
Influence of information presentation	X	X	X		
Misunderstanding costs, risks and benefits			X	X	

Source: Created by the authors.

Below, we explore each template in detail to gain a deeper understanding of how these barriers are connected to behaviour and whose behaviour is involved. Each barrier analysis is structured as follows: presenting the input from participants (*raw data*), reflecting on the input and interpreting the links from a behavioural point of view (*ex post*), and highlighting potential limitations (*ex post*).

1- Lack of political will

Input: Participants described this barrier as stemming from a lack of political will, resulting in inaction and missed opportunities. Instead of leading, politicians often follow, focusing primarily on immediate concerns. Participants suggested this behaviour is linked to a lack of awareness and prioritisation of past investments, as well as the way information is presented, which can influence decision-making. Lobbyists exert considerable influence, potentially compromising political integrity due to group dynamics and social pressures. Politicians also exhibit confirmation bias, adhering to entrenched ideologies, prejudices, and strong convictions. Additionally, they may prioritize aligning with voter preferences to maintain public support and their positions. The behaviours involved in this barrier include those of policymakers, voters/citizens, political parties with marketing-driven goals, policy implementers, and lobbyists or companies driven by their vested interests.

Interpretation: Participants' emphasis on politicians' focus on immediate concerns rather than long-term goals aligns with the concept of **short-termism**, a common behavioural tendency in democratic

contexts driven by the need to maintain public support and deliver quick wins, especially given frequent election cycles. The observation that politicians undervalue past investments and are influenced by how information is framed points to **framing effects** and **availability bias**, suggesting that prominently presented or recent data often weighs more heavily in their decisions than long-term evidence. The influence of lobbying on political decisions reflects group dynamics and social pressures, highlighting how **social norms**, **status-seeking behaviour**, and **affiliation with influential groups** can affect political integrity. This aligns with the behavioural reality of political systems, where powerful lobbies can significantly sway policy direction. Participants' mention of **confirmation bias** further illustrates how politicians may become entrenched in their ideologies and convictions, making them resistant to new evidence or alternative perspectives, thereby stalling or complicating policy change. Politicians' fear of losing votes is generally positive as it reflects democratic accountability. However, challenges can arise when citizen preferences, such as a reluctance to adopt environmentally friendly practices, conflict with long-term public interest goals, potentially hindering progress on issues like environmental sustainability. This fear of losing votes can be linked to **loss aversion**, where potential losses (e.g., diminished voter support) are perceived as more impactful than potential gains. This bias may lead to a preference for short-term, popular measures over more effective but potentially less immediately palatable long-term strategies. The highlighted behavioural tendencies of policymakers, voters, political parties, policy implementers, and lobbyists illustrate a complex web of influence and interaction that shapes the implementation process.

Limitations: While these behavioural explanations make sense in many respects, some areas warrant further clarification. For example, the suggestion of a "lack of awareness" among politicians could be explored in more depth to distinguish between genuine knowledge gaps and the prioritisation of competing interests. Similarly, the reference to "valuing past investment" remains somewhat ambiguous, whether it denotes protecting previous projects or resistance to change due to prior commitments needs more precise framing.

2- Resource and infrastructure constraints

Input: Participants characterised the resource and infrastructure constraints barrier as stemming from a lack of human and financial resources, insufficient infrastructure, and issues related to resource allocation. They noted the increased costs associated with the green transition for companies, public administrations, and citizens. Additionally, participants highlighted challenges with costing methodologies and a lack of accessible information on available support. The behavioural aspects connected to this barrier included difficulties in achieving immediate, tangible results, issues with how requirements are explained and prioritised (leading to information overload), and social behaviour change that must be incentivised and monetised. Participants illustrated these behaviours through examples such as the need to "see" and "experience" green investments (e.g., visualising the benefits of bike lanes). Companies, civil servants, and the general public were identified as key actors linked to these behaviours.

Interpretation: Participants' focus on resource constraints highlights **present bias**, where immediate, **tangible** results are prioritised over long-term investments. This is evident in the emphasis on visualising and experiencing green investments (e.g., bike lanes). The complexity of requirements and lack of accessible information reflect **information overload** and **framing effects**, which can hinder effective resource allocation. Social behaviour change linked to resource use underscores the importance of **group dynamics** and the need for incentives to align individual and organisational behaviour with green goals. Engaging with visible infrastructure reinforces the impact of **availability bias**, as people are more likely to support changes they can directly observe.

Limitations: While the behavioural insights make sense, the concept of "monetising social behaviour change" stated by one participant needs clearer context—specifically, how monetisation aligns with behaviour shifts. The mention of "costing methodology" as a barrier also warrants clarification on whether it relates to inconsistent valuation practices or transparency issues. The idea of visualising investments could be expanded to better capture how behavioural insights influence engagement with green initiatives.

3- Knowledge, expertise, and awareness gaps

Input: Participants described the barrier as rooted in a reluctance to move beyond existing, familiar practices and public authorities' and citizens' resistance to new knowledge. They noted that politicians tend to prefer options with predictable outcomes, which can limit the adoption of innovative or transformative policies. Overload from excessive and highly technical information was identified as a further source of confusion. Politicians, according to participants, often focus on immediate concerns and public authorities may hold misperceptions about the costs and benefits of certain policies or actions. Social group dynamics were also highlighted as an influence on behaviour and decision-making. Participants in this group took the initiative to link these tendencies to different groups: politicians were seen as primarily influenced by a preference for predictable outcomes, a focus on immediate issues, and social group dynamics; public authorities were considered susceptible to sticking with familiar practices, favouring predictable outcomes, and experiencing confusion due to complex information; and the public/citizens were thought to be influenced by adherence to existing practices, confusion from technical information, misperceptions of costs and benefits, and social dynamics.

Interpretation: Politicians' preference for familiar practices and predictable outcomes highlights a **status quo bias** and **risk aversion**, limiting openness to innovative policies. Public authorities' tendencies to stick with known approaches reflect broader **institutional inertia**. Confusion due to technical information and overload suggests **cognitive strain** and **information overload**, which can hinder effective policy interpretation and implementation. The focus on immediate concerns by politicians and public authorities shows **present bias**, often driven by electoral cycles and public scrutiny. **Confirmation bias** could perpetuate misperceptions about costs and benefits, while **social group dynamics** suggest that **peer pressure and groupthink** shape decisions within political and public sectors.

Limitations: The "familiarity with practices" aspect might need more specificity to distinguish between limited training, institutional norms, or political risk aversion. The influence of misperceptions could be further explored as it is broad and could relate to different types of information. Social dynamics are complex and may involve reputational pressures and network influences that require deeper analysis.

4- Governance complexity

Input: Participants described governance complexity as stemming from overlapping jurisdictions, excessive regulatory requirements, and information overload. This barrier includes misunderstandings of costs, risks, and benefits, burdensome administrative processes, and a lack of coordination and cooperation across governance levels. They identified behaviours such as uncertainty avoidance, where detailed and prescriptive regulations are created to minimise ambiguity, inadvertently increasing complexity. Participants also pointed to resistance to change within governance structures and the behaviour of decision-makers, public servants, and social partners as contributors to this barrier. Ambiguity in regulation and execution allows room for misinterpretation and non-transparent processes, potentially fostering maladministration or corruption. Stakeholder dynamics, such as the

desire for consensus, further exacerbate governance challenges by delaying or complicating decision-making.

Interpretation: Governance complexity often results from **uncertainty avoidance**, where decision-makers draft highly detailed regulations to mitigate perceived risks. This approach paradoxically adds to the administrative burden and hinders efficiency. Participants' emphasis on overlapping jurisdictions highlights the challenges of multi-level governance systems, which can lead to fragmented processes and conflicting interpretations. These issues are compounded by **status quo bias**, where **resistance to changing** established governance practices perpetuates inefficiencies. The behaviour of stakeholders aiming for consensus in decision-making reflects **group dynamics**, which can delay or dilute effective reforms. **Ambiguity** in regulations and procedures further exacerbates the problem by creating opportunities for mismanagement and corruption. **Information overload** adds another layer of difficulty, particularly for public servants and external stakeholders, reducing their capacity to navigate and implement green policies effectively. Beyond behavioural tendencies, participants' input suggests that sludge—unnecessary frictions in processes—could also fit into this discussion, as could the Easy pillar of the EAST Framework,⁴ highlighting the importance of behavioural science as a lens to simplify and streamline governance processes.

Limitations: Further clarification is needed on the drivers of "uncertainty avoidance" and its role in regulatory drafting—are these behaviours driven more by risk aversion, lack of capacity, or political considerations? In addition, while status quo bias is a plausible explanation for resistance to change, exploring institutional inertia and vested interests more explicitly could provide a fuller picture. The impact of "stakeholder dynamics" could also be elaborated—how do divergent views and consensus-seeking behaviours tangibly contribute to delays or complexity? Lastly, it would be helpful to distinguish between structural barriers inherent in governance systems and behavioural factors that exacerbate these barriers.

5- Business resistance and lobbying

Input: Participants described business resistance to change and lobbying as a significant barrier to implementing green transition policies. Special interest groups, such as farmers and fossil fuel-dependent industries, resist change and, when large enough, can influence political decisions, causing setbacks for green policies. The intensity and methods of protests, such as farmers throwing eggs or staging demonstrations, were noted as impacting policy progress. Examples included farmers' protests, resistance to decarbonisation in mining regions, and opposition from fossil fuel-dependent industries. Participants also highlighted difficulties for farmers in accessing funding due to complex administrative processes and insufficient information. Behavioural tendencies linked to this barrier included a focus on immediate concerns, such as financial goals or survival, and a preference for familiar approaches, driven by fear of abandoning traditional ways of living. Resistance was also tied to avoiding uncertainty, with perceived risks in adopting new technologies, and group dynamics, where groups like farmers act as a unified "tribe" defending shared interests. Additionally, valuing past investments played a role, as stakeholders resisted policies that would negate recent investments in scaling up their operations. Stakeholders involved included syndicates, social partners, farmers and their families, national policymakers, members of parliament, voters aligned with food industry workers, public servants, and media shaping public perceptions.

Interpretation: Business resistance reflects behavioural tendencies such as **present bias** and **status quo bias**, where immediate stability and familiar practices are prioritised over uncertain long-

⁴ EAST stands for Easy, Attractive, Social and Timely. Refer to <https://www.bi.team/publications/east-four-simple-ways-to-apply-behavioural-insights/>.

term gains. For example, farmers and coal miners resist green policies due to economic fears, focusing on short-term survival rather than future environmental benefits. **Group dynamics** reinforce this resistance, with stakeholders uniting over shared struggles and creating a strong collective identity. This aligns with **social identity theory**, where behaviour is shaped by group norms and solidarity. Valuing past investments illustrates the **sunk cost fallacy**, as stakeholders resist changes that challenge their previous financial commitments, such as recent farm expansions. **Risk aversion** further exacerbates resistance, with stakeholders avoiding unfamiliar technologies or methods due to perceived uncertainty. Administrative barriers, such as complex paperwork and insufficient information, amplify these behavioural tendencies, creating additional friction in transitioning to green practices.

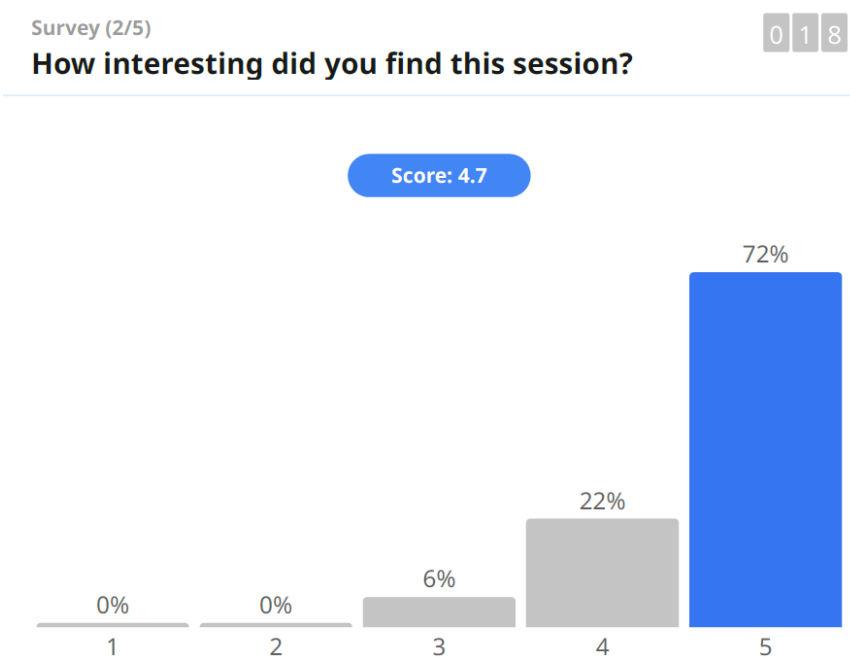
Limitations: The notion of media influence could be elaborated: how does media coverage amplify group resistance or shape public opinion on green policies? Additionally, the role of citizens as voters siding with food industry workers needs clarification: do they align out of empathy, economic dependence, or cultural ties? The discussion of administrative challenges, such as complex paperwork and lack of information, could benefit from further analysis to understand whether these are behavioural issues (e.g., inertia) or purely systemic obstacles. Finally, while valuing past investments is a valid point, further research is needed to assess how targeted compensation schemes or transitional support might address this resistance effectively. Another limitation to explore is whether present bias is truly at stake here; at an individual level, certain sectors (e.g., the fossil fuel industry) are likely to experience damage from environmental policies both in the short and long term, raising questions about the broader behavioural drivers of resistance.

Overall, the five barrier clusters analysed by the participants and our team reveal significant overlap and interconnections. For instance, a lack of political will may stem from competing priorities requiring resource reallocation, limited awareness of climate issues, or pressure from interest groups resisting environmental reforms. These intertwined elements highlight the need for further analysis to explore the interactions between barriers and identify efficient leverage points that could address multiple barriers simultaneously.

4. Insights from participant feedback

At the end of the workshop, we collected feedback from both in-person and online participants. Overall, the instructions were well-received: 20% of participants found the instructions and templates very clear, 70% found them quite clear, and 10% found them quite unclear. Importantly, participants found the session highly engaging and educational (**Figure 5**). 75% stated they would like to join a behavioural insights training session that the CCBI team provides at the Commission. Many also noted that they gained a deeper understanding of how implementation barriers are closely linked to human behaviour, highlighting the relevance of the workshop and the importance of continuing this research.

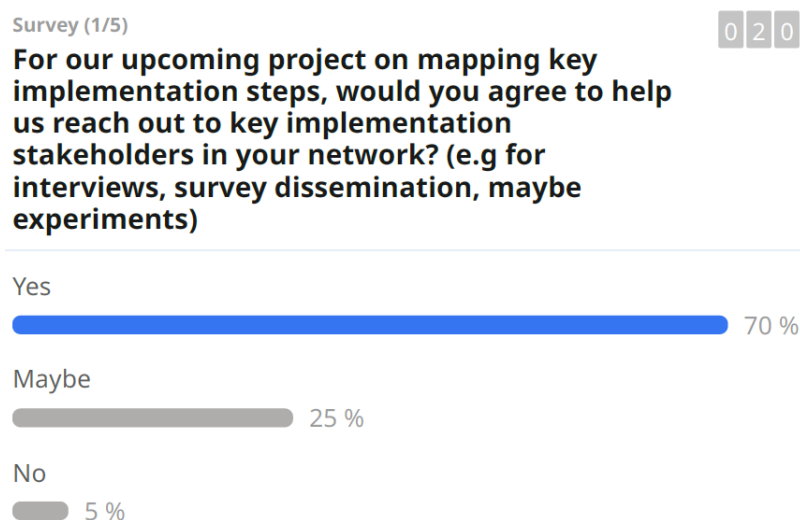
Figure 5. Survey poll to workshop participants on their interest in the session



Source: Slido output.

When mentioning the follow-up project on mapping the journey of an EU law from its adoption to its application, putting forward the relevant stakeholders of the implementation process, their behaviours and influences on behaviour, participants expressed their willingness to help to reach out to their network (**Figure 6**).

Figure 6. Survey poll to workshop participants on their willingness to support the follow-up project



Source: Slido output.

5. Conclusions

This workshop, which was conducted in the framework of the high-level meeting of the Expert Group on Public Administration and Governance organised by DG REFORM marked the beginning of an important project by the EU Policy Lab to explore barriers to implementing EU green policies, with a particular focus on their behavioural dimensions. Through collaborative discussions, participants reflected on the behavioural drivers that might explain, connect to, or underlie commonly recognised implementation obstacles. These reflections have provided a foundation for developing hypotheses on how behavioural factors contribute to such barriers and for identifying the key actors involved in the implementation process.

Among the barriers discussed, the lack of political will emerged as the most significant factor slowing down implementation. Other prominent barriers included the lack of resources, finance, and infrastructure; a lack of awareness, understanding, and expertise; public resistance to change; governance complexity; and resistance from businesses and lobbying groups. Each of these barriers presents valuable opportunities for further behavioural investigation to uncover root causes and design effective interventions.

This workshop has not only laid the groundwork for deeper behavioural analysis but also highlighted the relevance and necessity of addressing human behaviour in overcoming implementation challenges. The insights gained will guide the next steps of this project, ensuring a targeted and impactful approach to facilitating the EU's green transition.

6. References

Arrigoni, O., Hamarat, Y. and Dupoux, M., (2025) *WATER RESILIENCE EXPERIMENT*, Publications Office of the European Union, Luxembourg, 2025, JRC140148.

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Annex I: Workshop choreography

Time		What	Material	Notes for Leader	Instructions for Facilitators
14:15	10'	Introduction - Welcome by the facilitators - Introduction by Marion, stating objective of the session, providing definition and scope and running through the agenda. - Participants are divided into 5 groups of 5 or 6	4 tables with chairs to host the groups	<i>Together online and in-person</i> Introduce policy lab mindset "It's a free-thinking space, we are all participants on the same level..."	Please check that, on your table, there are: a stack of wide post-its, pens (about 7), an instructions sheet
14:25	20'	Interactive session 1.1: Identifying barriers in the implementation of green transition. <u>Objective:</u> Coming up with all types of barriers that hamper the implementation of green transition policies and discuss those in groups. - Participants (sitting in groups) are asked to answer the following questions on post its: "What barriers have you encountered in implementing EU green transition policies in your country?" "What barriers do you know of in implementing EU green transition policies?" "Can you provide specific examples of how these barriers manifest in practice?" - First, everyone thinks individually for a minute. - Then, everyone shares the barriers they identified with the group, clustering ideas as the discussion progresses. And naming the clusters when relevant.	Wide post its, 7 Pens per table, 1 A3 blank sheet per table Project questions on screen		Please: - <u>Start the recorder</u> at the beginning of the session - Ensure that people have time to think individually (no discussion starting before some individual thinking) - Ensure people write <u>one idea per post-it</u> - During the sharing time on barriers, - o Ensure everyone speaks (about 2min per person) - o <u>Take notes</u> on key discussion points and cases mentioned - <u>Stop the recorder</u> at the end of the session and <u>save it</u> (include in the name of the recording "_session1.1")

14:45	20'	Interactive session 1.2: Mapping the barriers. <u>Objective:</u> Mapping the key barriers of every group, placing them on a scale of commonality. - Every group chooses 1 person to present the main barriers, or clusters of barriers, they identified together. The spokesperson places them on the commonality scale map. "Place your barrier on a scale from less to more common." - Someone starts and someone else from another group connects their barriers to what is already on the map. <u>The goal is to cluster while sharing.</u> - The participants receive a task to do just before / during the break. "You receive three votes (dots) from us. Looking at the map, which are the most impactful barriers? Which of these barriers impede implementation of EU green policies the most?"	Commonality scale A4 template (just in case), Dot votes (at least 100) A big white piece of paper (2m x 1m paper roll?)	Take a picture of the map! At the end of the discussion, distribute stickers (1 chunk of 3 stickers per participant) while providing instructions for the break	Marion leading facilitation No facilitation work for Mina and Johannes but please: <u>Take notes</u> on key discussion points and cases mentioned @Yannick: please <u>Start the recorder</u> at the beginning of the session to record the plenary discussions <u>Start the stopwatch</u> (20') as well <u>Keep the time</u>: let me know when we have 2min left <u>Stop the recorder</u> at the end of the session and <u>save it</u> (include in the name of the recording "_session1.2")
15:05	10'	BREAK		Analyse which barriers is likely to be analysed (take notes)	@Mina (or other REFORM colleagues): could you please help reconnect to the online audience during the break? And also put my slides on the screen?
15:15	25'	Presentation: Overview of behavioural insights and their potential link to implementation barriers <u>Objective:</u> Provide participants with an overview of behavioural insights, what it can bring to public policy and organisation change and the role behavioural factors can have in explaining barriers Introduce behavioural barriers cards (indicate we will use them later).		Together online and in-person Are people in the room sitting in the amphitheatre or staying at their table? (TBD on the spot)	@Yannick: please <u>Count the number of dots</u> (impact) for each barrier or cluster of barriers and write that number on the map with blue marker next to the cluster <u>Keep the time</u>: let me know when I have 5min left in my presentation

15:40	20'	Interactive session 2.1: Searching for behavioural barriers <u>Objective:</u> Identify behavioural barriers to implementation potentially present/explicit on the map. Identify barriers that are likely to have no link with human behaviour. - Participants gather around the map, together we go through the outcome of the voting, highlighting the top 3 most impactful barriers. - Then we ask the group (about all barriers on the map): - Which of the barriers are primarily behavioural? These barriers are directly linked to human attitudes, perceptions, or decision-making processes without any intermediary factors. → Draw a green circle around the post-it(s) on the map - If it's not primarily behavioural, does this barrier have no significant link to human behaviour? Is this barrier purely related to e.g. legal, technical, or financial constraints? Does it seem unaffected by any cognitive, social, or political behaviours? - The map shows a selection of barriers that are not explicitly behavioural (not circled, not crossed-out) but potentially connected to human behaviour. Now, we select the four most impactful barriers (i.e. those with highest number of dots) and assign one barrier to each group to take into the next round, leaving the primarily behavioural and the non-behavioural barriers behind.			Marion leading facilitation No facilitation work for Mina and Johannes but please <u>take notes</u> on key discussion points and cases mentioned @Yannick: please <u>Start the recorder</u> at the beginning to record the plenary discussions - IN THE FIRST PART OF THE SESSION (10min): please <u>write down on a flip chart</u> the primary behavioural barriers I progressively circle in green on the map to gather and use them later (writing needs to be visible for all tables) <u>Keep the time</u>: let me know when we are approaching 10min (so that I switch to the second question) - IN THE SECOND PART OF THE SESSION: <u>distribute the card decks</u> (one per table) <u>and the A3 templates with questions</u> (one per table) <u>Stop the recorder</u> at the end of the session and <u>save it</u> (include in the name of the recording "<u>_session2.1</u>")
16:00	20'	Interactive session 2.2: Exploring behavioural factors connected to implementation barriers <u>Objective:</u> Explore the behavioural factors that drive or influence implementation barriers and identify whose behaviour plays a key role.	A deck of BI Cards per table. A3 question templates		ALL FACILITATORS Please: Make sure groups have been remixed (must not be the same groups as before)

		- Participants go back into groups. Every group is assigned one <i>implementation barrier that is not primary behavioural</i>. The goal of this round is to define how this barrier is rooted in or influenced by behaviour. - Each group receives an A3 template with questions and a set of 9 BI-cards (behavioural barrier cards) that were introduced during the presentation and that they can use as inspiration along with the primarily behavioural barriers identified by them in the previous session. 1. How is this barrier <u>connected</u> to human behaviour? 2. Whose behaviour is involved? - The group fills out the template, following the questions, using the BI-cards as inspiration and the primarily behavioural barriers they identified the previous session.			<i>Start the recorder at the beginning of the session</i> <i>Encourage participants to use the behavioural cards and also consider behavioural factors that were put aside on the flipchart</i> <i>If you feel the discussion doesn't go deep enough, try to ask "why" several times to trigger more discussion and in-depth reflection in the group</i> <i>Encourage them to think of all stakeholders that might be involved in the policy process (I'm interested in knowing about these stakeholders)</i> <i>Take a maximum of notes on exchanges</i> <i>Stop the recorder at the end of the session and <u>save it</u> (include in the name of the recording "_session2.2")</i>
16:20	20'	Interactive session 2.3: Presenting how barriers connect to behaviour - Every group has 3 minutes to present to the others "How their barrier is connected to behaviour..." using the question template as a guide. - Facilitators open a discussion round making space for any type of comments, contributions or feedback. - The purpose of this exercise is for you to have a better understanding of what is stopping the implementation process and to reflect on what behaviours would need to change, and about your own influence.		<i>Give some space and time for participants to express themselves.</i>	Marion leading facilitation No facilitation work for Mina and Johannes but please take notes on key discussion points and cases mentioned @Yannick: please <i>Start the recorder at the beginning to record the plenary discussions</i> <i>Stop the recorder at the end of the session and <u>save it</u> (include in the name of the recording "_session2.3")</i> @Mina or other REFORM colleagues: could you please reconnect us to the audience around the end of the session.

		Quick feedback: How was this for you? (<i>Note there is a quick poll at the end of the workshop to collect feedback from everyone too</i>)			
16:40	5'	Closing remarks and follow up. - Marion introduces the follow up for a possible project about barriers on implementation in spring 2025. - Closing words	1-2 slides closing	<i>Together online and in-person</i>	@Yannick: please - Collect the A3 templates from each table and gather them on the outputs table
16:45		END			

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