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The Politics of Policy Change in the European Union's Nature Restoration Regulation: An Integrative Approach

Ronit Justo-Hanani

The Department of Public Policy, and the Steinhardt Museum of Natural History, Tel Aviv University, Tel Aviv, Israel

Correspondence: Ronit Justo-Hanani (ronitjus@mail.tau.ac.il)

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ABSTRACT

The EU policy framework for nature restoration has undergone a significant change with the adoption of the Nature Restoration Regulation. Since 2022, the EU has developed a new comprehensive and continent-wide legislation to restore degraded ecosystems and halt biodiversity loss, which came into force in August 2024 and is an integral part of the EU Green Deal and the EU Biodiversity Strategy for 2030. How can this policy change be explained? This article addresses this question by adopting an explanatory framework that examines political drivers and the policy process to explain the policy shift—defined here as a change in policy intensity—using mainly process-tracing and an analytical framework organized across three levels of analysis. It is argued that while regional and international economic factors acted as antecedent variables forming the background to the regulation, they interacted with two independent variables, EU institutional factors and domestic actors' preferences, which explain the controversy over the regulation and the shift in policy intensity.

摘要

随着《自然恢复法案》(Nature Restoration Regulation)的通过，欧盟关于自然恢复的政策框架发生了重大变化。自2022年以来，欧盟制定了一项旨在恢复退化生态系统并遏制生物多样性丧失的全新综合性全欧立法；该法案于2024年8月生效，是"欧洲绿色协议"与"欧盟2030年生物多样性战略"不可或缺的组成部分。应如何解读这一政策变革?本文旨在探讨这一问题，通过考察政治驱动因素和政策制定过程来解释这一政策转向(此处定义为政策力度的变化)；研究主要采用过程追踪法，并基于三个分析层面的框架展开。本文认为，尽管区域性和国际性经济因素构成了该法案出台背景下的前置变量，但它们与欧盟制度因素及国内行动者偏好这两个自变量相互作用，共同解释了围绕该法案的争议以及政策力度的变化。

RESUMEN

El marco político de la UE para la restauración de la naturaleza ha experimentado un cambio significativo con la adopción del Reglamento de Restauración de la Naturaleza. Desde 2022, la UE ha desarrollado una nueva legislación integral y de alcance continental para restaurar los ecosistemas degradados y frenar la pérdida de biodiversidad, que entró en vigor en agosto de 2024 y forma parte integral del Pacto Verde Europeo y la Estrategia de Biodiversidad de la UE para 2030. ¿Cómo se explica este cambio político? Este artículo aborda esta cuestión mediante un marco explicativo que examina los factores políticos y el proceso político para explicar el cambio de política —definido aquí como un cambio en la intensidad de la política— utilizando principalmente el

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análisis de procesos y un marco analítico organizado en tres niveles de análisis. Se argumenta que, si bien los factores económicos regionales e internacionales actuaron como variables antecedentes que conformaron el trasfondo del reglamento, interactuaron con dos variables independientes: los factores institucionales de la UE y las preferencias de los actores nacionales, lo que explica la controversia en torno al reglamento y el cambio en la intensidad de la política.

1 | Introduction

The European Green Deal (EGD) (EC 2019) and the EU Biodiversity Strategy for 2030 (EC 2020) have put the spotlight on the urgency of strengthening nature restoration governance. In June 2022, the European Commission (EC) proposed a highly ambitious new regulation on nature restoration to tackle biodiversity loss and to address the ongoing degradation of ecosystems in the EU as a key element of the EU biodiversity strategy for 2030 (EC 2022a, 2022b, 2022c, 2022d). The proposal marked a significant shift from a voluntary, reactive approach to a legally binding, proactive policy instrument, moving beyond the mere protection of nature to actively restoring degraded ecosystems (EC 2022a, 2022b, 2022c, 2022d). Following the publication of this proposal, there was an intensive negotiation process within the EU institutions which, after many debates, led to a political agreement between a significant number of them (EC 2025a, 2025b). In August 2024, the Nature Restoration Regulation (the Regulation or NRR), also known as the Nature Restoration Law, came into force (EC 2024). It is the EU's first comprehensive and continent-wide legislation for nature restoration, a significant milestone since the 1992 Habitats Directive (92/43/EEC) and also a pioneer on the global stage (Hering et al. 2023; IUCN 2024).

The NRR is important for three main reasons. First, it signals a major advance in EU environmental policy (Tosun 2023) and establishes the fundamental structure guiding regulatory changes across all Member States. Second, it ties in with discussions in the literature on why and how ambitious environmental policies are pursued in the EU with the EGD (e.g., Eckert 2021; Pollex and Lenschow 2024). Third, as one of the world's major jurisdictions, the EU is showing a stronger dedication to combating global biodiversity loss and the objectives of the NRR are intrinsically linked to the goals and targets of the Kunming-Montreal Global Biodiversity Framework (Tosun 2023; Aggestam 2024). Hence, such 'redesign' of this policy area has implications for all these issues.

This article addresses the question of what explains this environmental policy change? In other words, it seeks to describe this important policy shift and explain the drivers that led to the approval of the NRR. The NRR has been selected for analysis for three reasons. First, the degree of change is remarkable when compared with the *status quo ante*, as demonstrated below. Second, spelling out the drivers that led to the approval of the NRR would improve our knowledge of policy development related to the EGD. Third, a comprehensive, legally-binding response to the biodiversity crisis has been a controversial area in the EU (Hering et al. 2023). The NRR evolved from a pragmatic biodiversity proposal into a polarized political battle, ultimately winning an approval despite fierce controversy (Politico 2024). This presents an interesting empirical puzzle that merits a detailed investigation to explain the drivers of this policy change.

The *dependent variable* of the analysis is the shift embodied in the NRR. This shift is particularly significant given that prior to the NRR many Member States have failed to deliver on voluntary national restoration plans set under the EU's previous Biodiversity Strategy—a stagnation that ultimately led to the EC's proposal of legally binding restoration measures (IEEP 2022a). This article operationalizes this shift through a policy design lens, focusing specifically on 'policy intensity' and its evolution within this policy domain. Drawing upon the Index of Policy Activity (Schaffrin et al. 2015), policy intensity is assessed based on specific elements, such as objectives and scope, which signify a higher level of ambition relative to the regulatory status quo.

From a theoretical point of view, this research explains the shift embodied in the NRR by integrating theories of the politics of EU environmental policy processes and change. An integrated analytical framework is articulated across three levels of analysis reviewed in the section 'Explanatory Framework.' First, there is academic discussion on how economic benefits can strengthen the EU's environmental policy and its drive to 'globalize' its environmental regulations. This body of political economy literature connects to the second discussion—theories of European integration and the role of EU institutions in policy development—which is detailed in the following section. Finally, the third section addresses the theoretical debate concerning the influence of domestic politics on the EU's policy-making processes and policy change. Preliminary analysis of policy documents associated directly with the NRR confirms the salience of these issues in recent regulatory debates. It is argued that sequencing different theoretical strands—economic benefits, EU institutions, and domestic actors' policy preferences—explains the various phases of the policymaking process: motivation, agenda-setting, and final decision-making, as well as the controversy over the regulation and the policy shift. Such multidimensional approach that bridges existing theories with empirical findings, allowing us to gain a more accurate and nuanced understanding of how policy change and design evolve (Howlett and Rayner 2006; Capano and Howlett 2009; Bandelow et al. 2025).

The paper is organized as follows: Section 2 presents briefly the problem of nature restoration in the EU. It then focuses on the dependent variable, elucidating and defining the changes in policy intensity introduced by the NRR. It also sets out the analytical and theoretical frameworks adopted for this research—which are subsequently applied to the empirical record—and concludes with a description of the methodology employed. Section 3 traces the policy evolution over the 2020–2024 formative period and interprets the policy process by evaluating the explanatory power of the theoretical hypotheses. The final section concludes.

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2 | The Analytical Framework

2.1 | Context: The Policy Problem

The general problem is that biodiversity loss and the degradation of ecosystems continue in the EU at an alarming rate, with more than 80% of habitats in poor condition (EC 2025a, 2025b). These include the decline of pollinating insects and natural environments such as forests, grasslands, rivers and lakes, rocky habitats and dunes (EC 2022a, 2022b, 2022c, 2022d; IUCN 2024). As outlined in the EGD, this is one of the greatest threats to the EU in the next decades, as the EU economy and society are highly dependent on the benefits that healthy ecosystems provide (EC 2022a). The EGD has emphasized that 'we and our economy are fully dependent on a functioning environment and ecosystems' (European Council 2025a, 2025b). Furthermore, geopolitical developments in Europe have underlined the need to ensure the security and resilience of food systems. Climate change and biodiversity loss pose a significant long-term threat to agricultural productivity. In this respect, restoring nature acts as an insurance policy to ensure the EU's long-term sustainability and resilience across a range of economic sectors. So far, however, ecosystem restoration across the EU is far from sufficient to address these challenges and ecosystems continue to deteriorate (EC 2022b, 2025a, 2025b).

Although there are some specific policies that contribute to ecosystem restoration, there are many shortcomings (EC 2022b): the lack of specific targets in existing legislation, the fact that several ecosystems (such as forests and agro-ecosystems) are not comprehensively covered by legislation, and the ineffectiveness of the voluntary targets that have previously been set. Overall, attempts to date have not resulted in sufficient restoration at the scale and level of effort required (EC 2022b).

Relatedly, a major problem relates to the lack of binding norms on nature restoration and a more adaptive governance for inclusive conservation (Hoek 2022; Aggestam 2024). In light of European biodiversity decline, the Habitats Directive, which was considered to be the cornerstone of EU nature conservation law, has been criticized for suffering from lack of binding nature restoration norms—from connectivity restoration to climate change adaptation (Hoek 2022).

2.2 | Defining the Policy Change

The dependent variable of this research is the policy shift embodied in the NRR. This article operationalizes this shift through a policy design lens, focusing specifically on "policy intensity"—defined as the content and strength of policy instruments (see e.g., Howlett and Cashore 2009; Knill et al. 2012; Bandelow et al. 2025). Drawing upon the Index of Policy Activity framework proposed by Schaffrin et al. (2015), our analysis categorizes the policy change into specific intensity elements: objectives, scope, integration, budget, implementation, and monitoring (see Table 1).

The NRR is an ambitious legislation that aims to repair Europe's damaged ecosystems (EC 2022a; EU 2024; Lees and Pedersen 2025). In terms of objectives, key aspects of the shift embodied in the NRR include the change from voluntary measures to binding nature restoration targets for habitats and species. While previous regulation, such as the Habitats Directive (92/43/EEC), includes voluntary restoration commitments, the NRR introduces binding, time-bound restoration targets, moving away from voluntary commitments (Mauerhofer 2025). It also shifts in terms of overarching objectives from merely protecting nature to actively restoring it, aiming to cover 20% of EU's degraded land and sea areas by 2030 with the ultimate goal of restoring all degraded ecosystems by 2050 (EU 2024, Chapter 1, Article 1; Council of the EU 2024). The Regulation is the first ever focused specifically on the recovery of nature in EU Member States (EC 2025a, 2025b).

In terms of broader scope, the NRR extends beyond protected areas, like Natura 2000 (e.g., Birds and Habitats Directives) to encompass working landscapes, including farmland (e.g., restoring peatlands) and urban green spaces (EU 2024, Chapter III, Article 14; Trouwborst 2025).

In terms of integration, the NRR is designed to supplement existing EU nature legislation. This effort includes large-scale habitat restoration and the recovery of species populations beyond those already protected by expanding their natural habitats (EC 2025a, 2025b).

Regarding implementation and monitoring, the NRR involves the development of a draft of binding National Restoration Plans by Member States by September 1, 2026, putting restoration measures for at least 30% of habitats in poor condition by 2030, for 60% by 2040, and for 90% by 2050 (EU 2024, Article 4). Priority until 2030 will be given to land in areas of habitat types not in good condition that are located in Natura 2000 sites. The EC and the European Environmental agency (EEA) should support Member States in preparing and implementing their National Plans, as well as in monitoring progress toward meeting the restoration targets and fulfilling the obligations (EU 2024, Articles 72). The National Restoration Plans would include a detailed financing plan combining EU funding with public-private funding (EU 2024; EP 2022). The EEA's NRR Reference Portal provides documentation, guidelines, and reference data to assist in the development of these national plans (BISE 2026).

In summary, the most significant developments have been the broadening of integrated policy to combat biodiversity loss, distinguished by a strong emphasis on restoration. This expansion includes increasing the coverage of ecosystem types and establishing legally binding targets with clear timetables for restoration. Central to this paper's argument is the fact that the NRR was driven by a new political commitment to increasing the intensity of restoration policy. Table 1 presents and defines the shift embodied in the NRR. In each category, there has been a higher intensity as shown above.

2.3 | The Explanatory Framework

Following Howlett and Cashore (2009), we investigate multiple causal pathways for policy change to avoid omitted variable bias. This section introduces a range of explanations derived from

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TABLE 1 | Defining policy change: Existing legal instruments versus NRR.

Intensity measures	Existing directives (mainly habitats and birds directives)	NRR	Intensity change
1. Main objectives 1.1 Restoration as the main objective 1.2 Mandatory restoration 1.3 Measurable and time-bound objective	1.1 Conservation and protection of Europe's most threatened species and habitats. 1.2 Restoration is a secondary, voluntary goal within broader conservation policies 1.3 Without deadline for recovery or area-based targets	1.1 Active restoration mandate 1.2 Legally binding targets for nature restoration in different ecosystems. 1.3 Higher legal precision than previous directives: mandates restoring 20% of land/sea by 2030 and all degraded ecosystems by 2050	1.1 From secondary to main objective 1.2 Voluntary vs. mandatory restoration 1.3 Vague restoration objectives vs. clearly measurable and obligatory objectives
2. Scope 2.1 Encompassing approach to restoration 2.2 Geographical area coverage	2.1 Focus on specific rare species and habitats listed in Annexes 2.2 Mainly limited to Natura 2000 protected sites	2.1 Holistic approach: nature restoration includes pollinators, farmland, urban green spaces, free-flowing rivers, agricultural soils etc. 2.2 Covers all ecosystems both inside and outside protected zones	2.1 Confined to specific habitats and species vs. holistic approach 2.2 Confined to natura 2000 sites vs. holistic scope
3. Integration 3.1 Part of a package or integration with other frameworks 3.2 EU legislative status	3.1 No statement about integration in a package or reference to other policy instruments was found 3.2 Through Directives—requires transposition into national law.	3.1 A clear and explicit endeavor to complement and support the existing legal framework, particularly Habitats and Birds Directives 3.2 Binding and immediately enforceable across Member States.	2.1 No integration vs. complementarity to existing frameworks 3.2 Directives vs. Regulation
4. Budget (Dedicated financial resources)	Co-financing of sites of Community importance, priority habitats and species	Combining EU funding with public-private funding. Under the Multiannual Financial Framework, around €100 billion will be available for biodiversity spending, including restoration.	Non-defined budget vs. defined budget
5. Implementation (Type of implementation procedure)	Voluntary national management plans	Implementation procedure is strict: mandatory national restoration plans. Member States must submit formal, standardized plans for the EC and EEA's approval	Non-inspected vs. inspected by EU
6. Monitoring (Procedures for checking progress)	National monitoring, primarily focus on Natura 2000 sites.	EEA's monitoring: mandates specific monitoring process on the *progress of restoration* across all ecosystems, using standardized EU-wide indicators. Member States must report on their progress	National vs. EU level's standardized monitoring

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TABLE 2 | Explanatory framework structure.

Theoretical explanations	Hypotheses
Economic benefits	EU binding nature restoration law is driven by a mutually reinforcing logic: an internal economic benefit from reversing ecosystem degradation, and an external geopolitical and trade ambition to preserve the EU's role as a global rule exporter under the EGD
The role of EU institutions	EU institutions played a crucial role in driving the shift to the NRR. The relative extent of their influence and policy entrepreneurship varied throughout the policy process The policy process reflected the diverse preferences of different party groups within the EP; environmentally and socially aligned actors acted as drivers of higher policy intensity
Domestic actors' preferences	National governments acted as drivers for policy change with varying degrees of ambition, resulting in an intensification of environmental policy Interest groups and non-state actors, including EU's industry and civil society actors, lobbied for greater policy intensity

various theories of the politics of EU environmental policy processes and change. Preliminary data suggest that three theoretical frameworks are most relevant: economic benefits, the role of EU institutions, and the policy preferences of domestic actors (See Table 2 for summaries of the hypotheses).

These theoretical approaches, taken on their own, are not well equipped to explain the EU policy change. To address this issue, this research adopts an integrative analytical framework that is articulated across these three levels of analysis (see Table 2). What all these strands of literature have in common is the tendency to focus on the plurality of actors (EC, EP party groups, influential Member States, and stakeholders), and stressing the importance of economic interests and institutions in mutually stabilizing each other in shaping integrated environmental policy change. Moreover, the influence of these independent variables on EU's science, technology, and environmental policy changes has increased over the last decade (Bandelow et al. 2022; see also Justo-Hanani 2022, 2025). Better understanding of the causes and outcomes in this policy area is thus a helpful step toward better understanding how changes in policy intensity occur (for the merits of processual and multi-dimensional perspectives in the study of policy integration and change, see Howlett 2009; Candel and Biesbroek 2016; Bandelow et al. 2025).

2.3.1 | The Role of Economic Benefits

Vogel (2012) argues that when environmental regulation is adopted, it often comes with the promise of social or economic progress. This argument is central to the concept of ecological modernization, which posits that economic and environmental goals can be mutually supportive. Implementing ecological modernization and shifting the EU market toward a greener growth trajectory requires management capacities and tools (Mol 2002; Jänicke and Jacob 2002; see also Justo-Hanani and Dayan 2020). This establishes the basis for a wider expectation that the biodiversity crisis was reframed through the lens of a regional economic threat. Consequently, ambitious nature regulation is now viewed as essential to fostering economic growth and a competitive economy.

Kelemen (2010), Damro (2012), and Bradford (2020) have taken a similar position, underscoring the EU's global regulatory leadership. They emphasize how the EU strategically develops its environmental, health, and trading standards with the goal of exporting these standards worldwide. In the case of environmental degradation, this dynamic fits into a broader vision of economic and ecological transformations and external effect, as explicitly mentioned in Article 3 of the EGD, entitled 'The EU as a global leader': 'The global challenges of climate change and environmental degradation require a global response. The EU will continue to promote and implement ambitious environment, climate and energy policies across the world... The EU should use its expertise in "green" regulation to encourage partners to design similar rules that are as ambitious as the EU's rules, thus facilitating trade and enhancing environment protection and climate mitigation in these countries.' (EC 2019). This framework merges ecological goals with economic interests to foster green growth. By establishing measures such as the world's most comprehensive nature restoration and anti-deforestation standards, the EU requires international trade partners to meet these requirements in order to access its market influencing international supply chains and environmental policies. As a result, the EU leverages its market power to influence global environmental and sustainability standards, while simultaneously addressing the interaction between internal and external factors (See also Eckert 2021). Synthesizing this literature, it is possible to suggest the following hypothesis:

H1. *Progress toward EU nature restoration legislation is driven by a mutually reinforcing dual logic: an internal economic necessity to reverse the degradation of ecosystem services vital to the economy, and an external geopolitical ambition to fulfill multilateral commitments on the nature conservation–trade nexus, thereby preserving the EU's role as a global rule exporter through the EGD.*

2.3.2 | The Role of the EU's Institutions

A second perspective looks directly at the policy-making process and examines how the creation of nature restoration regulations is strongly affected by a broader European institutional context. This context encompasses the societal goals and functions that underpin both environmental and socio-economic policies, along with the EU's unique institutional

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structure and its distinct approach to coordinated governance and policymaking.

The EU's institutional framework, informed by the 'regulatory state' theory (Majone 1996), identifies the push for EU regulation as a combination of socially desired regulatory functions (e.g., environmental and consumer protection) and the entrepreneurial drive of its institutions to craft harmonized, integrated policies (Jordan et al. 2021). Additionally, scholars suggest a change in political culture where the Parliament and green MEPs are exerting greater influence over environmental regulatory policies. Research generally suggests that left-leaning groups are more pro-environmental than right-leaning ones and propose more ambitious policies in these areas (Hix and Høyland 2013; Justo-Hanani and Dayan 2015; Pollex 2025). Finally, an institutional approach highlights the importance of the EU institutions as policy entrepreneurs pushing their own regulatory agendas. EU institutions may address the challenge of changing regulatory policies by taking several approaches during the agenda-setting and policy-formulation stages, such as identifying problems, establishing high objectives, increasing the intensity of policy instruments, and setting ambitious objectives (Bernauer and Meins 2003; Howlett 2009; Selin and VanDeveer 2015). In the case of the NRR, two testable assumptions can be produced:

H2. *EU institutions, specifically the EC, the EP, and the Council played a crucial role in driving the shift to the NRR. The relative extent of their influence and policy entrepreneurship varied throughout the policy process.*

H3. *The policy process reflected the diverse preferences of different party groups within the EP, while environmentally and socially aligned actors acted as key drivers of higher policy intensity.*

2.3.3 | The Role of Domestic Actors

An alternative explanation for policy change focuses on the role of Member States. This view aligns with the liberal intergovernmentalist account of European integration (Moravcsik 1993), which posits that the political factors driving EU-level actions are domestic in character. Within the realm of environmental politics, this framework suggests that national governments remain the primary drivers of environmental policy shifts in the EU, while a number of related terms, such as "stringency," are used and operationalized in the literature to define these governments' demand to strengthen the "intensity" of policy instruments (Liefferink et al. 2009). Furthermore, previous studies have shed light on the differentiated roles and preferences of Member States in EU environmental policy negotiations, identifying them as environmental leaders or laggards based on varying national political and socio-economic preferences (e.g., Wurzel et al. 2019).

Domestic politics explanations also characterize EU environmental decision-making as a reflection of policy choices driven by non-state actors and stakeholder preferences with diverse opinions on environmental risk management and regulation (Jordan et al. 2021).

Within the policy formulation process, interest groups and non-state actors, including in particular business, European industry and specific sectors, engage in EU fora to articulate their preferences, thereby shaping the direction of policy formation (Jordan et al. 2021; see also Wurzel et al. 2019). Businesses in highly regulated jurisdictions often lobby for stricter supranational standards to maintain their competitiveness (Vogel 1997). Consequently, literature highlights the business sector's willingness to promote stringent environmental regulations. Simultaneously, environmental NGOs, scientists, and epistemic communities are recognized as vital policy actors. They raise public awareness, shape agendas, and monitor compliance with domestic and international policies (Haas 1992). As key advocates for policy change, these groups provide the essential scientific and practical insights needed to both identify environmental problems and design solutions (Haas 1992; Wurzel et al. 2019).

Overall, the regulatory process and its ultimate outcome can be explained by a confluence of factors, including the policy preferences of decision-makers, the specific configuration of the regulatory debate, and the dynamic interplay between 'green' and industry perspectives. Consequently, we can formulate two distinct hypotheses:

H4. *National governments acted as drivers for policy change with varying degrees of ambition, resulting in an increase in environmental policy intensity.*

H5. *Domestically, interest groups and non-state actors, including European industry and environmental NGOs, lobbied for greater policy intensity.*

2.4 | Data and Methods

To define the dependent variable, we adopted the intensity elements of the Index of Policy Activity (Schaffrin et al. 2015) to evaluate the shift embodied in the NRR relative to the status quo (in this respect, this research aligns with the definition provided by Howlett and Cashore (2014), who describe government actions as the decisions to act, or not to act, to change or maintain some aspect of the status quo). Policy intensity is assessed across six specific intensity elements: objectives, scope, integration, budget, implementation, and monitoring (For a comprehensive discussion on the Index of Policy Activity methodology and concepts of policy change in comparison, see, e.g., Schmidt and Sewerin 2019). Because a database on the implementation across different Member States is not yet complete, and the drafting of national restoration plans is still ongoing (BISE 2026), establishing a comparative measurement of intensity elements across countries is unfeasible. Using qualitative content analysis, we compared these intensity elements within the NRR against those in existing regulations, and evaluated the 'intensity change' (see Table 1). This analysis included mainly legislative texts and press releases obtained from official EU websites, alongside reports and secondary literature.

To examine the independent variables, this research employed a process-tracing method to identify the conditions that led to the policy change and to elucidate the mechanisms linking causal factors to outcomes (Beach and Pedersen 2019). As a research methodology, process tracing involves scrutinizing

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data regarding actions, events, and expectations to trace how a potential cause leads to an observed effect. This approach acknowledges that outcomes are often the result of interactions between multiple causal factors (Blatter and Haverland 2012; Morgan 2016). The main purpose is to determine 'what causes what' by identifying the chain of events (Morgan 2016). The search for answers is based on the assumption that a number of causal factors work together to create an outcome (Blatter and Haverland 2012). According to this logic, theoretical predictions regarding the dependent variable were compared with the actual outcome (the policy shift). On the basis of these observations, this paper draws conclusions on the role of causal conditions in the policy process and outcome. If the outcome was consistent with the predictions, there was at least a presumption of a causal relationship. By systematically comparing theoretical predictions with empirical evidence, this study evaluated the validity of these causal links and the specific role of these conditions in driving the policy shift.

The relevance of the explanatory factors was determined through an analysis of primary and secondary sources. First, we identified primary data (30 publications), including key policy documents, reports, formal press releases, and legislative texts published by EU institutions, Member States, and stakeholders, specifically focusing on the policymaking process. Second, we gathered secondary data (40 publications) relevant to the policy evolution during the formative period of 2020–2024. These sources encompass media coverage, digital news, interest group position papers, documentary record of legislative debates, and relevant literature on the NRR.

To isolate the conditions that led to policy change, we categorized actions, events, and preferences according to their specific context and timeline. Our analysis focused on three primary categories: 'economic benefits' (encompassing both intra-EU and global interests), 'the role of EU institutions' (legislative and advocacy efforts within the EC, Parliament, and Council), and 'domestic actors' preferences' (national government positions). This sequential organization allowed for a systematic reconstruction of the policy-making process and the identification of its driving mechanisms. It was found that all three factors are key drivers shaping the policy shift, and explaining the core stages of the policymaking process—problem definition, agenda-setting, and decision-making—as well as the main characteristics of the outcome.

3 | Making the NRR: Comparing Expectations to Observations

This section describes the regulatory process and outcome, subsequently evaluating the explanatory power of the aforementioned hypotheses.

3.1 | An Overview of the EU's Policy Development

In June 2022, the EC issued a proposal for a Nature Restoration Law, initiating the development of the NRR (EC 2022a, 2022b, 2022c, 2022d). This proposal addressed key elements of the EGD and the EU biodiversity strategy 2030, aiming for leadership in reversing biodiversity loss and restoring nature. It was also presented as a key contribution to a post-2020 global biodiversity framework (EC 2022a, 2022b, 2022c, 2022d). The proposal was based on an impact assessment conducted by the EC Directorate-General for Environment, which evaluated environmental, socio-economic, and administrative impacts across four policy options, including their costs and benefits. The EC's impact assessment demonstrated that the benefits of restoration significantly outweigh the associated costs. Specifically, the benefits of restoring diverse ecosystems—including peatlands, forests, grasslands, and coastal wetlands—were estimated at €1860 billion, compared to estimated costs of €154 billion (EC 2022b). This substantial benefit–cost ratio proved pivotal, as the projected economic returns provided the primary justification for introducing legally binding targets. Furthermore, the assessment highlighted the EU added value of the proposal, noting that the transboundary nature of ecosystem degradation requires coordinated action. Such a unified approach is deemed essential for achieving large-scale restoration and securing the EU's credibility as a global leader in biodiversity (EC 2022b).

The EC further conducted ecosystem-specific impact assessments, quantifying the monetary costs and benefits of achieving the NRR targets. Based on these findings, the EC claimed that 'investment into nature restoration adds €8 to €38 in economic value for every €1 spent, thanks to the ecosystem services that support food security, ecosystem and climate resilience and mitigation, and human health' (EC 2022a). To meet the 2030 targets, the Institute for European Environmental Policy (IEEP 2022a, 2022b) estimates that an annual investment of €8.2 billion will be required.

In the 'problem definition' stage, the main concern was the insufficient restoration policies on the scale and scope required in the EU (2022c). Although there were some specific policies that contributed to the restoration of ecosystems, there were many shortcomings, such as lack of specific targets in existing legislation such as the Habitats Directive and the ineffectiveness of voluntary targets that have previously been set (EC 2022c). The proposed solution centered on establishing legally binding targets for ecosystems restoration and their maintenance in good condition, justified by the principle of subsidiarity. The EC was less favorable to the option of implementing the Biodiversity Strategy for 2030 without legally binding restoration targets. It claimed that in theory 'the targets for 2030 are achievable, however, their voluntary nature makes their achievement unlikely' (EC 2022c).

Notably, the policy intensity elements discussed in the analytical framework proved highly relevant to decision-makers. For instance, the EC proposed establishing statutory monitoring mechanisms to develop an EU-wide methodology for assessing ecosystems, habitats, or species that currently lack sufficient data (EC 2022c). This methodology would establish the baselines and thresholds for "good condition" required to set future restoration targets (EC 2022c). This operationalization directly addresses the analytical section's debate on the merits of national versus standardized EU-level monitoring. Furthermore, it aligns with policy implementation—another core dimension of the Index of Policy Activity. For example, environmental NGOs broadly supported mandatory National Restoration Plans that

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feature clear implementation obligations, a structured review process, and a defined oversight role for the EC to ensure consistency across member states [EC 2022c, article 2.3; EC 2024, Article (75)]. This operationalization directly addresses the analytical section's discussion on the merits of standardized, mandatory national restoration plans that require approval from the EC and EEA.

The EC formally proposed the Regulation in June 2022, moving the process from the preparatory stage to the political co-decision stage. In the EP, the proposal was referred to the Committee on the Environment, Public Health and Food Safety (ENVI), the Committee on Fisheries (PECH), and the Committee on Agriculture and Rural Development (AGRI) (EP 2025). In May 2023, both the AGRI and the PECH committees rejected the EC's proposal. On June 15 and 27, 2023, the ENVI Committee voted on amendments to the proposal, but the final vote resulted in a deadlock (44 in favor, 44 against). Lacking a majority to support the amended text, ENVI was procedurally required to submit a recommendation to the plenary to reject the EC's proposal entirely (EP 2025).

However, a proposal for a rejection did not pass in plenary (EP 2025). In June 2023, the Council of the EU reached an agreement ("general approach") on a revised proposal for the NRR (Council of the EU 2023). The compromise introduced greater flexibility for Member States, such as adjusted targets for agricultural, marine, and urban ecosystems to improve practical implementation (Council of the EU 2023). In July 2023, the Parliament significantly amended the proposal's substance, taking into consideration several elements from the Council's revised proposal adopted on June 2023, specifically regarding flexibilities and derogations (EP 2023). For example, the Parliament deleted the proposed provisions on the restoration of agroecosystems, and specified that the Regulation would only apply once the EC provides robust scientific data on ensuring the necessary conditions for long-term food security (EP 2025). In addition, it foreseen a possibility to postpone the restoration targets in the event of exceptional socioeconomic consequences ('emergency brake'). However, the Parliament reinforced requirements related to pollinators, mandating both an improvement in pollinator diversity and a reversal of the populations decline by 2030 at the latest. Moreover, the requirements for the monitoring of pollination were not tied to a specific Annex, meaning that a research-intensive approach for pollinators was taken (Hoek 2022). It also added a new article requiring Member States to help achieve the EU objective of planting at least 3 billion additional trees by 2030, along with new provisions to ensure coherence with the common fisheries policy in the implementation of marine ecosystem restoration measures. The EC would be required, within 1 year of the act's entry into force, to assess any gap between restoration financial needs and available EU funding and identify measures to bridge such a gap (EP 2024).

In November 2023 an agreement was reached after an intensive trilogue negotiation between the EP, EC, and Council (EC 2023; EP 2025). The co-legislators backed the ambition to restore at least 20% of the EU's land and sea areas by 2030, and all ecosystems in need of restoration by 2050. In line with the Parliament's demand, Member States prioritizing restoration measures on land until 2030 should focus on habitat types not in good condition that are located in Natura 2000 sites. Moreover, the co-legislators agreed on derogations regarding renewable energy projects and national defense, as well as various flexibilities for ecosystem-specific obligations, such as the rewetting of peatlands. They also included an 'emergency brake' for the restoration of agroecosystems, a provision requested by the Parliament. The agreement required the EC to assess implementation funding gaps within 1 year and propose solutions if necessary (EP 2025). The agreed text was approved by the ENVI Committee on 29 November 2023. On 27 February 2024, Parliament formally adopted it in plenary, by 329 votes in favor, to 275 against, with 24 abstentions (EP 2025). This vote followed months of protracted negotiations that exposed long-standing divisions in the EP, notably after the European People's Party (EPP) spearheaded a campaign to reject the Regulation (CNN 2023; Cliquet et al. 2024). The law, initiated by the Socialists and Democrats (S&D), was ultimately adopted despite strong opposition from conservative and far-right groups (see next section). Other supporters of the Regulation included the Greens, the Left and part of Renew Europe (CNN 2023).

Following formal approval of the agreement by the co-legislators, the revised legislative text was signed in June 2024 and entered into force in August 2024. As it takes the legal form of a regulation, the NRR applies directly in the Member States and does not require transposition into national legislation.

3.2 | The Role of EU Economic Incentives

Two distinct economic rationales underpin the motivation for the NRR. First, the single market has increased the exploitation of ecosystem services, which are vital for the economy (EC 2022a; European Central Bank 2024), such as pollination of crops, water purification, soil health, carbon storage, and disaster risk reduction [see, e.g., EC 2024, Articles (4), (47)]. A strong incentive was, therefore, the high economic benefit resulting from restoration-oriented regulation. Based on its impact assessment, the EC stated that 'investment into nature restoration adds €8 to €38 in economic value for every €1 spent on restoration, thanks to the ecosystem services that support food security, ecosystem and climate resilience and mitigation, and human health' (EC 2022a). DG-Environment further stressed that 'only healthy and productive ecosystems can provide the many services we all depend on, including resilience to climate change and natural disasters, such as droughts and floods as well as long-term food security' (EC DG-ENV 2024).

A strong additional incentive was the wider economic benefit of preserving and enhancing Europe's natural capital, in line with the EGD (EC 2019). The preamble to the EGD states that 'all EU policies should contribute to maintaining and restoring Europe's natural capital' (EC 2019). The EGD therefore focuses on recognizing the interdependencies between the environment and the economy, as natural capital drives the EU's regional growth (EC 2025a). The EU bioeconomy relies heavily on these natural resources; restoring and conserving biodiversity in agriculture, oceans, and forests is not only economically viable but also ensures the resilient

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production of agricultural, fisheries, and timber products (EC DG-ENV 2024). Furthermore, the European Central Bank (2024) found that approximately 3 million companies in the Eurozone (72% of all firms) are highly dependent on at least one ecosystem service. Severe functional losses in these ecosystems would cause critical disruptions for these companies and the broader European economy (EC DG-ENV 2024). Consequently, for the first time ever, the Regulation adopts measures designed not only to preserve but to actively restore nature (Council of the EU 2024).

Secondly, economic drivers at the EU level coincided with a global trend toward ecological transformation. This shift is reflected in international biodiversity and trade agreements, such as the Kunming-Montreal Global Biodiversity Framework, the UN Sustainable Development Goals, and the UN Decade on Ecosystem Restoration (Cliquet et al. 2024; see the NRR preamble, which explicitly links the Regulation to the Union's international commitments on the nature conservation–trade nexus). An EU-level restoration regulation was also deemed necessary to bolster the EU's influence in the international arena. As the proposal stated, the EC's objective is to provide the EU with the necessary credibility to take a leading role on the global scene (EC 2022b; Cliquet et al. 2024). The NRR further notes that 'the EGD will lead to a progressive and profound transformation of the economy of the Union and its Member States, which in turn will have a strong bearing on the Union's external action. It is important that the Union uses its trade policy and extensive network of trade agreements to engage with partners on the protection of the environment and biodiversity also globally, while promoting a level playing field' (EC 2024). Furthermore, the European Commissioner for the Environment warned that rejecting the draft regulation would damage the EU's global reputation, given its pioneering role at the COP15 summit in Montreal in 2022 (O'Carroll 2024).

3.3 | The Role of EU's Institutions

Regarding the second hypothesis, the EC and the Directorate-General for Environment played a pivotal role during the agenda-setting stage, initiated by the EC's proposal and its accompanying impact assessment (EC 2022a, 2022b). Both the EC and DG Environment acted as policy entrepreneurs by framing the problem as a critical lack of mandatory restoration regulation and subsequently proposing concrete legislative solutions (EC 2022b, 2022c). In this regard, the EC and DG Environment set ambitious objectives and scope during the agenda-setting and policy-formulation stages. This elevated the intensity of the restoration policy and shaped all subsequent phases of the policy process. Such an expansion in objectives and scope inevitably intensifies political activity, such as lobbying and bargaining (see, e.g., Howlett 2009; Schaffrin et al. 2015).

The EC also deliberately solicited input from a wide range of stakeholders, including scientists across numerous disciplines, companies, and a broad alliance of civil society organizations (Luick et al. 2025). Public support was significant, with over one million citizens signing petitions in favor of the Regulation. Furthermore, more than 6000 scientists, 100 businesses, and various youth and civil society groups actively advocated for its passage (ClimateTrade 2024; Cliquet et al. 2024). Ultimately, this emphasis on engagement with the scientific community and diverse stakeholders has been a defining feature of the NRR's development (Pe'er et al. 2023).

The EP acted as co-legislator alongside the Council in the adoption of the 2022 proposal. The EP was particularly active during the decision-making stage—specifically the trilogue negotiations—where it significantly amended the text to incorporate several elements of the Council's general approach (Luick et al. 2025; EP 2023, 2025).

Regarding the third hypothesis, the regulatory outcome is compatible with the preferences of the EP, as the final Regulation incorporates numerous amendments to the EC's original proposal (EP 2023, 2025). Following the submission of the EC proposal, the EP—driven primarily by the ENVI Committee—successfully influenced the design of the NRR by systematically introducing specific amendments and derogations to ensure a balanced approach to restoration. For instance, the EP was critical of the proposed provisions on the restoration of agroecosystems. By securing the inclusion of an 'emergency brake'—which allows Member States to temporarily suspend implementation in farmland under exceptional socioeconomic circumstances affecting land availability for agricultural production—the EP successfully integrated its policy preferences (EP 2023; EU 2024, Article 27). The EP also added a new article requiring Member States to contribute to the EU-wide objective of planting at least three billion additional trees by 2030 (EP 2023).

Nevertheless, the regulatory outcome aligns more closely with the preferences of green and social MEPs, such as the Party of European Socialists (PES). Following months of negotiations—and despite the EPP group's staunch opposition to the NRR—the Council approved this landmark legislation. The PES has strongly supported the Regulation from the outset; it was introduced by France Timmermans during his tenure as Executive Vice-President of the EC and championed in the Council by the Spanish Minister for Ecological Transition and the Demographic Challenge, Teresa Ribera, among others. In the EP, it was supported by Socialist MEPs César Luena and Mohammed Chahim (PES 2024).

In summary, the EU institutions performed three key functions that underscore their significance in the policy process. First, the EC set the substantive agenda by defining the regulatory problem and presenting a legally binding proposal for nature restoration. Second, the EP and the Council facilitated broad political support by introducing critical amendments—notably regarding the restoration of agroecosystems. Third, the EC and EP collaborated on measures designed to improve the protection of biodiversity and common socio-economic interests in the context of restoration policy.

3.4 | The Role of Domestic Actors

Regarding the influence of domestic actors on the policymaking process, empirical data suggests that shortly before the Council

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of the EU vote—originally scheduled for March 25, 2024—representatives from eight Member States withdrew their support. Sweden, Italy, the Netherlands, and Hungary signaled opposition, while Austria, Belgium, Finland, and Poland announced their intention to abstain. Consequently, the vote was removed from the agenda (O'Carroll 2024; Euronews 2024).

However, the Austrian Minister for Climate Action, Environment, Energy, Mobility, Innovation and Technology, Leonore Gewessler, played a pivotal role in the final adoption by the Council of the EU. Despite significant domestic opposition and political controversy, she announced her support for the NRR, stating that she could not bear to let the opportunity pass without having tried everything (Guardian 2024). After Austria signaled its support, Member States secured a qualified majority (20 out of 27), pushing past initial opposition (Reuters 2024). The agreement establishes legally binding targets to restore 20% of land and sea by 2030 and mandates national restoration plans, both of which represent a significant increase in policy intensity. The vote in the Council took place in June IEEP 2023, and the NRR was adopted (Council of the EU 2024).

According to the domestic preferences hypothesis, policy change is shaped by the aggregated interests of domestic actors, particularly economic interest groups and industrial sectors. Throughout the NRR negotiations process, numerous businesses publicly endorsed robust nature restoration legislation, emphasizing its necessity for both climate stability and long-term economic resilience (IEEP 2023; CISL 2023). It seems clear from their support that the shift in policy intensity was in line with their preferences. Their support indicates that industry players believed that there is a positive link between strengthening policy intensity and economic benefits (see also Cliquet et al. 2024; Fleckenstein et al. 2025, 18).

On the other hand, Copa-Cogeca and Europêche—representing the farming and fisheries sectors, respectively—labeled the Nature Restoration Law "ill-thought-out, unrealistic, and unimplementable," arguing it "endangers farmers' and fishers' livelihoods and food production in the EU" (Rabesandratana 2023). Commercial forestry and industry-linked associations similarly campaigned against the Regulation (Cliquet et al. 2024). For instance, the AGDW (2023) strongly criticized the EP's approval, contending that the proposal "does not do justice to the core objectives of the Green Deal, namely climate change mitigation and species conservation." They further argued that restrictions on forest use would "lead to a shortage of wood as a raw material and reduce the forest's climate protection performance."

Moreover, in 2023, the law became the focus of a fierce opposition campaign led by conservative, anti-Green Deal parties, in particular the European People's Party (EPP), which had previously supported the EGD. The EPP repeatedly argued that the Regulation would threaten the livelihoods of European farmers, disrupt supply chains, reduce food production, increase consumer prices, and even "eradicate" urban areas to create green spaces. EPP Group Chairman Manfred Weber, among the most vocal opponents of the Regulation, questioned its financial implications, asserting it would harm the farming sector (CNN 2023). The outbreak of farmers' protests across Europe further undermined the coalition needed to pass the Regulation, as farmers blamed the bloc's environmental rules for creating excessive bureaucratic burdens (Politico 2023).

These arguments were rejected by left-wing parties, the EC, dozens of environmental NGOs, climate scientists, renewable energy industry leaders, and major corporations such as IKEA, H&M, and Nestlé (e.g., Business for Nature 2023; De Schutter and Frison 2023; Cliquet et al. 2024). These proponents emphasized the necessity of prioritizing nature restoration, arguing that it is not only compatible with sustainable economic activity but also essential for the long-term viability of European landscapes (Business for Nature 2023; Pe'er et al. 2023). On 27 February 2024, the EP formally adopted the Regulation in plenary session by 329 votes in favor, 275 against, and 24 abstentions (EP 2025).

In summary, the data support the hypotheses concerning the influence of both national governments and interest groups. Overall, the analysis argues for stronger EU regulatory efforts in biodiversity restoration, thus supporting Vogel's (2012) claim of a broader European trend toward stricter environmental policies.

4 | Conclusions

The aim of this article was to describe and explain the important policy change in the domain of nature restoration, focusing specifically on policy intensity. This was an ambitious policy change, potentially affecting the overall sectoral activity in which it is embedded, as well as the puzzle of power relations surrounding the interpretation of the NRR (Lees and Pedersen 2025; Aragã and Braak 2026).

The NRR transitioned from a practical biodiversity initiative into a highly polarized political dispute, ultimately passing despite significant controversy. This trajectory creates a compelling empirical puzzle that warrants a deeper investigation into the underlying causes of the policy shift. In our research, we examined this transformation, demonstrating that a complex mix of actors and factors drove the policy process and its outcome. Different theoretical explanations were applied to different phases of the policy process as well as to specific features of the NRR. Our analysis suggests that the economic dynamics, which are the motivating factors and background for the NRR, complement other theoretical explanations and explain the timing of the development of the NRR. The EU institutional approach can explain the central role of the EC and its authoritative bodies in the agenda-setting phase and the marked increase in regulatory intensity. In addition, the institutional strength of the Parliament can make a difference in the policy process by either inhibiting or catalyzing policy change. The influence of both national governments and interest groups was also important in the decision-making stage. Overall, this article highlights the direction of influence and a number of different theoretical explanations that are tested as specific hypotheses. Analyzing public policy and change using different theoretical approaches allows us to understand ongoing environmental regulatory activity in the EU.

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Feeding into the broader scholarly debate on policy process and change, the integrative approach used in this article brings together different levels of analysis that are often treated separately by mainstream theoretical approaches. In so doing, it explores how factors active at the economic, EU institutional, and domestic levels interact to affect regional and national policy change in the nature restoration domain. This interaction is particularly important in the policy area under scrutiny because biodiversity restoration is highly internationalized—even more so in Europe following the EGD and the Kunming-Montreal Global Biodiversity Framework—and is characterized by competing economic interests and the activity of actors and institutions. Focusing only on one of these factors would provide a more parsimonious model but would overlook a significant portion of the explanation.

This research primarily focuses on explaining the politics of policy change regarding the NRR. It does not attempt to provide a quantitative measurement or a comparative analysis of national nature restoration policy changes, nor does it seek to evaluate the performance or effectiveness of this policy shift. As the drafting of national restoration plans and associated data collection are still in progress (see BISE 2026), empirical data on concrete changes in national policies intensity is currently lacking. Nevertheless, the information gathered in this study establishes a foundation for analyzing future progress. Future research should, therefore, extend this analysis into a comparative study to measure actual shifts in policy intensity across Member States and to validate the causal explanations proposed in this study.

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