

DOING INTEGRITY: FAST

How to reconcile the measured pace of accountability with the speed imperative of the energy transition

An exploratory literature scan and discussion note

* **Dieter Zinnbauer**
Copenhagen Business School

d.zinnbauer@gmail.com
January 2025

As TAI explores issues with and for our funders members, we seek inputs from experts and practitioners to provoke our thinking. This think piece is one of those inputs to spark thinking about the governance of the energy transition and in particular the growth of the renewables sector in ways that assure community benefit and achievement of energy access and reduced emissions goals. The views are those of the author and do not necessarily represent those of TAI members. Please tell us what you think and reach out on TAI socials



CONTENTS

IN A NUTSHELL	4
A. Context and background – a civilizational challenge to be addressed at unprecedented pace.....	5
B. Approach.....	7
C. Insights and ideas – the big picture.....	7
A blind spot confirmed: the good governance conversation pays insufficient attention to acceleration needs, rooted in a broader neglect of time and timing.....	8
Concerns about slow-downs are very real and do partly relate to accountability and participation arrangements.....	9
But speed and integrity are not locked into a zero-sum clash – they can also be combined to reinforce each other.....	10
The critical issue of critical minerals.....	11
D. Insights and ideas - important pockets of ideas, practices, and experiences	11
Permitting and process reforms.....	12
Curbing corruption in crisis response and emergency relief.....	14
Risk management and effective compliance practice.....	15
The emergent broader approach for ETI: front-load (transparency/ participation) – streamline (execution) backload (accountability).....	15
E. Some contours for action options.....	17
A rare cross-partisan window for action.....	17
More thinking about time, timing, duration, and acceleration, in strategy, program design and MEL.....	17
Mapping it out – assessing the integrity implications of acceleration measures.....	18
Low hanging fruit: a speed-scan of the integrity toolbox.....	20
Opportunity for a new tripartite public-private acceleration compact?.....	20
Promising research directions.....	21
Outlook: environmental justice - a tried and (con)tested work horse for innovation in accountability.....	23
References.....	24

IN A NUTSHELL

On the surface, there appears to be a profound disconnect and tension between the “speed” imperative of the energy transition and the “go carefully” imperative to safeguard governance integrity and justice along the way. The latter is typically understood to come with prescriptions for participatory and accountability mechanisms that have the potential to decelerate, as they add more complexity and more processes, thus forcing a more measured, deliberate pace. Therefore, reconciling these expectations for the fast and for the measured and delivering effective “fast-track accountability” is essential to the success of the energy transition.

A multi-disciplinary literature scan and a small set of expert interviews begin to shed more light on this challenge and aim to pave the way for more nuanced questions and a more targeted conversation. As it turns out, the disconnect is real, yet less irresolvable than it seems at first sight. Integrity and transition practitioners do indeed largely talk past each other. Duration and speed are under-appreciated parameters in the governance community of practice. Integrity risks are under-considered by green accelerationists. Yet, on closer inspection, the acceleration-integrity trade-off is less stark than assumed. A suite of integrity measures related to openness, transparency, and robust participation are more plausibly helping to remove delays further downstream if deployed strategically while reducing some red tape, building more capacity, and using digital tools better can be beneficial for both integrity and speed.

Nevertheless, some substantive trade-offs remain and a deeper engagement with the accountability x speed nexus is clearly and urgently warranted for both the governance and transition communities. But this conversation need not start from scratch. It can draw inspiration from very different practice areas, including procurement in emergencies and crises, administrative reforms, or organizational risk management.



A Context and background: A civilizational challenge to be addressed at an unprecedented pace

It must be really fast...

The energy transition presents a civilizational challenge not only with regard to the scale of the required transformation but also with regard to the speed at which it must advance. We must decarbonize our economies and societies in less than three decades in order to avert at least the most catastrophic impacts of climate change (Calvin et al. 2023). This requires a tripling of green energy investments, a tripling in supplies of critical minerals, and a doubling of the improvement rate in energy efficiency – all by 2030. A successful transition also hinges on a doubling of the entire global electricity grid installed today by 2040 as a major milestone (COP28-UAE 2023; IEA 2023a, 2023b; IRENA 2023).

...but it takes too long

Time is running out for meeting these targets, and we must dramatically accelerate our efforts, particularly also on the governance front. For example, the planning and permitting for onshore wind farms takes on average more than five years and more than two years respectively (World Wind Energy Association 2021). Approving green energy projects takes longer than actually building them (Dixson-Declève 2023). The implications are significant. Permitting delays in the US risk cutting the emissions impact of the flagship US climate policy initiative, the Inflation Reduction Act (2022), by a third (Voigts and Paret 2024). And if grid connection rates cannot be doubled, even 80% of the potential emission reductions may be lost (Burgess et al. 2024).

Even Europe, as the vanguard region for green energy deployment, has four times more wind farm projects in the permitting stage than in the actual construction stage (Ferris 2022). A total of 59GW of onshore wind capacity is stuck in the permitting pipeline (IEA 2023c) and even where utility-scale renewable projects are online, the insufficient build-out of storage and distribution networks means that the power they produce can often not be properly utilized, leading to



records of mismatched renewable oversupply and more than 8,000 hours of negative prices for electricity in Europe during 2024 (Tani and Millard 2024). Meanwhile, the 1.5-degree target moves further out of reach. The world is off-track to avert catastrophic change and needs to dramatically accelerate the green scale-up.

This presents a fundamental conundrum about the governance dimension of the transition. On the one hand, both scale, scope, and nature of the transition present high risks of corruption and policy capture that have the potential to corrode the already fragile trust in a just transition and derail the entire project (Zinnbauer and Trapnell 2023).^[1] Ensuring the integrity, credibility, and inclusiveness of both mitigation and adaptation measures is thus a prerequisite for success, particularly in the context of an increasingly polarized and populist political environment (Gazmararian and Tingley 2023; Guthridge 2023).

Does integrity take time?

At the same time, however, many of the good governance and anti-corruption mechanisms that are typically prescribed for such high-integrity risk situations are in public policy debates often associated with slowing things down, rather than speeding them up (Bagley 2019). Adding an expansive layer of civic participation and deliberation at the policy development and project design stage is likely to prolong, and, at times, stall the permission pipeline.

Similarly, various impact assessments for the permitting stage, social accountability mechanisms during implementation, and a host of due diligence, oversight, monitoring, auditing, and reporting regimes along the way are all measures that are more likely to add extra complexity and deceleration to what are already highly complicated and protracted efforts (Ruhf and Salzman 2020).

[1] For a repository of corruption cases in the climate sector see <https://www.transparency.org/en/projects/climate-governance-integrity-programme>.



How to square this circle? How to combine essential integrity safeguards that tend towards a measured pace and deceleration with the expediency imperative to dramatically speed up the transition? This is a pivotal challenge at the heart of the transition project.

Speed with poor integrity gives rise to what observers tend to call “green sacrifice zones” (Zografos and Robbins 2020) where, in the name of the climate crisis, the rights of local communities and the needs of local ecosystems are harmed and projects provide a boon for the corrupt. Integrity without speed may put the transition at risk and lead many into resigned apathy and some toward impatient, illiberal calls for a sort of eco-authoritarianism (Enninga 2023).

We need to urgently grapple with the question of how we can refashion and roll out participation and accountability measures that are sufficiently robust and effective, yet that also deliver “integrity at speed,” fully compatible with decarbonization initiatives that need to dramatically pick up pace in the years to come. Business as usual is not an option, neither for the energy transition nor for its governance.

B Approach

This scoping and ideation exercise draws on a literature scan across a variety of related disciplines and policy domains, including governance and anti-corruption, energy transition, organizational development, emergency and crisis response, and procurement, as well as on a small set of interviews with experts on governance, accountability, and the energy transition.

C Insights and ideas – the big picture

The following sections summarize the insights and ideas gleaned from the scoping work. True to the exploratory and discussion-stimulating nature of the exercise, these points are at times speculative and at times in tension with each other. They do not add up to one conclusive story but rather provide more nuanced questions and more diverse pathways for further exploration and discussion. For better readability, I use the shorthand ETI – expediting transition integrity – to refer to the overall challenge to build adequate transparency, participation, accountability, and integrity measures into the energy transition at the expedited pace required.



A blind spot confirmed: The good governance conversation pays insufficient attention to acceleration needs, rooted in broader neglect of time and timing

Both literature scans and expert interviews confirm that the good governance community has, so far, indeed paid very limited attention to the “fast-tracking accountability” imperative. A proliferation of analyses and prescriptions for how to safeguard integrity in climate governance have produced many important insights and recommendations over the last decade (Sovacool 2021; Transparency International 2011). Yet none of these – and, to the best of my knowledge, no other major contributions in both the academic and policy literature on governance – consider the acceleration prerequisite in the context of the energy transition in any kind of substantive detail. This does not come as a surprise, as it is rooted in a broader neglect of the role of time in thinking about governance and integrity, about the political economy dynamics it is embedded in, and even about still broader phenomena, such as how institutions and organizations do and should work. Time as a potentially significant antecedent, intervening factor, resource, externality, or motive for action or optimization (Blagoev et al. 2024) is rarely put front and center (Howlett and Goetz 2014; McDevitt and Zinnbauer 2021).

This relative neglect notwithstanding, the literature scan has yielded at least some very basic data points with regard to the duration of integrity mechanisms, primarily in the area of participation and deliberation:

- The OECD Deliberative Democracy Database catalogs and describes a large number of deliberative initiatives across OECD member countries. Most entries about climate- and environment-related mini-publics approach *half a year* in duration from planning to the last meeting, not accounting for the production of outputs and their consideration. The selection of participants alone often takes several weeks. [2]

[2] authors calculations based on (OECD 2023)



- The POLITICIZE data collection of more than one hundred deliberative mini-publics across Europe between 2000 and 2020 records the duration of these events. It shows a wide spread from events that only rely on one day of citizen engagement to others that span several weekends and some that are institutionalized and rely on periodic meetings with no end date. Most frequently, these mini-publics took 2-3 days (Curato et al. 2021; Paulis et al. 2021).
- A small batch of reviews of the empirical literature on deliberative methods reaffirms the large spread in duration (van der Does and Jacquet 2023), concludes that “deliberation takes time” (Curato et al. 2017), that participants often complain that time was too short (Street et al. 2014), and that the relationship between duration and outcomes is multi-faceted and context-specific, meaning longer is not necessarily better (Niemeyer et al. 2023).

These data points are far from helping to satisfactorily address the question of how long good integrity and accountability take, but they provide at least a starting point for further exploring this question.

Concerns about slow-downs are very real and do partly relate to accountability and participation arrangements

A number of case vignettes and fragmented statistics suggest that some governance processes meant to support more inclusion and the consideration of a broader range of impacts might indeed contribute to slowing down transition efforts in specific contexts.

- In the US, environmental impact statements – required for larger infrastructure projects – have ballooned in size and duration. On average, they now amount to more than 600 pages (Sud and Patniak 2022) and take 4.5 years to complete (Council on Environmental Quality 2020), while initially (1981) intended to be completed in 12 months or less (Rutzick 2018). Similarly, litigation risks for energy transition projects are above average. Nearly two-thirds of solar energy projects, 50% of transmission lines, and 38% of wind energy projects experience litigation (Bennon and Wilson 2023). Commentators also note that there is growing anecdotal evidence that more federal financial support for transition projects currently goes to Republican-controlled US states partly because project generation is easier due to looser local regulations (Klein n.d.).



- In Brazil, the length of environmental impact assessment (17 months in practice vs. 4 months envisioned by the rules) is one of the main reasons for low wind farm completion rates (Bayer 2018).
- In Germany, participation processes related to building new electricity lines are estimated to delay projects by up to two years (Buchholz et al. 2023), while specialized law firms have popped up to help navigate the administrative approval thicket.
- Even more troubling, many well-intended accountability mechanisms turn out to be vulnerable to being weaponized by special interests to stall and derail transformative (climate) action. This includes the tactical use of citizen referenda to undermine and re-open decision-making (Fahlenbrach, Ovtchinnikov, and Valta 2023), the deployment of bad-faith freedom of information requests to prolong proceedings or intimidate expert and civic involvement (Pozen 2018), or distorting public consultations mechanisms through robo-comments or fake citizen groups (Walker 2014; Yackee and Yackee 2006).
- Similarly, some poorly designed efforts to accelerate green energy projects have come at the cost of environmental justice. In Chile, for example, public participation was only conducted pro forma after the completion of project design for several green energy initiatives and fell completely by the wayside for others. In Mexico, indigenous communities were sidelined and corruption surfaced in a wide range of other accelerated green transition projects (Figueroa, Flores, and Silva 2024; Ramirez 2021; Sovacool 2021).

But speed and integrity are not locked into a zero-sum clash – they can also be combined to reinforce each other

Concluding that more integrity necessarily means less speed is wrong when unpacking the relationship. Specific mechanisms for integrity strategically selected and carefully built into the transition agenda may even be able to speed up some elements of the entire endeavor.



Robust, carefully designed participation used early on is contrary to some public assumptions, not a prolonging factor, but likely to reduce the risk of conflict and protracted litigation later on.

Proactive transparency on a number of transition-relevant parameters such as ownership, power-purchasing arrangements, procurement data, infrastructure build-out status, or source-level emission reporting can expedite administrative learning, project design, and procurement efficiency and thus accelerate the scale-up and diffusion of good project development and implementation, while guarding better against integrity risks along the way.

At the same time, a number of efforts to remove administrative bottlenecks, weed out duplicative processes, and reduce red tape might, as a byproduct to accelerating the transition, also help cut out corruption hotspots that come with the strategic use of gatekeeping functions, bottlenecks, and multiple hold-up points for extorting facilitation payments.

The critical issue of critical minerals

Blitz-scaling the supply of critical minerals to feed the energy transition poses a specific challenge. Negative extraction externalities and production benefits accrue in very different places, often involving marginalized, remote extraction sites in the Global South and mineral consumption in the prosperous Global North. This poses particularly high risks for exploitative relationships and requires extra attention to avoid sacrifice zones. On the plus side, international mining companies involved do have more extensive experience with stakeholder engagement and benefits-sharing schemes – often gained the hard way after failures and scandals – than less-experienced renewables developers

D Insights and ideas - important pockets of ideas, practices, and experiences

Despite the limited attention being paid to how integrity and accountability can be fast-tracked in the context of the energy transition, this conversation need not start from scratch. There are several thematic pockets of practice, experience, and evidence in very different areas that offer practical ideas and inspiration. Exhibit 1 provides an overview of some of them.



Anti-corruption in
emergency situations

Permitting and siting
reforms

LEARNING FOR
FAST-TRACKING
INTEGRITY

Effective compliance
and risk management

Cutting red tape in
bureaucracies

Permitting and process reforms

Permitting reforms are discussed or already underway in a growing number of countries and contain interesting measures to accelerate transition projects. These measures include:

- Designating special geographic zones with pre-established, minimal adverse environmental or community impact for fast-tracked siting and permitting (e.g. acceleration zones in Europe (European Union 2023))
- Conducting programmatic, pooled reviews, rather than individual, site-specific reviews, for groups of projects that are sufficiently similar (Bipartisan Policy Center 2021)
- Expanding administrative capacities at all levels – THE central recommendation of almost all contributions
- Setting maximum time limits for completion of environmental impact assessments and other procedures and establishing an applicant's right to legal remedy if time is exceeded (Brownstein 2023) or even an automatic greenlighting provision



- Introducing “positive silence” rules (Planning for Climate Commission 2023) that provide default permits for small-scale renewable installations or “repowering provisions”(BMWWSB 2023) that provide default permits for smaller upgrades to existing renewable energy parks
- Public permitting dashboards that show permitting steps and progress for individual projects (Bipartisan Policy Center 2021)
- Statues of limitations for permit-related legal challenges (e.g. 2 years proposed for US) (Sud and Patniak 2022)
- Targeted digitization projects that make permitting processes more transparent, accessible and user friendly also for users inside the bureaucracy (Harris and Blackband 2024)

Several of these reform proposals put a specific focus on how to make public participation more effective and faster. Suggestions discussed include:

- Prioritizing early engagement of the public (both formal mechanisms and informal roundtables) to leave flexibility for project adaptability and reduce litigation risks (Bipartisan Policy Center 2021). In Germany, for example it is estimated that roundtables early in the process of siting windfarms can reduce the overall process by up to three years (Buchholz et al. 2023)
- A focus on fairness of participation, through low thresholds, high representativeness
- Combination of formal and informal public engagement mechanisms with formats that diffuse confrontation and encourage the finding of common ground.
- The presence of all responsible agencies, required experts and main stakeholders so that specific questions need not be deferred and remain unanswered.
- Adequate financial compensation and benefit-sharing package to secure and sustain broad support (Bolet, Green, and González-Eguino 2023)



Curbing corruption in crisis response and emergency relief

Tackling corruption in emergency situations has been a long-standing concern for governance practitioners and was brought into particularly sharp relief by the COVID-19 pandemic. A number of lessons and suggestions about how integrity can be safeguarded in such episodes of immense time pressure can be extracted. They include:

- Clear processes and guidelines when and by whom acceleration situations can be invoked, what types of processes they do or do not apply to, and with equally clear stipulations about when and how such exceptional situations must be concluded (Marcelo 2022)
- Pre-screening of suppliers and framework agreements to accelerate individual tendering processes (e.g., ChileCompra)[3]
- Full transparency of expedited procurement contracts[4]
- Increasing administrative capacity / sourcing in extra capacity if internal system too slow[5]
- Required record-keeping for ex-post inspections (spend, but keep all receipts) (IMF 2023; OECD 2020)
- Encouraging/ incentivizing civil society to monitor procurement and implementation (TI UK 2023), including public dashboards and tracking systems for disbursements (IMF 2023)
- Ramping-up ex-post audit capacity and judicial capacity to prosecute suspected wrongdoing (TI UK 2023)
- Expanding whistleblower protection and establish dedicated channels (Schultz and Søreide 2008; UNODC 2022)

[3] <https://www.opengovpartnership.org/stories/emergency-procurement-for-covid-19-buying-fast-open-and-amart/>

[4] <https://www.opengovpartnership.org/stories/emergency-procurement-for-covid-19-buying-fast-open-and-amart/>

[5] Referenced in some form by almost all related sources.



Risk management and effective compliance practice

An expert interview with an experienced head of compliance for a large development initiative in the health sector surfaced a number of project management-related practices that help reconcile effective integrity measures with the required speed and efficiency of developmental interventions. These measures include:

- A dedicated application of risk-management and materiality approaches to firmly focus integrity capabilities on the most consequential and highest risk areas and avoid indiscriminate, laborious box-ticking across all processes and projects (Chen and Soltes 2018; Soltes 2022)
- Increased use of outcome and impact-focused contract elements that provide discretion and adaptability on the input and implementation side yet stipulate specific outcomes to be expected and tie payments to these outcomes (Gibson n.d.) [6]
- More use of digital networked technologies on mobile devices at service delivery points for automatic, instant verification and validation of service fulfillment via geo-location, integrated evidence gathering (e.g., pictures taken with date /time stamp, etc. (Muralidharan et al. 2021)

None of these practices present fool-proof recipes for expedited integrity. They all come with their own well-documented challenges and limitations (Clist 2019; De Pieri, Chiodo, and Gerli 2023; Hubbard 2020; Kosec and Wantchekon 2020) . Yet they provide inspiration and a repertoire of tools to consider and selectively draw on for specific contexts to help streamline and accelerate integrity practices.

[6]Some experts also propose the use of relational contracting techniques for expanding flexibility even further and for proactively diffusing conflicts between contracting parties that may cause significant delays in the execution phase (Frydinger, Hart, and Vitasek 2019).

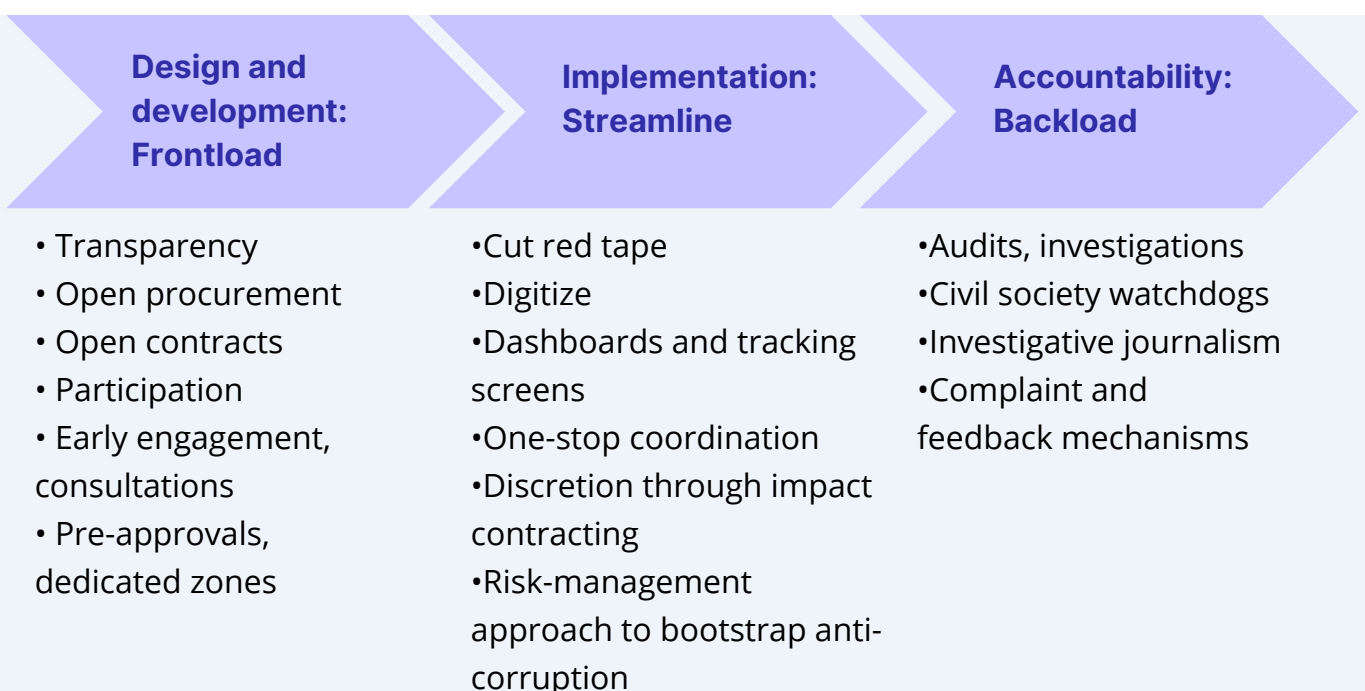


The emergent broader approach for ETI: front-load (transparency/participation) – streamline (execution) – backload (accountability)

When taking a step back and looking – with a bit of squinting - at the mix of tools and approaches that are deemed useful to help expedite transition integrity, they squarely fall into three baskets:

- Some are dedicated to frontloading integrity measures, i.e., providing upfront transparency, upfront screening, pre-approval, participatory mechanisms at a high strategy level, and early local involvement.
- Others seek to streamline the execution and implementation phase by introducing one-stop shops and more coordination, reducing some red tape, introducing time-bound performance indicators and entitlements, digitizing processes, and all throughout adding more capacity either in-house or temporarily insourced.
- Yet others are geared towards establishing a credible deterrence and ex-post sanctioning mechanism, with receipt and record-keeping requirements or a robust audit infrastructure involving professional audit institutions as well as investigative journalists and civil society watchdogs.

Exhibit 2: ETI – general approach



E Some contours for action options

The referenced insights and ideas already spawn several possible action options that merit further exploration. Here are some examples.

A rare cross-partisan window for action

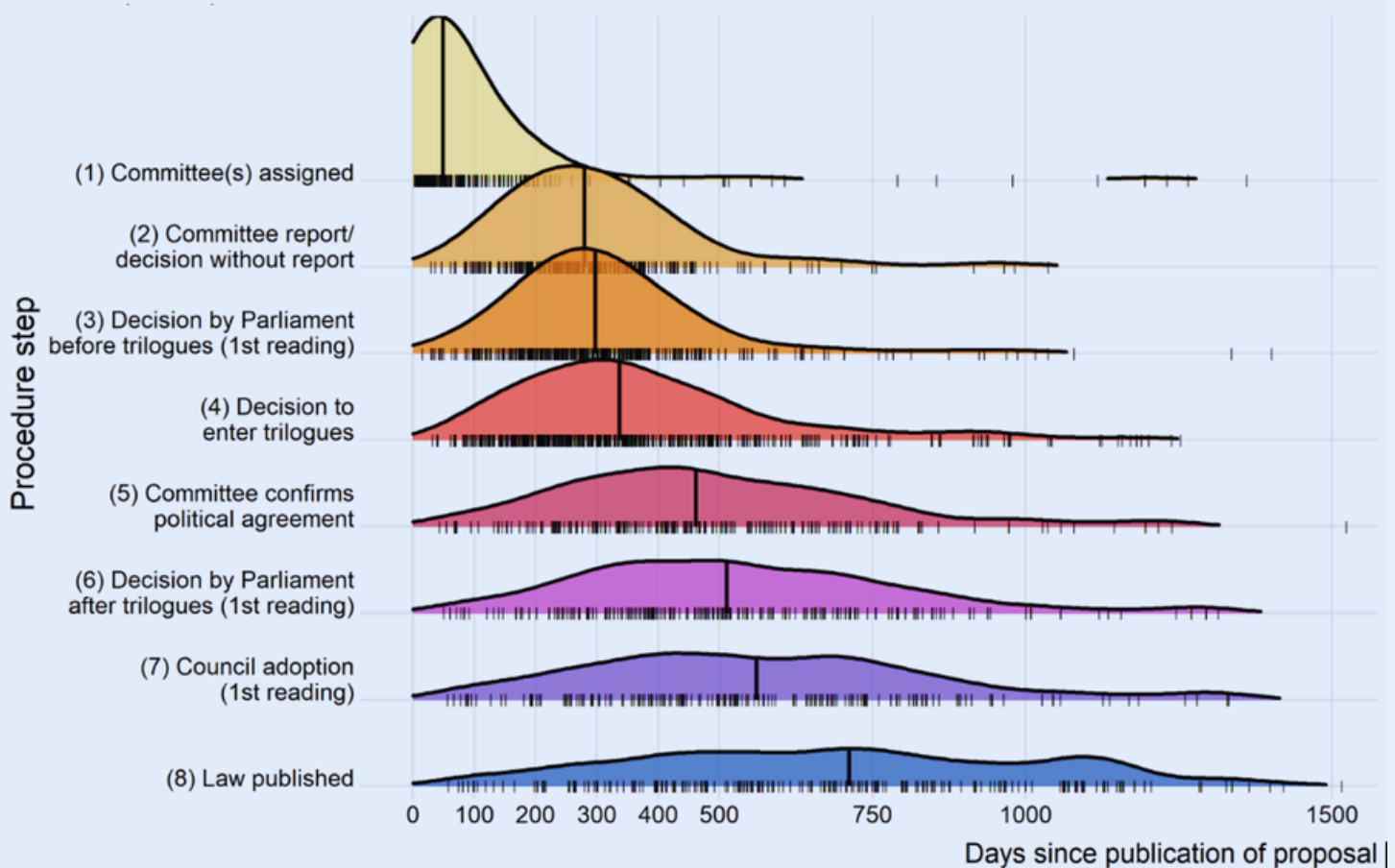
For a start, it might be helpful to note that ETI gives rise to an action and reform agenda that appears to have wide ideological appeal. It appeals to climate activists and a new crop of supply-side progressives who subscribe to an agenda of making the government more capable of taking determined action and the economy more capable of producing social goods from housing to healthcare to transition infrastructures. Yet at the same time, it also can muster considerable support at the other end of the political spectrum, from libertarian skeptics and small government advocates who seek to bootstrap or curb the administrative state in the name of more economic liberty. To be sure, these interests are only partly overlapping, but ETI covers sufficient common ground to foment cross-party legislative proposals even in highly polarized environments such as the US. Integrity advocates should take note and embrace this conversation as a promising lever for assembling broader coalitions for long-standing reform items.

More thinking about time, timing, duration, and acceleration, in strategy, program design and MEL

Donors, practitioners, and advocates might consider mainstreaming a regard for time, duration, and speed into all their activities, from upstream strategy creation to program and project design and very importantly down to monitoring, evaluation, and learning (MEL) and scholarly research on integrity and accountability mechanisms both in the energy transition context and more broadly. The summary of the state of the art concerning recognizing time and duration in the area of mini-publics and deliberation clearly shows that much more attention to the dimension of time and timing is warranted – and urgent. Such explorations may also include finding compelling ways to visualize time-related information about processes and mechanisms. Here is an illustrative example from a data project that visualizes the duration of the EU policy-making processes, clearly showing the observed duration of individual steps, their relative importance in overall process duration, and their empirical dispersion for a large number of policies working their way through the system.



Exhibit 3: Duration of EU policy-making process



Source: <https://fabianbohlenberger.com/2024/09/02/the-rhythm-of-eu-law-making-trilogues-part-3/>

Once relevant data has been gathered, similar visualization efforts for integrity mechanisms and energy transition projects could help identify and communicate priorities and opportunities for improvements.

Mapping it out – assessing the integrity implications of acceleration measures

One approach for launching a bridging conversation to better connect transition and integrity practitioners could be a joint mapping exercise that collects specific measures for permitting reform and examines them to determine their implications for integrity and accountability.

Here is a simple example of what this could look like:



Exhibit 4 An indicative snippet of an integrity risk and opportunity map for acceleration measures

ACCELERATION MEASURE	EXAMPLES (PROPOSED AND/OR IMPLEMENTED)	INTEGRITY OPPORTUNITIES	INTEGRITY RISKS
Pooled pre-approval of planned and future projects in a specific zone	US: Programmatic approval EU: acceleration zones UK: strategic approach in offshore wind[7]	CSOs can pool representation and inputs Early-stage engagement	Loss of context-specific concerns and on-ground stakeholder inputs Higher participation threshold due to centralized hearings
Default prioritizing of green projects	DE: overwhelming public interest		Legitimate interest override, greenwashing
Resources: administrative capacity scale-up	Identified as major bottleneck across administrations	Remove corruption-prone administrative bottlenecks. Robust integrity training for new gen of officials	Rushed hiring, onboarding and administrative expansion might impair conflict of interest screening /management and operational oversight
More public process transparency	US: permitting dashboard	Improved monitoring and performance accountability	Data deluge and symbolic transparency
One-stop shop or integrated agency permitting	DE: offshore wind[8]	Less hold-up and chokepoints	Less accountability checkpoints
Pre-clearance of private vendors for rapid procurement			Collusion lock-in, if done badly

[7] (Webster and Carpen 2023)

[8] (Webster and Carpen 2023)



Low hanging fruit: a speed-scan of the integrity toolbox

Integrity tool developers and champions from social accountability to citizen juries to open contracting might find it useful to undertake a speed audit of their tools and approaches: They could direct their MEL frameworks to include questions such as how long things take to be effective or what a minimum viable duration would be contingent upon; they could subject their existing toolboxes to a speed check, assessing which elements could be bootstrapped, reengineered, re-sequenced or even dropped to square speed and efficacy; and /or they could review their guidance for the recommended implementation trajectory for potential acceleration points and avoidable time sinks.

A proximate example comes from the CoST, which put its maximalist approach of how to roll out transparency and collective action for infrastructure projects through a check to see what could be done as a pragmatic bare minimum when available time and available resources are less than ideal. The result is an interesting guidance note on how to do CoST on a shoestring time budget, that can serve as a template for other integrity tool providers that want to avoid that perfect becomes the worst enemy of good. (CoST 2021)

Opportunity for a new tripartite public-private acceleration compact?

Some of the transparency measures marked out as helpful – open contracts, open ownership, etc. – often meet with resistance from the private sector due to concerns about commercial confidentiality, privacy, or cost. But if the public sector actors can, in return for more disclosure, offer fewer bottlenecks in processing permits and more streamlined, risk-based compliance measures, the calculus may change and the contours of a deal emerge: A public-private compact that generates more transparency and less administrative burden. Similarly, permitting reforms are eyed with suspicion by civil society groups who are afraid that they might offer entry points for special interest pleading and a downgrade of environmental objectives. A concurrent commitment to more expansive transparency, better data, and tighter ex-post accountability might allay some of these fears and make civil society support more likely. The promise of linking such commitments warrants further exploration.



Promising research directions

This scan clearly highlights that there are major evidence gaps and promising pathways for expedited research, including:

- **Piercing generalizations, pluralizing actionable research:** Quite often the speed vs. integrity discussion takes place at a very high level of generalization centered around notions such as “the energy transition” or “renewables.” Producing actionable insights, however, requires digging deeper, unpacking these umbrella terms, and examining the distinctive speed, integrity, and political economy profiles of different types of renewables and other important pieces of the transition puzzle. Solar, wind, or hydropower come with vastly different decentralization potentials, cost-benefit sharing options, capital costs, and business models. They have very different land-use requirements and environmental impact footprints and therefore interact with speed and integrity dynamics quite often in very different ways. In the US, for example, litigation risks in solar are almost twice as high as for wind energy projects (Bennon and Wilson 2023). And even more significant differences arise when looking at other major elements of the energy transition, such as critical mineral extraction on the input side or electricity grid build-out and transformation on the other, both of which are equally essential pieces of the puzzle and warrant their own specific treatment in research and policy on ETI.
- **What is China doing?** No other country is so rapidly developing all parts of the energy transition value chain. At first sight, this could be explained by a strictly authoritarian and statist approach that simply overrides any opposition and concerns and just wills whole new industries into a growth spurt. However, the actual picture is plausibly more nuanced as the central government is continuously struggling to rein in provincial and local level economies, faces huge political economy challenges around entrenched coal and heavy industry incumbencies, and does need to demonstrate responsiveness to environmental concern and community harms when they occur on a critical mass scale. In other words, China is confronted with not completely dissimilar challenges and potential blockages when putting its energy transition on steroids and it would be worthwhile exploring whether any additional learnings and insights – good or bad – can be gleaned from this experiment, even though this may sound like a controversial project at the surface. A quick scan of the related literature surfaces a number of such



practices to be explored, including the creation of targeted competition among large companies (Evans 2022), techniques of “directed improvisation” to enable adaptive development of transition solutions (Ang 2016, 2024), and mixing informal and formal practices for experimentation and scaling up power grids (Korsnes 2020).

- **How are all these pilots in permitting reforms working?** What early experience can be collected from the vantage point of integrity and accountability? Pilot projects for anything from “positive silence clauses” (permit by default for small-scale projects), maximum duration entitlements for specific administrative processes, or dedicated development zones with streamlined permitting are all underway across the world. It should therefore already be possible – and high time – to gain a more empirical take: How effective in practice are these and many other reform mechanisms in this sprawling experimentation landscape? What are the observed implications for integrity? These are important questions to ask before such mechanisms are rolled out on a mass scale. The idea-to-evidence ratio is still very low.
- **What do we know about the efficacy of ex-post sanctions and accountability mechanisms?** One important strand of recommendations for ETI points towards a reliance on ex-post integrity mechanisms such as audits and investigations. It is therefore worthwhile exploring in more detail the available evidence on how to design such mechanisms for maximum effectiveness, how to adapt them to specific contexts, and how to maximize their ex-ante deterrence power through strategic communication and other means. It was beyond the scope of this quick scan to examine this in more depth, but there is an existing evidence base that can be probed for this purpose, which could make this low-hanging fruit for next steps on the research side.
- **Could anti-SLAPP measures play a role?** Given the aforementioned risk that integrity measures are being hijacked by special interests to slow down or even stymie the energy transition, is there potential for developing something akin to protections against SLAPPs (strategic lawsuits against public participation) that are also brought in bad faith for frivolous purposes to silence criticism and legitimate claims? Can anti-SLAPP legislation provide some ideas or even templates for stopping the frivolous use of plebiscitary or other integrity mechanisms in the energy transition?



Outlook: environmental justice - a tried and (con)tested work horse for innovation in accountability

The blitz-scaling challenge is unprecedented, but past experience comes with a kernel of optimism. The journey of environmental justice, the need to devise and adapt environmental governance in heavily contested contexts, has a long and proud track record of achievements and attests to the adaptability of related governance frameworks.

Environmental justice is the policy domain that has given rise to and actively driven the evolution of key integrity and accountability mechanisms and the public norms that accompany them. From freedom of information regimes to public consultation mechanisms, from externality impact assessments to third-party litigation rights, it was often environmental movements that have pushed the boundaries and driven the institutionalization and encoding of new rights and new accountability and participation mechanisms. Confronting powerful vested interests and entrenched, counterproductive habits and norms along the way has been part and parcel of that struggle all along. This demonstrated agility and deep experience in managing conflicts and charting a progressive way forward against all odds does not diminish the scale of the challenge ahead. But it does offer hope that integrity and accountability measures can be adapted and fast-tracked to meet the civilizational challenge of a rapidly accelerating energy transition.

It is high time to have this conversation, and there are already many insights, ideas, and action options that can help us get started



References

- Ang, Yuen Yuen. 2016. *How China Escaped the Poverty Trap*. Ithaca (N.Y.) London: Cornell university press.
- Ang, Yuen Yuen. 2024. 'Ambiguity and Clarity in China's Adaptive Policy Communication'. *The China Quarterly* 257: 20–37. doi:10.1017/S0305741023000826.
- Bagley, Nicholas. 2019. 'The Procedure Fetish'. *Michigan Law Review* 118(3): 345–401.
- Bayer, Benjamin. 2018. 'Experience with Auctions for Wind Power in Brazil'. *Renewable and Sustainable Energy Reviews* 81: 2644–58. doi:10.1016/j.rser.2017.06.070.
- Bennon, Michael, and Devon Wilson. 2023. 'NEPA Litigation Over Large Energy and Transport Infrastructure Projects'.
• <https://papers.ssrn.com/abstract=4498938> (January 12, 2024).
- Bipartisan Policy Center. 2021. *Smarter, Cleaner, Faster*. https://bipartisanpolicy.org/download/?file=/wp-content/uploads/2021/05/BPC_SmarterCleanerFasterRecPage.pdf (January 12, 2024).
- Blagoev, Blagoy, Tor Hernes, Sven Kunisch, and Majken Schultz. 2024. 'Time as a Research Lens: A Conceptual Review and Research Agenda'. *Journal of Management* 50(6): 2152–96. doi:10.1177/01492063231215032.
- BMWSB. 2023. 'Tempo bei Planung und Genehmigung'. *Bundesministerium für Wohnen, Stadtentwicklung und Bauwesen*.
<https://www.bmwsb.bund.de/SharedDocs/kurzmeldungen/Webs/BMWSB/DE/2023/03/newspaper-planungsbeschleunigung.html?nn=17138838> (January 29, 2024).
- Bolet, Diane, Fergus Green, and Mikel González-Eguino. 2023. 'How to Get Coal Country to Vote for Climate Policy: The Effect of a "Just Transition Agreement" on Spanish Election Results'. *American Political Science Review*: 1–16. doi:10.1017/S0003055423001235.
- Brownstein. 2023. 'Much Ado About NEPA'. Brownstein Client Alert.
<https://www.bhfs.com/insights/alerts-articles/2023/much-ado-about-nepa> (January 12, 2024).
- Buchholz, Nele, Ute Zetek, Eike Bierman, and Hans-Ludger Dienel. 2023. Effekte von Beteiligungsformaten Auf Die Beschleunigung Oder Verlangsamung von Infrastrukturprojekten Zur Energiewende. Studie Im Auftrag Der Wissenschaftsplattform Klimaschutz.
https://www.wissenschaftsplattform-klimaschutz.de/files/WPKS_Studie_Beschleunigung-durch-Beteiligung_Mai-2023.pdf (January 10, 2024).
- Burgess, Matthew G., Leaf Van Boven, Gernot Wagner, Gabrielle Wong-Parodi, Kyri Baker, Maxwell Boykoff, Benjamin A. Converse, et al. 2024. 'Supply, Demand and Polarization Challenges Facing US Climate Policies'. *Nature Climate Change* 14(2): 134–42. doi:10.1038/s41558-023-01906-y.
- Calvin, Katherine, Dipak Dasgupta, Gerhard Krinner, Aditi Mukherji, Peter W. Thorne, Christopher Trisos, José Romero, et al. 2023. IPCC, 2023: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change. First. Intergovernmental Panel on Climate Change (IPCC). doi:10.59327/IPCC/AR6-9789291691647.
- Chen, Hui, and Eugene Soltes. 2018. 'Why Compliance Programs Fail—and How to Fix Them'. *Harvard Business Review* 96(2): 116–25.
- Clist, Paul. 2019. 'Payment by Results in International Development: Evidence from the First Decade'. *Development Policy Review* 37(6): 719–34. doi:10.1111/dpr.12405.



- COP28-UAE. 2023. 'COP28: Global Renewables And Energy Efficiency Pledge'. <https://www.cop28.com/en/global-renewables-and-energy-efficiency-pledge> (January 18, 2024).
- CoST. 2021. *Guidance Note: Improving Infrastructure Transparency, Participation and Accountability during a Crisis*. <https://infrastructuretransparency.org/wp-content/uploads/2020/12/Crisis-Guidance-Final.pdf> (January 8, 2024).
- Council on Environmental Quality. 2020. Environmental Impact Statement Timelines (2010 - 2018).
- Curato, Nicole, John S. Dryzek, Selen A. Ercan, Carolyn M. Hendriks, and Simon Niemeyer. 2017. 'Twelve Key Findings in Deliberative Democracy Research'. *Daedalus* 146(3): 28–38.
- Curato, Nicole, David Farrell, Brigitte Geissel, Kimmo Grönlund, Patricia Mockler, Jean-Benoit Pilet, Alan Renwick, et al. 2021. *Deliberative Mini-Publics: Core Design Features*. 1st ed. Bristol University Press. doi:10.46692/9781529214123.
- De Pieri, Benedetta, Veronica Chiodo, and Francesco Gerli. 2023. 'Based on Outcomes? Challenges and (Missed) Opportunities of Measuring Social Outcomes in Outcome-Based Contracting'. *International Public Management Journal* 26(3): 437–62. doi:10.1080/10967494.2022.2077490.
- Dixson-Declève, Sandrine. 2023. 'It Takes Longer to Permit a Wind Farm than to Build It'. www.euractiv.com. <https://www.euractiv.com/section/energy-environment/opinion/it-takes-longer-to-permit-a-wind-farm-than-to-build-it/> (September 6, 2023).
- van der Does, Ramon, and Vincent Jacquet. 2023. 'Small-Scale Deliberation and Mass Democracy: A Systematic Review of the Spillover Effects of Deliberative Minipublics'. *Political Studies* 71(1): 218–37. doi:10.1177/00323217211007278.
- Enninga, Justus. 2023. 'Environmentalism, a Flirt with Eco-Authoritarianism and the Robustness of Ordoliberalism'. *Constitutional Political Economy*. doi:10.1007/s10602-023-09406-z.
- European Union. 2023. (European Union) Directive (EU) 2023/2413 of the European Parliament and of the Council. <http://data.europa.eu/eli/dir/2023/2413/oj>.
- Evans, James. 2022. 'How China Is Winning the Race for Clean Energy Technology'. *Fairbank Center for Chinese Studies*. <https://fairbank.fas.harvard.edu/research/blog/how-china-is-winning-the-race-for-clean-energy-technology/> (January 29, 2024).
- Fahlenbrach, Rüdiger, Alexei V. Ovtchinnikov, and Philip Valta. 2023. 'Corporate Contributions to Ballot Measure Campaigns: Real Effects and Valuation'. Swiss Finance Institute Research Paper No. 21-23. doi:10.2139/ssrn.3801024.
- Ferris, Nick. 2022. 'Data Insight: The Permitting Problem for EU Wind Farms'. *Energy Monitor*. <https://www.energymonitor.ai/policy/data-insight-the-permitting-problem-for-eu-wind-farms/> (September 6, 2023).
- Figueroa, Maria, Cristián Flores, and Nicolás Silva. 2024. 'Meaningful Stakeholder Engagement and Energy Justice for Indigenous Communities in Energy Transition Implementation in Chile'. In *The Routledge International Handbook on Meaningful Stakeholder Engagement*, ed. Karin Buhmann.



- Frydlinger, David, Oliver Hart, and Kate Vitasek. 2019. 'A New Approach to Contracts'. *Harvard Business Review* 97(5): 116–25.
- Gazmararian, Alexander F., and Dustin Tingley. 2023. *Uncertain Futures: How to Unlock the Climate Impasse*. 1st ed. Cambridge University Press. doi:10.1017/9781009405331.
- Gibson, Michael. 'Outcomes-Based Contracting'. *The Government Outcomes Lab, University of Oxford*. <https://golab.bsg.ox.ac.uk/the-basics/outcomes-based-contracting/> (November 8, 2024).
- Guthridge, Greg. 2023. *Why Wavering Consumer Confidence Could Stall the Energy Transition*. EY. https://www.ey.com/en_bh/power-utilities/why-wavering-consumer-confidence-could-stall-the-energy-transition (September 6, 2023).
- Harris, Allie, and Jessica Blackband. 2024. 'How to Build Effective Digital Permitting Products in Government'. *Federation of American Scientists*. <https://fas.org/publication/how-to-build-effective-digital-permitting-products-in-government/> (November 7, 2024).
- Howlett, Michael, and Klaus H. Goetz. 2014. 'Introduction: Time, Temporality and Timescapes in Administration and Policy'. *International Review of Administrative Sciences* 80(3): 477–92. doi:10.1177/0020852314543210.
- Hubbard, Douglas W. 2020. *The Failure of Risk Management: Why It's Broken and How to Fix It*. 1st ed. Wiley. doi:10.1002/9781119521914.
- IEA. 2023a. *Critical Minerals Market Review 2023*. OECD. doi:10.1787/9cdf8f39-en.
- IEA. 2023b. *Electricity Grids and Secure Energy Transitions: Enhancing the Foundations of Resilient, Sustainable and Affordable Power Systems*. OECD. doi:10.1787/455dd4fb-en.
- IEA. 2023c. *Renewable Energy Market Update. Outlook for 2023 and 2024*.
- IMF. 2023. 'Mitigating Corruption Risks in Emergency Spending: Lessons Learned from the IMF's Experience During the Covid-19 Pandemic'. *Policy Papers* 2023(015). doi: 10.5089/9798400238017.007. A009.
- IRENA. 2023. 'World Energy Transitions Outlook 2023'. <https://www.irena.org/Publications/2023/Jun/World-Energy-Transitions-Outlook-2023> (September 12, 2023).
- Klein, Ezra. 'The I.R.A. Passed a Year Ago. Here's a Progress Check - Interview Ith Robinson Meyer.' <https://www.nytimes.com/2023/07/07/opinion/ezra-klein-podcast-robinson-meyer.html> (January 12, 2024).
- Korsnes, Marius. 2020. *Wind and Solar Energy Transition in China*. London: Routledge.
- Kosec, Katrina, and Leonard Wantchekon. 2020. 'Can Information Improve Rural Governance and Service Delivery?' *World Development* 125: 104376. doi:10.1016/j.worlddev.2018.07.017.
- Marcelo, Teri. 2022. 'Corruption in Emergency Procurement: Lessons Learned in the Philippines'. <https://globalanticorruptionblog.com/2022/06/24/corruption-in-emergency-procurement-lessons-learned-in-the-philippines/> (January 12, 2024).
- McDevitt, Andy, and Dieter Zinnbauer. 2021. *Making Citizen-Centred Accountability Last: Time, Money, Partners, Motivation; Integrity Action*.
- Muralidharan, Karthik, Paul Niehaus, Sandip Sukhtankar, and Jeffrey Weaver. 2021. 'Improving Last-Mile Service Delivery Using Phone-Based Monitoring'. *American Economic Journal: Applied Economics* 13(2): 52–82.



- Niemeyer, Simon, Francesco Veri, John S. Dryzek, and André Bächtiger. 2023. 'How Deliberation Happens: Enabling Deliberative Reason'. *American Political Science Review*: 1–18. doi:10.1017/S0003055423000023.
- OECD. 2020. *Public Integrity for an Effective COVID-19 Response and Recovery in the MENA Region*. <https://www.oecd.org/mena/governance/OECD-Policy-Brief-Public-Integrity-COVID19-2020.pdf> (January 12, 2024).
- OECD. 2023. 'OECD Deliberative Democracy Database (2023)'.
- Paulis, Emilien, Jean-Benoit Pilet, Sophie Panel, Davide Vittori, and Caroline Close. 2021. 'The POLITICIZE Dataset: An Inventory of Deliberative Mini-Publics (DMPs) in Europe'. *European Political Science* 20(3): 521–42. doi:10.1057/s41304-020-00284-9.
- Planning for Climate Commission. 2023. 'Tackling Climate Change through Fast and Fair Permitting for Renewable Energy and Hydrogen'.
- Pozen, David E. 2018. 'Transparency's Ideological Drift'. *The Yale Law Journal* 128(1): 100–165.
- Ramirez, Jacobo. 2021. 'Contentious Dynamics Within the Social Turbulence of Environmental (In)Justice Surrounding Wind Energy Farms in Oaxaca, Mexico'. *Journal of Business Ethics* 169(3): 387–404. doi:10.1007/s10551-019-04297-3.
- Ruhf, J. B., and James Salzman. 2020. 'What Happens When the Green New Deal Meets the Old Green Laws?' *Vermont Law Review* 44(4): 693–721.
- Rutzick, Mark C. 2018. *A Long and Winding Road: How the National Environmental Policy Act Has Become the Most Expensive and Least Effective Environmental Law in the History of the United States, and How to Fix It*. Federalist Society,.
- Schultz, Jessica, and Tina Søreide. 2008. 'Corruption in Emergency Procurement'. *Disasters* 32(4): 516–36. doi:10.1111/j.1467-7717.2008.01053.x.
- Soltes, Eugene. 2022. 'Measuring Compliance Risk and the Emergence of Analytics'. In *Measuring Compliance*, eds. Melissa Rorie and Benjamin Van Rooij. Cambridge University Press, 137–52. doi:10.1017/9781108770941.008.
- Sovacool, Benjamin K. 2021. 'Clean, Low-Carbon but Corrupt? Examining Corruption Risks and Solutions for the Renewable Energy Sector in Mexico, Malaysia, Kenya and South Africa'. *Energy Strategy Reviews* 38: 100723. doi:10.1016/j.esr.2021.100723.
- Street, Jackie, Katherine Duszynski, Stephanie Krawczyk, and Annette Braunack-Mayer. 2014. 'The Use of Citizens' Juries in Health Policy Decision-Making: A Systematic Review'. *Social Science & Medicine* 109: 1–9. doi:10.1016/j.socscimed.2014.03.005.
- Sud, Rajan, and Sanjay Patniak. 2022. 'How Does Permitting for Clean Energy Infrastructure Work?' Brookings. <https://www.brookings.edu/articles/how-does-permitting-for-clean-energy-infrastructure-work/> (January 12, 2024).
- Tani, Shotaro, and Rachel Millard. 2024. 'Negative European Energy Prices Hit Record Level'. *Financial Times*. <https://www.ft.com/content/1f94d0b4-c839-40a2-9c8d-782c00384154> (November 6, 2024).
- TI UK. 2023. *Navigating Corruption and Promoting Transparency: Lessons from the COVID-19 Pandemic for Future Health Emergencies*. https://ti-health.org/wp-content/uploads/2023/06/Lessons_from_Covid-19_Pandemic_Paper_v6_Digital.pdf (January 12, 2024).



- Transparency International, ed. 2011. *Global Corruption Report: Climate Change*. London: Earthscan.
- UNODC. 2022. 'Crises and Corruption: Emergency Responses during COVID-19. Experiences and Lessons Learned'.
- Voigts, Simon, and Anne-Charlotte Paret. 2024. *Emissions Reduction, Fiscal Costs, and Macro Effects: A Model-Based Assessment of IRA Climate Measures and Complementary Policies*. Washington, D.C: International Monetary Fund. doi:10.5089/9798400268786.001.
- Walker, Edward T. 2014. *Grassroots for Hire: Public Affairs Consultants in American Democracy*. Cambridge University Press. <https://books.google.com/books?hl=en&lr=&id=9J1cAwAAQBAJ&oi=fnd&pg=PR9&dq=walker+grass+roots&ots=Y5aLzvCTF0&sig=r4fa0HvVf5AnDg5jx8l2o-y7Eng> (January 23, 2024).
- Webster, Joseph, and Elina Carpen. 2023. 'US Offshore Wind's Growing Pains: Permitting and Cost Inflation'. *Atlantic Council*. <https://www.atlanticcouncil.org/blogs/energysource/us-offshore-winds-growing-pains-permitting-and-cost-inflation/> (January 12, 2024).
- World Wind Energy Association. 2021. *Measuring Performance of Permitting Processes: The Wind Power Planning and Permitting Index*. <https://wwindea.org/download/wind-power-planning-and-permitting-index/?wpdmdl=34448&refresh=64f1e92f8e68b1693575471> (September 1, 2023).
- Yackee, Jason Webb, and Susan Webb Yackee. 2006. 'A Bias Towards Business? Assessing Interest Group Influence on the U.S. Bureaucracy'. *The Journal of Politics* 68(1): 128–39. doi:10.1111/j.1468-2508.2006.00375.x.
- Zinnbauer, Dieter, and Stephanie Trapnell. 2023. *Race to Renewables. Tackling Corruption and Integrity Risks in the Renewable Energy Sector*. Extractive Industries Transparency Initiative



Dr. Dieter Zinnbauer has more than 25 years of research, policy and innovation experience in the area of integrity and governance with leading universities (LSE, Harvard, Oxford), think tanks (Carnegie, U4, IDEA), IGOs (UN, UNDP, EC) and NGOs (TI, OGP). Most recently he has examined the corruption risks in the renewables sector (EITI) and as fellow at Copenhagen Business School he explores the political responsibilities of business. Dieter holds a PhD from LSE in international development and an MSc in Economics from University of Regensburg.



The Trust, Accountability, and Inclusion Collaborative - Funders for Participatory Governance (TAI) is a platform for donor learning and action. Our members seek to strengthen trust, accountability and inclusion in societies around the globe (and in their own funding practices) as building blocks for a more just world where democracy, economy and planet thrive.

