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Diessner, S.; Petit, C.A.

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Actions Speak Louder Than Words: Assessing the Democratic Accountability of Europe's New Industrial Policy

Sebastian Diessner[1,2] | Christy A. Petit[3]

[1]Institute of Public Administration, Leiden University, The Hague, the Netherlands | [2]European Institute, London School of Economics and Political Science, London, UK | [3]School of Law and Government, Dublin City University, Dublin, Ireland

Correspondence: Sebastian Diessner (s.diessner@fgga.leidenuniv.nl)

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ABSTRACT

This article asks "who controls the controllers" now that the European Commission—long responsible for controlling the conduct of industrial policy in the EU's internal market—increasingly pursues its own industrial policy objectives. We draw on delegation theory to establish why the Commission should be held accountable for its industrial policy-making and, based on a distinction between procedural and substantive accountability, develop a simple typology of accountability outcomes that helps us distinguish between full accountability, partial accountability, and unaccountability in the realm of industrial policy. To assess empirically whether and how the Commission has been held accountable in its pursuit of industrial policy, we leverage a new dataset that tracks Commission follow-ups—both in writing and in terms of policy actions—to 432 points raised in own-initiative reports by the European Parliament's Committee on Industry, Research and Energy between 2019 and 2024. Our analysis suggests that the Commission has been far more responsive in "words" than in "actions", which carries implications for our understanding of executive-legislative relations and democratic accountability not only in industrial policy but also in other EU policy domains.

1 | Introduction

Industrial policy-making involves political choices and trade-offs at the executive level, given its stated intention to alter economic behavior and to enhance the fortunes of some firms and sectors over others (Bulfone 2023). While seemingly technical on the surface, these choices can have far-reaching distributive implications (Brandão-Marques and Toprak 2024; Common Market Law Review 2023). In representative democracies with checks on executive policy-making, industrial policy-makers thus need to be held democratically accountable by majoritarian institutions (Curtin 2009; Fromage and Herranz-Surrallés 2021). In the European context, the quasi-federal executive authority of the European Union (EU) is diffused in a compound and "accumulated executive order" (Curtin and Egeberg 2008; Fabbrini 2016), marked by a pluralization of the executive through "agencification" (Everson et al. 2014). Within this order, the European Commission has emerged over time as a distinctive executive center at the supranational level (Curtin and Egeberg 2008) alongside other executive institutions (including the Council of the EU, the European Council, and "quasi-executive" agencies; see Olsen 2018). In its executive capacity, the Commission has long monitored and restricted the conduct of industrial policy by national governments in the EU's internal market (Blauberger 2009). But who controls the controllers—*quis custodiet ipsos custodes*—when the Commission formulates and pursues its own industrial policy objectives?

This article sets out to assess whether, and to what extent, the EU's new industrial policy is held democratically accountable through legislative oversight by the European Parliament. To do so, we put forward two interrelated arguments, drawing on the literature on delegation theory as well as scholarship on accountability in multi-level governance systems like Europe's Economic and Monetary Union (Bressanelli et al. 2023; Crum 2018; Hodson et al. 2024; Tesche 2023). First, we submit that parliamentary oversight over the executive should be expected to be most stringent in policy areas that are marked by three key characteristics: (1) the complexity of the policy area, (2) the potential for inter-institutional conflict, and (3) strong requirements for democratic legitimation (Blom-Hansen 2013; Bundi 2018). We consider each of these to be fulfilled in the area of industrial policy in Europe. Second, we leverage the distinction between procedural and substantive modes of accountability (Dawson et al. 2019; Dawson and Maricut-Akbik 2020; Dionigi and Koop 2019) in order to develop a parsimonious typology that we argue can help us distinguish between full accountability, partial accountability, and unaccountability outcomes in a given policy area. We thus conceptualize accountability as a social mechanism (Bovens 2007; 2010) that calls for a close examination of inter-institutional relationships and, in our case, of the extent to which the Commission is overseen by and responsive to the European Parliament in the area of industrial policy.

Our empirical investigation is facilitated by the publication of a new dataset for the full ninth parliamentary term (2019–2024) that has only recently been made available by the European Parliamentary Research Service (EPRS).[1] In a nutshell, the EPRS compiles studies that monitor the European Commission's follow-ups to resolutions adopted by the European Parliament, including those based on the own-initiative reports (INI reports) and legislative own-initiative reports (INL reports) of the Parliament's competent committees. Through these reports, the Parliament can, on its own initiative and subject to the authorization of its conference of presidents, request the Commission to provide explanations, take action in a certain issue area, or initiate legislation. By tracking the Commission's (non-) responses to all INI and INL reports between 2019 and 2024, the EPRS data enable policy-makers, researchers and other observers to assess "how and to what extent the Commission has reacted to Parliament resolutions and initiatives in its follow-up documents and whether it has fulfilled its commitments or promises" (EPRS 2022, I; 2024, III).

Specifically, we investigate all INI reports of the European Parliament's Committee on Industry, Research and Energy (ITRE) that resulted in resolutions throughout the ninth legislative term, amounting to 432 parliamentary requests that "directly and explicitly" required the Commission to take a certain action (EPRS 2024, III) within the realm of industrial policy.[2] Thanks to the EPRS data we can match each of these requests with a dedicated written response—or lack thereof—and with a new and completed action—or lack thereof—by the Commission. This approach allows us to distinguish "words" (written follow-ups) from "actions" and, by implication, to explore the drivers of what we might call mismatches or discrepancies between the two—that is, of instances where the executive (in this case, the Commission) promises to undertake a certain course of action in the area of industrial policy but fails to follow through with said action in the eyes of the legislature (in this case, the staff of the European Parliament), thereby resulting in what we conceptualize as partial accountability.

Our analysis has implications not only for the salient field of industrial policy but also for other economic policy areas in which (quasi-)federal executive actors are overseen by the legislature. For one, our finding of a sizable gap between procedural and substantive accountability speaks to a common tension in EU economic governance. As industrial policy is evolving from a nationally-constrained to a supranationally-steered policy area, legislative oversight arguably needs to follow suit. Unlike in national contexts, however, where industrial policies can in principle be vetted by parliamentary committees (within the boundaries of the internal market), the EU's compound polity has tended to place policy-making capacity in the hands of executive actors and intergovernmental negotiators that can be further removed from public scrutiny. Thus, the extent to which the return of market interventionism in Europe risks coming at the expense of democratic oversight is a key question that our study seeks to shed new light on.

The remainder of the article is organized as follows. Section 2 engages the literature on delegation and democratic accountability and identifies three conditions under which stringent accountability mechanisms should be put in place by the legislature. We then argue that these conditions are fulfilled in the realm of industrial policy-making in the EU and develop an own typology of accountability outcomes. Section 3 discusses the research design and data. Section 4 presents our analysis of whether and how the challenge of parliamentary oversight over industrial policy is met in the EU. Section 5 concludes by discussing the implications of our findings and linking them back to the themes of the special issue.

2 | Conceptualizing Democratic Accountability: When and How Should the Executive Be Held Accountable by the Legislature?

This section briefly reviews extant scholarship on delegation to the executive and its implications for legislative oversight, with a view to formulating expectations for the accountability—or lack thereof—of industrial policy-making. While the rich literature on delegation to independent agencies and bureaucracies—grounded in the rationalist tradition of political science and political economy scholarship—has predominantly focused on the initial act of delegation (and, more recently, on the prospect of *de*-delegation; Thatcher et al. 2023), the literature has also sought to indicate—explicitly or implicitly—when and in which kinds of policy areas we should expect the need for legislative control over the executive to be perceived as particularly acute *post*-delegation. By and large, these theoretical and normative expectations revolve around three main factors: (1) the issue complexity of the policy in question; (2) the propensity for conflicts between the legislature and the executive over the policy in question (as well as within one or both branches of government); and (3) the need for stronger democratic legitimation. Each factor is briefly derived and explained in the following, including a transposition to the specific context of the EU and to the realm of industrial policy.

First, regarding the complexity of a given policy, the legislature is typically expected to delegate more authority to—and, by implication, require more stringent means of legislative control over—the executive in *complex issue areas*. On the one hand, higher complexity requires more specialized expertise, which represents one of the key functionalist motivations for delegating competencies to executive agents in the first place (Haas 1964; Majone 1993). On the other hand, however, the greater the authority and discretion of the executive, the greater the risk of agency loss, that is, the executive agent deviating from the preferences of the legislative principal (Bawn 1995; Abbott et al. 2020; cf. Guidi 2015; Diessner and Genschel 2025). To counter this threat, the legislature is likely to install procedural controls in order to keep the wayward agent in check (McCubbins et al. 1989; Judge and Earnshaw 2002, 358).

In the context of the EU, and with a view to the European Commission, a number of studies across different policy areas have established a link between complexity and the likelihood of oversight procedures being put in place in a given area (Franchino 2000; Pollack 2003; Blom-Hansen 2013). Transposed to the area of industrial policy-making in particular, there should be little doubt that the field is marked by a notoriously complex mix of different programmes and schemes, given that industrial policy can encompass any form of public intervention that supports the economy with the objective of enhanced welfare and economic growth (European Court of Auditors (ECA) 2024, 34–36; Warwick 2013). As provided by the EU Treaties, the EU and its member states must ensure the conditions necessary for the competitiveness of the union's industry, and any EU legislative actions will be of a supporting, coordinating and supplementing nature to member states' actions (Article 173 (1) and (3) TFEU and Article 6 TFEU; see also Dermine & Patrin in this special issue). While apparently constraining the scope of actions, the approach to industrial policy has become much broader. This is due to the interplay of industrial policy with trade, the EU's internal market, and other sectoral applications in areas such as research and innovation, energy, and health (EPRS 2019a; Zachmann and Bergamini 2025). As a result, the EU's industrial policy landscape is scattered and fragmented, with a lack of coordination across member states, funding sources, and policy areas (Common Market Law Review 2023).

Second, and closely related, the delegation literature commonly expects the legislature to try and gain more control over the executive in cases of *conflicting preferences between and/or within the different branches of government*. In principle, such conflicts might arise (a) among principals (i.e., among the legislature), and (b) between principals and agents (i.e., between the legislature and the executive) (Blom-Hansen 2013; Yordanova and Zhelyazkova 2020), and they might emerge both before and after the delegation of authority to the agent. In terms of divergent preferences *among* legislators, the literature generally assumes that overcoming collective action problems and stalemate within the legislature is the *raison d'être* of delegation to unelected agents to begin with (Volden 2002; Strøm 2000). However, while delegating authority to the executive might help the legislature overcome its divisions, this will typically lead to a delegation contract based on a lowest common denominator position among legislators and therefore result in a relatively broad and/or vague mandate for the agent. This invites agency slippage or drift, which, in turn, is likely to lead to more stringent oversight mechanisms being put in place (McCubbins and Schwartz 1984). A broadly similar logic is thought to apply to conflicts *between* the legislature and the executive: the larger the divergence in preferences between the two, the higher the risk of agency loss, and thus the higher the likelihood of tighter control mechanisms that will accompany delegation, at least ex-post (Huber and Shipan 2002; Franchino 2007; cf. Dimitrova and Steunenberg 2000; Yordanova and Zhelyazkova 2020).

In the context of the EU, studies by Franchino (2000) and Blom-Hansen (2013, 430) find that "[g]rowing conflict within the Council and the European Parliament or between the Council, the European Parliament and the Commission leads to stricter comitology procedures". Industrial policy-making in particular is an issue area ripe with potential for conflict in the EU. This is exemplified nowhere more clearly, perhaps, than in the area of state aid control which, according to Blauberger (2009, 723), is controversial "[e]ven within the Commission", given that it entails "many different policies—represented by different DGs (…)—and thus conflicts with Community goals other than just competition" (see also Cini and McGowan 1998; Kassim and Lyons 2013).[3]

Third, for the last factor, it is commonly argued that policy areas in which the *need for democratic legitimation* is perceived to be particularly high—for instance, due to their distributive consequences or their implications for national security—will also attract more and more intense legislative oversight (Scharpf 1999; Bundi 2018, 169). In the EU, the question of whether supranational policies are of a (re-)distributive as opposed to merely of a regulatory nature—and therefore require more stringent democratic legitimation and oversight—is one of the foundational debates in the European studies literature (Majone 1998, 2002; Moravcsik 2002; Follesdal and Hix 2006). The fact that the EU has progressively integrated (re-)distributive "core state powers" over the years—and has thus moved beyond the technocratic confines of the regulatory state—would seem increasingly hard to deny, however (Genschel and Jachtenfuchs 2014). Industrial policy-making in particular can be expected to be riddled with distributive struggles. In its own reports to the Eurogroup, for example, the Commission recognizes major trade-offs inherent in its decision-making, including "active industrial policy versus market incentives; fiscal trade-offs; free trade in a changing geopolitical context; and innovation versus market power" (European Commission 2023). Moreover, recent evidence suggests that "the lion's share of State aid is awarded by large countries which can afford it", whereas EU-level industrial policy funds and measures "can hardly compensate for such disparities" (Common Market Law Review 2023, 623). This has raised questions about the equity of the EU's industrial policy turn, reinforcing the need for political deliberation and legislative oversight (see also Bulfone et al., this special issue).

In sum, the extant literature on delegation to executive and/or supranational agents suggests that we can expect a policy area to feature more stringent forms of legislative oversight if it is marked by complexity, inter-institutional conflicts and the need for democratic legitimation. We have argued that, on these grounds, there should be strong incentives for legislative oversight in the realm of industrial policy, given that all three factors would seem to be fulfilled in this case. In reality, however, legislative oversight over industrial policy-making in the EU has often been found wanting. As McNamara (2023, 15) posits, "the lack of true electoral politics at the EU level means the European Parliament has only had a consultative and de-fanged oversight role necessary for democratic decision-making". We probe into this alleged contrast in the following sections, first by developing a conceptual framework through which to assess the accountability of economic governance in the EU (Section 2.1) and then by operationalizing (Section 3) and applying it to the specific case of industrial policy (Section 4).

2.1 | Democratic Accountability of Economic Governance in the EU: Words Versus Actions

The literature on the democratic accountability of the EU's changing economic governance regime has delved into a growing array of policy areas in recent years. By and large, however, this literature has not yet concerned itself with the recent resurgence of industrial policy as a key pillar of post-crisis economic governance in the EU (Fabbrini and Petit 2024). Instead, a sizable strand of the literature has dedicated its attention to the various "dialogues" (or hearings) that the European Parliament's Committee on Economic and Monetary Affairs (ECON) conducts regularly (albeit with varying frequencies) with different executive authorities. These range from the "Monetary Dialogues" (during which the European Central Bank testifies on monetary policy), to the "Banking Dialogues" (where the same institution is held to account for banking supervision and the Single Resolution Board for bank resolution), to the "Economic Dialogues" (where representatives of the member states, the Commission, European Council, Council of the EU, or the Eurogroup exchange views with MEPs on questions related to the European Semester or other economic governance tools), to the most recently institutionalized "Recovery and Resilience Dialogues" (RRD) held jointly with the European Parliament's Budget Committee (BUDG) (which scrutinize the management of funds disbursed under the post-pandemic NextGenerationEU programme) (Akbik and Diessner 2024; Bressanelli et al. 2023; Crum 2018; Diessner 2022; Dionigi and Koop 2019; Fromage and Markakis 2022; MacIver 2024; Petit 2019; Thinus and Dermine 2024; Zeitlin and Bastos 2020).

A key corollary of this well-established focus on parliamentary hearings is that the practice of accountability ultimately boils down to the quality of exchanges of spoken words, namely, in the form of questions and answers between elected representatives (MEPs) and the leaders of executive authorities (such as the president of the ECB or the Commissioner in charge of a given policy area).[4] This creates difficulties for the assessment of democratic accountability, given that "the contents and consequences of a discussion may be diffuse", especially for outside observers (Collignon and Diessner 2016, 1302). One approach toward addressing these difficulties has been to focus on the *perception* of accountability among elected representatives and their staff, that is, on whether executive authorities are perceived to be accountable in the eyes of those who are tasked with holding them to account (Akbik 2022; Ferrara et al. 2024; Macchiarelli et al. 2020). Another approach has been to assess the quality of questions fielded by MEPs against a yardstick of pre-defined criteria, and to compare this to the quality of responses provided by their executive interlocutors (Akbik 2022; Bressanelli et al. 2023).

These advancements notwithstanding, they continue to leave scholars with (at least) two challenges that are relevant but by no means limited to the realm of overseeing industrial policy-making. First, the emphasis on spoken and/or written words in accountability settings provides little to no room for assessing whether the promises and commitments offered by executive policy-makers are matched by dedicated actions once said policy-makers leave the committee rooms of parliament—or, at the very least, whether their actions (rather than their words alone) are perceived to be pertinent in the eyes of legislators and their support staff. Second, and related, the focus on parliamentary hearings as the main locus of accountability for economic governance in the EU has contributed to narrowing the lens of inquiry to what scholars have called formal or *procedural* accountability, referring to a form of answerability in which executive actors are evaluated on the basis of whether and how they *answer* to parliamentary requests (i.e., on the quality of their deliberation and decision-making procedures) (Crum 2018; Sibert 2010). Conversely, this development is argued to have come at the expense of more *substantive* forms of accountability, in which executive actors are evaluated on the basis of what they *do* in response to parliamentary requests (i.e., on the quality of their decisions and actions) (Dawson et al. 2019; Dawson and Maricut-Akbik 2020).

Against this backdrop, we submit that a relatively straightforward way to operationalize the procedural versus substantive dichotomy is to boil it down to the importance of "words" versus "actions" in democratic accountability. These can be juxtaposed as two structuring dimensions that create a simplified scale ranging from full accountability, via partial accountability, to unaccountability. Full accountability obtains, at least in principle, when (quasi-)executive actors are accountable to the legislature both in words and in actions (i.e., both procedurally and substantively). By the same token, partial accountability is achieved when actors are accountable in terms of words but not in terms of actions (i.e., substantively but not procedurally), or vice versa (i.e., procedurally but not substantively). Lastly, unaccountability can be characterized as a lack of accountability both in words and in actions (i.e., when executive actors are accountable neither procedurally nor substantively). Table 1 below summarizes this stylized scheme in a 2 × 2 format.

To be sure, accountability outcomes in practice are likely to be more complex and nuanced than this simplified conceptualization suggests. In particular, the structuring dimensions of procedural versus substantive accountability and of words versus actions may not be exclusive in and as of themselves, on

TABLE 1 | Words versus actions in democratic accountability.

		Words	
		Yes	**No**
Actions	Yes	Full accountability: Procedural and substantive	Partial accountability: Substantive but not procedural
	No	Partial accountability: Procedural but not substantive	Unaccountability: Neither procedural nor substantive

Source: Authors' elaboration.

the one hand, and may not map neatly onto one another, on the other hand. For instance, one might argue that a well-justified explanation for the absence of an action could qualify as substantive accountability (and, by extension, that words can be functionally equivalent to actions). Moreover, actions may be considered partial in themselves, especially if one takes the temporal dimension of policy-making into account. For example, an action might be ongoing and thus be neither fully completed nor entirely absent, or it might have been completed in the past but this has been overlooked by the legislature in its requests. These important caveats notwithstanding, we posit that our conceptual distinction between words and actions as indicative of procedural versus substantive accountability can provide a useful heuristic for assessing the democratic accountability of executive policy-making, as derived from the extant literature. The following section explains how these stylized concepts can be rendered measurable in order to be applied to the context of industrial policy in the EU.

3 | Research Design and Data

To assess the extent to which industrial policy-making by the European Commission is held democratically accountable both in words and in actions by legislators in the European Parliament, we propose to turn our attention to the relatively understudied role of European Parliament resolutions and, in particular, to the so-called own-initiative reports (or "INI" reports) that pave the way for certain kinds of resolutions. At a general level, EP resolutions aim at conveying political positions which may call for a political and/or legislative initiative from the Commission. While resolutions based on INI reports are non-legislative and thus of a non-binding nature, the Commission has agreed to respond to them in writing within 3 months, specifying whether and how it intends to undertake the action (s) requested by the Parliament.[5] Although resolutions stemming from INI reports can thus be deemed consequential for parliamentary oversight in the EU, they have received relatively scant attention in the literature to date (cf. Maurer 2003; Bardou 2024; Massoc 2024), especially in terms of their capacity to oversee and influence the activities and agenda-setting of the Commission (cf. Kreppel and Webb 2019; Webb and Kreppel 2021).

We seek to overcome this lacuna by leveraging a new dataset that has only recently been made fully available by the Ex-Post Evaluation Unit of the EPRS, covering the whole ninth parliamentary term (2019–2024). Compiled in two separate documents titled "European Commission follow-up to European Parliament requests", the data were released in May 2022 and November 2024, respectively, with the aim to "support the European Parliament's scrutiny of the Commission" (EPRS 2024, 1; 2022). Taken together, the dataset captures the Commission's (non-)responses to each specific point raised in parliamentary resolutions stemming from different committees' INI reports. Importantly, in addition to recording the Commission's written responses, the dataset also tracks whether the Commission promises to carry out "genuine actions" on the points raised by the Parliament and whether these promised actions have been completed or not (EPRS 2024, 2223).[6] This provides us with a novel opportunity to probe into *both* the words and the resulting (in-)actions on behalf of the Commission, as perceived by the EPRS (i.e., in the eyes of the staff of the account-holder itself). We are not aware of extant scholarship leveraging this new data source to date, not least owing to its recency.

For the purpose of this special issue, we focus our attention on the European Parliament's ITRE Committee, which has been formally in charge of "the Union's industrial policy and related measures", as per its official mandate based on annex VI of the European Parliament's rules of procedure (Committee on Industry and Research and Energy (ITRE) 2024, 5). We zoom in on ITRE's account-holding activities throughout the ninth legislative term (2019–2024) which has coincided with the return and intensification of economic statecraft and market interventionism in Europe under the banner of President Von der Leyen's (2019) "geopolitical commission". As the responsible co-legislator, ITRE has been involved in major recent initiatives of industrial restructuring in the EU, ranging from the Chips Act, to the Net Zero Industry Act, to the European Defense Fund (Committee on Industry and Research and Energy (ITRE) 2024; see also Bulfone et al., Di Carlo et al., and other contributions to the special issue). When narrowing our focus to the ITRE Committee, we can identify a total of 432 specific requests for action on the subject of industrial policy that the European Parliament addressed to the Commission between July 2019 and May 2024. These can be retrieved from the 17 INI reports that were eventually adopted as resolutions in the EP plenary, also referred to as ITRE resolutions (EPRS 2024, 2219–2223; see Appendix for a full list).[7]

Based upon the coding of the EPRS, we single out those requests that (1) obtained a response from the Commission with a specific commitment to act upon said request, and (2) those requests that also attracted an identifiable action by the Commission to fulfill its commitment. This allows us to gain an insight into the extent to which the Commission matches its words with actions in the pursuit of industrial policy and, by implication, the extent to which, as one of the EU executives, it discharges its accountability toward the European Parliament not only procedurally (by providing responses in writing) but also substantively (by following up its responses with dedicated actions) in this particular policy area. Examples that the EPRS considers to be "genuine actions" by the Commission include:

taking legislative initiatives; adopting tertiary legislation; conducting impact assessments; drawing up progress reports; devising funding programmes; setting up work programmes and action plans; revising state aid guidelines; or launching relevant platforms, such as the Industrial Alliance, among others (see Appendix for an explanation of the EPRS coding).

In a second step, and departing from the codes provided by the EPRS, we focus on those requests by the Parliament that (1) obtained a response from the Commission, but (2) were not followed up by dedicated actions, in order to gain a better understanding of the potential drivers of discrepancies between words and actions in the accountability of industrial policy-making in the EU (and hence of "partial" accountability outcomes, as per our conceptualization). To do so, we code, in an inductive fashion, all instances of discrepancies that can be identified in the data and group them into a novel set of subcategories beyond the initial categories provided by the EPRS (see the Appendix for an explanation of our coding procedure; cf. Skjott Linneberg and Korsgaard 2019). The aim of this coding exercise is to ascertain the reasons for which some requests by the EP, while attracting a response from the Commission, do not seem to be followed through by the latter. The results of our analysis of the EPRS data for the ITRE Committee are reported and discussed in the following, while the limitations of our approach are reflected upon in the Appendix.

4 | Words Versus Actions in the Democratic Accountability of EU Industrial Policy (2019–2024)

Between July 2019 and May 2024, the European Parliament, on the own initiative of the ITRE Committee, addressed a total of 432 individual requests to the European Commission in the area of industrial policy, with requests typically taking the form of the Parliament "calling on", "urging" or "asking" the Commission to act (see Table A1 in the Appendix). Examples from the EP resolution of 15 September 2022 on "The implementation of the Updated New Industrial Strategy for Europe: aligning spending to policy" (T9-0329/2022 2022/2008(INI)) include calls on the Commission to "present a strategy focused on the transition of the most energy-intensive industries", or to "swiftly kick off the delayed work of the European Industrial Alliance for Processors and Semiconductor Technologies", or to "establish clear, effective, simple and comprehensive guidelines regarding IPCEIs [Important Projects of Common European Interest]" (EPRS 2024, 2260–2270).

Once a resolution is adopted, the Commission is committed (under the framework agreement between the two institutions discussed in endnote 5) to inform the Parliament within three months and in writing on actions taken (or to be taken) in response to the specific requests addressed to it, including when it is not going to act "according to the positions adopted by the Parliament" (EPRS 2022, 1). In principle, the three-month period can be shortened for urgency or extended by a month in case of heavy workload, but this procedure appears to not have been relied upon by ITRE or the Commission during the ninth legislative term.

Our analysis of the EPRS data suggests that the Commission provided 14 formal written replies (or SP documents) to the 17 ITRE resolutions, with a total of 266 specific responses, while leaving 166 parliamentary requests without clear responses. The latter include instances where there was no submission of a formal reply by the Commission (amounting to 69 requests left unanswered) or those in which the EPRS did not manage to identify a specific reply in the Commission's written follow-up (amounting to 97 unanswered requests) (EPRS 2024, 2223). Notably, of the 14 formal written replies, none was provided within the 3-month deadline.[8] In three cases, the Commission provided a written reply within three months but only to inform the EP that it would not respond formally to the Parliament's requests. Taken together, this provides us with an indicator of the procedural accountability—or answerability—of the Commission toward the Parliament in the realm of industrial policy—as measured through ITRE resolutions and Commission follow-ups—amounting to a Commission "response rate" of 61.6% (or 266 dedicated responses to 432 specific requests).

When turning toward actions rather than words alone, however, the Commission's record of accountability toward the Parliament in the area of industrial policy appears mixed at best. Among the 266 responses in which the Commission had pledged specific actions to the EP in writing, the EPRS data suggest that only 109 "new and dedicated actions" were actually completed by the Commission throughout the ninth parliamentary term (EPRS 2024, 2224). In other words, the Commission delivered on only about 25.2% of all ITRE requests by completing new and dedicated actions between 2019 and 2024 (109 new Commission actions vs. 432 specific requests). While it would hardly have been plausible to expect a rate approaching anything close to 100% of ITRE requests (given the long-bemoaned lack of substantive accountability in EU economic governance highlighted in the extant literature, as discussed in Section 2 above), it is striking to note that even among its own specific responses, the rate of completed new and dedicated actions by the Commission amounts to 41% only (109 actions vs. 266 responses). It is this apparent discrepancy between words and new actions, accounting for 59% of the Commission's responses, that we seek to unpack further in the following paragraphs. Table 2 below provides an overview of the main results in accordance with the 2 × 2 table developed in Section 2, notwithstanding the caveats regarding the EPRS data, as discussed in the Appendix.

Among the 157 apparent discrepancies between specific responses (words) and the lack of new and dedicated actions identified above, the EPRS dataset records 81 instances which the Commission argues are explained by the fact that it had already been working on action(s) falling within the scope of the Parliament's request (EPRS 2024, 2224). Our own coding suggests that that number is larger still, spanning at least 89 instances (see Table A2 in the Appendix). This indicates that one key driver of discrepancies between words and deeds in the area of industrial policy may be sheer redundancy: while the Parliament calls on the Commission to take action across a range of different topics, it appears either unaware of the fact that some of those actions have already been undertaken, or unwilling to accept the Commission's assertions that its prior actions should be considered sufficient.

TABLE 2 | Words versus actions in Commission follow-ups to ITRE resolutions, 2019–2024.

		Words	
		Yes 61.6% (266 of 432)	**No 38.4% (166 of 432)**
Actions	Yes 25.2% (109 of 432)	Completed new and dedicated Commission actions (as % of Parliament requests) 25.2% (109 of 432) Completed new and dedicated Commission actions (as % of Commission responses) 41% (109 of 266)	n/a (0 of 432) (Not observable from data; see notes below)
	No 74.8% (323 of 432)	Lack of new and dedicated Commission actions (as % of Parliament requests) 36.3% (157 of 432) Lack of new and dedicated Commission actions (as % of Commission responses) 59% (157 of 266)	38.4% (166 of 432)

Note: EPRS data only record Commission actions related to responses that were made by the Commission through SP documents. The data therefore do not record potential Commission actions that have not been specified in responses to the EP. Accordingly, the first quadrant (Words: "No"/Actions: "Yes") necessarily remains empty. Percentage totals may not add up due to rounding.
Source: Authors' elaboration based on (European Parliamentary Research Service (EPRS) 2022, 2024).

The remaining 68 instances represent the unexplained discrepancies that we aim to make sense of by means of an inductive exploration of the Commission's responses as well as the lack of new and dedicated follow-up actions (see the Appendix for an overview). A closer look at this set of instances, gleaned from the detailed appendices of the EPRS dataset (2022, 1389–1524; 2024, 2225–2234), suggests that the bulk of mismatches (with 35 instances in total) boils down to *explicit inter-institutional disagreements* between the European Parliament and the Commission. These entail (a) differences in *assessment* (25 instances), with the two institutions disagreeing on the magnitude of the underlying problem or the actions required to address it, or (b) dissent over *competences* and *responsibilities* (10 instances), with the two institutions disagreeing implicitly or explicitly on who should be in charge of the request (e.g., the Commission or the Member States).

Another sub-set of discrepancies that we can identify from zooming into the appendices of the EPRS dataset, amounting to 19 instances in total, relates to the relative *vagueness* of (a) the *initial request* by the Parliament, which allows the Commission to point to accomplished actions that appear broadly in line with the request but that are deemed insufficient by the EPRS (with a margin of assessment on both sides) (14 instances), or of (b) the *dedicated action*, with the Commission promising to "consider" performing an action or agreeing with the importance of an action but without providing the Parliament with a timeline or other indications for how it is planning to undertake the action (amounting to what one might call soft commitments) (5 instances). Lastly, we are left with a residual category of 14 instances of discrepancies, the underlying reasons for which are not readily apparent from the data (at least not to the authors) and which mainly seem to relate to issues that are simply left unaddressed by the Commission despite agreement with the Parliament on the initial request.

In sum, our analysis suggests that, in the realm of holding the EU's new industrial policy to account, the European Commission appears at first sight to have been far more responsive in promising rather than completing new and dedicated actions, which would seem consistent with the often-perceived lack of substantive forms of democratic accountability in European economic governance. Beneath the surface, however, the underlying responsibility for this discrepancy cannot easily be attributed to the Commission (and hence to the executive level) alone. Instead, we find that the European Parliament's ITRE Committee appears at times to have been either unaware of or to overlook prior or ongoing actions by the Commission, while at other times its requests are formulated too vaguely. The latter may make it difficult for the Commission to enact the Parliament's requests in a specific manner or, conversely, makes it (too) easy for the executive to claim that it has acted upon them already.

5 | Discussion and Conclusion

This article grappled with the question of who oversees the European Commission—as part of the EU's compound executive which had long been responsible for controlling and delimiting the exercise of industrial policy-making in the EU's internal market—now that the union increasingly formulates and pursues its own industrial policy ambitions. To address this question, we first established why the Commission should be held democratically accountable in the area of industrial policy in the first place, drawing on literature on delegation theory as well as insights from scholarship on the parliamentary oversight of European economic governance. Based on the distinction between procedural and substantive accountability—operationalized as answerability ("words") and dedicated policy responses ("actions")—we derived a simple typology of accountability outcomes that can help us assess the state of democratic accountability of the EU's industrial policy (although the parsimonious typology itself is applicable beyond this particular policy sphere).

To establish empirically whether and to what extent the Commission has been held accountable by the European Parliament in its pursuit of industrial policy objectives, we drew on a new dataset released by the Ex-Post Evaluation Unit of the EPRS (2022; 2024) which tracks Commission follow-ups—both in writing and in terms of policy actions—to points raised in European Parliament resolutions stemming from own-initiative reports by the Committee on Industry, Research and Energy between 2019 and 2024. Our analysis of the EPRS data suggested that the Commission has been far more responsive in words than in deeds, with rates of 61.6% in terms of written responses versus 25.2% in terms of completed new policy actions vis-à-vis 432 points raised by the Parliament. In a second step, we also probed into the hitherto little understood set of instances in which the Commission did specify actions that it would undertake but was eventually found by the EPRS not to have implemented them (with 41% of 266 specified actions having been followed through during the period under observation).

We found that the apparent discrepancy between words and actions—and, by implication, between procedural and substantive forms of accountability—is partly driven by implicit or explicit disagreements between the two institutions (over competences, responsibilities, problem assessments, and required actions), by the relative vagueness of parliamentary requests or of Commission replies, or by sheer redundancy (with the Parliament seemingly overlooking or discounting previously completed actions). Each of these drivers point to relevant hypotheses worthy of further investigation, both within and beyond ITRE. Indeed, while our own analysis of discrepancies was limited to the area of industrial policy, given the thematic focus of this special issue project, future research can and should be expanded to other areas and parliamentary committees as well, since the EPRS has made the considerable effort of coding Commission responses and (in-)actions for all 20 standing committees, 10 joint committees and even five temporary committees of the European Parliament between 2019 and 2024 (for an indication of how ITRE compares to another large standing committee, ENVI, please see the Appendix).

Although our study of the democratic accountability of industrial policy in the EU is, to our knowledge, among the first of its kind, it is also only a first step and, as such, faces several limitations that call for attention and additional research. For one, our use of EPRS data on INI reports, while novel, has narrowed the lens of our inquiry to written follow-up documents by the European Commission, as compiled by the EPRS (see European Parliamentary Research Service (EPRS) 2019b). This approach is prone to overlooking possible actions that the Commission might have pursued without formally announcing them in its written responses to parliamentary requests. On the surface, the latter would seem to raise questions about the transparency of the executive toward the legislature—which the EPRS flags itself—while in practice it is possible that the competent Commissioner had already responded to certain requests orally, for example, during a parliamentary debate (EPRS 2022, 4–6). Above all, we have had to rely on the judgments of the EPRS staff, whose views should not be equated with official positions of the Parliament (EPRS 2024, 7), to establish whether actions undertaken by the Commission constitute relevant fulfillments of its commitments toward the Parliament or not. At the same time, this concern is mitigated somewhat by the fact that our approach is in line with an established practice in the literature to take the perceptions of account-holders and their staff seriously when seeking to ascertain the quality of parliamentary oversight (Akbik 2022; Macchiarelli et al. 2020; for deeper a discussion of the EPRS data, see the Appendix).

In terms of policy and broader implications, our findings call for the development of additional monitoring procedures to be put in place beyond the assessment of the Commission's actions by the EPRS, such as the creation of an ITRE (or joint ITRE-ECON) working group on industrial policy charged with conducting an industrial policy dialogue with the Commission, as is the case for other EU economic governance areas such as monetary policy and banking supervision (see Diessner and Petit 2024). More substantively, and in the spirit of this special issue project to challenge established dichotomies in the comparative political economy and public policy literatures, future research could probe deeper into the determinants of when and why "words" (and procedures) trump "actions" (and substance) in the practice of democratic accountability—bearing in mind that the latter does not necessarily weigh more than the former, given that the relative importance of each is likely to vary with the policy context in question. In the realm of monetary policy, for example, a few words may make all the difference (as in the case of the European Central Bank's fabled promise to do "whatever it takes to preserve the euro"), whereas that would seem unlikely to "be enough" when it comes to the long-term industrial restructuring of Europe's political economy. We thus hope to have provided a useful starting point for scholars of democratic oversight in Europe in terms of where to look, and what to look for, when assessing the quality of parliamentary oversight over the executive across different economic policy areas.

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Conflicts of Interest

The authors declare no conflicts of interest.

Data Availability Statement

The data that support the findings of this study are openly available in European Commission follow-up to European Parliament at https://www.europarl.europa.eu/thinktank/en/document/EPRS_STU(2024)762869.

Endnotes

[1] A first pilot of the dataset was published in January 2017, while the data for the entire ninth legislative term were released in November 2024 (EPRS 2017; 2024).

[2] We exclude INL reports from the analysis since only one such report led to a resolution during the entire ninth term, namely, on freedom of scientific research, according to the EPRS (2024, 3247–3252).

[3] On how intra-Commission dynamics are marked by competition as well as concerns over administrative turf more generally, see Senninger et al. (2021).

[4] Note that some recent work has paid attention to the exchange of written questions and answers between MEPs and executive authorities as well (Fraccaroli et al. 2018; Massoc 2024).

[5] This arrangement follows the Framework Agreement on relations between the European Parliament and the European Commission (FA, point 16) and the Interinstitutional Agreement between the European Parliament, the Council of the European Union and the European Commission on Better Law-Making (IIA, para 10). The Commission's written responses to European Parliament resolutions are also known as "Suites données aux résolutions du Parlement Européen", or SP documents in short.

[6] For a detailed explanation of the dataset, the underlying assumptions, limitations, and coding strategy, please see the Appendix as well as EPRS (2022, 3–10; 2024, 4–9).

[7] Given the scope of its mandate, we consider all ITRE INI reports to be related to EU industrial policy.

[8] It should be noted that this need not imply unaccountability on behalf of the Commission in and as of itself, as it may indicate the impracticality of the agreed deadline to begin with, for example.

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