Legislation by Association

How the Ability of Associations to Provide Access Goods Affect Their Degree of Access to EU Institutions

A Pilot Study of the Negotiations surrounding LULUCF and the Waste Package

Valter Selén

Master's Thesis in European Governance | Utrecht University (6241506) & University of Konstanz (01/842248)

Acknowledgements

"It's a dangerous business, Frodo, going out your door. You step onto the road, and if you don't keep your feet, there's no knowing where you might be swept off to."

The title 'acknowledgements' for this part of a research paper is to my mind aptly chosen. It accurately captures the essence of what it is to write and hopefully finish a Master's thesis. As I found myself at the top of some sort of personal summit I set out to reach at age seven in a small village in Sweden, it seems fitting to acknowledge that my personal journey was not heroic, nor was it single-minded or purposeful. Rather, it was rather characterized by frequent missteps, belatedly fortuitous pitfalls and occasional despondency as I stumbled towards finding out what I would like to do with my life. Most importantly, it has been one hell of an ascent, in all senses of the word.

Having thus recognized that finishing this thesis is part of a personal and professional peak of sorts, I would also like to take a moment to acknowledge the people who helped me get here in the first place. In true Lutheran fashion, I shall order these acknowledgements according to the principle of putting business before pleasure, starting with acknowledging the colleagues and especially the managing director of Miltton Europe, Kaisa-Maria Soro-Pesonen, for abiding by the words of Swedish greats ABBA by taking a chance on me. I am well aware that I have been very fortunate in being paid to work half-time with interesting and relevant clients for my research. I would be amiss not to also recognize the invaluable support of my eminent thesis supervisor Sebastiaan Princen, whose equanimity, honesty and pragmatism when providing feedback for innumerable drafts spared the reader my directionless verbosity (this acknowledgement chapter not included).

I would like to acknowledge the generosity and kindness of all the interview subjects, who were kind enough to spare some of their valuable time to aid and abet a tweed-wearing grad student asking far too many questions. I would also like to thank my friend and consummate Brussels insider Alexander Mäkelä, for being so imminently helpful in connecting me with a number of initial interview subjects, and for offering to buy the first round of strong Belgian beer at our first meeting since our high school debating days.

I would like to acknowledge the unwavering support of my beloved parents Jonas and Fredrika as well as their respective partners, who I consider additional parents anyways. Your baseless belief in my abilities is only matched by your complete disinterest in what I am using said abilities for. Laissez-le faire at its finest.

To avoid this turning into a Oscars-like recital of names, I will finish by acknowledging the role of my dear girlfriend Caroline, who provided love, support and delicious French cooking in equal measure. Without you (or your quiches) I would not have been able to finish this thing, and it wouldn't have mattered anyways if you weren't here with me.

Now, on to the next summit.

Table of Contents

Abstract

This thesis is a pilot study that seeks to provide a more fine-grained account of the degree of access different types of associations enjoy to EU institutions. By testing a qualified and nuanced theoretical framework based on access goods, the thesis seeks to capture how the ability of associations to provide such access goods affect to what degree they can access EU institutions during legislative processes. To that end, this thesis applies a comparative case study of EU environmental policy, focusing on the negotiations surrounding the legislative files of LULUCF and the Waste Package.

By conducting semi-structured interviews with institutional representatives and different types of associations, the thesis generates rich and detailed empirical findings. The exploratory nature of the thesis and the setting in which it was written enabled initial interviews to be the conducted with Brussels insiders involved in other legislative processes, particularly RED II. These findings served as a point of comparison for the main case studies. The findings suggest that the ability of associations to provide a certain access good matters to a great degree, but this ability is not the sole determinant of the degree of institutional access. Other factors such as personal connections facilitated by a Brussels presence also play a fundamental role in facilitating the supply of access goods. Furthermore, the findings suggest that political intelligence is an important factor when some association types engage in political entrepreneurship during legislative negotiations. On the basis of these findings, this pilot study thus manages to further the theoretical and empirical debate on associational lobbying, and establishes that future research should consider the tactics adopted by associations alongside the supply and demand of access goods.

Keywords

Associations, informational supply and demand, access goods, EU institutions, the Waste Package, LULUCF, RED II.

List of Abbreviations

ALDE: Alliance of Liberals and Democrats for Europe
CEFIC: The European Chemical Industry Council
CEI-BOIS: The European Confederation of Woodworking Industries
CEPF: The Confederation of European Forest Owners
CEPI: The Confederation of European Paper Industries
CEWEP: Confederation of European Waste-to-Energy Plants
COD: Ordinary Legislative Procedure
CONFINDUSTRA: General Confederation of Italian Industry
COREPER: Committee of Permanent Representatives
DEI: Domestic Encompassing Interests
DG AGRI: Directorate-General for Agriculture and Rural Development
DG CLIMA: Directorate-General for Climate Action
DG ENVI: Directorate-General for Environment
EC: European Commission
EEI: European Encompassing Interests
ENVI: Environment, Public Health and Food Safety
EPF: European Panel Federation
EPP: European People's Party
ePure: The European Renewable Ethanol Association
EPR: Extended Producer Responsibility
EP: European Parliament
EU: European Union
EuRIC: Confederation Representing the Interests of the European Recycling Industries
EUROFER: The European Steel Association
EUROMETAUX: European non-ferrous metals association
EUROPEN: The European Organization for Packaging and the Environment
EUSTAFOR: European State Forest Association
FEAD: European Federation representing the European waste management industry
FEVE: The European Container Glass Federation
ITRE: European Parliament Committee on Industry, Research and Energy
LRF: Lantmännens Riksförbund
LULUCF: Land Use, Land Use Change and Forestry
MEP: Member of European Parliament
MNC: Multinational Company
MS: Member State
MTK: Finnish Central Union of Agricultural Producers and Forest Owners
MWE: Municipal Waste Europe
REI: Regional Encompassing Interest
S&D: Progressive Alliance of Socialists and Democrats
WP: Waste Package

Chapter I: Introduction

When it comes to the legislative process of the European Union (EU), it could be said that no single phenomena have been as publicly maligned whilst tacitly accepted, as lobbying. Despite, or perhaps due to, the high level of public, political and academic interest in the area, there has been limited theoretical or empirical convergence towards generalizable findings as regards why firms lobby, when, and how. This holds especially true in light of the lack of cross-pollination between research on lobbying in the US, and that conducted on the EU (Woll, 2006). Therefore, as a field of inquiry, the study of lobbying of legislative processes has been characterized by a wealth of descriptive and quantitative studies on different aspects of lobbying activities, without having yielded much in the way of generally applicable theories of lobbying (see ibid., and Bernhagen & Mitchell, 2006). This can perhaps be attributed to the sheer number of political and circumstantial factors that when interacting make up the complex and singular legislative contexts that both lobbying entities, and by extension the researchers of lobbying, must attempt to successfully navigate. It follows that findings on general patterns of behaviour are few and far between in the empirical findings on lobbying, as most legislative processes are to some degree unique.

As suggested by the title of this work, this thesis is concerned with the institutional access enjoyed by associations during legislative negotiations. The title is wordplay on the concept of 'guilt by association', where a person or entity is prematurely judged or condemned for being associated with wrongdoing or morally questionable activities. It is also a play on the double meaning of the word association. Therefore, by replacing the word 'guilt' with the word 'legislation', the title acknowledges, yet tries to move beyond, the public perception of lobbying as undue corporate influence over the legislative process. Irrespective of normative discussions on the merits or drawbacks of lobbying, associations and other private interests do play an important role in EU legislative processes. Accordingly, there is room for this thesis to provide nuance to the academic and societal discussion on lobbying, by expanding upon existing literature on the access enjoyed by associations. To this end, this thesis seeks to systematically investigate how different association types help explain institutional access through adding to the theoretical framework presented by Bouwen (2002) on the supply and demand for access goods. In doing so, this thesis does not only consider the type of information or intelligence provided to institutional representatives, but also accounts for who supplied it. By doing so, this thesis tries to establish whether the ability of associations to provide access goods as a part of their lobbying affects the degree of institutional access they enjoy during legislative processes.

The nature of lobbying as "the informal pathway to influence policies in arenas or bodies in which lobbyists themselves have no formal decision-taking competencies" (Panke, 2011, p. 130) means that lobbying will most often involve attempts by outside interests such as associations or NGOs to influence policy-makers such as the EU institutions. They do so in a political environment saturated by a plethora of different entities seeking to influence policy-making, making the game of political influence difficult to play for firms and associations alike. This challenge can be attributed partly to a process of Europeanization, where a greater number of domestic actors have entered the European political game as the competencies of the EU have expanded (van Schendelen, 2002).

The ongoing struggle for institutional influence sees constant attempts at interactions between institutional representatives and lobbying entities such as associations. As the key component of lobbying, these interactions are naturally of great academic interest, and potentially allow for the construction of a more general theoretical framework seeking to explain key aspects of

how different interests gain access to, and attempt to influence, institutional representatives in EU institutions.

As EU competences in different policy areas have grown in scope and ambition, so have the number and variety of private interests affected by the introduction of EU legislation in different MS. To overcome the hinders created by intense competition for legislative influence, firms and interests cooperate on the basis of common interest, with associations being the most common example of such cooperation. These associations are one way for private interests to collectively organize lobbying activities on a European level. They are amongst the most commonly consulted types of interest groups consulted by European institutions, and they are intended to represent the interests of some delineated subgroup (Coen, 2007). Nonetheless, associations can be considered to represent private interests that are sourced from larger constituencies of firms.

Mahoney (2007) argues that networking is a defining feature of lobbying activities, placed on a continuum of activities that can either be informal and loosely defined or highly coordinated and formalized through associations (ibid.). Such associations are therefore a means for individual firms or entities to gain more access to EU institutions, enabling resource-sharing and more efficient lobbying activities. Whilst previous research has established the efficiency of cooperating through associations, there is room for further research that establishes how the ability of different types of association to provide access goods affects the degree of access enjoyed during legislative negotiations. Institutions can be expected to demand technical information and information on sectoral or country-specific needs from associations, which serve to foster legitimate and workable legislative outcomes. Associations also presents a means to overcome the resource constraints faced by European institutions staffed by generalist bureaucrats, elected or politically appointed officials and seconded personnel, rather than by technical experts or specialists. In this context, associations with a greater ability to provide institutional representatives with relevant information are more likely to enjoy a greater degree of institutional access, which has a bearing on the efficiency of different types of associations in general.

Therefore, this thesis seeks to investigate how the type of association providing access goods affects the level of access enjoyed by the same. Relying on an integrated theoretical account of the determinants of institutional access, this thesis attempts to add nuance and complexity to theories on supply and demand of access goods, where not only the type of the good, but the ability to supply that good, matters. This framework argues that associations specialize in the provision of a certain type of access good in accordance with the niche they occupy in relation to other associations and interest groups. This specialization is therefore a direct result of the high number of interests competing for institutional access. As such, the thesis finds that niche theory as presented by Lowery (2007) helps explain how the ability of associations to supply different access goods is a result of specialization in areas of competitive advantage (ibid.). Concretely, this means that the decision to specialize in the provision of a certain access good can be expected to largely be the result of the type of association that is seeking access, and what level it operates on. As an example, a national sector-specific association is more likely to specialize in the provision of technical and economic access goods informed by national knowledge and sectoral expertise. It follows that niche theory captures how associations occupy certain niches of the market for access goods as a result of specializing in the provision of a certain type of access good. This in turn affects their ability to provide access goods, which has implications for the degree of access different types of associations can be expected to enjoy. In addition to this supply mechanism, this thesis will also account for the institutional demand

for access goods, leading different types of associations to achieve different degrees of institutional access depending on which institution is approached. This means that the ability of certain types of associations to satisfy different institutional demands for certain access goods will be considered the explanatory variable of interest.

Moreover, it will be argued that the messenger, in the form of associations, affects how the message, in the form of information or intelligence, is received by institutional representatives. This indicates that supply tactics play an important role in strategic interactions with EU institutions through different avenues. As a part of that strategy, associations need to consider how their type and chosen supply tactic affects their reliability from an institutional viewpoint. Associations can be regarded as reliable partners, adversaries, or something in between. It follows that it is important for associations to build connections and networks in order to create a trusting or at least working relationship. To this end, large networks facilitated by a Brussels presence enable institutional representatives to trust the veracity and quality of the access goods provided. This should in turn result in a greater degree of access enjoyed by trusted associations, and would provide a theoretical rationale for the prevalence of networking in lobbying activities.

In this context, it is important to note that networking and trust-building is based on relationships between individual associational and institutional representatives. Accordingly, this thesis will abide by the distinction made by Douglas & Ney (1998) in their work *Missing Persons - A Critique of Social Sciences*, where they argue that institutional and associational representatives are not only agents responsible before an institutional principal, but also individual persons (ibid.). This is important as the lobbying efforts of associations are ultimately conducted by individual persons, where interpersonal relationships can affect the degree of access granted these associational representatives.

Hence, this thesis will assume that some level of trust is needed for the effective functioning of information or intelligence as an access good, where institutional representatives will make a judgement as to whether the information provided by associations can be considered reliable. It follows that becomes imperative for associations seeking to access EU institutions to establish that the interests they represent, and the access goods they can provide, are bona fide and valuable to institutional representatives in order to ensure institutional demand for their access good. Given the presence of institutional resource constraints yielding conditions of imperfect information, institutional representatives have limited capacity to verify which associations are reliable, especially given that this reliability can be variable over time and issue areas. Therefore, they can be expected to rely on heuristics and personal affective and cognitive cues, such as the national origin of an association, the members of the association and by extension the identity of the association and its representatives to establish whether the information provided by the same association is reliable and ultimately aligned with the informational demands of the institution.

Associations on their part seek access in order to influence legislative outcomes through the provision of timely and reliable information, but also seek to gain insights into the positions of different institutional actors and the state of play of legislative processes as such, which this thesis will refer to as political intelligence. This political intelligence is therefore different from other types of informational access goods in the sense that it can serve to facilitate coalition-building, and potentially provide advantages in negotiations for an institution that is party to such intelligence.

1.1 Research Question and Descriptive Subquestions

This thesis will ask the following research question:

How does the ability of different types of associations to provide access goods affect their degree of institutional access during legislative processes?

This explanatory research question can be subdivided into a number of descriptive subquestions, aiming to ultimately provide an answer to how the ability of different associations to provide access goods affect institutional access. In this set-up, the descriptive subquestions form the building blocks that are necessary and jointly sufficient for answering the central research question.

Subquestion 1: Which associations gained access to EU institutions in connection to the studied legislative negotiations?

Subquestion 2: What degree of access did these different associations enjoy?

Subquestion 3: What type of access goods did these associations provide to institutional representatives?

Subquestion 4: Did the type of access good provided vary between institutions and institutional representatives, and if so, why?

Subquestion 5: What role did regional access goods play in granting associations institutional access?

Subquestion 6: What degree of institutional access did the various associations enjoy as a result of their ability to provide access goods?

Subquestion 7: What were the differences between these different associations?

By providing answers to these subquestions, it will become possible for the thesis to answer the overarching research question. In doing so, the thesis will rely on qualitative findings generated by semi-structured interviews with the key stakeholders involved in two legislative processes; the Regulation on land use, land use change and forestry in 2030 climate and energy framework, henceforth referred to by its acronym LULUCF (2016/0230(COD)), and the Waste Package.

This chapter will proceed to provide definitions of key terms, followed by a motivation of study and a rationale for exploratory interviews, whilst the subsequent chapter introduces a synthesized theoretical framework. The methodological chapter details the sources of the findings, after which the case-specific findings will be presented and analysed. The penultimate chapter will provide a comparative analysis of the cases, and the final chapter concludes.

1.2 Definitions

This section will provide definitions of the terms introduced in the research question, presented in order of importance. For the sake of clarity, this chapter will provide definitions of key concepts used by this thesis, which is especially important in view of the varying uses of these concepts in the relevant literature. Thus, the definitions provided in this chapter are rooted in

the existing literature on lobbying, but occasionally apply a degree of academic freedom in the redefining these key terms in the process of constructing an expanded theoretical framework.

Interest groups can be broadly defined as any membership-based organization or entity with particular interests and subsequent policy preferences, including lobby organizations, business organizations and associations as well as NGOs, thereby aligning with Bennedsen & Feldman (2002). This corresponds to the definition provided by Olson (1971), who defines an interest group as "the association of individual members or collectives with a common interest, who pursue this interest and act in exchange of selective incentives" (Santiago López, 2015).

Concerning the object of study, this thesis construes associations as one type of interest organization attempting to influence EU policy-making, where associations are defined as groupings of firms or occasionally local actors organized on a sectoral basis or on the basis of shared issue-preferences within a policy area. These can be further distinguished on the basis of regional, national, or European levels of representation. This relatively wide definition accounts for the heterogeneity amongst associations in terms of characteristics such as membership, Brussels presence, knowledge of key interests, and their likelihood to cooperate internally or with other associations. This heterogeneity is reflected in the wide array of monikers used by associations themselves, such as confederation, federation, bureau and union. It also allows this thesis to consider associations that consist predominantly of public or state actors, as well as what can be called mixed-membership associations, where such an association includes both private companies and national associations.
Umbrella associations are defined as industry-wide gatherings of interests, for instance the waste management industry. Production-chain associations are considered to be associations that involve all parties involved in producing a certain good or in providing a service, for instance waste-to-energy. Sectoral associations are those concerned with a specific aspect or part of a productive process, such as the forest entities owned by the state.

With this wide conception of what defines an association in mind, the next logical step is to define the dependent variable. Access has long been used as a proxy of sorts for influence over the legislative process, acting as a necessary, but not sufficient factor for the success of lobbying efforts (Bouwen, 2002). However, this measurement does not sufficiently capture how institutional representatives choose to resort to consult some business representatives over others, as most associations capable of somehow contacting European institutions technically enjoy potential access to the same, possible institutional rules of engagement notwithstanding. Therefore, this thesis will rely on an understanding of access as a continuum in line with Bouwen's original framework (2002), where the theoretical chapter will provide a categorization of what characterizes low, intermediate, or high degrees of associational access. This categorization allows for classification and evaluation of access enjoyed by different types of associations, and accordingly informs analytical comparison.

Having thus settled on access as a suitable indicator for associational influence, it is useful to connect this degree of access to the supply of access goods, which is a term originally coined by Bouwen (2002), which according to Hawkins and Holden (2014) describes "the informational resources possessed by businesses, and desired by government, which guarantee corporate actors access to policy makers" (ibid., p. 56). The original definition provided by Bouwen finds that "[a]ccess goods concern information that is crucial in the EU policy- making process. In return for access to an EU institution, business interests have to provide the access good(s) demanded by that institution" (Bouwen, 2002, p. 2). The concept of ability to provide such access goods will be defined in accordance with economic theory, where the ability of an

association to supply a certain access good can be considered equivalent to capacity of a company to specialize in the production and supply of any other good. As such, the ability of an association to supply a certain type of access good depends on the ability to specialize on the basis of a competitive advantage in providing a specific type of knowledge. The thesis deliberately uses ability instead of capacity as used by Bouwen, as there is an important distinction to be made between the two (ibid.). The capacity to provide access goods implies a hypothetical, passive capability based on assumptions on the role of organizational form and hierarchy. Ability is concerned with what quantity and above all type of access goods that associations actually supply in exchange for institutional access.

Concerning the institutions that grant associations access based on their ability to meet institutional demands for access goods, they are defined on the treaties guiding the EU legislative process. This is in keeping with the approach taken by Bouwen, where this thesis will consider the three EU institutions with treaty-based power over the legislative process, including the European Commission, the Council of the European Union, and the European Parliament. In keeping with this approach, legislative negotiations refer to interinstitutional negotiations that are conducted on the basis of the ordinary legislative procedure (COD) and in the form of trilogues. In practical terms, that means that this thesis will consider the relevant institutional representatives subject to lobbying by associations, which includes, but is not limited to, DG officials, permanent representations and the Council secretariat, and MEPs. Having thus provided definitions of the major concepts introduced in the research question itself, this section will conclude by offering a definition of the concept of a region as introduced in Subquestion 5. For the purposes of this thesis, regions will be used to signify transnational entities constructed on the basis of socio-geographical conceptions of a shared cultural, political and historical identity transcending current administrative divisions into sovereign MS of the EU. Hence, the concept will be referred to as in Naurin & Lindahl (2008), where regional identity can coincide or inspire certain policy positions, making it a tangible yet vaguely defined source of shared understanding for MS or firms hailing from the region in question.

1.3 Motivation of Study

This thesis is a pilot study aimed at bridging some of the theoretical and empirical gaps in the available literature on lobbying. As such, this thesis studies the institutional access enjoyed by associations through a case study of legislative processes within the area of environmental policy. As discussed in the opening section of this thesis, the stated aim of providing a more nuanced view of associational lobbying. The topic holds both academic and public interest, as attested by heated public debates on the influence of private interests on legislative processes. Hence, whilst this thesis is generally intended to educate and inform the general public on the role of private interests in EU policy-making, it also seeks to make specific contributions to the body of research on lobbying.

As briefly mentioned in the introduction, there appears to be room for overarching theorization on some aspects of lobbying in the context of EU legislative processes. The choice to focus on associations is in part motivated by the fact that associations are heavily relied on as sources of informational access goods for EU institutions, as supported by Coen (2007). Notably, Bouwen (2002) do not specifically consider associations when introducing his framework for access goods. At the same time, Cotton & Delis (2015) argue that the degree to which associations access institutions is a prerequisite for relaying information to these representatives (ibid., p. 3). Bernhagen & Bräuninger (2005) note that several studies have found that business actors are generally privileged in terms of institutional access, which conforms to the argument put forward by Klüver (2011b) that the type of interest group providing information has an effect

on institutional access. Therefore, this thesis is not only interested in the type of access good provided, but also in whether the type of association providing it makes a difference. In connection to the expected importance of association type, this thesis will also consider the potential role of regional knowledge in gaining institutional access. Accordingly, the aim of this thesis is to provide an explanation of how access goods can be a more or less efficient access good for associations, depending on the association providing the access good, and the approached institution.

The theoretical notion of supply and demand of access goods inspired a large number of subsequent studies on interest group access, which taken in sum provide the theoretical starting point for this thesis. Specifically, this thesis is an attempt to add to the existing literature on associational lobbying by attempting to clarify how the ability of different types of associations to provide different access goods affect the degree of access enjoyed by these associations. By incorporating the reasoning of niche theory, this thesis will seek to provide a rationale for why certain types of associations could reasonably be better placed to provide certain types of access goods. It also adds an additional type of information to the typology originally presented by Bouwen, by considering the potential role of regional knowledge as a meso-level, intermediate type of access good that could be provided by regional associations.

On an empirical level, there appears to be a research gap on the ability of different types of associations to provide access goods. Despite a number of large-N quantitative studies (see Klüver, 2010 and 2011a, and Klüver et al., 2015), there have been fewer studies conducted using a qualitative approach to evaluating lobby coalition efficiency. As emphasised by Coen (2009), researchers need to consider the lobbying of EU institutions, and the Commission in particular, as part of a long-term process operating over the whole of the policy cycle, allowing long-term factors such as reputation, path dependencies and personal relations to come into play. Since the author of this thesis has observed the different access enjoyed by different types of associations first-hand, it seems pertinent to attempt a structured theoretical explanation of this differentiation. Hence, this thesis applies a version of Bouwen's 2002 framework to another EU policy area, where Bouwen himself focused on the financial sector of the EU (ibid., 2002). By doing so, this thesis intends to replicate and test a broadened iteration of the theoretical notion of access goods in the environmental policy area, focusing solely on associations as the main type of generally consulted interest group in EU legislative processes. Thus, the cases studied are a means to an end, in demonstrating the testability and applicability of the predictions generated by the thesis. The fact that this thesis is a pilot study helps motivate the decision to focus on a limited set of cases within a single sector, favouring the internal validity of the empirical findings over generalizability at this initial step towards testing a broader theoretical framework.

1.4 A Rationale for Exploratory Interviews and Additional Sources

Considering that this thesis will focus its attention on interviews with representatives involved in two specific cases, it is important to account for subjectivity and recall bias through the inclusion of additional sources on the course of the negotiations and associational access. The choice to add these additional sources is intended to generate triangulating and rich empirical data aimed at providing an answer to the research question that is informed by multiple sources of information such as reputation, position papers, meeting requests and other interactions. Primary sources such as official documents published by EU institutions present an indirect means of inferring which associations were accessing EU institutions, by comparing the positions of said associations and the legislative outcome. The use of triangulation facilitates a

more detailed reconstruction of the negotiation processes, delineating the different phases of negotiations and the involvement of different stakeholder during these phases.

In view of this thesis acting as a pilot study, this thesis will conduct exploratory interviews with representatives involved in negotiations in the policy areas of energy and environment, which provide a complementary source of information in addition to secondary sources. Initial exploratory interviews conducted with key institutional and private representatives serve to inform the case selection made by this thesis, and generate valuable theoretical insights. They also provide a point of comparison to the findings generated by the main case studies, as will be shown in Chapter V.

As such, the secondary sources and exploratory interviews applied to these case studies enable the identification of, and detailed inquiry into, the particular cases to be chosen by this thesis, where the additional sources provide important information as regards representative and suitable cases in the area of environmental policy. The initial interviews are also expected to be instrumental for establishing the cases and developing the theoretical framework (Beach & Pedersen, 2013).

Chapter II: Arriving at an Extended Theory of Access Goods

This chapter will present a theoretical framework based on an extension of the relatively parsimonious theory of supply and demand of access goods first introduced by Bouwen (2002). In doing so, the chapter will first outline the fundamental assumptions and the basic approach used by Bouwen's framework, and will then proceed to make theoretical additions aimed at extending the framework. In doing so, this chapter will draw from the existing literature inspired by his 2002 article, as well as from the broader literature on lobbying and associations. The theoretical contributions made by this thesis are concerned with expanding on additional potential access goods supplied by associations, and with connecting the ability to provide access goods with different degrees of access enjoyed by various types of associations. This thesis will also provide a typology of different associations based on the extended theoretical framework, which introduces association coalitions and a regional level of operation. The theoretical mechanism connecting the ability of associations to provide access goods with their institutional degree of access is based on the theoretical arguments provided by Sections 2.2-2.5. These arguments subsequently inform the hypotheses, which will be considered on the basis of the empirical findings.

Concretely, the following six sections will proceed as follows: the first section will outline Bouwen's initial framework, with the second section expanding on the concepts of degrees of access and access goods. Based in this expanded conception of access goods, the third section provides a typology of associations. The fourth section explains associational ability to provide access goods, whereas the fifth section connects different types of associations with their ability to supply access goods, providing the mechanism whereby differing types of associations can be expected to enjoy differing degrees of institutional access. On the basis of this expanded framework for the market for access goods, the sixth section of this chapter derives a number of testable hypotheses.

2.1 Outlining the Initial Framework for Access Goods

In order to answer how the ability of associations to provide information affects to what degree they are consulted during legislative negotiations, this thesis will rely on a theoretical framework where information acts as an access good in a system of informational supply and demand, popularized by an article by Pieter Bouwen (2002). Bouwen's study is concerned with "companies, associations and consultants" seeking access to the three EU institutions considered by this thesis (ibid., p. 2). As such, this section will first provide a short introduction of the framework, and will then proceed to discuss the typology of access goods, the supply and demand of access goods, and the interaction of these two forces on what can be viewed as a market for access goods.

2.1.1 Introducing the Framework

In Bouwen's framework, the institutional demand for information provides outside interests such as associations an opportunity to trade information for legislative influence in a simplified system of supply and demand (Bouwen, 2002). This simplified system has subsequently been applied by a large number of researchers, where lobbying by associations is considered a process of information collection, where interest groups in general, and associations in particular, seek to collect facts, arguments and evidence supporting their positions (Cotton & Dellis, 2015). Although this thesis will broaden this conception of lobbying solely consisting of accessing institutions through informational access goods, the supply and demand framework is a useful tool to explain why associations supply information to institutional representatives in order to gain institutional access. Accordingly, information can act as an

access good on the market, seeing associations trading different types of information for access to legislators. The overall soundness of the Bouwen's framework has been reaffirmed by a number of related works seemingly prompted or inspired by his 2002 publication.

For instance, Bennedsen & Feldman (2005) support Bouwen's fundamental argument, by claiming that the provision of information by interest groups can influence legislation (ibid.). This suggests that there is an incentive for interest groups to provide information if it can affect an outcome favourably (ibid.). Providing a rationale for how this incentive is related to institutional access, Cotton & Delis (2015) argue that all parties seek to gather information of different kinds both in order to produce good legislation, but also to gain the upper hand in the negotiations. Since institutions are subject to time and resource constraints when engaging in legislative processes, they must seek to satisfy their demand for information partially through external sources. By relying on such external sources of information, EU institutions can overcome their internal resource constraints and legislate more effectively (ibid.).

This should hold especially true in complex and technical policy areas such as environment and energy policy. As argued by Hawkins & Holden, it would seem that the provision of pertinent information and specific technical expertise is one of three ways whereby businesses and associations attempt to gain institutional access (2014, p. 56). The other two ways are financial and constituency building, where the latter seems to align with the notion of political intelligence, which will be elaborated upon in the next section of this chapter. Chalmers (2013) provides further supporting arguments for access goods, by claiming that the capacity to provide institutions with useful information is positively related to the degree of access enjoyed by firms or associations (ibid.).

2.1.2 The Original Typology of Access Goods

Bouwen's original typology consists of three types of information that can act as access goods; 'Expert Knowledge', 'European Encompassing Interests' (EEI) and 'Domestic Encompassing Interests' (DEI). Expert knowledge is concerned with specific "expertise and technical know-how" held by private sector entities (Bouwen, 2002., pp. 7). Domestic and European encompassing interests are based on knowledge of national or European circumstances and constituencies, where this knowledge is implicitly connected to the level where the access-seeking entity operates. Notably, Bouwen's typology does not account for the possibility of regional encompassing interests as found in transnational policy concerns and geographical areas located in European transnational regions. Moreover, Bouwen's definition of expert knowledge does not explicitly include a mention of 'encompassingness' or representativeness, indicating that there is a fundamental tension between specific and expert knowledge and notions of representativeness.

2.1.3 The Supply of Access Goods

When it comes to the supply of access goods by private interests, Bouwen suggests that the type of association has implications for the nature and extent of the expert knowledge any individual association possesses. However, this is not explicitly connected to the type of the association, but rather to internal functioning of the association in question. Bouwen argues that the organizational capacity to supply access goods is determined by the "number of layers that constitute the organizational form […] [t]he more layers are involved in the provision of the access good, the slower and less flexible the access goods can be supplied" (ibid., p. 11). The argument that the capacity to provide an access good is a function of the number of levels involved in the provision suggests that the base of operation of the private interest is of lesser

importance. Generally, Bouwen is more concerned with the internal functioning of the organization providing the access good, than its type or level of operation per se, as he argues that the complexity of the internal decision-making process is the second factor that affects the capacity to provide access goods. This is important, as it entails that Bouwen's framework tacitly assumes that there is no real intersection or interaction effects between level of associational operation and the type of association. This is an interesting assumption which will be challenged in the section outlining a revised typology for associations.

2.1.4 The Demand for Access Goods

Concerning the demand for access goods, Bouwen argues that there is a positive correlation between the so-called 'encompassingness' of interest groups and their representativeness, where this thesis infers that the author expects the level of representativeness of a certain interest group to be positively related to the degree of access enjoyed by the same interest (ibid., p. 9). This interpretation is supported by the fact that he mentions that the provision of all three access goods of varying 'encompassingness' are related to issues of strengthening EU legitimacy and ensuring regulatory compliance (ibid.). Concurrently, Bouwen expects this potential correlation to be of varying strength depending on the demanding institution, where the role and mandate of each institution determines their demand for access goods, indicating that some institutions would be less concerned with the 'encompassingness' of a certain interest (ibid., p.13). Bouwen predicts that the EP would be more interested in domestic and European encompassing interests, whereas the Commission would be demanding expert knowledge and European encompassing interests, and occasionally domestic encompassing information when seeking to identify compromise positions. As the most intergovernmental body, the Council is expected to predominantly demand access goods representing domestic encompassing interests (ibid., pp. 15). This view of institutional demand is largely corroborated by other authors, such as Chalmers (2013).

2.1.5 The Interaction Between Supply and Demand Goods

Considering the supply and demand of access goods in concert, Bouwen hypothesizes that European associations will have the highest access to the EP, whereas individual firms will have the highest degree of access to the Commission, and national associations will enjoy the greatest access to the Council. When tested, Bouwen finds that European associations have a much higher degree of access to the EP and the Commission compared to the Council, whereas national associations enjoy the highest degree of access to the Council. Building on these findings, Bouwen argues that the theoretical framework could be applied to other policy sectors, and briefly mentions that private interests might strategically resort to using different organizational forms and fora when seeking to gain or maximize the degree of access. The author concludes that this choice is fundamentally informed by the capacity of different organizational forms to provide the demanded access goods (ibid., p. 32).

2.2 Expanding on the Concepts of Access and Access Goods

Having provided an outline of the major components of Bouwen's theoretical framework, the following five sections will outline theoretical additions and extensions to the original framework. These additions will feed into the revised, extended framework that will be applied by this thesis. Starting with this section devoted to expanding the concepts of access and access goods, these sections will explicitly question and nuance some of the assumptions, definitions, and classifications underpinning Bouwen's approach. As such, this section will make three theoretical contributions; it will provide a categorization of degrees of access, it will introduce the intermediary level of regional knowledge that informs regionally encompassing interests found between the national and European level, and it present political intelligence constitutes as a distinct type of access good. These extensions of the theoretical framework will inform the revised typology of access goods provided in the third part of this section.

2.2.1 A Categorization of Degrees of Access

This section provides a conceptualization of the central dependant variable considered by this thesis in the form of institutional access. Specifically, this subsection will provide a categorization of the continuous notion of degrees of access introduced by Bouwen (2002). The categorization should be viewed as a first attempt at qualifying degrees of access as a widely used indicator for association influence. Providing such a categorization provides the basis for the theoretical discussion on the role of access goods and their connection to different types of associations. As such, the thesis relies on the definition of access provided in Chapter 1.2, where access acts as a necessary, but not sufficient factor for the success of lobbying efforts.

The categorization of degrees of access is informed by the findings of Schnakenberg (2015), who argues that access in its most basic form is usually unproblematic for lobbying parties (ibid.). Rather, influence tends to corresponds to the degree of access to institutional representatives, where the presence of multiple avenues of influence means that associations can engage in venue-shopping. The crucial role of the content of the interactions suggests that it seems prudent to distinguish between different degrees of access. This is since different types of associations can enjoy the same hypothetical access to EU institutions, yet enjoy wildly different levels of actual involvement and influence during negotiations. Introducing a qualitative difference in the form of degrees of institutional access accounts for the fact that most associations enjoy a minimum level of access through being able to contact and potentially visit some institutional representatives some of the time, whilst accurately capturing how access can be a matter of degrees. Categorizing the continuum facilitates a shared understanding of what constitutes a high or low degree of access, and makes the rather vague concept of degrees more concrete. Table 1 below outlines the different degrees of access that an association can enjoy. A low degree of access corresponds to a minimum of access to EU institutions, where an association is only able to nominally access institutional representatives through one-way communication and formal channels such as open consultations. A high degree of access would suggest that an association would be more likely to have influence over a legislative negotiation, as a high degree of access implies an element of being actively consulted by associations. Typically, higher levels of access would also seem to indicate or at least facilitate a certain level of trust between the association and the institutional representative. Crucially, a high level of access entails some level of active involvement of certain associations by EU institutions themselves, be it through formal or informal consultations, invitations to events or institutional requests for meetings. The intermediate degree of access is found somewhere in-between the two extremes.

Consultation is the logical extension and corollary of access, where having a relatively high degree of access to institutional representatives will be considered a precondition for consultation. Therefore, being consulted by a European institutional representative implies some level of influence, although it does not necessary equate to successful lobbying in the sense of securing a certain legislative outcome. Rather, it simply implies that the official in question considers it somehow important to provide an opportunity for a certain interest to be heard in connection to a legislative process. Thus, consultation is broadly considered to be equivalent to a higher level of access to the institutional representative, facilitating the exchange of access goods.

Table 1: Categorizing Degrees of Access

Low	Intermediate	High
The association • enjoys a minimum of institutional access, • is rarely or never consulted, • engages predominantly in one-way communication through phone calls or emails, • is never sought out by institutional representatives, • is not a source of political intelligence, and rarely considered a source of technical or economic information, • is not considered an important or trustworthy party to the negotiations.	*The association* • enjoys some degree of access, • is sporadically or intermittently consulted, • corresponds and occasionally meets with middle- to low-ranking representatives • is predominantly a source of technical or economic information, • is considered somewhat trustworthy outside party to the negotiations • is occasionally contacted by institutional representatives.	*The association* • enjoys a high degree of continuous access, • is consulted by institutional representatives, • acts as a source of political intelligence or technical and economic information, or both, • is seen as a trustworthy, constructive and important part of the negotiations • has face-to-face meetings with high-ranking representatives • is actively sought out by institutional representatives.

2.2.2 The Intermediary Level of Regional Interest

Having conceptualized what is meant by degrees of access, the three following sections will consider and integrate substantive additions to the notion of access goods. In keeping with the aforementioned definition of regions provided in introductory chapter, this thesis will introduce the concept of regional encompassing knowledge (REI) as a distinct type of knowledge from national and European knowledge, where regional associations are expected to be able to provide specific information on technical, legal, cultural, political and economic conditions present in transnational regions. As noted in Section 2.1.2, Bouwen's typology of access goods does not account for the possibility of regional encompassing interests. Nonetheless, the nature of many areas of EU legislative competence finds institutional representatives legislating on transnational, cross-border issues. This leads the author of this thesis to suspect that institutional representatives could demand regional knowledge in the form of transnational, yet regionally specific knowledge that encompasses both the needs and interests of the transnational region, and the first-hand expertise of private interests in overcoming practical and legal issues that arise in border regions or other transnational regions. Examples include the economic conditions for industries operating in border regions such as Öresund, or technical information or political intelligence on the views of Nordic logging companies.

Since regional knowledge concerns transnational, localized problems and concerns that national or European associations are not necessarily aware of, such regional knowledge could lend regionally-based associations an advantage over other associations when seeking to access EU institutions. Nonetheless, this thesis will loosen the explicit connection made by Bouwen between the base of operation of an association and the type knowledge they possess, insofar as regional knowledge goes. This decision is informed by both theoretical and practical reasons. Theoretically, this thesis argues that the fundamentally transnational nature of much of EU legislation entails that regional knowledge can be expected to be supplied by both national and European associations, as well as potentially by associational coalitions formed in part for the express purpose of supplying this regional knowledge (ibid.). In practical terms, regions are not, unlike the national and European levels, codified and clearly defined legal entities, and as a result exert less overt influence on European legislative processes. This also means that this thesis expects there to be fewer expressly regional associations involved in the studied legislative processes, despite the fact that regional knowledge is expected to function as a noteworthy additional type of knowledge found on the intermediary level. This fact could be the reason for regional encompassing knowledge having been largely been overlooked in previous works on access goods. Nonetheless, this looser connection between association type and the possession of regional knowledge is only expected to be present when it concerns the representation of regional encompassing interests.

2.2.3 Political Intelligence as an Access Good

In addition to the introduction of regional knowledge to Bouwen's original framework, this section will argue that associations also provide what will be referred to as political intelligence. The typology of informational access goods outlined by Bouwen and subsequently adopted by Eising amongst others, is predicated on a very broad understanding of information (Chalmers, 2013, pp. 6). By implicitly lumping together potentially biased, yet factual information such as technical facts, data and figures with the provision of political intelligence, this initial approach runs the risk missing the more actively political role taken by some associations when seeking to secure a high degree of access. Thus, this thesis tries to address this tendency towards conceptual stretching by distinguishing between technical and economic information, and political intelligence. This subsection will discuss the implications of making a distinction between information and intelligence, and the theoretical definition of political intelligence.

Information can be characterized as factual or situational knowledge that is communicated to institutional representatives, where information is at least theoretically available to everyone. This thesis distinguishes between two closely related types of information; technical, and economic information, where both approximately correspond to what Bouwen terms 'expert knowledge' (2002). The division aims to capture the fact that there are differences between technical and economic information provided by associations. Technical information is concerned with the technology, scientific details, and production method used by association members. Economic information is concerned with the specificities and functioning of the business model of the concerned association members.

In contrast, intelligence is only useful and actionable as long as it is only distributed to a limited number of institutional representatives. The instant intelligence becomes common knowledge, it ceases to be valuable in negotiations, meaning that political intelligence is by definition privileged information that associations gather and provide to institutional representatives. As the name suggests, political intelligence is intended for political purposes both by the institutional representatives applying it to legislative negotiations, and by associations themselves. This is supported by Schnakenberg (2015), who finds that institutional

representatives use associations to facilitate coalition-building and as a means to achieve political ends (ibid.). Political intelligence will not be defined as arguments and evidence supporting a position as discussed by Cotton & Dellis (2015). Rather, this thesis aligns itself with the previously outlined position of Hawkins & Holden (2014), who argue that the provision of information is only one out of three ways associations seek to gain institutional access. The other two ways are financial and constituency building, where political intelligence resembles constituency building (ibid., 2014, p. 56). To exemplify, an MEP about to vote on an amendment in a parliamentary committee involved in a legislative negotiation could demand intelligence on how this amendment is viewed by fellow committee members, other responsible committees, or by Council representatives. By comparison, technical or economic information is less actively concerned with influencing the negotiations themselves, as it acts as a means to the end of institutional access, whereas political intelligence can be expected to act as a direct means of influencing negotiations. Nonetheless, it should be emphasized that both information and political intelligence can be used to obstruct or constructively engage with the legislative negotiations.

Making this distinction makes it possible to provide analysis on which types of access goods grant associations access to which institutions, overcoming the shortcomings of Eising's model, which is "limited in the sense that he uses a very vague ['information'] variable that lumps together a broad range of information types: political, legal, technical and economic information" (Chalmers, 2013, pp. 6). By making the distinction between political intelligence and informational access goods, this thesis can also account for the findings by Bennedsen & Feldman (2005), who find that associations will provide different access goods if it would seem to influence the outcome of negotiations in a favourable direction.

The choice to provide political intelligence is actively aimed at influencing the direction or outcome of the negotiations in a favourable direction for associations, whereas the provision of for example technical specifications could be construed as less directly influenced by calculations of private benefit or profit for associations. Concurrently, information is always provided with the purpose of conveying a certain message, image or position, even if the information itself consists of technical 'facts' (Cotton & Dellis, 2015). This notwithstanding, political intelligence is about serving the direct interests of institutions, where institutional representatives demand intelligence on the position of other institutional representatives found within their own, or one of the other institutions. From this follows that political intelligence is concerned with "actor's reactions or details about procedure as well as information about the "political salience" and "public support" of a policy proposal (Chalmers, 2013, pp. 9).

In light of these considerations, the more sensitive nature of political intelligence is likely to correspond to a higher level of trust between the individual association and the institutional representative. A higher level of trust would in turn be expected to be found amongst associations enjoying a high degree of access, where they are actively consulted by institutional representatives. Table 1 in Section 2.2.1 categorizes what is meant by low, intermediate, and high degrees of access and what implications that has for trust between institutional and association representatives.

This thesis also makes the argument that associations will be more likely to provide combinations of for instance technical information and political intelligence in order to achieve a higher degree of access, where associations could be expected to only provide intelligence such that it favours their own position and preferred outcome. Such a scenario would see associations maintaining or establishing a degree of reliability and trustworthiness through the

provision of factually correct information, whilst also enabling associations to potentially influence the direction of negotiations by providing institutional representatives with political intelligence of varying reliability. As such, associations can attempt to balance the role of a relatively apolitical and external source of expertise and industry insights, with that of a political operator, actively engaging with, and potentially influencing negotiations in a favoured direction. In connection to this flexibility, associations capable of providing both intelligence and technical information could be more likely to enjoy a higher degree of access, as they satisfy two partly different institutional demands, which could be especially useful within the European Parliament and the Council.

The role of political intelligence provided by associations is supported by Schnakenberg (2015), who argues that institutional representatives, especially political figures such as MEPs and heads of administration, use associations and lobbyists as a means of facilitating coalition-building and political persuasion (ibid.). This entails that political representatives use associations as political proxies that facilitate coalition-building, consensus-formation and political monitoring. Such activities would be most likely to occur in the European Parliament, as this institution has the greatest number of political institutional representatives.

2.2.4 Arriving at a Revised Typology of Access Goods

In view of Bouwen's original framework, this thesis will attempt to clarify the relationship between different types of knowledge and the access good they relate to. Table 2 below outlines the revised typology of access goods inspired, but distinct from Bouwen's framework (2002, see also Section 2.1). It differs in three notable ways; first, the typology considers 'Expert Knowledge' as a component of all access goods, secondly, it introduces the regional level as an additional source of knowledge, and third, it views political intelligence as a distinct type of access good provided by some associations.

This thesis has already briefly touched upon the role of technical or economic information in the form of 'expert knowledge', where the theoretical framework considers such expert knowledge as one characteristic of the different types of information, rather than a separate type of information as such. This captures the complexity of informational access goods, which is crucial to account for when deriving hypotheses concerning the ability of different types of associations to provide informational access goods. Thus, this thesis chooses to divert from Bouwen's framework by widening expert knowledge to feed into both political intelligence and technical and economic information (ibid., 2002). This was previously discussed in Section 2.2.3, where the widened definition of expert knowledge relates to the previously mentioned tension between the encompassingness of expert knowledge, and its inherent need to be particular to a certain sector, process, or context. In line with Schnakenberg (2015), this thesis therefore claims that political intelligence is informed by expert knowledge, where the role of associations and lobbyists in general can be to provide insights regarding the positions, and possible coalition-building opportunities available to decision-makers, providing materials such as compromise amendments and voting recommendations (ibid.). Moreover, it is also highly likely that political intelligence is also based on knowledge about national, regional, or European constituencies, where the nature of the knowledge is not necessarily encompassing, as its usefulness lies in its specificity and limited spread. Having thus discussed the ways in which this thesis expands on the notion of access goods as originally defined by Bouwen (2002), Table 2 below outlines the types of access goods that will be considered by this thesis. Section 2.4 will provide a more fleshed out account of how the supply tactics relate to the type of access good and the type of association.

Table 2: Types of Access Goods
Note: The types of knowledge provided are ranked in order of likelihood.

Level	**Type**	
	Technical and Economic Information	*Political Intelligence*
European	*Representativeness:* Can be broad or specific *Knowledge-base*: Expert knowledge, EEI, *Expected Supply Tactics:* Position papers, consultation input, events *Examples:* General or specific facts, figures and data,	*Representativeness:* Specific, reflecting European institutional interests *Knowledge-base*: EEI, expert knowledge *Expected Supply Tactics:* Compromise amendments, formal or informal voting recommendations *Examples:* Positions of other institutional representatives or associations, coalition-building
Regional	*Representativeness:* Regionally broad or specific *Knowledge-base*: Expert knowledge, REI, DEI *Expected Supply Tactics:* Position papers, consultation input, events, plant or site visits *Examples:* Best practices and regional champions, insights on practical or legal issues arising in transnational regions.	*Representativeness:* Specific, reflecting regional interests *Knowledge-base*: REI, expert knowledge, DEI *Expected Supply Tactics:* Compromise amendments, formal or informal voting recommendations *Examples:* Positions of other regional or national representatives and associations, insights from constituencies, coalition-building
National	*Representativeness:* Nationally broad or specific *Knowledge-base*: Expert knowledge, DEI, REI *Expected Supply Tactics:* Position papers, consultation input, events, plant or site visits *Examples:* Best practices and national champions, general or specific facts, figures and data	*Representativeness:* Specific, reflecting national interests *Knowledge-base*: DEI, expert knowledge, REI *Expected Supply Tactics:* Compromise amendments, formal or informal voting recommendations *Examples:* Positions of other national representatives and associations, insights from constituencies, coalition-building

2.3 Expanding the Typology of Associations

Having conceptualized the dependent variable of degrees of access and revisited Bouwen's concept of access goods, this section integrates the additions of regional knowledge and political intelligence into an expanded typology of associations. Accordingly, this section will produce a revised typology of associations, based on an overview of the theoretical literature on association, followed by a discussion of some important assumptions made in Bouwen's initial typology. As such, this thesis considers associations in line with their organizational characteristics, as it facilitates analytical precision, and also ensures that the typology provided below is aligned with previous research in the field.

In considering different types of associations, the typology outlined by this thesis relies on the notion of niche theory as discussed by Lowery (2007), which will be expounded upon in the next section. For now, suffice it to say that niche theory helps explain how associations are bound to specialize in the provision of a certain type of access good, where each association tries to stake out a domain or constituency which it exclusively represents (ibid.). In that regard, niche theory would see associations would tend to differentiate themselves from each other in order to gain institutional access, explaining the great number and variation amongst associations.

To that end, this thesis will provide a revised typology of associations that considers the level of operations and type of membership as the two main organizational characteristics. Associations can vary in terms of intensity of cooperation between its members, which is evident in the distinction between federations and the less closely configured confederation. The theoretical framework intends to account for this tendency to cooperate when mentioned by institutional representatives or associations in connection to the ability to provide access goods. The presence of federations, confederations and unions are accounted for through the wide definition of associations. Whereas Bouwen considered the internal functioning as key to the ability of associations to supply access goods, this thesis (Bouwen 2002, see also Section 2.1) would like to consider the external aspect of base of operation. This is since the base of operations for an association could be expected to have a clear influence on their ability to represent national, regional, or European encompassing interests, as they would have easier access to certain types of knowledge by virtue of their physical location. This also has implications for the representativeness, or encompassingness of the knowledge possessed by associations. Notably, the representativeness of national or regional associations can be expected to be bounded, where a regional association would be able to provide knowledge that is broadly representative of the region.

Another addition that this thesis makes to Bouwen's framework concerns the assumption that there is little overlap or interaction within or between associations operating on different levels. On the basis of that assumption, Bouwen argues that associations are less capable to provide access goods compared individual firms, as a result of complex internal decision-making processes (ibid.). This thesis considers this assumption flawed, as the wide variety of associations providing both technical and economic information alongside political intelligence indicate that associations are to varying degrees able to overcome internal barriers in order to supply access goods. Coen's (2007) finding that associations enjoy a high degree of access to European institutions further strengthen this point (ibid.). Crucially, as suggested by Bouwen himself, "a number of new collective fora have been established [which] allow private interests to provide new and/or better access goods and to provide them in a more efficient way" (ibid., p. 32). By accounting for the presence of mixed-membership associations that include both individual firms and national associations, alongside production-chain associations and

associational coalitions, this thesis thus attempts to address the practice identified in the concluding chapter of Bouwen's paper. The introduction of these new types of associations therefore seek to account for the potential for inter-associational cooperation and coalition-building aimed at improving associational ability to supply access goods. According to Coen (2009), coalitions can be a means for smaller or resource-poor associations to overcome resource-constraints and gain institutional access (ibid.). Consequently, this thesis will attempt to account for the tendency of different types of associations to cooperate, by including what will be called the 'cooperation tendency' in the typology below.

Taken together, internal organizational characteristics in concert with external factors produce certain associational features in terms of representativeness, access to different kinds of knowledge, likelihood of a presence in Brussels, and tendency towards inter-associational cooperation. Based on the academic literature on associations, this thesis provides a typology of associations in Table 3. This typology relies on the organizational characteristics to distinguish between different types of associations in line with Baroni et al. (2014). As such, this thesis aligns itself to a number of previous studies which employ this organizational definition of groups when studying lobbying activities and their outcomes (ibid., p. 144).

Table 3: Typology of Associations
Note: The types of knowledge provided are ranked in order of likelihood.

Level/Type of Association	Production-chain or Umbrella associations	Sectoral	Association Coalitions
European	*Representativeness:* Broad *Type of Knowledge*: EEI *Brussels Presence:* Most Likely *Cooperation tendency:* Medium	*Representativeness:* Narrow *Type of Knowledge*: EEI *Brussels Presence:* Likely *Cooperation tendency:* High	*Representativeness:* Depends on coalition members *Type of Knowledge*: EEI, DEI *Brussels Presence:* Likely *Cooperation tendency:* High
Regional	*Representativeness:* Regionally broad *Type of Knowledge*: REI, DEI *Brussels Presence:* Likely *Cooperation tendency:* Medium	*Representativeness:* Narrow *Type of Knowledge*: REI *Brussels Presence:* Unlikely *Cooperation tendency:* High	*Representativeness:* Depends on coalition members *Type of Knowledge*: EEI, REI, DEI *Brussels Presence:* Less than likely *Cooperation tendency:* High
National	*Representativeness:* Nationally broad *Type of Knowledge*: DEI, REI *Brussels Presence:* Less than likely *Cooperation tendency:* Medium	*Representativeness:* Narrow *Type of Knowledge*: DEI, REI *Brussels Presence:* Unlikely *Cooperation tendency:* High	*Representativeness:* Depends on coalition members *Type of Knowledge*: EEI *Brussels Presence:* Unlikely *Cooperation tendency:* High

This thesis distinguishes between umbrella associations, production-chain associations, sectoral associations, and associational coalitions. Umbrella associations will be defined as those associations representing an entire industry. An example is EUROPEN, who represents the packaging industry on a European level. Despite relying on a stylized typology of associations, this thesis acknowledges the potential role of individual cases of hybrid types of associations. These associations are somewhere between an umbrella and a sectoral association in terms of size and scope. Hybrid associations can represent both individual firms and national associations, which would suggest that such associations would combine the national association's capacity to provide intelligence and technical information from specific member states, with the ability of umbrella associations to provide generally applicable and

representative European access goods. Notably, some umbrella associations active on a European level have mixed memberships that include both national associations and individual industries active within a certain sector, where an example of such an association is EuRIC. Since the characteristics and scope of the membership base of different associations has an impact on the ability of associations to provide certain types of information, this thesis will consider such associations as instances of mixed-membership associations when relevant to the findings.

Notably, this thesis will not explicitly consider the type of associations that represent the broad interests of the private sector as such, since apart from BusinessEurope there are very few such associations active on a European level, which is perhaps the result of the scope of interests represented by said association. For the purposes of this thesis, such associations will be considered an extreme variant of a European umbrella association, which is consistent with the capacity in which BusinessEurope attempts to gain institutional access. The same does not apply for national business associations, who despite their narrower scope represent more clearly delineated national interests that is often particular to a certain national context.

Production-chain associations represents the entire chain of producers and industries concerned with certain issues, for instance associations covering all stages of waste management, including landfill companies, recyclers and incinerators. These associations seek to represent an entire chain of production affected by a certain legislative negotiation, regardless of the exact industrial activity of these firms or the stage of the production cycle they are involved in. An example of such an association active on a European level is CEWEP. Sectoral associations are those associations representing firms active within a certain sector or aspect of an industry. An example of a European sectoral association is EPF, which is a federation for the wood-based panels sector.

The inclusion of associational coalitions captures the theoretical possibility that different associations, sectors or potentially entire industries band together and form formal or informal coalitions (Mahoney, 2007). Thus, this thesis adopts a more fine-grained approach to the typology of associations compared to that provided in Bouwen's framework. Moreover, there is also a need to account for the presence of associational coalitions, where different types of associations can be expected to form ad hoc or issue-based coalitions on the European, regional, or national level. These coalitions could also potentially be vertical, which is this case would mean that they involve associations and individual industries from more than one level. As a consequence, associational coalitions can be expected to combine elements from the other types of association, meaning that the ability of a certain coalition to provide access goods will depend on the type of associations participating in the coalition. A crucial difference between coalitions and umbrella or sectoral associations is the ability to supply access goods that are more broadly representative of different industries, different levels of operation, and different stages of production. In that regard, coalitions that combines different types and levels of associations can be expected to enjoy a similar level of access as production-chain associations.

2.4 The Ability of Associations to Provide Access Goods

On the basis of the expanded concept of an access goods, which in part informed a new typology of associations and a categorization of degrees of access, this section provides the theoretical rationale for what determines the ability of associations to provide access goods. As such, this section will argue that niche theory explains why associations specialize in the provision of certain access goods, whilst the supply tactic adopted by associations in supplying access goods has a bearing on their ability to secure access.

2.4.1 Niche Theory as a Factor in Determining Associational Ability

As mentioned in Section 2.1, this thesis argues that Bouwen's original framework does not clearly explain what informs the ability of associations to provide certain access goods over others. This ability is crucial to explaining why different types of associations would be expected to enjoy varying degrees of institutional access. As such, this thesis will argue that niche theory as discussed by Lowery (2007) provides a rationale for what determines the ability of associations to provide a certain type of access good.

According to niche theory, associations create and inhabit particular niches as a result of competition over limited resources in terms of institutional access, political patrons, issues to lobby, and financial resources (ibid.). This means that the construction of a viable niche becomes the associations core task, where "niche theory is fundamentally about competition among similar organizations" (ibid., p. 49). The introduction of niche theory, as well as the specialization it results in, helps explain why associations might be better able to provide a certain type of access good over another. Whilst Bouwen's original framework hints at such a mechanism, he does not explicitly account for why or how certain associations might be better placed to provide access goods based on for instance regional knowledge. As a result, associations that enjoy easy access to certain types of knowledge by virtue of their type and base of operations would seem to enjoy a competitive advantage when it comes to their ability to supply certain types of access goods. This entails that the crucial link between the type of association and the degree of access enjoyed can be accounted for through the mechanism provided by niche theory.

In line with Lowery as well as Dahm and Porteiro (2005), this thesis will allow for the possibility that specialization might occur amongst providers of information as a strategic response to the presence of multiple lobbying interests seeking to influence institutions. Such specialization could be expected to occur along the lines of the specific niche occupied by different types of associations. Building on the logic of association specialization, this thesis expects that such specialization would yield niched information and expertise knowledge that differs amongst different types of associations. In short, different types of associations would be better placed to provide different types of access goods, which would in turn provide varying levels of access to different institutions.

Alongside Dahm & Porteiro, Bernhagen & Bräuninger (2005) highlight the fact that information gathering and transmission can be a costly endeavour, especially for institutions, which helps explain why information acts as an access good that warrants a price on the market (ibid.). In line with niche theory and the subsequent specialization of associations that follows from it, it can be expected that certain associations will be at a comparative advantage when it comes to providing types of access goods that are less costly for them to gather and relay (Lowery, 2007). Given that associations also face resource constraints, they must weigh the costs of 'producing' access goods against the benefits of institutional access. Since one of the

main activities of associations is the gathering and provision of knowledge, it is safe to assume that information does indeed acts as an access good, meaning that they specialize in this activity as the benefits are expected to outweigh the costs. This seems to run counter to Bouwen's predictions, where he argues that associations will be less able to provide access goods compared to individual companies (ibid., 2002).

Given the presence of a market for access goods, it would appear safe to assume that the information or intelligence supplied by associations is cheaper for them to gather and provide than it would be for institutions to produce themselves. Associations enjoy daily access to highly specialized and niched expertise, technical information, data provided by their members, sectoral know-how, and political intelligence. When such information is pooled within associations, this information can produce an informational advantage, which can be traded for institutional access (ibid., p. 47). This thesis will assume that the lion's share of the cost for associations is incurred when attempting to provide institutional representatives with the information, rather than when gathering the information itself. Hence, some of these costs can be considered comparable to transaction and matching costs shouldered largely by the supplier of access goods.

Assuming that it would be more or less costly for different types of associations to acquire different types of knowledge, it becomes theoretically possible that the type of associations determines the ability to provide different informational access goods. This would in turn imply that different types of associations are likely to enjoy different levels of institutional access and influence. However, it is important to keep in mind that some degree of initial access is in itself not too difficult for associations to achieve, as supported by Hawkins and Holden (2015) in the context of the UK. As argued by these two scholars, it is rather the content provided during interactions and its usefulness to the institutional receiver that determines the degree of access granted associations (2014, p. 59).

When considering the knowledge held by different types of associations, it is instructive to recall Bouwen's definition of expert knowledge. This thesis finds that the absence of a definition of representativeness of knowledge in this 2002 work is indicative of the fundamental tension between specific and expert knowledge in relation to representativeness. In that sense, representativeness of national, regional, or European interests would not necessarily be expected to play as great a role when it comes to expert knowledge, which this thesis argues is more specifically concerned with technical and economic information. Following this line of reasoning, institutions that are more interested in such information could be expected to demand access goods from relatively 'less' representative private interests that are champions or frontrunners, be it individual companies or sectoral or national associations. This also entails that associations that specialize do not need necessarily run a great risk of losing institutional access to institutions that can be expected to demand technical or economic access goods, such as the Commission.

At the same time, the strategic choice facing associations entails a trade-off between the ability to provide representative access goods, and highly specific expert knowledge. A compromise solution to this problem could be for European umbrella or sectoral associations to institute a division of labour, delegating the provision of more specific access goods such as expert information to national and more highly specialized association members. This would in turn mean that European associations will be supplying political intelligence and more representative access goods in exchange for institutional access. This thesis argues that in order to maximize the degree of access enjoyed to all three EU institutions, associations might strive

for the ability to provide several access goods. Furthermore, different institutions can be expected to demand different types of information at different stages of the policy process.

2.4.2 The Role of Supply Tactics on the Ability to Provide Access Goods

Alongside niche theory, this thesis will consider the tactics adopted by associations as an important factor influencing the ability of associations to successfully supply access goods. Such supply tactics are concerned with the method or approach adopted by associations when seeking to provide access goods to EU institutions. Examples include the provision of position papers for both technical and economic information, and informal meetings when relaying political intelligence. As Bouwen's original framework largely avoids discussing the role of tactics by simply considering information provision a characteristic of interest groups, his framework does not provide an explicit distinction between the type of access good provided and the way it was supplied. However, this is still important, as the method of delivery may be as important as the good itself in securing access (Chalmers, 2013). That is to say, the supply tactic may well influence the degree of access secured through supplying the access good. For instance, Chalmers (2013) argues information tactics are a more significant determinant of access than the type of information provided (ibid.). The author claims that so-called shoe-leather approaches in meeting with decisionmakers are more important in increasing the salience of the information provided, which is in turn crucial to granting access.

The approaches outlined by that Chalmers are concerned with inside tactics, which is aligned with the approaches considered by this thesis. These include "face-to-face meetings; write a letter; write an email; make a phone call; and [participation] in the 'open consultation' process." (ibid., p. 10). Outside tactics are defined by Chalmers as "mobilizing citizen support behind a policy", and will not be considered by this thesis (ibid.). Tempering Chalmer's argument, this thesis argues that in the absence of high quality, reliable and well-timed provision of access goods, there would be little incentive for legislators to give firms access or influence over legislative processes over repeated interactions, regardless of the efficacy of their supply tactics. Lobbying parties will seek to be reliable and trustworthy in providing access goods, since the provision of poor quality or unreliably information or intelligence would have negative strategic effects on future access to institutional representatives (Dahm & Porteiro, 2005). This lends further credence to the idea that political intelligence is more likely to be provided by associations enjoying high degrees of access, as some modicum of trust is necessary in order for this type of access good to be considered actionable and reliable by institutional representatives.

Generally, the supply tactic adopted by associations can be expected to depend in part on the type of associations, where a European association is more likely to enjoy closer and more frequent opportunities to meet in person with institutional representatives than the average national association would. Moreover, it is not unlikely that the choice of tactic is related to the degree of access already enjoyed by an association, meaning that there could be a measure of reverse causality or correlation affecting the concept of information tactics. This to say, that associations adapt the way in which they contact institutional representatives on their de facto degree of institutional access, meaning that the chosen tactic is a priori affected by the level of access they enjoy rather than the other way around. To account for this possibility, this thesis will remain open to inductive insights and take combinations of different inside tactics into special consideration, It will also allow for the possibility that different types of associations employ differing information tactics.

Table 4 below outlines possible information tactics employed by associations, listed in order of ascending degree of access. Based on the initial findings generated by exploratory interviews, attributed or unattributed position papers, plant visits and official and informal events are outside tactics used by associations. The table also illustrates that the tactics adopted by associations can vary to some degree, as a result of their basis of operation and type.

Table 4: Different Supply Tactics Adopted by Associations
Note: Tactics in bold are unique to the specific institution

	Institution		
Level	*European Commission*	*European Parliament*	*The Council*
European	*Tactic:* • **Open consultations** • **Closed consultations** • Phone calls • Face-to-face meetings • **Impact assessment involvement** • Attributed position papers • Unattributed position papers • Official events • Informal events *Targets: Representatives from association member constituencies, or representatives at large* • Policy officer • Head of Unit • Director-General • Cabinet Official • Head of Cabinet • Commissioner	*Tactic:* • Emails • Letters • Phone calls • Face-to-face meetings • Attributed position papers • Unattributed position papers • **Voting recommendations** • Amendment proposals • Official events • Informal events • Plant or site visits • **Parliamentary hearings** *Targets: Representatives from association member constituencies* • Parliament Committee Secretariats • Parliamentary Group Secretariats • Other MEP Assistants • Other MEPs • MEP Assistants • MEPs (rapporteurs, shadow rapporteurs or key committee members) • National party representatives	*Tactic:* • Emails • Phone calls • Letters • Face-to-face meetings • Attributed position papers • Unattributed position papers • Amendment proposals • Official events • Informal events *Targets: Representatives from association member constituencies* • National ministries • National governments • Permanent Representation representatives • Secretariat • Regional bodies

2.5 Connecting Associational Type with Degrees of Access

This fifth and penultimate section formulates and makes explicit the connection between the type and level of operation of associations with their ability to supply different types of access goods. As such, it argues that different associations will be better or worse at providing certain types of information, which results in differing level of institutional access enjoyed by different types of associations. The section will present expectations for how the type of association affects the access goods they supply, and will then connect the type of association with the degree of institutional access they enjoy.

2.5.1 Expectations Concerning Type of Association and the Supply of Access Goods

The typology of associations presented in Section 2.3 showed that different associations have different characteristics in terms of representativeness, ability to provide different types of knowledge, their physical Brussels presence, and their tendency to cooperate. Section 2.4

showed that specialization and supply tactics can explain how the ability of associations to provide certain access goods depends on their base of operation and the type of association. Building on these two sections, this subsection will briefly outline the expectations regarding which type of association can be expected to be able to supply which type of access good. In doing so, the subsection relies on Table 3 outlined in Section 2.3. Note well that most association types can be expected to retain the ability to provide more than one type of access good, which can be explained by the fact that different EU institutions are expected to demand different access goods. Furthermore, some variation in demand for certain access goods can be expected over the course of the policy cycle, with technical and economic information expected to be more in demand during the initial phases of legislative negotiations.

European umbrella associations can be expected to largely supply economic information and political intelligence, by virtue of being well-placed to provide access goods informed by EEI and expert knowledge. Moreover, these associations are highly likely to a presence in Brussels, facilitating the provision of political intelligence. Since European associations do not have a base of operations located 'on the ground' in terms of where their members carry out production and day-to-day operations, they lack the necessary insight and expert knowledge to be able to effectively supply technical information. National umbrella associations can on the other hand be expected to supply technical and economic information alongside some national political intelligence based on DEI and expert knowledge. Any mixed-membership associations are likely to combine the strengths of both levels of operation, leveraging their knowledge of both EEI, DEI and potentially REI to supply highly representative political intelligence and information.

European production-chain associations can be expected to supply predominantly technical and economic information, as they are uniquely able to rely on knowledge of both EEI, DEI and expert knowledge of the entire chain of production by virtue of their organizational form. This also entails that these associations could be able to supply political intelligence on a European level, as they are likely to interact with institutional stakeholders through a likely Brussels presence, and by virtue of representing an entire value-chain. Depending on the base of operations of the members, production-chain associations could also be expected to possess knowledge of REI.

European sectoral associations are most likely to provide technical and economic information informed by knowledge of EEI and expert knowledge, but will also be able to provide political intelligence within certain limits. This is since these associations represent a specific sector in Brussels, meaning that such a presence facilitates the gathering and supply of political intelligence to trusted institutional representatives. However, this intelligence would most likely only cover actors that are involved with the particular sector. National sectoral associations will follow the same pattern, where they are expected to overwhelmingly provide technical and economic information that is specifically representing national interests in the form of DEI, but potentially also REI.

European associational coalitions are likely able to supply technical and economic information, depending on whether they are physically present in Brussels. Depending on the composition of coalition-members, the access goods supplied by such coalitions are likely to be highly representative of EEI and DEI, as well as REI. The high level of cooperation also allows for the possibility of the provision of some political intelligence, although they are less likely to be competitive in this area due to a lack of expert knowledge and established levels of high trust.

Other regional or national coalitions can be expected to follow the same pattern, with greater specialization towards the provision of technical and economic information to be expected.

2.5.2 The Connection between the Type of Association and Institutional Access

On the basis of the expectations regarding the ability to supply access goods outlined above, this subsection will discuss the expected institutional demands for access goods based on Bouwen's initial framework and other relevant literature. Having thus reconsidered the main components of the market for access goods, the thesis will provide some predictions regarding the degree of access enjoyed by different types of associations. These predictions are clustered according to the relevant institution, with the resulting three clusters informing the hypotheses outlined in Section 2.6.

Recalling Bouwen's predications as outlined in Section 2.1, he argues that the simultaneously intergovernmental and supranational EP would be more interested in access goods representative of DEI and EEI. The supranational Commission is expected to demand technical information and knowledge of EEI, and occasionally DEI. Due to its intergovernmental nature, the Council is expected to demand access goods based on knowledge of DEI (ibid., pp. 15). This is supported by Chalmers (2013), who finds that "The Commission serves a largely apolitical and technocratic function and thus requires a large amount of technical, operational and expert information. The Parliament, as the EU's only elected supranational assembly, requires information that allows it to evaluate the Commission's proposals from a 'European perspective' [apostrophes added by the author]. Finally, the Council is a wholly intergovernmental institution and carries out executive policymaking functions. […] it requires information that can facilitate bargaining between member states." (ibid., p. 6). Notably, Chalmers emphasises the supranational aspect of the EP, which suggests that the EP would favour access goods based on knowledge of EEI slightly over those informed by DEI. Having established the expectations for institutional demands by EU institutions, this thesis argues that the associations that have the ability to meet the varying demands of EU institutions can be expected to enjoy greater degrees of institutional access. This is supported by previous research on the provision of public goods by interest groups conducted by Beyers & Braun (2014), who find that "different types of policy goods interest groups offer co-vary with the likelihood of access to different types of policy officials" (ibid, p. 99).

Cluster I: Access to the European Commission

For the reasons outlined above, this thesis expects European umbrella associations and production-chain associations to enjoy the greatest access to the Commission out of the three institutions, given their ability to sate institutional demands for technical and economic information. Moreover, the explicitly European interest represented by the Commission leads can be expected to favour European umbrella associations. In practical terms, the Commission can overcome time and resource constraints by dealing with a few large, representative associations rather than a larger number of small, national associations with less reconciled interests. Furthermore, these European associations have a physical presence in Brussels, which facilitates easy access and a greater choice of supply tactics when supplying access goods, whilst allowing for the establishment of trust.

Cluster II: Access to the European Parliament

Alongside umbrella associations, European and national sectoral associations are more likely to enjoy the highest degree of access to MEPs and MEP assistants in the EP, since these are interested in serving both European interests and national constituencies. European sectoral

associations could provide both technical information and political intelligence concerned with regional and national considerations depending on their degree of cooperation. As such, they provide MEPs insights into the nature and potential impact of the legislation, whilst potentially providing them with a trump card in intra- and interinstitutional negotiations. Since MEPs are pressed for time and do not necessarily have easy access to representative and holistic expert information, umbrella associations are also likely to enjoy a high degree of access. Nonetheless, the degree to which umbrella or sectoral associations are allowed access depend on the political priorities and sensitivities of individual MEPs, as well as the role of the MEP in the legislative negotiations. For this same reason, mixed-member associations could provide MEPs with a one-stop shop, as it is potentially able to supply both national, regional, and European information.

Cluster III: Access to the Council of the European Union

Lastly, the intergovernmental nature of the Council would see those associations capable of providing national and regional knowledge to enjoy a high degree of access. This could be either national production-chain associations, umbrella associations or sectoral associations. Given that Council representatives can be expected to be even more sensitive to national considerations, specific national sectoral associations can be expected to enjoy the highest degree of access, which could also be a result of a greater need to lobby if the negotiations specifically disadvantage a certain industry or national sectoral concern. National production chain associations are also able to provide very specific and niched information, whilst representing several national interests at once. Moreover, umbrella associations active on the national or European level can mostly provide political intelligence which can be very useful to Council negotiators, especially when concerned with transnational concerns. Their ability to provide the lowest common denominator position amongst its members can be expected to have an ambiguous effect on the degree of access, since certain Council representatives might be more interested in the leaders and the laggards amongst members.

2.6 Hypotheses

This final section outlines six testable hypotheses, with two hypotheses for each EU institutions considered by this thesis, which are clustered in accordance with the EU institution in question. These hypotheses are generally informed by the theoretical framework provided in the preceding sections.

Cluster I: Access to the European Commission

H1: European umbrella organizations enjoy the greatest degree of institutional access to the Commission.

H2: The high degree of access enjoyed by European umbrella organizations is due to their capacity to enable the provision of technical information, which is facilitated by their longstanding physical presence in Brussels. To a lesser extent, it also due to their ability to provide political intelligence that represent broad European interests.

Cluster II: Access to the European Parliament

H3: National sectoral associations enjoy the greatest access to the European Parliament out of the three EU institutions.

H4: The high degree of access enjoyed by European sectoral associations is due to their ability to provide both technical and economic information and political intelligence concerned with European and national considerations.

Cluster III: Access to the Council of the European Union

H5: National sectoral associations enjoy the greatest access to the Council of the European Union out of the three EU institutions.

H6: The high degree of access enjoyed by national sectoral associations and national production-chain associations is due to their ability to provide very specific and niched technical and economic information, whilst representing several national or regional interests at once.

Chapter III: Methodology

The methodological strategy of this thesis is to engage in a comparative case study, where the aim is to establish how the access goods supplied by associations affect the degree of institutional access. As such, this chapter proceeds to outline the case selection, followed by a brief discussion on the operationalization of the study, after which the combined approach of interviews and triangulation will be elaborated upon. As alluded to in the introduction, the limitations imposed by the requirements of a Master's thesis means that this thesis will constitute a pilot study of the negotiations surrounding LULUCF and the Waste Package. This format allows for the study to test the plausibility of the revised framework within the given time and resource constraints, whilst simultaneously contributing to the academic literature on access goods. Thus, by focusing the research agenda on two particular cases within the field of EU environmental policy, it becomes possible for this thesis to construct and test a theoretical framework using two cases, seeking to produce internally valid findings on the institutional access enjoyed by involved associations. Hence, the choice of conducting a pilot study makes it possible to test the feasibility of the theoretical framework whilst laying the groundwork for future large-N studies concerned with testing the external validity and generalizability of the small-N findings generated by this thesis. The chosen format also accommodates the inclusion of exploratory interviews with key institutional and associational representatives, which inform the revised and extended theoretical framework outlined in Chapter II, whilst also serving as a source of guidance when making the case selection. In addition to the main interview findings,

This chapter consists of three sections, where the first section is concerned with case selection. The second section presents the operationalization of the independent and dependent variable considered by this thesis, whilst the third section discusses the chosen interview approach.

3.1 Case Selection

The case selection made by this thesis was aimed at identifying instances where lobbying by different types of associations took place. In order to do so, the case selection was intended to capture the varying degrees of access enjoyed by different types of associations during legislative negotiations. For this reason, EU legislative processes were considered the universe of cases, where the aim was to identify legislative negotiations that could be expected to have seen various degrees of institutional access enjoyed by different types of associations. Within that universe, a choice was made to focus the research on the area of environmental policy for both methodological and practical reasons which are discussed in greater detail below. As such, two legislative processes were identified as likely to have seen varied associational lobbying on the basis of a preliminary inquiry into suitable cases. This inquiry was informed by two exploratory interviews as well as by discussions with Brussels operatives and the supervisor of this thesis. These exploratory interviews were conducted during the initial phase of the research conducted during the latter half of February, with interview subjects identified with the aid of findings from the preliminary inquiry mentioned in above. The interview subjects were involved with one or several legislative negotiations within environmental and energy policy, and some of the exploratory interviews will serve to corroborate the main findings in Chapter V which provides a comparative analysis of the two cases. The included exploratory interviews are listed in Appendix 3 along with the main interview findings.

Given the constraints introduced by the nature of an MA thesis and the limitations of a pilot study, the choice to focus on one policy area was deliberately made in order to maximize the internal and external validity of the findings. Environmental policy was chosen over other policy areas in accordance to Bouwen's call for further research on access goods conducted in

other policy areas apart from the financial sector (ibid., 2002). It is also an area of personal interest to the author of this thesis, and an area where EU institutions welcome lobbying during legislative negotiations (Gillies, 1998). In lieu of more recent numbers, Coen (2009) provides numbers from 2007 showing that interest group lobbying activities are directed at a few DGs including DG ENV, making it the third most lobbied Directorate-General in the Commission (Coen, 2009, p. 24).

The choice to focus on legislative processes in the field of environmental policies allows for the minimization of variation in terms of the lobbied institutions, this thesis will only consider directives proposed by the Commission General Directorates (DG) responsible for Environment (DG ENV) and Climate Action (DG CLIMA) that were all negotiated during the Juncker Commission 2014-2019. The same logic applies to the European Parliament, where the relevant parliamentary committees and MEPs are likely to remain largely similar, focusing on the standing committee on Environment, Public Health and Food (ENVI), with the potential inclusion of other directive-specific committees such as Industry, Research and Energy (ITRE). Moreover, studying another area of EU policy is crucial to attempting to establish whether the findings produced by Bouwen can be replicated and potentially generalized.

Having chosen to focus on association access to negotiations in the policy area of the environment, the legislative negotiations surrounding LULUCF and the Waste Package were chosen as suitable cases of where different types of associations would be expected to enjoy varying degrees of access. The cases considered by this thesis have been selected according to the principle of most-likely cases.

As recognized in the theoretical chapter, this thesis acknowledges the possibility of multifinality where the same value on the independent variable could yield different outcomes contingent on exogenous factors affecting the context of lobbying efforts (Bennett & Elman, 2006). In order to minimize the risk of such multifinality, the case selection strives to control for factors that could potentially affect institutional access. In order to approximate the conditions present in an experimental setting, this thesis limited its scope to only consider legislative files concluded during the Estonian presidency, which lasted between the 1st of July and the 31st of December 2017. Previous research on lobbying and environmental policies alongside exploratory discussions with parties actively involved with these files indicate that LULUCF (2016/0230(COD)) and the Waste Package – especially the Plastics Directive – saw different types of associations enjoying differing degrees of institutional access. Furthermore, exploratory interviews conducted with institutional representatives and associational representatives suggested that there was a high likelihood of diverging interests amongst different stakeholders during these legislative negotiations, which could be expected to overlap with regional and national concerns.

Largely concluded during the last month of the Estonian presidency, the negotiations of LULUCF and the Waste Package have been characterized as long, technical, and at times challenging by the parties involved, as well as by external media reports (Politico, 2018). The negotiations surrounding the legislative files were considered to representative, typical cases of such negotiations within the area of EU environmental policy. In spite of the similarities, these legislative files nonetheless exhibit unique features, which is evidenced by differences in legislative scope, degree of politicization, and duration of the negotiations.

Keeping in mind that legislative cycles often span several years, the chosen approach does not limit its analysis to only consider the time period of the Presidency, but focuses on legislative

processes that were concluded during the same. By doing so, this thesis will approximate the conditions where the hypotheses should theoretically hold, keeping a number of exogenous factors constant (Bennett & Elman, 2006). Concretely, it ensures a relatively stable and consistent political context for the studied files. This methodological choice also ensures that most institutional stakeholders in the Council, permanent representations, the Commission and the EP remain the same during the considered time period, which is necessary to establishing empirically and practically whether specific associations were successful in gaining institutional access. Given that these files were successfully concluded, it is more likely that involved stakeholders are open to discussing the negotiations, as they are potentially less politically sensitive in the context of both the Commission and the EP heading towards a new mandate during 2019. Moreover, the relatively recent conclusion of these files minimizes the risk of recall bias, and is practically feasible in terms of conducting interviews in person.

Having identified the negotiations surrounding the Waste Package and LULUCF as most likely cases of significant association lobbying, this thesis will proceed to map the associations involved in the negotiations. This approach is chosen in favour of identifying suitable cases through reaching out to potentially relevant associations, since the large number and variety of associations would have made it difficult to settle on specific legislative negotiations. This holds especially true in light of the limited amount of time and resources available for conducting the research.

3.2 Operationalization

The operationalized version of the theoretical framework considers the ability to supply demanded access goods as the main factor explaining different degrees of access. Factors affecting the ability to provide certain types of access goods is in turn discussed at length in Section 2.4. The choice of dependent variable is conceptualized and motivated by the theoretical argument provided in Section 2.2, where the categorization of degrees of access is presented. Accordingly, the use of semi-structured interviews and triangulating sources are intended to test whether the ability to supply access good explains the degree of access enjoyed by associations.

On the basis of the definitions outlined in Section 1.2 and the theoretical framework outlined in Chapter II, this thesis applies the following operationalization; the independent variable is considered to be the ability of associations to supply a certain access good. The dependent variable is considered the degree of access granted to the different types of associations to the EU institutions. This thesis acknowledges the large number of exogenous factors potentially affecting the degree of institutional access, and has attempted to control for a number of these factors through the case selection outlined in Section 3.2. Keeping this in mind, this thesis does not make claims to having completely isolated the potential effect of the variable of interest. Nonetheless, the thesis posits a causal relationship between the ability to supply access goods and the degree of institutional access.

Independent variable: Ability of different types of associations to supply a certain access good

Dependent variable: Degree of access granted to the different types of associations to the three EU institutions.

3.3 The Use of a Semi-Structured Interview Approach

This thesis primarily relies on semi-structured interviews to produce findings on how the ability of different types of associations to supply access goods affects the degree of access. The findings generated by interviewing lobbying parties and lobbied EU institution representatives are complemented by additional findings sourced from negotiation documents, position papers and secondary accounts of the negotiations. This approach allows for triangulating the findings generated by the interviews through convergent validation (King et al., 1995, p. 479). This section will first introduce the interview approach, and then proceed to discuss the selection of the interviewees and the set-up of the interviews.

3.3.1 Introducing the Interview Approach

The chosen methodology of semi-structured interviews is based on the existing literature on conducting qualitative research. As stated in the title of this section, the thesis relies on semi-structured interviews to generate the main case-specific findings, whilst bringing additional sources to bear on the research question. These additional sources consist of publicly available documents, and will be further discussed in Section 3.4. The theoretical framework outlined in Chapter II can be applied to other cases, and expanded or adapted for a quantitative approach such as quantitative content analysis. Nonetheless, the use of semi-structured interviews is motivated by the fact that such interviews generate empirically rich data, allowing for inductive insights by making a virtue of follow-up questions, tangents, and open-ended question.

As such, the chosen approach hinges on the ability of the interviewer to establish rapport with the interview subject. Since this thesis is a pilot study intended to provide an empirical starting point for future larger-scale studies, the chosen method is appropriate when developing and testing the revised theoretical framework. The relatively simple approach is aligned with principles of methodological parsimony, which facilitates the understanding and replicability of the research. The choice of interview approach is validated further by the rich and relatively detailed accounts generated by the semi-structured and long-form interview format, which allow for internally valid conclusions to be drawn. Consequently, the methodological strengths of the chosen approach outweigh any shortcomings in terms of replicability.

3.3.2 Selecting the Interview Subjects

Given the wide-ranging scope and extensive duration of the two legislative negotiations studied by this thesis, establish a suitable sampling frame posed some difficulties. Exploratory interviews were conducted with associations involved in energy and environmental policy, predominantly the negotiations of RED II, which provided insights into a suitable sample. As discussed at length in Section 1.4, the exploratory and iterative approach was motivated by the thesis being a pilot study, where two initial interviews concerned with RED II served as a source of important insights that were subsequently included in the theoretical framework.

Having accumulated a number of initial interviews, it became possible to deduce which other parties were relevant to contact. Access to key representatives was gained without any official accreditation, but were occasionally facilitated through personal connections. Serendipitously, many interview subjects were involved in more than one of the cases studied by this thesis, increasing the generalizability of the findings, whilst allowing for comparisons to be made between the different negotiations. Adjustments to this initial sample were made on the basis of records of institutional and association representatives provided by sources such as VoteWatch and Commission consultation documents.

Subsequently, these insights formed the basis of a stakeholder mapping of relevant representatives that was continually extended using the so-called snowball or chain-referral sampling method. This method involved asking each interview subject to name other relevant parties involved in the legislative process in question. The procedure facilitated the identification of, and potential access to, additional relevant parties to interview, whilst providing an iterative means of checking the representativeness and accuracy of the sampled population (Biernacki & Waldorf, 1981). Many of the relevant interview subjects were identified using this chain-referral technique, where both institutional and associational representatives were very helpful with identifying key players, and facilitating additional interviews. As a result, the technique eventually resulted in referrals coming full circle, with interview subjects referring to previously interviewed representatives as crucial players in the negotiations. The success of this approach was underlined by one of the interview subjects from the European Panel Federation (EPF) stating that "[n]ine out of ten requests I ignore, but since you got recommended to me through your snowballing technique, I decided to talk to you. So I really recommend this technique" (Interview 7). Lastly, the use of chain-referral method applied by this thesis can be said to indirectly account for the role of networks, personal relationships and potential national affinities, since institutional and associational representatives could reasonably be expected to refer to people they have some kind of relation to in connection to the studied cases.

In keeping with previous research into associational lobbying and access goods, as well as the scope of this thesis, the author of this thesis contacted predominantly association representatives, MEP rapporteurs, responsible Council Presidency representatives, representatives from national permanent representations, and the responsible Commission officials such as policy officers, heads of unit or director generals (Coen, 2009). Some Brussels consultancies specialized in the field of environmental policy were also contacted and interviewed. As will be discussed further in the chapters dedicated to the findings, very large umbrella associations active on the European and national level declined to be interviewed, or did not answer interview requests.

This thesis managed to conduct interviews with all relevant institutional representatives and with representatives from major European and national associations involved in the negotiations of LULUCF and the Waste Package. In light of the large number and variety of conducted interviews, the interviewed respondents can be expected to constitute a representative sample of the actors involved in the negotiations. This is nonetheless an educated guess, given the lack of definitive accounts or mappings of associations involved in particular negotiations, and the corresponding lack of details on the institutional representatives involved in the same negotiations. In total, this thesis contacted 76 representatives, seeking to secure interviews with a representative sample of those involved in the negotiations. As outlined in the Tables 5-7, this thesis conducted 22 interviews with representatives from associations and EU institutions. Given the scope of this MA thesis, this can be considered a larger number than what could be expected given the research agenda, as well as time and resource constraints.

Notably, one interview subjects represent several associations at once, usually representing both national and European associations. This thesis therefore made the decision to count this interview as three separate interviews, as the interview questions were answered from three different perspectives. Accordingly, findings from this interview subject will be attributed in accordance with the capacity in which the question was answered. Moreover, one interview saw the involvement of two CEWEP representatives, where both these representatives will be counted given their varied roles and perspectives on the negotiations. Given the tendency

amongst interview subjects to be involved in more than one legislative file, a methodological choice was made to classify the interviews based on the degree of involvement. Therefore, a representative involved mostly with the Waste Package but also involved in LULUCF was counted as a representative involved in the Waste negotiations.

The 22 interviews covered institutional representatives from all three EU institutions, EU MS representatives, association representatives and consultants representing individual firms or firm coalitions. The interview subjects were all involved with the negotiations surrounding either LULUCF, the Waste Package, RED II or a combination of these files. Thus, two of the initial, exploratory interviews are included in the total number of interviews as they provided a source of comparison and background information. Some interview subjects were involved with RED II alongside one or both of the main cases studied by this thesis. Table 5-7 present an overview of the interview subjects and the number of contacted parties.

Table 5: Respondents from Associations
Note: Given the previously mentioned tendency of certain associations to share a representative, the total sum of association representatives will be larger than the number of total interviews.

Level	Umbrella & Production-Chain	Mixed-membership	Sectoral	Total
European	Contacted: 10	Contacted: 2	Contacted: 9	Contacted: 21
	Interviewed: 2	Interviewed: 1	Interviewed: 2	Interviewed: 5
Transregional	Contacted: 2	N/A	N/A	Contacted: 2
	Interviewed: 1	N/A	N/A	Interviewed: 1
National	Contacted: 4	N/A	Contacted: 6	Contacted: 10
	Interviewed: 2	N/A	Interviewed: 1	Interviewed: 3
				Total interviewed: 9*

*Since the representative for CEPF, the Bureau of Nordic Family Forestry and MTK represented three associations but was interviewed during one sitting, 7 interviews were conducted in total.

9 interviews were conducted on LULUCF, and 13 interviews were conducted on the Waste Package. This disparity partly be attributed to the relative difficulty of identifying and securing interviews with respondents involved with the LULUCF negotiations. This difficulty could in turn be the result of the narrower scope of these negotiations seeing a smaller number of interests being mobilized. Since forestry policy is technically a national competence, there is also reason to suspect that it only interested those MS who had some sort of stake in the outcome of the negotiations. Moreover, the vastly larger Waste Package affected a much wider range of associations and institutional stakeholders, meaning that the division of respondents between the two negotiations can be considered as representative of the number of stakeholders involved in the negotiations.

Table 6: Respondents from EU Institutions

Institution	Institutional Functionaries	Political Appointees	Attachés & Presidency Representatives	Total
European Commission	Contacted: 4	Contacted: 3	N/A	Contacted: 7
	Interviewed: 1	Interviewed: 0	N/A	Interviewed:1
Council	Contacted: 6	N/A	Contacted: 10	Contacted: 16
	Interviewed: 2	N/A	Interviewed: 3	Interviewed: 5
European Parliament	Contacted: 10	Contacted: 4	N/A	Contacted: 14
	Interviewed: 2	Interviewed: 4	N/A	Interviewed: 6
				Total interviewed: 12

Out of the 22 case study interviews, the author of this thesis conducted interviews with representatives with twelve different nationalities. The sample contains two French consultants, four Germans out of which two worked at the Council secretariat and one at the Commission, and one is an MEP. The author of this thesis also talked to two Greek association representatives involved in the Waste Package negotiations, two Swedish attachés, one Maltese and one Estonian presidency representative, four Finnish representatives from the Parliament and two associations, one Italian Parliament assistant, one Czech Parliament assistant, one British consultant and one British association representative, one Dutch Council functionary and one Lithuanian association representative.

Table 7: Respondents from Consulting Firms

Type of Consultancy	Consultants
European	Contacted: 6
	Interviewed: 3
	Total interviewed: 3

3.3.3 The Set-Up of the Interviews

The interviews were conducted during the spring of 2019, and were mostly conducted in Brussels. Owing to the nature of the research, the questions asked to institutional representatives and to lobbying parties differ slightly. Generally, the interviews carried out by the author of this thesis can be considered to approximate élite interviews (Goldstein, 2002). The questions asked during the exploratory interviews were open-ended and largely inductive, as they sought to cast a wide net when identifying relevant cases and key theoretical insights. The interviews strove to avoid priming the interview subjects by only providing a cursory overview of the purpose of the interviews prior to the interview taking place. In accordance with the semi-structured approach, the interviews consisted of both scripted structured questions as well as on open-ended questions. These were often accompanied by unscripted and inductive questions intended to allow interview subjects to develop arguments further, as well to allow for the possibility of potentially useful, yet unprompted findings (Leech, 2002).

The interview questions were asked in descending order in terms of importance and sensitivity, and were phrased in a way that sought to avoid underlying assumptions leading to presuming questions. The interview questions are provided in Appendices 1-2.

In keeping with the aim of maximizing the size of the sample within a relatively small population, the interviews were generally conducted according to the preferences of the interview subjects. That required a modicum of flexibility on behalf of the researcher when it came to venue and the practice of recording the interviews. It also involved conducting some interviews via phone or email. As a rule of thumb, the interviews were conducted in person unless practically unmanageable, with two interviews being conducted via email. On average, interviews lasted for 45 minutes. The interview subjects were left to decide the date and the location of the interview as much as possible, in order to enable them to feel at ease when answering the questions. As a result, most interviews were conducted in the offices of the interviewee, or at cafés. All interview subjects were asked for permission to be recorded during the interview, in order to facilitate the correct transcription of the interviews. If there were any recordings, they were provided to the interviewed party for approval, and subsequently deleted upon completed transcription (Leech, 2002). In light of the small total population of potential interview subjects and the short time period wherein the interviews were conducted, the presence of a trade-off between keeping interview conditions homogenous and the size of the sample had to be made, where the loss of internal validity caused by varying interview conditions were outweighed by the gained external validity generated by a very large sample of interview subjects.

Chapter IV: Findings from the Studied Cases

This chapter introduces the main features of the cases studied by this thesis, and presents the main findings generated by the interviews conducted with associations and institutional stakeholders involved in the negotiations of the Waste Package and LULUCF. The introduction of the case studies and all interview findings will also be corroborated by, and complemented with, secondary sources in the form of legislative texts, voting records and varying materials produced by associations in connection to the legislative negotiations.

In order to balance a desire for specificity with varying degrees of attribution, the findings presented in this chapter will be as specific as possible when directly quoting or referring to a specific interview subject. In that regard, the most relevant information is what organization or institution the interview subject is representing, whereas a few interview subjects will be exceptionally referred to in very general terms in order to respect their requests for anonymity. The findings generated by the interviews generally concerned four different topics: the nature of the negotiations, the varying degrees of institutional access, the role of different types of information, and the role of inter-associational relationships and coalitions. These factors are based on findings from both the studied cases, but are initially considered separately on a case-specific basis, starting with LULUCF to then proceed to the Waste Package. Chapter V will then move up the ladder of abstraction to provide more general analysis on the basis of the case studies, which will be complemented by exploratory interview findings.

4.1 LULUCF

The negotiations surrounding LULUCF were concluded with the preliminary agreement reached during the Estonian presidency in December 2017. Subject to the ordinary legislative procedure, the regulation required the approval of both the Parliament and the Council before adoption as a part of the co-decision procedure (VoteWatch, 2019). Adoption was achieved at first reading, as LULUCF was adopted by the Council in May 2018 after gaining European Parliament approval a month earlier (European Commission, 2019).

The regulation is concerned with ensuring that "greenhouse gas emissions from land use, land use change or forestry are offset by at least an equivalent removal of CO_2 from the atmosphere in the period 2021 to 2030." (ibid.). As such, the Regulation codifies and implements an agreement between leaders of EU MS to involve the sector of land use in the work towards reaching the EU emission reduction target for 2030, and to align the land use sector with the Paris Agreement (ibid.).

The aim of the regulation is to provide a framework wherein MS and private actors such as farmers and foresters are encouraged to engage in climate-friendly land use. This is to be achieved by LULUCF mandating all EU MS to commit to the so-called 'no-debit' rule, where emissions from land use must be entirely compensated by removal of CO_2 from the atmosphere within the same sector. By making such compensation mandatory on an EU-wide level, the regulation is the first time such a commitment is encoded in EU law. Widening the scope of previous commitments, the regulation includes all types of land uses including both forestry but also wetlands (ibid.). Key issues addressed by the regulation include the accounting of biomass emissions used in energy towards MS 2030 climate commitments, especially in the context of forest management, an improved accounting methodology establishing a new EU governance process for how MS are monitored, and the introduction of some flexibility in how MS reach their targets by allowing allocations from the Effort Sharing Regulation to be counted towards the 'no debit' principle (Commission, 2019).

The negotiations surrounding LULUCF can be placed in the context of the 2030 Climate and Energy Framework, where the legislative file forms part of a larger effort by the EU to combat climate change. Since LULUCF codified commitments made in 2014, the file took approximately four years to negotiate and adopt, leaving associations and other private interests ample time to attempt to influence the negotiations by attempting to access institutional representatives from all three EU institutions. The Commission involved stakeholders at various stages of developing the proposal, predominantly through consultations in 2015 which yielded the *Written consultation on the Green Paper: A 2030 climate & energy framework* and the *Written consultation on addressing greenhouse gas emissions from agriculture and LULUCF in the context of the 2030 EU climate and energy framework.* These consultations informed an impact assessment carried out by the Commission (ibid.). The legislative proposal published in July 2016 was also subject to a round of consultations as a part of the Better Regulation Package, where the feedback was forwarded to all three institutions (Commission, 2016).

In the Council, the Environmental Council debated the LULUCF proposal for the first time in October 2016, reaching a political agreement in terms of a general approach focused on flexibilities and forest reference levels in October 2017 (European Parliament, 2019). In the Parliament, Norbert Lins (MEP, EPP) was appointed rapporteur for the Environment, Public Health and Food Safety Committee (ENVI). The draft report was presented to the committee in February 2017, with the amended Committee report adopted in July 2017. The report tasks MS with ensuring that CO_2 removals in the LULUCF sector should exceed emissions after 2030, aligning the proposal for regulation with the Paris Agreement and EU long-term objectives (ibid.). The Committee report was adopted in the plenary in September of 2017, enabling negotiations with the Council. A provisional agreement was reached in trilogues chaired by the Estonian presidency in December 2017. The final text saw "flexibility on the accounting of managed forests for Member States where these represent an important carbon sink" (ibid.). The Council adopted the regulation by qualified majority.

As regulations require direct implementation by MS, the file was contested as MS and sectors of private interests heavily involved in forestry worried that additional harvesting would be prevented under the regulation (Nabuurs et al., 2018). According to a Council representative involved in the negotiations, most of the concern came from densely forested MS such as Sweden, Finland, Latvia, Poland and Austria, which is partly reflected in the Council vote where Latvia abstained and Poland voted against the final proposal (VoteWatch, 2019a). A briefing produced by the Parliament finds that a number of associations were involved in the negotiations of the file, notably the European farmers' and agri-cooperatives' association Copa Cogeca, the Confederation of European Forest Owners, and the European State Forest Association (European Parliament, 2018). Out of these, the farmers' associations reportedly welcomed the balance struck between climate change mitigation and food security, supporting the flexibility put forward in the proposal. Associations representing forest owners made references to the Paris Agreement, and were keen to highlight the importance of striking a balance between GHG emissions and removals, calling for sustainable active forest management. This was echoed by representatives from state-owned forest associations, who welcomed the integration of forestry in the 2030 climate framework, but insisted that the forestry sector is unique and provides services that should be valued and recognized (ibid.).

4.1.1 The Nature of the LULUCF Negotiations

Having provided an introductory overview of the case of LULUCF, this section largely relies on the interview findings, seeking to establish which types of associations gained institutional access, and to what degree. This section on the nature of the LULUCF negotiations discusses how interview subjects characterized the negotiations, relying on interview findings and official documents published by the relevant EU institutions. As outlined in Table 8 below, the section considers the time period, the Council presidency, the nature of negotiations, the involved actors, and the access goods provided during the negotiations.

The table is intended to provide a structured timeline of the course of the negotiations, motivated by the fact that several interview findings indicate that associational involvement generally tend to vary over the course of negotiations. As such, Table 8 applies to the entirety of Section 4.1 concerned with LULUCF, where the same is true for Table 9 in Section 4.2 on the Waste Package. The cells concerned with the nature of negotiations corresponds to interview findings on the representativeness, complexity, and scope of the LULUCF negotiations. These findings are included in order to establishing the internal and external validity of the studied cases, and will also facilitate the comparisons made between the cases of LULUCF and the Waste Package provided in Chapter V. All references made to specific interviews correspond to the table of interview subjects provided in Appendix 3.

Table 8: Timeline of the negotiations of LULUCF
Based on official publication dates and interview findings

	I: Preparatory phase	II: Publication of Commission proposal	III: Co-legislative negotiations	IV: Trilogues
Time Period	2015-2016	2016	2016	2017
Council Presidency	N/A	N/A	The Netherlands, Slovakia	Malta, Estonia
Nature of negotiations	Technical, attention on impact assessment and public consultations.	Contentious on technical details and divisive amongst MS.	Tough discussions on technical components, but some consensus surrounding ultimate goal.	Consensual, compromise-seeking, opaque, hectic.
Involved Actors	**Commission:** Broad public consultations, need for data for impact assessment. Focus on forest sinks.	**Commission:** Proposal got a lot of attention. Focus on forest sinks maintained in proposal.	**Commission:** Largely facilitating role, chairing meetings and preparing for dialogues. Defensive posture in protecting spirit of proposal.	**Commission:** More difficult to access during trilogues, and varying access to different DGs.
	N/A	**EP:** Conflicts in EP committees, and between ENVI and ITRE committees.	**EP:** Position set within Parliament. Rapporteur entered into the negotiations with the Council with a strong mandate.	**EP:** Different to influence MEPs during trilogues. MEPs aligning on the basis of ideology, nationality or institutional preferences.
	Council: Divide between forested MS (SE, FI, EE) and ambitious MS (NL, UK).	**Council:** MS still divided, with clear dividing lines remaining.	**Council:** More opaque, Nordic coalition and opposing coalition of ambitious countries formed.	**Council:** Rebates and exceptions placates resistant MS (FI and HR). Pushing for agreement.
	Associations: National and European associations involved in consultations and impact assessments. Open to anyone. Laying groundwork in establishing contacts with relevant Commission representatives.	**Associations:** Scrambling to understand proposal and put forward unified positions. Seeds for ad hoc coalitions sown.	**Associations:** Good access to Parliament during this phase. Smaller number of associations involved, sector-specific on EU-level, regional level (Nordic) and national level (FI, SE, SL, EE, AT). Coalitions forming amongst Nordic associations.	**Associations:** Lack of influence over Council secretariat. Consulted by domestic ministries and key permanent representations.
Access Good	**Technical & Economic Information:** On the ground and production-chain impact of legal texts, country-specific and EU-wide data. Facts and data on impact on forest industry.	**Technical Information:** Scientific impact of certain provisions such as Article 8, fact sheets.	**Technical & Economic Information:** Forest reference period, the accounting modalities and compensation mechanism and the inclusion of wetlands. Provided largely to EP technical negotiators and MEP assistants.	**Technical & Economic Information:** Transnational information on bark beetles, forest fires etc. One key issue concerned the termination or finalization of the 2030 Climate and Energy Package. Economic impact on forested countries.
	Political intelligence: Events, preparatory meetings.	**Political intelligence:** legal formulations, position papers, and mapping political support.	**Political intelligence:** Amendments written for MEPs, position papers, compromise positions.	**Political intelligence:** Voting recommendations, coordination, coalition-building, monitoring MEPs and relevant MS. Transnational knowledge also used for political purposes in coalition-building.

Speaking on the subject of the representativeness of the legislative negotiations, the European Parliament rapporteur for the LULUCF file claimed that there was a "normal representation of interests, objective exchange". As a Council functionary stated, "[t]he negotiations were a typical case, there was no drama." (Interview 3). According to a representative for EPF, "[…] every one was different, but the process was largely the same. […] In both cases we looked for support in the Commission, and then in Parliament, working on amendments." (Interview 7).

The majority of interview subjects found that the negotiations on LULUCF were constructive, with contestation on technical issues such as forest reference periods (see Table 10), and agreement on the overall direction and aim of the negotiations amongst the involved negotiating parties. According to the LULUCF rapporteur, "[e]veryone wanted a good compromise, because it was important to strengthen the positive effects of sustainable agriculture and forestry." (Interview 1). Echoing this notion, a Swedish official noted that LULUCF was a long and open process (Interview 4). The rapporteur notes in a newspaper interview shared with the author of this thesis that "[i]n general Member States and the European Parliament were on the same page as both sides acknowledged the importance of land-use for the achievement of the climate goals." (Bilas, 2018). The same article notes that the discussions were toughest in connection to technical issues such as the forest reference period (ibid.).

Underscoring the role of technical issues, a CEPF representative claimed that "[LULUCF] introduced more complex accounting, which made it difficult to tell what the impact will be. This was also the first time that LULUCF was considered under an EU umbrella framework." (Interview 6). Despite the characterization of the negotiations as consensual, some interview subjects argued that disagreement between heavily-forested MS such as Finland and Slovenia and other MS seeking to secure ambitious targets led to some political contestation in the Council (Interview 3). Corroborating this point, a Swedish attaché responsible for the LULUCF negotiations noted that the file was very complex, sensitive and important to heavily forested MS, with intra-EU heterogeneity complicating negotiations both in the Council and between the co-legislators (Interview 4). These political differences appear to have been reflected in public discussion surrounding the negotiations, where according to a representative from the Finnish Forest Industries, the "[p]ublic debate was quite contentious. In general, there was lots of criticism from non-forested countries towards forest-rich countries. Which was odd." (Interview 7). Notably, it appears that some accommodation was made for these inter-MS differences in the adopted text, as discussed in the introductory Section 4.1.

Many associations characterized LULUCF as rather narrow in its legislative scope, which can be seen as a difference between what Section 4.2 will characterize as the horizontal Waste Package (see Table 10). The supposedly narrow scope of the file can help explain the political mobilization of a few affected MS, with the rapporteur for file noting that "70 percent of EU forests are in seven nations: Finland, France, Germany, Italy, Poland, Spain and Sweden." (Bilas, 2018). This is echoed by a Council official, who states that the key players were "especially Finland and Sweden, as well as Slovenia, Austria" (Interview 3). A Swedish official noted that LULUCF held specific interest to Sweden in light of their ambitious and progressive profile in the policy areas of climate and environment policy, arguing that Sweden needed to balance this reputation with a desire to protect domestic forestry industries (Interview 4). According to the same official, the narrower implications of the regulation saw some MS and national associations being more involved than others. The official mentioned Poland, Finland and Eastern MS as being in favour of the forestry industry, whereas Denmark, the UK, the Netherlands and Luxembourg were seen as very ambitious when it came to the use of forests as carbon sinks (ibid.).

4.1.2 Degree of Institutional Access

Having established the nature of the negotiations (see Table 8), this section will consider the degree of access enjoyed by different types of associations to different EU institutions during the negotiations. Based on the interview findings, this section will compare and contrast institutional perspectives on associational access with the views of associations themselves, providing a detailed account of the degree of access enjoyed by specific associations involved in the negotiations. Appendix 4 provides specific information on the access enjoyed by the interviewed associations, as well as other associations identified as involved in the negotiations by the interview subjects. Alongside the equivalent table for the Waste Package, these two tables are formatted in line with the theoretical expectations outlined in Chapter II.

Speaking on the general accessibility of EU institutions, a representative from EPF noted that "I would not like to say that one [institution] is any easier than the other." (Interview 7). This seems to suggest that some degree of access is attainable for all associations, given that they are capable of correctly approaching and navigating EU institutions, which in turn would seem to require certain levels of institutional resources and experiences. According to institutional representatives, there was at least a low degree of access granted to associations. The rapporteur for LULUCF noted that the negotiations saw a "normal representation of interests, objective exchange" amongst EU institutions (Interview 1), with a Council official noting that "[LULUCF got] a distinct start with the Commission proposal, where we had a long discussion on the impact assessment as it was a rather technical file. This got a lot of attention." (Interview 3).

Speaking on the topic of institutional access, a representative from the Finnish Forest Industries stated that "we took part in public discussions […] participated in Commission's public consultation" (ibid.). According to a representative of the European umbrella association CEPF, "[w]e got involved in LULUCF and MS by sharing our views with institutional representatives. […] There are public consultations, but there are other ways to be involved." (Interview 6). In this interview, the other ways to get involved refers to reaching out to individual representatives to provide information and arrange for meetings, suggesting that consultations cannot be relied upon as a reliable source of consultation and negotiation involvement. Notably, the Commission conducts various types of consultations with stakeholders, where a distinction can be made between open consultations, workshops with stakeholders, and targeted stakeholder involvement through what will be referred to as closed consultations.

Interestingly, the minimal degree of access afforded by public consultations is not officially conditional on the provision of an access good by an association. According to a policy advisor at the national association MTK and the European confederation CEPF, "[o]bviously formally we all enjoy access to EU institutions, but this is not always practically the case." (Interview 6). This appears to be aligned with the theoretical framework elaborated by this thesis, where the Commission could reasonably be expected to prioritize and favour associations supplying access goods that satisfy demands for European, technical information that is representative of the broadest possible number of stakeholders (See Appendix 4). The CEPF representative explained their dual approach to access by claiming that "[t]he big thing is that the Commission is difficult to influence compared to the Parliament. […] Everybody can reply to public consultations, there is a roadmap for the feedback, so we contribute there and take all occasions to contribute. We are not sure of the impact, but we cannot miss it." (Interview 6).

Considering specific EU institutions in turn, the representative for CEPF provided a qualified account of access to representatives from different parts of the Commission, noting that "[f]or

the Commission, it was easier to access DG AGRI than DG ENVI, and DG CLIMA was okay. They do not need or have to see us, so we rely on the goodwill of the civil servant." (Interview 6). A representative from European sector association EPF argued that "[o]bviously DG Grow is our first stop, followed by DG ENVI, CLIMA and AGRI according to our particular points. DG ENER too. All are accessible if approached professionally, and correctly." (Interview 7). This seems to suggest that even if the degree of access to the Commission enjoyed by a European umbrella and sectoral associations is similar, there can still be intra-institutional variation in which DG they enjoy access to. Moreover, the quote seems to suggest that associations prefer to supply access goods early in the legislative process. The representative from Finnish sectoral association MTK argued that access was "[r]elatively easy." (Interview 6). The managing director of EPF argued that in terms of the involvement and access, the association enjoyed a high degree of access "in both [LULUCF and the Waste Package], yes. I know that there are many still unhappy with LULUCF (especially related to the Forest Reference Levels), but in both packages I think that we had ample time for our advocacy." (Interview 7).

As for access to the European Parliament, institutional representatives such as the Parliament rapporteur for LULUCF claimed that both sectoral, national and umbrella associations were involved in the negotiations in Parliament, with his office aiming at "[g]etting an overview of all relevant positions and expertise." (Interview 1). The office of the shadow rapporteur claimed that "[o]ur starting point was to meet everyone who we could fit into our calendar" (Interview 2). The representative from the shadow rapporteur's office went on to claim that "several sectoral and some umbrella associations approached us. When it comes to LULUCF, we met a lot with Finnish and Swedish sectoral associations, as well as with NGOs in order to get a balanced view. We also met with all big individual companies active in the forestry sector." (Interview 2). The representative from H+K Strategies argued that they enjoyed a high degree of institutional access, claiming that "we met with 27 permanent representations, 27 MS, all MEPs" (Interview 9). According to a MEP assistant, "LULUCF was controversial, and in our position as shadow rapporteurs, we wanted to sit down with both sides [NGOs and associations] as well as with other MEPs in order to create and foster understanding about the forest" (Interview 2).

The Council was considered the least accessible institution during LULUCF negotiations. An explanation for this is potentially lacking transparency and associational familiarity with the Council as an institution. Providing a potential explanation for why associations do not enjoy a high degree of access to the Council, a Council secretariat representative involved in LULUCF argued that, "[a]ssociations do not influence me, when they contact me they just want to know the date and time of the next meeting." (Interview 3). This indicates that there is no real demand for associational access goods within the Council, which is also reflected in the meagre expectations that associations place on meetings with Council representatives. According to the same Council representative, "some companies [were] trying to influence" (ibid.), indicating that the Council secretariat did not necessarily see many attempts at associational lobbying. At the same time, there was a pattern of MS divides being replicated and potentially reinforced by associational coalitions, with one Swedish permanent representation representative arguing that there was coalition-building in the Council and amongst national associations, which could facilitate institutional access (Interview 4). This is corroborated by an MEP assistant at the office of the shadow rapporteur, who claimed that "some interests were very transnational in the sense that the Swedish and Finnish interests were extremely closely aligned, and they clearly acknowledged that they cooperate when they met with us." (Interview 2).

Concurrently, it appears that permanent representations were the easiest means of accessing the Council according to a Swedish permanent representation representative (Interview 4). According to the representative from the Swedish permanent representation, they had a lot of contact with Swedish sectoral organizations such as Skogsindustrierna, LRF and Skogsägarna (Interview 4). Speaking generally on the involvement of associations in legislative negotiations, the representative argued that associations from both EU- and national level were mobilized to a greater extent than what is normally the case during legislative negotiations in the policy area of environment (ibid.).

4.1.3 Different Types of Access Goods as Determinants of Institutional Access

This section considers the different types of information demanded by institutional stakeholders, and supplied by associations in exchange for access. The section outlines the main findings regarding the reliability of associational information provision, different types of information, the access and influence gained through the provision of information, and the different ways in which information was provided to different institutional stakeholders.

Speaking in general terms, a consultant from Hill+Knowlton Strategies argued that "[o]ur access depends on if we have some information, and who you represent – you get more access if you share more information." (Interview 9). The representative went on to argue that "providing the right arguments and data, and people find it interesting." (ibid.). This seems to support the notion that the provision of technical information plays a key role in enabling institutional access to both the EP and the Council. According to the representative from EPF "[i]f you do it [lobbying] correctly, all doors are open. EU institutions are very inclusive in this regard." (Interview 7).

Finnish Forest Industries illustrates that resource constraints and a lack of a Brussels presence could make it difficult for national or sectoral associations to achieve greater degrees of institutional access, especially when it comes to the Commission (Interview 5). This is supported by an MEP assistant at the offices of the shadow rapporteur, who claimed that "[t]he associations who have representatives in Brussels is easier to meet with and to develop relationships with, even outside work or in other contexts. In that sense, you develop similar networks. Sometimes things just come up in other private conversations." (Interview 2). Therefore, the generally higher level of access for European associations to the Commission can be considered the result of EU associations having a Brussels presence, which facilitates the development of institutional relationships, and the development of insights into how to effectively supply the desired access goods in exchange for institutional access (see Appendix 4).

Hence, the role of associational representativeness and trust appear to play a role in facilitating the provision of access goods. The managing director of EPF noted that personal connections could also help associations gain the trust of institutional representatives, claiming that "[r]eally knowing people, it's like a filter, which is based on trust, creating a network is like a chain of trust." (Interview 7). However, this is disputed by the representative from H+K Strategies, who noted that "[c]oncerning personal connections, that is not for us. It is one thing to build trust with MEPs […] Personal connections matter less and less, that is good." (Interview 9). Appearing to agree with this account, the rapporteur for LULUCF argued that "[associational] knowledge and expertise was key to determine whether they were consulted or not. Of course, countries with a lot of forests or special situations tried to see Mr Lins more often." (Interview 1). At the same time, a policy advisor at CEPF argued that nationality does play a role, stating that "I don't need to meet everyone, it was more a question of determining who was best placed

to call [MEP and LULUCF rapporteur] Lins, where we wanted it to be a German member [since Lins is German]. We possess knowledge on the legislative timetable, and who is the best person to bring our message." (Interview 6).

Arguing that the differentiation in Commission access was the result of not only personal relationships with individual institutional representatives, but also due to differing views between specific DGs and CEPF, the CEPF representatives argues that "DG CLIMA was really difficult for us to access. They were not necessarily on our side in LULUCF." (Interview 7). This would seem to be the result of the type of access good provided, but also due to the political priorities of the differing DGs, with DG GROW seeming more concerned with the viewpoints of the industry than for instance DG CLIMA.

Such political priorities were also found to play a role in the Parliament, with an MEP assistant claiming that "we wanted to create a compromise that aligned with the views of our MEP, who was closely aligned with the interests of the [Nordic] forest industry. Associations provided us with numbers, and alternative models for how to count emissions." (Interview 2). The generally lower level of access enjoyed by European associations in the Parliament can be explained by the need to identify and befriend MEPs to act as points of entry and potential legislative champions. This is possibly easier for national associations, who can appeal to a shared national identity, and potential political or cultural alignments (Appendix 4). The representative from EPF argued that "it is harder to get in with EP. MEPs are national, I personally can meet a British MEP more easily than with a German one. To get around this, we tell our national association to contact them. A Spanish guy wants to hear from Madrid. So the national association or member can call them up, and that is certainly easier." (Interview 7). According to the same representative, "[f]or the Parliament, it is necessary to have friendly MEPs. We rely on them and their assistants enormously." (ibid.).

The shadow rapporteur assistant argued that "there are shared Nordic interests, with forests crossing borders and some owners operating on both sides of the Swedish-Finnish border." (Interview 2). The same representative went on to argue that "[g]iven our limited time, we prioritize in the following order – domestic [Finnish] associations first, then other associations from Nordic countries or Nordic associations, then European associations, and then lastly global associations. However, the last two often provide information that on such a general level that it is not useful for us or them, making it a waste of time." (ibid.). The same representative argued that transnational knowledge could be helpful, where "[i]f we can get such transnational information, it helps in the sense that we have more backing for our position (if it is compatible with our position). The more we have behind us, the better, and close cooperation between these national associations makes it easier for us by having one agreed Nordic position." (Interview 2).

Interestingly, associations seem to make a distinction between access to assistants and access to MEPs themselves, where assistants could be viewed as providing a lower degree of access in terms of official institutional position. Nonetheless the representative for CEPF argued that the change in parliamentary assistants had a very large impact on the access and eventual influence of the association (Interview 6). The MTK representative went on to argue that certain committees were easier to access and influence than others, stating that "[w]ith LULUCF, our access to EP and the Council paid off, especially concerning the vote in ITRE." (ibid.). This seems to suggest that European associations have greater access to the Commission than to the Parliament because the Commission is more receptive, but also because these European associations seem to think that they can achieve more through the Commission. This leads them

to more intensively target the Commission when supplying access goods. At the same time, national and regional associations can benefit from targeting the EP and the Council. Providing additional support for the notion that sustained efforts and continuous access is important to securing a high degree of consultation and access, the EPF representative claimed that "[w]e focus to 90 % on the Commission, devoting 10 % to the EP. This is since the EP is found farther down the chain, which makes [access] that much harder." (Interview 7). Thus, the representative seems to argue that European sectoral organizations such as his focus most of their attention on the Commission, which could help explain their high degree of access (see Appendix 4).

According to the representative from the Swedish permanent representative, associations enjoyed a greater degree of access to permanent representations due to the supply of access goods in the form of technical information and political intelligence by national associations which was traded for access and political intelligence on the direction of negotiations in the Council (Interview 4). According to the same representative certain national associations or national champions can act as good examples of progressiveness, providing information that counterbalances the 'lowest common denominator'-type information provided by umbrella associations (ibid.). This seems to suggest that Council representatives from leading or driving MS could be more accessible to sectoral or national associations, since they can be expected to provide more political intelligence in the form of best practices and examples of progressive, outlying industry opinions. Notably, the national associations granted access through the provision of such access goods seem to enjoy more access predominantly to institutional functionaries such as the Parliament Secretariats, and to MEPs and MS who could use this political intelligence to their advantage in negotiations (ibid.).

Some associations argued that MEPs rely the most on associations as key sources of reliable technical information (Interview 2). Sectoral or national associations were consulted more often for their ability to provide specific or technical information, especially given the complexity of the files, as supported by an MEP assistant. The representative argued that "We usually call Swedish and Finnish associations and individual companies based on previous meetings or on our own initiative. Our national associations in Finland and in Sweden." (ibid.). This shows that national ties and national knowledge played the biggest role when associations sought to access MEPs and national permanent representatives.

When it comes to political intelligence, the same MEP representative argued that "the role of associations was to provide supporting arguments, alternative models. They also sent out amendments, where we usually compare amendments provided by different associations and write our own." (Interview 2). According to a representative from CEPF they "use position papers of only one page, as the shared wisdom is that MEPs don't know how to turn a page, and we also made an infograph, and very very short fact sheets with three points and amendments. Usually we just assist with amendments […] there is no credit and no telling who the source is, but whatever they need, we provide. We have experts whose core job is to know these things, so that's how it goes." (Interview 6). This suggests that there is indeed a market for access goods, where political intelligence, as well as technical and economic information, is provided by associations in exchange for a greater degree of access. It seems that political intelligence and complex technical information is most often provided through amendments and industry visits, with national or EP delegations visits organized by associations play a role in providing national, sectoral, or regional information in a very tangible and concrete way. This approach was aimed mostly at the Commission and MEPs, and was brought up by

representatives from the Swedish Permanent Representation, CEPF, and EPF (Interviews 4, 6, and 7 respectively).

4.1.4 Inter-associational Relationships and Coalitions

The last part of this section on the LULUCF negotiations considers the role of inter-associational relationships and coalitions in providing associational access. The role of cooperation between different levels of associations in the context of umbrella associations, as well as coalitions between national associations, corresponds to the tendency to cooperate as outlined in the theoretical Chapter II. Several interview subjects representing EU institutions or associations argued that the negotiations saw the formation of several issue-based coalitions, where for instance there were "consultancies representing Nordic industries. LULUCF saw a lot of Nordic special interests." (Interview 2). The representative working with the shadow rapporteur accordingly argued that there were such Nordic interests, which also saw national Swedish and Finnish associations coordinating and cooperating in lobbying their interests (ibid.).

Providing an instance of associational coalitions, the CEPF representative claimed that 'gathering [association] logos' was a key activity to gain credibility and representativeness of position, which could be complemented with the provision of position papers without any sender at all (Interview 6). The same representative argued that it was important to find different avenues to provide the message in, stating that sometimes it is better for the association if the information and the position is not overtly provided by the association itself (ibid.). This seems to indicate that forming coalitions amongst associations are key to ensuring a higher degree of institutional access, since institutional representatives on a European level demand broadly representative information, whilst expecting coalitions to be able to provide specific technical and economic information.

According to a permanent representative attaché, national associations talked to one another and coordinated which institutional representative they targeted, and subsequently what type of access they gained (Interview 4). In terms of national coalitions, the same representative argued that the Finnish industry was more publicly visible, whereas the Swedish forest industry focused more on bilateral contacts behind the scenes. The representative finds that it was evident that they cooperated, since they provided identical proposals and policy papers to those presented by a Finnish MEP. Allegedly, associations were open about these inter-associational relationships. According to the representative from EPF, the association cooperates with "loads of them [associations]. Europe is too big to advocate on solo, unless you are BASF, or someone like that." (Interview 4). This is supported by the MEP assistant working for the shadow rapporteur, who claimed that national associations "explained a lot about how this [model] would affect them" (Interview 2). By entering into coalitions, individual associations can also use different coalition members to gain a higher degree of access, by leveraging national connections, personal relationships and the varying expectations placed on different associations by institutional representatives. Moreover, associational coalitions can also pool their MEP champions in the EP, or the support from individual MS in the Council in order to build coalitions within the co-legislative institutions. By agreeing on a common position, individual associations can group together and act as a one stop shop for institutional representatives, who can count on the supplied information or political intelligence being representative of a large number of industry players.

In terms of umbrella associations coordinating with their individual association members, the representative from the Finnish Forest Industries stated that "our industry has its EU-

associations." (Interview 5). This seems to suggest that national sectoral associations contacted EU-level umbrella associations in an attempt to gain access on multiple fronts. The same interview subject claimed that the association approached the "Commission, some members of European Parliament, Finnish decision makers and forest related stakeholders in order to explain our side of the story." (ibid.).

An interesting instance of inter-institutional cooperation was provided by the representative for CEPF. The representative claimed that "I represent an EU organization, but also Nordic forest owners and the Finnish organization MTK. I was previously the interim Secretary General for CEPF, but I am generally responsible for energy and climate policy." (Interview 6). This seems to indicate that certain representatives represent a certain sectoral or industry interest at several levels. According to the same representative, "[g]enerally with these organizations, the Brussels office is smaller compared to larger regional or national offices due to lacking resources or prioritization, meaning that I have become the 'Brussels forestry person' of sorts." (ibid.). The practice of having a single Brussels representative for a certain sector seemed to facilitate a certain degree of access, since it allows for the provision of trustworthy, and widely representative information, whilst also allowing the representative flexibility when attempting to gain institutional access. Supporting this point, whilst mentioning the tendency towards coalition-building amongst associations, the CEPF representative claimed that "[i]n terms of Council access, it is always important for us to contact the Swedes […] in terms of the national association" (ibid.).

4.2 The Waste Package

In keeping with the methodological approach adopted by this thesis, the Waste Package also reached a preliminary agreement during the last month of the Estonian presidency. Unlike LULUCF, the Waste Package is a package directive launched as a part of the Circular Economy package presented in 2015 (Commission, 2018). The adopted package involved "amending Directive 2008/98/EC on waste, amending Directive 1999/31/EC on the landfill of waste, amending Directive 94/62/EC on packaging and packaging waste, amending Directives 2000/53/EC on end-of-life vehicles, 2006/66/EC on batteries and accumulators and waste batteries and accumulators, and 2012/19/EU on waste electrical and electronic equipment" (European Parliament, 2016, p. 1). The package was subject to the ordinary legislative procedure, where the preliminary agreement formed the basis for an adoption on first reading by the co-legislator in May 2018 (Commission, 2018).

An earlier version of the Package was introduced by the Commission in 2014, but was withdrawn in 2015 as the Commission claimed it wanted to provide "a more ambitious proposal that will cover the whole of the circular economy" (European Parliament, 2016, p. 2). The incident illustrates the ambitious scope, and controversial nature of parts of the Waste Package that was negotiated between 2015 and the end of 2017. Given the large discrepancies in approach and waste volumes between EU MS, the efforts towards a harmonized approach to waste reduction and recycling between MS made the negotiations surrounding the Waste Package controversial. The negotiations were long and occasionally contentious, which can be partly attributed to the sheer size, ambition, and technical complexity of the Package, where a large number of MS and a wide array of private actors were directly or indirectly affected by the outcome of the negotiations according to an assistant to the rapporteur (Interview 11). At the same time, a number of interview respondents claimed that the negotiations were characterized by a certain amount of goodwill and goal-consensus amongst involved stakeholders (European Parliament, 2016).

The Package aims to prevent waste and to increase recycling levels of municipal and packaging waste by gradually moving away from landfilling and by promoting economic instruments such as the so-called 'Extended Producer Responsibility' (EPR). The package seeks to strengthen the pre-existing 'waste hierarchy', where certain types of waste reduction and recycling must be prioritized over incineration or landfilling. Under the Directive, MS are required to abide by the prioritization provided by the waste hierarchy as part of the move towards a more circular economy (Commission, 2016). As such, the adopted Package is claimed to be the most modern waste legislation in the world (Commission, 2018). The new waste rules include increasingly demanding recycling targets for municipal waste, and packaging waste, more stringent means of calculating recycling rates, new separate collection rules, the phase out of landfilling, and economic incentives to prevent and reuse waste (Commission, 2018).

The large number of technically complex files included in the Waste Package warranted extensive involvement of stakeholders in the legislative negotiations. The Commission relied on consultations done in connection to withdrawn 2014 proposal when developing the Waste Package proposal, engaging in consultations with key stakeholders both before and after the withdrawal of the initial proposal in 2015. The Commission included both private interests and MS in the consultations leading up to the Waste Package proposal in 2015, and also published an additional impact assessment complementing a previous assessment based on the initial Waste proposal (European Parliament, 2016).

The European Parliament saw the ENVI Committee charged with producing a report on the Waste Package proposal, where Simona Bonafé (MEP, S&D) was made rapporteur for the Package (Interview 11). The Parliament acted as a key driver of the new Waste Package proposal, adopting a resolution in July 2015 urging the Commission to present a more ambitious Waste proposal by the end of 2015. This ambitious line saw the Parliament advocating for "strictly limiting incineration of recyclable and biodegradable waste by 2020; gradually implementing, by 2030, a ban on landfilling (except for certain hazardous waste and residual waste); and increasing targets for recycling and preparation for reuse to at least 70% of municipal solid waste and 80% of packaging waste by 2030" (European Parliament, 2016., pp. 8). Notably, the Parliament advocated for the new proposal to facilitate industrial sustainability through resource efficiency, noting that the potential for a green sustainable economy transition could generate both economic and environmental benefits. The Council also adopted a cautiously welcoming stance, taking issue with the high level of ambition found in the new proposal (ibid.).

As with LULUCF, the negotiations were occasionally contentious. Apart from the political debate in the Council surrounding the overall ambitiousness of the proposal, bones of contentions were the technical definitions and percentage targets foreseen by the proposal (Interview 2, 11, 18). Perhaps mirroring this contention, the Waste Package was subject to qualified majority voting in the Council, where Hungary abstained in all four votes related to the Waste Package (Votewatch, 2019b-e). Portugal also abstained on the Framework Directive vote (VoteWatch, 2019b).

According to a parliamentary briefing, associations were generally welcoming of the proposal, providing specific feedback on a number of concrete issues that served both to support and to criticize the proposal (European Parliament, 2016). The briefing mentions a number of different European associations involved in the negotiations of the Waste Package, where Waste-to-energy sector association CEWEP, non-ferrous metals association Eurometaux, European Steel

association Eurofer, European Aluminium, the Paper association CEPI, Europen, the Association of European Chambers of Commerce and Industry Eurochambres, Container glass federation FEVE, Waste management federation FEAD, Municipal Waste Europe, and Plastics Recyclers Europe are mentioned (ibid.). The wide variety of consulted associations indicates the broad scope of the negotiations, and also indicates that major European and sectoral associations enjoy at least some degree of institutional access. Notably, sector-specific European interests dominate the list of consulted associations outlined in the briefing, unlike the LULUCF, where the parliament briefing focused on European umbrella associations. Nonetheless, the briefings explicitly mention that they do not provide complete lists of all consulted associations, making it difficult to ascertain whether the type of association influenced institutional access relying on these documents alone. Furthermore, even if these lists were exhaustive, they cannot be used to determine whether the type of association had an effect on the degree of access to institutions, since different files are likely to mobilize different types of associations. Hence, some associations might not be mobilized during certain legislative negotiations, whereas others might not be able to achieve even a low degree of access, meaning that they fail to be included on the list.

Keeping this in mind, it is still possible to identify some patterns in the parliament briefings. Sector-specific associations were generally supportive of the proposal, and many associations were constructively engaged and consulted during the negotiations. Sector-specific associations such as CEPI and FEVE welcomed the package, highlighting the ambition and recognition given to their industries by the proposal. Plastic Recyclers Europe were more critical, arguing that there was not sufficient "concrete action on plastics recycling, especially as regards sorting and exports" (ibid). The sector association CEWEP requested more ambition in the area of landfilling, specifically highlighting the importance of their own sector in the circular economy (ibid.). The parliamentary briefing finds that the metal associations "particularly welcomed the landfilling and recycling targets, as well as the requirements for separate collection and increased recyclability" (European Parliament, 2016, p. 9). At the same time, metal associations also provided general feedback, with "Eurofer [calling] among other things, for a move away from 'waste management' to genuine 'resource management' and for more recycling of construction and demolition waste" (ibid.). Similarly, European Aluminium lobbied for moving away from landfilling through a phase-out, and "called for more ambition on construction and demolition waste targets" (ibid.). A similarly positive stance regarding landfilling was taken by associations representing the plastics sector, but also saw Plastics Europe voicing concerns about "extremely ambitious" recycling targets for plastic packaging (ibid.). Umbrella associations representing wider interests such as entire supply chains or European industrial interests appear to have focused their attention on the EPR schemes. Europen welcomed the proposal's intent to improve how these schemes function, whereas Eurochambres considered the EPR provisions "problematic" (ibid.). Providing a more general critique of the proposal, the latter association called the packaging waste targets "unrealistic". (ibid).

As for the waste sector, the management federation FEAD provided specific feedback on the need for more regulatory assistance with market-creation in their sector, whilst generally welcoming the presence of binding waste management targets (ibid.). Municipal Waste Europe, which can be seen as a mix between a sectoral and an umbrella association operating on the European level, specifically welcomed the provisions on waste management targets, the EPR schemes and the changed definition of municipal waste. At the same time, the association sought to "highlighted the need for waste-to-energy (incineration)" (ibid.). It is important to note that the relatively constructive and positive feedback provided by associations during the public consultations are part of the terms of engagement in EU legislative processes, where

stakeholders are unlikely to provide openly negative comments in order to be viewed as constructive partners during the negotiations. Generally, many interview subjects highlighted the importance of maintaining goodwill and good working relations with institutional representatives (Interview 12 and Interview 21).

4.2.1 The Nature of the Waste Package Negotiations

As in Section 4.1, this section centres around four topics; the nature of the negotiations, the degree of institutional access, the role of access goods, and inter-associational relationships and coalitions. These four topics largely correspond with the theoretical expectations derived from the theoretical framework. As such, this section will focus on the facts surrounding institutional access during the Waste Package negotiations. Table 9 below provides a timeline of the negotiations informed by interview findings provided by institutional representatives and associations. This timeline helps explain the differing accounts of the Waste Package negotiations, which could depend on which phase the interview subject was involved in.

An attaché working at the Maltese presidency noted that "[o]ur phase of the negotiations were contentious. There was a split between MS with highly sophisticated capabilities versus those that were not ambitious versus those who were pragmatic." (Interview 15). According to the Estonian Presidency negotiator, the "Package consisted of 500 pages, large files, it was a long process that went outside our six months of presidency, the Commission withdrew and discussed a new proposal for two years, and then the Maltese Presidency took over." (Interview 14). This sentiment was echoed by an official at the Council secretariat working on the Waste Package, who noted that "[t]here was a late push by the Estonian presidency in October, aiming for an agreement by the end of the year 2018. It was not clear in the beginning. I came in around October, and we had to start preparing documents over the weekend." (Interview 16).

A representative from EuRIC, the European umbrella association for recyclers argued that regarding the negotiations, "[t]he access we enjoyed during the negotiations of the Waste Package were representative, as were the negotiations themselves." (Interview 20). This was echoed by representatives from CEWEP, the Confederation of European Waste-to-Energy Plants (Interview 21). According to an EP political advisor, the one anomalous aspect of the negotiations was their long duration, where the representative argued that the "negotiations of the Waste Package were typical and representative, but they just took more time than any other file." (Interview 12). However, one Swedish policy officer claimed that the negotiations were not consensual, referring to the heterogenous approaches to waste amongst MS making negotiations more difficult (Interview 17). Nonetheless, the representative concurred that the legislative package was huge, with negotiations being partly rather technical (ibid.).

Indeed, the Waste Package negotiations seem to have been characterized by technical complexity, with one S&D Parliament assistant claiming that "[t]here were a lot of technical discussions, concerning definitions – in the end, these were clear." (Interview 10). According to Simona Bonafé's parliamentary assistant, their office "[…] cannot keep track of all technical information, forecasts, and targets […] [i]t was also pretty technical legislation" (Interview 11). The key role of technical information is illustrated in Table 9, which shows technical and economic information of varying complexity and scope playing a continuous role throughout the long negotiations. According to one European Parliament advisor involved in the trilogue negotiations, "[the Waste Package negotiations] saw the EP being unusually united, which could be due to the large trust capital of the rapporteur. On a technical level, there was a large degree of consensus." (Interview 12). The EuRIC representative claimed that the Waste

Package "negotiations had contentious issues, but overall a constructive file. There are typically contentious elements." (Interview 20).

The apparent disagreement concerning the contentiousness of negotiations amongst interview subjects can be explained by the sheer size of the Waste Package. Even though the Package was often characterized as less contentious by interview subjects, it involved a larger number of stakeholders. Moreover, it is possible that the negotiations were politically contentious, yet consensual and constructive on a technical level, as necessitated by the size and complexity of the Package. Bonafés assistant noted that "[The Waste Package] was horizontal legislation – who is NOT producing waste? This meant that there are many stakeholders, including a wide spectrum of individual companies. […] The file negotiated is super-big, and has real impact on MS." (Interview 11). A Commission policy officer at the Waste Unit noted that "in many ways the negotiations were quite standard, we ended up somewhere in the middle in the end. It was exceptional in so far as being an extensive package." (Interview 18). This characterization was echoed by a policy officer in the Parliament, who stated that although the Waste negotiations were largely representative of negotiations surrounding environmental policy, the size of the file resulted in a large amount of lobbying, which could support the notion that its horizontal nature saw the involvement of a larger number of associations and other stakeholders (Interview 13).

Table 9: Timeline of the negotiations of the Waste Package
Based on official publication dates and interview findings

	I: Preparatory phase	II: Publication of Commission proposal	III: Co-legislative negotiations	IV: Trilogues and political agreement
Time Period	2014-2015	2015	2015-2017	2017
Council Presidency	N/A	N/A	The Netherlands, Slovakia	Malta, Estonia, Austria
Nature of negotiations	Technical, attention on impact assessment and public consultations. Politically sensitive, with the initial proposal withdrawn in 2015.	New proposal accounting for political concerns. Contentious on technical details, consensus on big picture. No mention of food waste. Associations welcomed minimum packaging requirements.	Major issues dealt with first. Tough discussions on technical components, but some consensus surrounding ultimate goal. Hectic late push on batteries. Disputes surrounding scientific basis. EPR an issue.	Consensual, compromise-seeking, finetuning. Food waste included in final text.
Involved Actors	**Commission:** Broad public consultations, need for data for impact assessment. Focus on EU-level associations.	**Commission:** Proposal got a lot of attention. Focus on forest sinks maintained in proposal.	**Commission:** Defensive posture in protecting spirit of proposal. Involved with the Parliament and political parties, and these negotiations took two years and saw intensive negotiations.	**Commission:** More difficult to access during trilogues, and varying access to different DGs. Facilitation of fine-tuning.
	EP: Political parties of all colours opposed to different parts of initial proposal, forcing an eventual withdrawal.	**EP:** Conflicts in EP committees, and between ENVI and ITRE committees.	**EP:** Position set within Parliament, largely united. Large influence of associations during parliamentary negotiations. Political secretariats acting as team on draft report, associations involved in technical discussions. National factor playing a large role in accessing rapporteur.	**EP:** Rapporteur had political motivations. Rapporteur mainly involved with the Maltese and Estonian Council presidencies, where we had more formal negotiations. Different to influence MEPs during trilogues. MEPs aligning on the basis of ideology, nationality or institutional preferences.
	Council: Divide between forested MS (SE, FI, EE) and ambitious MS (NL, UK).	**Council:** MS still divided, with clear dividing lines remaining.	**Council:** More opaque, Nordic resistance on incineration, and general resistance on EPR. Late start of discussions on batteries led to hectic negotiations.	**Council:** Estonian presidency pushing for agreement for political reasons. Not clear until October 2017.
	Associations: National and European associations involved in consultations and impact assessments. Open to anyone. Laying groundwork in establishing contacts with relevant Commission representatives.	**Associations:** Scrambling to understand the huge proposal and put forward unified positions.	**Associations:** Difficult to access the rapporteur. Large influence in committee stage. Associations were well-involved during the first year of negotiations, providing input. Huge number of associations involved, sector-specific, production-chain and umbrella associations predominantly on EU-level, but also some regional level (Nordic) and national level (DK, SE). Coalitions forming amongst Nordic associations.	**Associations:** Lack of influence over Council secretariat. More difficult to gain access during trilogues, as the EP and Council positions have already been set. Individual representatives had inside information provided by friendly MEPs. Attempts to leverage national connections and industries, and to pressure MEPs.
Access Good	**Technical Information:** Overview of waste process, implications and technical data. On the ground and production-chain impact of legal texts, EU-wide data.	**Technical & Economic Information:** Scientific and economic impact of certain provisions. Facts on specific industrial and regional impacts. Events.	**Technical & Economic Information:** Provided to EP technical negotiators and MEP assistants. Facts and figures on practical impact of legislation. Plant visits and events.	**Technical & Economic Information:** Plant visits and events, smaller role of such information. Source of additional information on what is technically possible.
	Political Intelligence: Events, preparatory meetings.	**Political Intelligence:** legal formulations, position papers, and mapping political support.	**Political Intelligence:** Amendments written for MEPs provided in committee, position papers, compromise positions.	**Political Intelligence:** Voting recommendations, coordination, coalition-building, monitoring MEPs and relevant MS. Provide arguments and speeches.

4.2.2 Degree of Institutional Access

In accordance with Section 4.1.2 concerned with LULUCF, this section considers the degree of institutional access enjoyed by associations during the Waste Package negotiations. The section will first outline the general findings on the degree of access enjoyed by associations, and will then provide specific findings on the particular associations involved in the negotiations. Detailed findings are provided in Appendix 5.

Referring to the level of access enjoyed by associations, a EuRIC representative noted that "[t]he legislative negotiations took place in accordance with the usual process. The Commission started structured participation, and published impact assessments where we provided data. The participation took the form of consultations and workshops. On the basis of these industry inputs, the Commission put forward a legislative proposal" (Interview 20). This indicates that association access goods such as technical information was welcomed and even sought out in the initial Phases I-II of the Waste Package negotiations. The representatives from CEWEP supported the notion that umbrella associations enjoyed a high degree of access to the Commission in general, explaining that "[w]hen seeking to get our views across, we talked with the Commission, sent statements and published joint papers. We met in person" (Interview 21). The representative from Municipal Waste Europe argued that "MWE has built an excellent working relationship with all EU institutions to which we constantly are available and provide them with our expertise in sustainable waste management policy" (Interview 19).

Qualifying the degree of access enjoyed during different phases of the negotiations, a parliamentary assistant argued that associations enjoyed the most influence at Phase III of the negotiations, where "at Committee level they [associations] have great impact. It is more difficult during trilogues, as the EP and Council positions have already been set." (Interview 10). According to the representative from Municipal Waste Europe, "[w]e do not only meet with MEPs directly, but also coordinate with MWE members to approach national governments and their permanent representatives in Brussels. Concerning comitology and dealing with technical affairs in the Commission, we invite our members to contact their national representatives. When there is a co-decision procedure, we meet with Member States' Attaches and MEPs." (Interview 19). Concerning which institutions associations attempted to access, an attaché at the Maltese Permanent Representation claimed that "[associations] also talk with the Commission". (Interview 15). This shows that associations were involved already in Phase I-II. An EuRIC representative claimed that during the Waste Package negotiations, "[w]e spent a lot of time with the Commission, Permanent Representations, the four Council Presidencies, MS and also visited rapporteurs and shadow rapporteurs. That's how lobbing works." (Interview 20). This indicates that associations approach all EU institutions involved in the negotiations.

Nonetheless, the access appears to have been continuous for the larger European associations, with a Commission policy officer involved in the Package negotiations noting that "[o]ver two years, we had contact with the bigger federations, and we had a professional relationship, but it was intense. We also meet at annual conferences and board meetings. […] Before that it was the public consultations, stakeholder meetings, on a more technical level. This is when they approach the Commission. They provide position papers, invite us to conferences, in some cases they move up in the DG or the Commission in general." (Interview 18). This suggests that there are indeed varying degrees of access informed by qualitative and tangible differences in who you get access to, and what influence these representatives wield. According to a representative from MWE, "[w]e are trusted by the EU institutions, and we are proud of that. We are consulted and provide expertise and advice continuously." (Interview 19). According

to a representative at EuRIC, relations with certain DGs and representatives were better than others, where "[e]specially in meetings with DG ENV and Langendorff, we had a good discussion.". (Interview 20). This again suggests that European umbrella organizations such as EuRIC enjoyed a high degree of access to the Commission.

Concurrently, national associations gained some access to the Commission nonetheless, with a policy officer at the Waste Unit stating that "[we] got input from Germany, the Netherlands, Sweden, France, and the Eastern European countries, including some national associations." (Interview 18). Municipal Waste Europe seems to have enjoyed a high degree of access, noting that "[w]ithin the Commission, we had equal access to all DGs. I haven't seen anyone saying no to a meeting to us. In the EP, we meet with most of the political groups. We met with the rapporteurs and the shadows as well as with the EP group coordinators regarding the Waste Package." (Interview 19).

Concerning which associations gained access to the Parliament, an assistant working for the Waste Package rapporteur claimed that "[w]e were in contact with many different stakeholders, continuously. The Parliament is easier to contact for associations, it's an easy and open place to go to.". (Interview 11). Thus, it appears that it was generally easier for associations to establish a continuous and high degree of access to the Parliament, regardless of their type. However, qualifying this notion, the same assistant notes that "[t]hose [associations] that were more interesting met with MEP Bonafé herself instead of with me or another assistant at the office.". (ibid.). This provides an indication that there are qualitative differences in the access granted to different associations in the Parliament, where a meeting with a MEP could indicate a higher likelihood of an association having an influence on the legislative negotiations.

According to a policy officer at the Parliament, "the majority of consulted associations were umbrella organizations operating on a European level. […] MEPs get more of the national associations and individual companies […] I want to achieve balance by combining EU umbrella organizations with individual companies, capturing leaders and laggards.". (Interview 11). According to an assistant to the Waste Package rapporteur, "[w]e used to meet with EU-level associations, it was not a priority to meet with associations from other MS, but they invited MEP Bonafé to visit them. We talk with national permanent representations, but do not consult all 28 national associations. European associations provide the position." (Interview 11). A consultant argued that "[i]n terms of who was more successful in gaining access, every negotiation demands flexibility. We try to map who can be supportive of our cause, and try to promote those representatives. National associations can be powerful tools in accessing some representatives, EU umbrella organizations are used a lot by the agriculture lobby and farmers such as COPA Cogeca" (Interview 22).

Concerning access to the Council, institutional representatives differed on their evaluation of the level of access enjoyed by associations. As discussed earlier, European umbrella associations such as EuRIC appear to have enjoyed a high and largely homogenous degree of access across the three EU institutions, whereas both national umbrella and sectoral associations enjoyed low or intermediate access to the Council (see Appendix 5). According to a parliamentary assistant involved in the Waste Package and RED II, "I am not sure if associations met with the Council, I've never heard of it." (Interview 10). Nonetheless, a policy officer at DG ENV argued that "associations wanted to feed their position to the Council working group and all kinds of different people." (Interview 13).

Council presidencies appear to often give associations access despite their supposedly apolitical role. According to an attaché working with the Estonian Presidency, "[w]e received guidance from associations and companies visiting us, and we made a selection. Our approach was to meet with everyone who wanted to meet. We met 40-50 stakeholders." (Interview 14). According to an attaché involved in the Maltese Presidency, "[w]e met horizontally with many associations, such as with the British and American chamber of commerce, and then with specific associations such as waste recyclers, packaging and plastics in particular seeking to find out the direction the package was heading in, the municipal waste association, and BusinessEurope. We met with anyone dealing with waste." (Interview 15). This suggests that both sectoral, product-chain and umbrella associations enjoyed some degree of access to Council presidencies. According to the same representative, "[u]mbrella organizations were more helpful perhaps, as you can get more out of one meeting instead of with 27 national associations, especially when you are pressed for time, they cover for instance a number of recyclers. It is very useful, it can be your friend. They coordinate their position, and find an acceptable position, which makes it a one stop shop." (ibid.).

The efficiency of having access to Council presidencies is questioned by the Maltese attaché, who argued that association "have their own modus operandi, they are ticking the boxes, and need to have something to bring back to their members. During the presidency, there were incessant requests, but I am the last person to talk with." (ibid.). According to a policy officer working at the Council, "Most often we are contacted by umbrella organizations, rarely by MNCs or national associations." (Interview 16). When it comes to the permanent representations, it seems that at least national associations and individual companies are more adroit in seeking to supply access goods, with a policy officer claiming that there was huge interest amongst stakeholders, including national umbrella associations such as Svenskt Näringsliv as well as individual companies (Interview 17). This seems to suggest that national sectoral and umbrella associations as well as European production-chain associations sought and enjoyed a high degree of access to permanent representations, especially when hailing from the same MS.

4.2.3 The Role of Different Types of Access Goods as Determinants of Institutional Access

This section discusses the findings regarding the reliability of associational information provision, different types of access goods, the access it resulted in and the different ways in which access goods were supplied.

During the negotiations for the Waste Package, there appears to have been recognition amongst the EU institutions that associations and industry were important players worthy of some attention. According to a policy officer in the Council secretariat, parts of the Waste Package "[…] posed a problem for industries and for authorities, which is important. There was also concern about industry not getting burdened by Waste management by EPR." (Interview 16). According to a permanent representative attaché, it was important to meet with everyone during the negotiations, in order to allow them to get their points across (Interview 17). The representative from EuRIC argued that these meetings were in part an exercise in making a virtue out of necessity, since "[...] industry is the only source of input on implementation on the ground." (Interview 20). A Commission policy officer noted that "[…] we need the lobbies and the associations as they have inside knowledge, and they can refer to experts. They know about technical details", adding that "[t]here was some positive cooperation" (Interview 18). According to CEWEP representatives, the access provided to different EU institutions does not differ as much as does the way they "present and deliver these facts to different institutional stakeholders, that depends. If we present a fact sheet, it's the same for all meetings. For MEPs,

usually we make a one-pager to make it easier for them to get an overview, but we also provide the full fact sheet for reference. For the Commission, this is less necessary, but we still try to summarize the facts on a one-pager.". The representatives went on to note that events and plant visits were useful tools for associations to use when providing local, national or regional information, arguing that "[…] we also invited permanent representation attachés to visit our plants, and to attend our events such as breakfast meetings." (Interview 21).

There appears to have been a number of reasons for why certain types of associations enjoyed varying degrees of access. Speaking on the importance of a Brussels presence, the MEP assistant to Bonafé argued that "the national associations do not have offices here and the resources needed to visit us enough and help us." (Interview 11). Corroborating this, the EuRIC representative noted that "EU associations [such as EuRIC and CEWEP] enjoy easier access to institutions, as we are here. Some national associations have representations here as well, that helps them and we work together with those. It's a waste of time to approach 28, soon 27 MS for our members, and that's what we're here for. EU institutions talk foremost with European associations, which is why we're here." (Interview 20). The same representative found that supply tactics can also be of importance, where EuRIC were particular in which MEPs they sought to access, where the association "approach committee members and raise key points and issues." (Interview 20). Exceptionally, some associations had inside connections telling them how negotiations were developing, with the Estonian Presidency attaché noting that "These few professionals were extremely well-connected, and were privy to insider-knowledge." (Interview 14). Speaking on the impact of a Brussels presence on the supply tactic of an association, a policy advisor argued that "|s]ome large companies with a presence in Brussels work through the EU associations and approach us as well. Concerning national connections, I might have some Finnish association contacts possibly." (Interview 11).

Accordingly, nationality appears to play a role in the EP, where Italian national sectoral associations hailing from Bonafé's constituency, or EU umbrella organizations such as EuRIC or DigitalEurope were given access as they were able to supply political intelligence (Interview 11, and Appendix 5). According to MWE, the association gained a high level of access since "[w]e provide expertise to MEPs during the EU decision-making process, and we provide technical information and details for amendments. We also organize events, such as the MWE plastics seminar, and the EP breakfast we organised together with our German member the last years. […] We provide amendments, our expertise, and we are engaged in active lobbying during the whole legislative process […] we formulate it differently as the legislative process progresses." (Interview 19). Making the case for the role of nationality in providing access, the MWE representative explained that "we organize meetings with the permanent representatives of the Member States in Brussels in which we also invite our relevant members to be present as well." (ibid.).

In terms of potential formal or informal barriers to access, the representative from EuRIC argued that "[we are] registered on the Transparency List, and the Commission only meets with associations registered there – this is important for the Commission to know exactly who they meet with. We never had an issue in exchanging with EU institutions – as long as they have time for a meeting they say yes." (Interview 20). This suggests that the Commission is unlikely to meet with associations that are either national, sectoral, or both. Concerning access to the EP, a Czech MEP assistant argued that "We have a written code at this office, where we are happy to meet with anybody. This is a fairness issue, as we do not want to discriminate when hearing thoughts, ideas, recommendations. This is part of a principle of politeness. Associations come to us." (Interview 10).

The EuRIC representative argued that political and ideological aspects is a factor in the level of access and influence granted them, stating that "if we visit a green MEP they are definitely more receptive than a conservative MEP, for good reason. […] Some people we are more successful with than others. It makes a difference when we make a case for something that is not evident." (Interview 20). Offering a differing perspective, permanent representation policy officer argued that "associations know which political groups and MEPS they can influence, so it depends on the group and the MEP. I can only speculate, but to me it seems that the basis is not really ideology, rather the priority is the perception of the position and the ability to assist the MEP." (Interview 12).

The lower degree of access to the Council can perhaps partly be attributed to formal and informal rules, where the Council secretariat appears to be less willing to meet with associations in general. According to a policy officer at the Council secretariat, "[n]ot meeting with associations is part of a Council policy on meetings. Associations are always trying, by calling, sending letters, asking for interviews or meetings. My colleagues do not meet with them either in principle. […] I guess hope dies last as associations contact the secretariat" (Interview 16). The generally lower level of access to the Council is explained by the Maltese attaché as being the fault of associations themselves, claiming that "[a]ssociations are slow, especially when contacting the Council." (Interview 15). This was echoed by the Estonian Presidency representative, who argued that "[associational] professionalism was lacking, they did not know who they were talking to. They were presenting amendments, with not everyone knowing that we were an incoming presidency. It was impossible to give them meetings." (Interview 14). Thus, the perceived inability of national and European associations to supply useful technical information and political intelligence in a timely manner appears to explain the lower degree of access they enjoyed during negotiations. According to the Maltese Presidency attaché, "[they] were not approached by national associations, we were rather approached by umbrella associations, but we had some meetings with national association representatives as well." (Interview 15). This indicates that umbrella associations enjoy a high degree of access partly as a result of the intensity and frequency of their attempts at institutional access.

A policy officer at the Swedish Permanent Representation explained that there can be a lot of attempts at access by associations, where the access also depends on the level of effort exerted by associations in terms of contacting permanent representations and the intensity of these requests. The same officer argued that they try to be accessible, but it is impossible to live up to due to time pressures. According to a permanent representation policy officer, they were approached by a typical cross-section of associations, approximately 50/50 in terms of EU umbrella organizations and Swedish national associations (Interview 17). According to representatives from CEWEP, the Council "is generally not very transparent – even though they publish their documents, they do so with a considerable delay when the interest is lost. They have gotten better though.". Comparing the Parliament to the Council, the CEWEP representatives argued that the former is easier to access due to its transparency.

Despite the consensus concerning the institutional demand for access goods such as technical information, the information and intelligence supplied by associations was not necessarily trusted. Rather, representatives from all EU institutions appear to have taken them with a grain of salt, verifying the veracity of the information with other sources of information. The extent to which such verification took place appears to be a product of the relationship and level of trust between the institutional representative and the association. The EuRIC representative noted that "Networks of constructive and trusted persons are crucial – there are a lot of exchanges." (Interview 20). A Commission policy officer involved with the Waste Package

argued that "CEWEP were successful, they were clearly pursuing their own interests. […] and we know this. […] There is a certain level of trust. I have been trained not to take everything at face value. This is a healthy way of working" (Interview 18). According to CEWEP "[t]here was goodwill during the [Waste Package] negotiations, the institutions trust us." (Interview 21). This seems to suggest that there is a difference between the perceptions of trust between the associations and the institutional representatives.

An advisor from the EP stated that "[w]e do have a professional relationship, where we know their interests, but with a good lobbyist there is something like trust, since they provide reliable and timely information. You have to be careful, […] I ask for references and information, and I always double-check with the original source since the information is usually spun." (Interview 12). As one permanent representative attaché put it, institutions can use information provided by associations, but cannot let it influence the position of the institution. The representative went on to argue that associations mostly provide examples and arguments. (Interview 17).

Indicating that associations act as a source of political intelligence, the same representative argued that the institutional representatives and associations trade intelligence on the direction negotiations are heading from the perspective of either party. The representative also claimed that associations relay insights on the possible consequences of a certain legislative outcome (ibid.). This suggests that political intelligence is more directly useful to institutional representatives, which in turn could make it a more useful access good. However, the same permanent representative argued that there was also an exchange of technical information between Council representatives and associations (ibid.). This could explain the success of CEWEP, who is an example of a European sectoral association providing predominantly technical and economic information (see Appendix 5).

Perhaps speaking to the special nature of the Waste Package negotiations, a policy advisor involved with the trilogues claimed that "[associations] often have anti-political intentions, which was not the case for these negotiations. […] This is important, and concerns trust which is necessary in order to trust the information. This is all based on good intentions and goodwill." (Interview 12). In this context, anti-political actions could be interpreted as non-constructive or even destructive involvement in the negotiations. Proceeding to provide a more fine-grained distinction between different types of associations, the same policy advisor argued that "[t]he problem with such umbrella organizations is that their stances always represent the lowest common denominator as a result of the internal political process aimed at developing a common position. They are credible and trustworthy, but on the other hand it is always good to get a direct account from national organizations or companies." (ibid.). This suggests that the EP Secretariats are perhaps more intent on gaining political intelligence and specific technical information from national and sectoral associations, in order to avoid the lowest-common denominator information provided by umbrella associations. Moreover, the findings suggest that the ability of national associations to provide local and regional knowledge is a factor that facilitates access to EP Secretariats. Echoing that regional knowledge and the ability of national and regional associations to provide such access goods facilitates a higher degree of access, a permanent representative attaché claimed that they are also interested to find out what it looks like for the Nordic industries and the Nordic members within the EU-associations, prioritizing Swedish and Nordic interests (Interview 17).

Most associations and institutional representatives agreed that associations try to maintain a cohesive position that they present to different EU institutions, which is also reflected in the political intelligence provided to certain institutional representatives (see Appendix 5). As a Commission policy officer noted "[concerning CEWEP] [t]here were common ground differences, but the subfederation had their back." (Interview 18). Nonetheless, the type of access good varies between the institutions, as does the supply tactic (Appendix 5). The policy officer at the Commission noted that "They provide position papers, invite us to conferences" (ibid). According to the EuRIC representative, "[w]hen we approach institutions, we always provide the same position, but in different format. For the EP, we provide practical examples, not many details or technical information. Rather we provide arguments for why, for instance, ecomodulation is important. For Commission representatives we provide engineers who know practical input and technical details." (Interview 20). The CEWEP representatives noted that "|g]enerally, MEPs want background information, a broad spectrum of opinions which I [Ella Stengler] would like as well as a MEP. Whether it is easier for national associations to gain institutional access depends – we have to do both. MEPs select amongst the stakeholders that contact them. We know specifics, we are a sectoral association. They do come for us for very specific information, they contact us – mostly the Commission, but also MEPs." (Interview 21).

According to a representative from Municipal Waste Europe, local expertise matters the most in facilitating access, as "[m]unicipalities are key actors, and are crucial since waste management is a local issue and our Members are very helpful, as they share with us their deep knowledge on sustainable waste management." (Interview 19). Further explaining his position, the representative argued that "[s]takeholders needed to receive technical expertise from us to form their positions." (ibid.). The same representative argued that this approach was successful in providing the association a high degree of access.

This is supported by a representative from FTI Consulting, who claimed that the information provided to all institution is very practical, and attempts to explain the position of the industry concerning particular legislative texts and formulations (Interview 22). The representative argued that they would identify internal actors such as engineers or experts, who could translate the industry views into politically useful information for institutional representatives. According to the representative, the Commission already knows how to do this, whereas the Parliament's more idealistic stance on the environment prevents a more detailed understanding of how the industry works, meaning that they demand such information (ibid.). This suggests that the Parliament demands more political intelligence, whereas the Commission is more interested in technical and economic information. This notion is supported by institutional representatives, with a parliamentary assistant to the Waste Package rapporteur explaining that "[t]he information we got from associations included all types of information such as amendments, although a lot of associations have no idea of how to draft those, and we also got position papers. For us it was more important to get the ramifications explained, getting an overview of the entire waste process, technical data and figures we can corroborate." (Interview 11). Another parliamentary assistant claimed that arguments or examples were another key type of information, noting that "[associations] also provide information in terms of arguments and speeches, they are one source of arguments." (Interview 10).

Generally, the practice amongst associations to provide amendments was controversial. A parliamentary assistant argued that "[w]hat associations do when it comes to committee voting on report adoption, they send an email on the vote, recommending specific amendments and stances to take. This is how they stay in touch, give recommendations, providing materials. If we have good relations and are cooperating, for example when negotiating a technically

demanding file, they can explain." (Interview 10). Adding the national component, "[…] national companies it is the same, they provide reliable information through studies, briefings and amendments directly to us." (ibid). The parliamentary assistant to the Waste Package rapporteur claimed that "[w]hen we prepare the draft, then we only consult them concerning the content of potential compromise amendments or wordings." (Interview 11). Contrasting this view, the representative from EuRIC, "[a]mendment suggestions are the ultimate policy choice. I do not like position papers with amendments, do not draft legislation like that. Practical phrasings of our position, yes, we depend more on providing input explaining why and how we want a certain thing." (Interview 20).

4.2.4 Inter-associational Relationships and Coalitions

Concerning the inter-associational relationships, the Waste Package interview subjects appear to indicate that national associations or association members often go through their EU umbrella parent associations when seeking to influence EU institutions. Notably, national members are essential in providing on the ground information and specific technical staff and knowledge necessary for EU-level lobbying efforts. This seems to work according to the assistant to the Waste Package rapporteur, who stated that "EU associations with many members, they will create a head or leading association from a MS, for instance in CEFIC, the EU chemical association would appoint a German national association to approach us and lead the process if there was a German rapporteur." (Interview 11). This indicates that the ability to provide national or regional knowledge and political intelligence concerning constituency conditions and industries facilitates associational access to MEPs and the Parliament at large. According to the CEWEP representatives, "[i]t can be helpful to have our MS member to introduce us and to facilitate contacts, where we found that we had an easier time gaining access to permanent representations after having been introduced by a representative from our national association member hailing from the country in question." (Interview 21).

According to MWE, "[w]e also organised joint events with other associations as well. […] We also worked together with associations such as Eurocities, EuRIC, CEWEP, CEMR, Zero Waste Europe, EUROPEN as well as many other (Interview 19). When it comes to associational coalitions, the EuRIC representative claims that this is often takes the form of the joint provision of political intelligence, where "[w]e also write joint statements with the other stakeholders in the biofuels chain in order to provide some common asks by aligning the sectors. We also tried to do this with other associations. When we cooperated, we focused on transport sector companies, in order to maintain our focus." (Interview 20). This suggests that cooperation is often prompted by close alignment and similar interests when it concerns specific issues. According to the same representative, these ad hoc coalitions include associations active on all levels, which perhaps reflects the role of regional knowledge as an access good in the context of the EP and to some extent the Council. "We try to cooperate with other national and EU associations, we must all pull together if we share a stance. This collective action is a complement to our own lobbying activities, and is an exception rather than a rule, but it happened during the Waste Package negotiations." (ibid.). Moreover, these coalitions could be a means for European umbrella associations to marry their ability to provide broadly representative political intelligence with the capacity amongst national associations to provide detailed technical and economic information (see Appendix 5).

Chapter V: A Comparative Analysis of the Cases

As alluded to in the introductory chapter, this chapter provides an overarching discussion of the findings, comparing the main findings generated by the two case studies. As such, the purpose of this section is to identify key commonalities and differences between the access granted associations in exchange for access goods during the negotiations of LULUCF and the Waste Package, using REDII as an additional case of interest. Thus, the analytical discussion will move to a higher level of abstraction, concerning itself with potentially generalizable findings generated by the interviews. Hence, the section considers the four topics identified in the interview findings on a general level, and relate these findings to the overarching theoretical expectations outlined in Chapter II. To facilitate the discussion, Table 10 below outlines generally applicable findings on the degree of access provided different types of associations as a result of the provision of different types of access goods. Lastly, this section will briefly discuss the limitations of the findings.

Table 10: Overview of the relationship between the type of access good and the degree of access

Association Type	European Umbrella	European Production Chain	European Sectoral	European Coalitions	Regional Umbrella	National Umbrella	National Sectoral	Nordic Coalitions
Brussels Presence	Yes	Yes	Yes	Yes	Yes	No	No	No
COM Access Goods	Technical information	Technical & Economic Information	Technical & Economic Information	Technical & Economic Information	Technical & Economic Information	Technical & Economic Information	Technical & Economic Information	Technical Information
Degree of COM Access	High	High	High	Intermediate	Low	Low	Low	Intermediate
EP Access Goods	Technical Information & Political Intelligence	Technical & Economic Information & Political Intelligence	Technical & Economic Information & Political Intelligence	Technical & Economic Information & Political Intelligence	Political Intelligence	Technical & Economic Information	Technical & Economic Information & Political Intelligence	Political Intelligence
Degree of EP Access	High	High	Intermediate	Intermediate	High	Intermediate	High	Intermediate
Council Access Goods	Technical Information & Political Intelligence	Economic Information & Political Intelligence	Technical Information & Political Intelligence	Technical & Economic Information & Political Intelligence	Technical & Economic Information & Political Intelligence	Technical & Economic Information	Technical & Economic Information	Technical & Economic Information & Political Intelligence
Degree of Council Access	Intermediate	Intermediate	Intermediate	Low	Intermediate	Intermediate	High	Intermediate

Initial findings generated by the exploratory interviews serve as an additional source of comparison and contrast. Notably, these findings do not serve to test the theoretical framework, as the initial exploratory interviews were conducted to establish the case selection and to generate valuable theoretical insights. Rather, in the context of the findings they serve to provide an additional point of comparison to the findings from the main case studies. Hence, they increase the external validity of the findings, illustrating areas where the two main cases have commonalities or differences with other legislative negotiations in the areas of the environment and energy.

Moreover, the inclusion of two exploratory interviews concerned with RED II is further motivated by the fact that some of the interview subjects were involved with this file alongside one or both of the main cases studied by this thesis. This could be attributed to the fact that both RED II and LULUCF are part of the EU's 2030 Climate and Energy Framework (Nabuurs et al., 2018). Since some of these stakeholders were also involved in the negotiations of LULUCF or the Waste Package, these exploratory interviews provided a basis for developing the theoretical framework adopted by this thesis. The overlap amongst institutional representatives in terms of involvement in different legislative negotiations provided a useful point of comparison during interviews, as it allowed the interview subjects to discuss the nature of different legislative negotiations in relation to environmental policy negotiations in general.

5.1 Similarities and Differences Between the LULUCF and Waste Package Negotiations

5.1.1 A Comparison of the Nature of the Negotiations

According to many respondents, the nature of the LULUCF and Waste Package negotiations were fairly representative of negotiations within the environment policy areas, as was the level of stakeholder involvement in these negotiations. Commenting on the negotiations surrounding LULUCF, the Waste Package and REDII, a representative from the consultancy Hill+Knowlton Strategies claimed that "[a]ll three negotiations of the files were atypical, there were controversies stemming from the political situation in the Parliament." (Interview 8). However, this apartness seems to be a product of the political makeup of the parliamentary term, rather than being considered a consequence of the negotiations themselves. Furthermore, findings from both cases indicate that both institutional representatives and associations considered the two main cases as representative of similar legislative negotiations in the policy area of the environment. Having thus established the general representativeness of the negotiations in the context of negotiations of environmental legislation in the EU, we can now consider the similarities and differences between the studied cases. Neither the LULUCF negotiations nor those for the Waste Package appear to have been especially conflictual, as outlined in Tables 9 and 10, although the latter negotiations saw initial controversy forcing the withdrawal and revision of what then became the Waste Package. Generally, contention in both files appear to have centred around technical policy issues, even when particular MS were mobilized for or against a certain politicized issue such as forest reference levels in LULUCF or extended producer responsibility in the Waste Package (see Tables 9 and 10).

When further comparing the nature of the negotiations as outlined in Tables 8 and 9, it becomes clear that policy cycles matter to institutional access, with trilogues generally being considered opaque and difficult to access for most associations. The representative from EuRIC, the European umbrella association for recyclers, noted that "We were not directly part of trilogue negotiations, timing is important for us." (Interview 20). Nonetheless, Appendices 4 and 5 show that the majority of associations get involved in legislative negotiations either in the initial stages I and II, focusing their attention on the intermediate and final stages of the negotiations, stages III and IV (see Tables 9 and 10). Both negotiations were also considered to be long-running, with LULUCF negotiations running for three years, and the Waste Package taking almost the entire legislative term of four years.

Relating these to other negotiations in the areas of environmental and energy policy, a representative from EPF noted that he was always surprised by how long negotiations still deal with major issues at the very end. The representative stated that "it's overwhelming to me how much documentation and debate there is, too much frankly. This applies to all three negotiations, where we are scrambling with too little information, and it's very fragmented.

This is par for the course, during all three negotiations we were dealing with all the pressure and the expectation. RED II was the most extreme, and LULUCF the least […] and the Waste Package was somewhere in the middle." (Interview 7).

5.1.2 Degrees of Institutional Access

Turning to the degree of access enjoyed by associations during legislative negotiations, most institutional representatives and associations seem to agree that associations had at least a minimal degree of access to EU institutions in general. This meant being able to participate in public consultations and to contact key stakeholders for a potential meeting, where any association could normally reach institutional representatives and have at least one meeting. Generally speaking, the interview findings suggest that associations were considered constructive, or at least necessary, parts of the negotiation process. There was general agreement that associations were important and sometimes trusted sources of information. Notably, some associations sought institutional access in relation to several, or all of the aforementioned legislative negotiations. When it comes to the different degrees access enjoyed by different types of associations during the two studied negotiations, it becomes clear that during both negotiations, umbrella associations seemed to have enjoyed greater degrees of access (Appendices 4 and 5).

Perhaps capturing the complex interplay of different types of associations, the representative from Hill+Knowlton Strategies argued that "[i]n terms of who was more successful in gaining access [during the LULUCF and Waste negotiations], every negotiation demands flexibility. […] National associations can be powerful tools in accessing some representatives, EU umbrella organizations are used a lot by the agriculture lobby and farmers such as Copa Cogeca, that in turn consist of national associations in MS. They used these national associations in Germany and France during the summer of 2018 to mobilize farmers and citizens against palm oil in tanks, which was an instance of an EU alliance." (Interview 8).

Concerning trust, associations often considered themselves as trusted partners to the institutions, whereas most institutional representatives reported that the access goods provided by associations cannot be trusted, even though the information or intelligence was often considered useful. Moreover, a Brussels presence was considered key to a higher degree of institutional access, which seems to be reflected in the generally higher access enjoyed by associations active on the European level, where both sectoral and umbrella associations are likely to prioritize being present in Brussels despite potentially limited resources (Appendices 4 and 5). This higher degree of access can be attributed to a Brussels presence facilitating attempts at access, but also because being present allows for spontaneous, unofficial, and private connections and relationships between institutional representatives and associations. This seems to complicate the theoretical notion of a simple supply and demand of access goods, given that there appears to be barriers to entry for national associations seeking to supply their access goods, in the form of the high entry costs and transaction costs that are brought about by choosing to invest in a Brussels office, or to stay on a national level, respectively.

In terms of access to the Commission, most representatives and associations agreed that associations were generally able to attain some degree of access to the Commission during the two studied cases, although national associations were less able to do so (Appendices 4 and 5). This seems to lend further credence to the importance of a Brussels presence in order to supply the Commission with access goods, especially in the initial stage of negotiations prior to the official publication of the legislative proposal. This could be difficult for a national association to do, as they are not necessarily interacting with the Commission regularly.

Within the Commission, many interview subjects differentiated between the level of access granted to representatives operating within different DGs, where policy alignment and political priorities of the respective DGs seemed to facilitate access, alongside the institutional demand for certain types of information. Generally speaking, DG ENV was easier to access than for instance DG CLIMA, which was viewed as 'anti-industry', with DG GROW and AGRI being touted as the most industry-friendly DGs.

Associations argued that when it came to the Council, it was the least accessible, and perhaps least important port of call for them during the negotiations. According to a consultant at Kreab, many consultancies and associations "go via MS into Council unless there are permanent representatives that we can approach." (Interview 9). This could perhaps by explained by the fact that, according to the representative from Hill+Knowlton Strategies, "[t]he Council has more access to really independent resources.", which means that the Council does not necessarily demand the specific technical and economic information supplied by these association types (Interview 8).

Interestingly, EU-associations appear to use national representatives or members as a means of appealing to shared nationality or identity, relying on the idea that they provide national or regional information. At the same time, EU-level associations often provide the messages, which are coordinated on a European level, meaning that the information provided is often very similar or identical. Nonetheless, they provide on the ground examples, which is related to plant visits and similar such events, as well as inviting national experts and representatives.

Comparing these findings with the negotiations surrounding RED II according to exploratory interviews, this thesis finds that European and national sectoral or production-chain associations also exerted influence during these negotiations. Interview findings generated by an exploratory interview with a representative from Swedish umbrella association Lantmännen argues that the large influence of his association was surprising "[e]specially given that there was big resistance towards us from NGOs, parts of the Commission, and the oil industry (in the background)." (Interview 23). Notably, the associational representative from Lantmännen found that the national identity of the association generated trust, especially in environmental policy, noting that "Sweden has an advanced agenda on climate change, which helps in giving us a good name. […] This is a national project, where we are the largest actor in Sweden, this gives us an advantage. This makes it easier to approach and access institutional representatives, as it makes us seem trustworthy." (ibid.). The representative went on to argue that this logic also applied to Finnish associations. The Lantmännen representative argued that "Swedish MEPs had common interests, so we appealed to their nationality to gain access and influence, whereas the Swedish reputation helps with foreign MEPs. The type of information provided differed a little based on whether you're talking with politicians of a certain colour and with certain levels of technical knowledge – sometimes you must simplify." (ibid.). The importance of nationality is further supported by the representative for ePure, who argued that some national members "give MEPs a call themselves, and a refinery located in the constituency helps especially when it comes to the rapporteur and the shadow rapporteurs." (Interview 24).

Providing a perspective on the importance of early associational involvement in negotiations, the representative for the European association ePure argues that "[w]hen it came to influencing the negotiations [for RED II] we didn't try to influence the proposal itself. I don't wait for the proposal to be published, I use another file as an opportunity to alert policy-makers of our views." (Interview 24). Exploratory interview findings from RED II support the existence of an

apparent disconnect or disparity between the relatively high level of access to the Commission and potential influence. The ePure representative argues that "[w]ith the Commission, influence is difficult to achieve, but the degree of access is okay. The Commission is always invited to briefings to explain their proposal. But after the proposal has been published, the Commission is defensive." (ibid.).

The view of the Council as lacking transparency also appears to be found by associations involved in other negotiations, where the representative from ePure argued that "[t]he Council is more opaque, so this means that we take care of the permanent representations, whereas the more important playing field is found on the national level. […] Sometimes we can get new documents from the Council which are a U-turn from previous stances, which can perhaps be due to a presidency initiative, but it is impossible to know from where it came." (ibid.). As supported by the ePure representative, associations get around the opacity of the Council by dividing the tasks between the national and European associations, where "this means that we take care of the permanent representations, whereas the more important playing field is found on the national level. We rely on our members to access and influence the capitals, and provide them ammunition to make sure that we replicate our positions on the national levels." (ibid.).

5.1.3 Comparing the Efficiency of Access Goods

There was a tendency for especially umbrella associations to be considered as liaisons or middlemen that serve as keystones coordinating and connecting MEPs and other EU institutional representatives with national associations and individual companies. This seems to indicate that political intelligence plays a key role in granting associations a higher degree of access, especially in connection to the EP and in part the Council. It furthermore validates the notion that most types of associations except national sectoral associations could be expected to have the capacity to provide relevant political intelligence, by virtue of having specialized in a national, regional or European niche. In relation to who took the initiative to arrange for meetings, it appears that institutional representatives often reach out to get information on specifics, be it national conditions, technical information or a holistic account of the effects down the line for industries. These overt and sometimes literal calls for the provision of access goods occurred both with national and EU-level organizations, but were more commonly aimed at the umbrella organizations in their capacity as middlemen connecting institutional representatives with the relevant national expert or association.

Concerning the supply tactic adopted by associations, the findings indicate that associations provide access goods through a multitude of means, often used in tandem or interchangeably depending on the institution and individual representative approached by the associations. Flexibility was a word that occurred frequently during the interviews. The efficacy of regional knowledge was brought up by some interview subjects, whereas others appeared uncertain or unaware as to the importance of such knowledge. The CEPF representative and Swedish permanent representatives were two instances where interview subjects mentioned the particular perspectives offered by Nordic associations or regional coalitions as having a role to play in facilitating a higher degree of access. At the same time, the exact role of regional knowledge has been difficult to establish, with some interviews indicating that it can matter in the Nordic area, whereas there was no mention of such regional knowledge amongst for instance the Benelux countries.

Offering a point of comparison regarding the demands for information in different EU institutions, the ePure representative explained that "[t]he information provided to MEPs is not too detailed, we provide broad solutions. In terms of what they want, they care more about political dividing lines than nationality. The Commission wants much more technical information, since it knows its own file – the information becomes much more legalistic. The Council is somewhere in the middle, where the information we provide is more detailed than that provided to the Parliament. Generally, the right side is easier to access since they care about industry, and whereas the Greens care about sustainability. Socialists often ask what the Greens want." (Interview 24). The ePure representative added that national concerns and political intelligence facilitates access, stating that "If there is a national interest, MEPs are more receptive." (ibid.).

5.1.4 Inter-associational Relationships and Coalitions

Concerning inter-associational relationships and coalitions, the findings indicate the presence of both EU-level and national coalitions, with frequent overlap between these two levels. National and sectoral coalitions were the most common, which can be considered reflective of the nature of the legislative files, but also the result of the lower level of resources these generally smaller, and niched associations have available. However, there was also a tendency amongst EU umbrella and sectoral associations to form coalitions. Furthermore, individual sector-specialized companies or associations tended to outsource such activities to consultants active on the European level, which was the case during LULUCF, as well as by REDII. This practice further strengthens the notion that associations tend to want a presence or representative in Brussels.

5.2 The Limitations of the Empirical Findings

Whilst these general findings seem to largely conform with the theoretical expectations outlined in Chapter II, it is still important to address some flaws of the theoretical framework, and to point out some of the important limitations of the findings themselves. Generally speaking, the findings paint a rather complicated picture, where many factors apart from the access good itself are important in determining the degree of access enjoyed by certain associations. This seems to suggest that future studies could engage in multivariable analysis of the factors potentially affecting associational access, in order to clarify the relative weight and importance of access goods in relation to other factors such as personal connections and associational resources in terms of manpower and a Brussels presence.

5.2.1 Accounting for the Role of Political Intelligence

As previously alluded to, the role of political intelligence appears to be crucial in acting as an access good, where technical and economic expertise seems less demanded by the EP, and in part the Council. This seems to validate the distinction of political intelligence from other types of access goods, and begs the question whether political intelligence or technical or economic information plays a larger role in securing associations greater access. However, the role of regional knowledge has been difficult to establish, with some number of interview subjects referring to the role of such transnational information. In these cases, the symbolic and representative importance of cross-border associational coalitions or regional associations appears more important in ensuring a greater degree of access than the ability of these associations to provide a particular type of regional knowledge. Nonetheless, the ability of associations to cooperate and provide common positions appear to facilitate institutional access, where transnational associations and coalitions can lay claim to greater representativeness in terms of knowledge and the encompassingness of the same.

5.2.2 Capturing the Frequency and Intensity of Attempts at Access

In terms of the limitations of the empirics, this thesis has been unable to establish the exact frequency and intensity of attempts at access amongst associations, which would be very likely to have an effect on the degree of access. Even though some associations and institutional representatives refer to the risk of badgering or oversaturating run by some overzealous associations, it has not been possible to establish how successful associations were in accessing institutions in relation to their attempts to access the same. Future research could also further investigate the motivations and impact of institutional representatives proactively seeking out and consulting certain associations during legislative negotiations. In terms of the interview subjects, this thesis was unable to secure interviews with large business umbrella associations active on a European or national level. Even though the findings have suggested that they are considered to enjoy limited access and utility in legislative negotiations, this is a shortcoming that future studies could remedy. On a similar note, this thesis was unable to secure any interviews with non-Swedish representatives from permanent representations, or representatives from transnational institutions such as the Visegrad or Benelux representations. Lastly, this thesis did not manage to secure an equally high number of interviews for LULUCF as for the Waste Package, which could be the result of its more limited scope. Notably, this thesis was unable to conduct interviews with Council presidency representatives tasked with LULUCF.

Chapter VI: Conclusion

This concluding chapter answers the hypotheses provided in the theory chapter, and ultimately provides an answer to the overarching research question. In addition to these concluding remarks, this chapter takes the opportunity to offer some concrete suggestions for future research, linking the findings generated by this pilot study to the larger academic debate on associational access and influence over legislative negotiations. Lastly, the chapter identifies some association best practices, and their implications. Since this thesis is a pilot study, the conclusions drawn in this chapter are subject to some limitations in accordance with the intent to explore the role of access goods within the methodological and practical constraints of the format. Since the purpose of this thesis is to investigate and qualify the nature of associational access using access goods, the conclusions seek to establish the feasibility and internal validity of the theoretical framework of the supply and demand of access goods, which can serve to inform further research on the interactions between associations and EU institutions as part of legislative processes. Thus, the conclusions drawn by this thesis are internally valid in terms of accurately capturing the role of different types of access goods in granting different types of associations institutional access. In addition, the findings can be said to have bounded external validity, where the findings are generalizable to other legislative negotiations in the area of EU environmental policy. The use of exploratory interviews on the RED II-negotiations, the apparent representativeness of the two chosen case studies of legislative negotiations in general, along with the involvement of many interview subjects in both LULUCF and Waste Package negotiations suggests that conclusions drawn in this thesis do enjoy bounded external validity.

6.1 Answering the Hypotheses

This thesis answers the six hypotheses grouped into three clusters that were derived from the theoretical framework as outlined in Section 2.6.

6.1.1 Cluster I

Cluster I predicted that European umbrella organizations enjoy the greatest degree of institutional access to the Commission out of all three EU institutions, due to their capacity to provide technical information, which is facilitated by their longstanding physical presence in Brussels. Their access is also considered to in part be due to their ability to provide political intelligence that represent broad European interests.

This thesis can confirm H1, as Table 10 and Appendices 4 and 5 provides evidence that European umbrella associations enjoyed a high degree of access to the Commission. We can also confirm H2, with two important caveats.

First of all, a Brussels presence does indeed seem to be connected to a higher degree of access, but this is something that is not necessarily accounted for in Bouwen's initial framework, meaning that transaction costs or what we can call "market entry costs" exists for associations lacking a permanent Brussels presence. The tendency seems to be that a Brussels presence facilitates networking and personal connections that have implications for the ability of associations to gather and supply political intelligence. Furthermore, a presence in Brussels also seems to provide a greater choice of supply tactics for associations, lending associations established in Brussels a double competitive advantage when it comes to accessing the Commission.

Second of all, the role of political intelligence is a factor that is partly overlooked in Bouwen's initial framework, where access goods are considered to simply consist of different types of information. As discussed in the theoretical chapter, this thesis set out to distinguish between the provision of facts and information in terms of technical or industry-specific expertise and insights, and the more subjective provision of intelligence on the positions of other actors, legal amendments, and monitoring and facilitation of coalition-building provided by umbrella associations. To that end, the findings suggest that this distinction is relevant, as political intelligence appears to act as an important access good for European umbrella associations. The efficiency of supplying political intelligence as an access goods seems connected to the ability and willingness of an association to act as a political entrepreneur, which is more likely to be the case for European associations (see Table 10, Appendices 4 and 5).

6.1.2 Cluster II

Cluster II hypothesised that national sectoral associations enjoy the greatest access to the EP out of the three EU institutions, thanks to their ability to provide both technical information and political intelligence concerned with regional and national considerations. This hypothesis can be rejected, as this association type seems to be more successful in accessing the Council. In part, this could be attributed to the greater attention given to the EP by all association types. Furthermore, it has been difficult to safely establish whether national sectoral or European umbrella associations enjoy the greater access to the EP out of all types of associations.

This thesis can clearly confirm H4, as the ability of national sectoral associations to provide both technical information and political intelligence yields a high degree of access to the EP, as well as to the Commission. Notably, close communication and cooperation between national associations with European or regional partners or members is key to achieving a high degree of access. This is since national sectoral associations wishing to secure a high degree of access to both the EP and the Commission needs to be able to provide both national and regional political intelligence to the former, whilst providing technical and economic information of varying complexity to both these institutions. Additionally, political intelligence appears to dominate other types of access goods in granting a higher degree of access to the EP. Furthermore, the role of European or national production-chain associations have been difficult to establish, given the relatively small number of such associations active in the negotiations.

6.1.3 Cluster III

Cluster III hypothesized that national sectoral associations enjoy the greatest access to the Council out of all types of associations, since these associations are able to provide very specific and niched information, whilst representing several national or regional interests at once. This thesis can confirm H5, as national sectoral associations used their ability to provide niched access goods based on knowledge of DEI and REI to gain a high degree of access to the Council. Permanent representations served as the preeminent avenue wherethrough national associations gained access to the Council, which seems to suggest that national identity plays a role in connection to the provision of access goods.

Notably, this thesis can only partially confirm H6, since it is not possible for this thesis to provide an answer as to whether national production chain associations enjoy a high degree of access to the Council in particular. Furthermore, the role of political intelligence as an access good to the Council also seemed more prevalent than predicted by H6. This is consistent with the pattern found in the other two clusters of hypotheses.

6.2 Answering the Research Question

Having provided answers to the hypotheses, it becomes possible to answer the research question, which asked how the ability of different types of associations to provide access goods affect to what degree they are consulted by EU institutions in legislative processes. This thesis finds that it matters to a great degree, but that it is not the sole determinant of the degree of institutional access. Other factors such as personal connections and networks facilitated by a Brussels presence also play a fundamental role in facilitating the supply of access goods to begin with. Thus, this thesis can conclude that the supply tactics available to, and applied by, associations is another determinant of the degree of institutional access alongside the ability to supply a certain access good.

6.3 Implications for Future Research

6.3.1 Conducting Multivariate Analysis based on Large-N Data

Further research should consider the tactics adopted by associations further, potentially providing a multivariate analysis on associational access. Such regressions could include a binary variable for a Brussels presence, which can act as an indicator capturing an associations' ability to provide political intelligence. Quantitative studies could rely on a larger sample to test and operationalize additional independent variables, such as the tactics used when seeking access, whilst accounting for the frequency of meeting requests. Moreover, these studies could perhaps establish which type of association enjoy the greatest access to EU institutions compared to all other types of associations. By generating data through a large-scale survey study, the quantitative study can overcome the tradeoff between internal and external validity by using this pilot study as a qualitative complement to large-N regressions that rely on the key factors and institutional representatives identified by this thesis. By doing so, future studies could provide numerical and comparative results on the degree of associational access during legislative negotiations, whilst determining which types of access good are significant in facilitating such access. This study could also widen the scope to include other policy areas and cases, which would generate externally valid findings. Furthermore, making authoritative claims regarding the direction and nature of the causal relationship between trust and the provision of political intelligence is something that future research could engage with further.

6.3.2 Connecting Institutional Access with Legislative Outcomes

There could also be room for more focused studies tracing the impact of individual associations on a single legislative file, seeking to more closely establish the connection between institutional access and actual influence on the outcome of a legislative negotiation. Such a study would more accurately address the role of different supply tactics amongst associations, and could incorporate associations preventing the inclusion of certain elements in legislation as an instance of legislative influence. This overcomes the methodological issue of the removal or absence of certain provision failing to register as an instance of such influence. Lastly, more research could be done on the role of associations as political entrepreneurs, where plausibility probes or another pilot study could engage in focused interviews with key institutional and associational representatives to investigate that particular tendency amongst European associations. All these studies could serve to further extend the initial theoretical framework outlined by Bouwen to more accurately capture the diversity and fine-grained nature of associational access to EU institutions, where the qualified account of such access provided by this pilot study hopefully contributes to a better understanding of the workings of access goods.

6.4 General Conclusions

In order to highlight and crystalize the most important findings presented in the previous chapter, this thesis will provide three generally applicable conclusions.

6.4.1 Connecting Association Types with Degrees of Access

First, it appears that EU umbrella associations seem to enjoy the highest degree of access, both out of the three institutions and when compared with other types of associations. Umbrella associations in particular enjoy the highest degree of access to the Commission and the EP, as do sectoral associations when considering the three institutions. Production-chain associations broadly enjoyed a high degree of access to all three EU institutions. National associations enjoy the highest degree of access to the Council and the EP relative to the three institutions, whilst European associations have the highest access to the Commission and the EP. Notably, the simplified typology of associations outlined in the theoretical section of this thesis has been able to accommodate hybrid associational forms such as mixed-membership associations. The predictions regarding these hybrids were largely confirmed, since they were able to combine the national association's capacity to provide intelligence and technical information from specific member states, with the ability of umbrella associations to provide generally applicable and representative European access goods. When it concerns associational coalitions, the findings indicate that coalitions combining national and European associations enjoyed a high degree of access to all three EU institutions.

6.4.2 Gaining Access Through Different Types of Access Goods

Second, the varying degree of access enjoyed at different institutions by different types of associations suggest that associations seeking to access all EU institutions must be flexible in combining different types of access goods in response to partly differing demands. Since close to all associations sought access to all three major institutions at different stages of the negotiations, the tendency towards niched associations forces the same associations to engage in coalition-building, to revert to inter-associational cooperation, or to engage outside third parties to gain access to those institutions that demand a different type of access good. This is supported by the fact that a higher degree of access to the Commission seems to be mostly achieved through technical and economic information, whereas EP access mostly achieved through a combination of national and European political intelligence and summaries of economic information, and Council access is mostly achieved through national political intelligence and expertise in the form of technical and economic information. Regional knowledge appears to play a marginal role as such, with the representativeness of regional associations or coalitions playing a facilitating role as a means of gaining or increasing the degree of access. This means that nationality and personal relationships are more important than the ability of regional representatives to provide a certain type of regional knowledge.

6.4.3 The Importance of Supply Tactics

Third, a related point is that the way in which information is supplied matters a great deal, supporting the notion that the medium is at least a part of the message itself. This warrants closer focus on the supply tactics in future studies, with the findings of this thesis indicating that three tactical factors play a role in the degree of access enjoyed by associations; who provides the access good, to whom, and by what method. As previously mentioned, this conclusion seems to indicate that the messenger matters to institutional representatives, which would suggest that the use of coalitions and inter-associational connections is not only a product of the need to diversify the range of supplied access goods, but also intended to leverage the role of national identity and personal relationships in order to achieve a higher degree of access.

Furthermore, the high diversity amongst the approached institutional representatives seem to suggest that associations are aware of the dual importance of access goods and the method whereby these goods are supplied. As the findings find that especially European associations attempted to contact different institutional representatives with differing mandates within each institution, this seems to suggest that there is a political awareness amongst these European associations, whereby a greater familiarity with the complex workings of European decision-making processes seems to provide a competitive advantage vis-a-vis national association.

This is borne out by the generally lower access enjoyed by national associations to the Commission, which is the most complex and arguably, the most hierarchical of the three EU institutions studied by this thesis. Additionally, interview subjects from both associations and EU institutions seemed to suggest that national associations more often contact national ministries, permanent representatives and MEPs rather than the Council or EP secretariat for instance. This notwithstanding, associations in general appeared opportunistic and utilitarian in their approach to contacting different types and levels of institutional representatives, suggesting that resource-constraints and limited institutional knowledge are the reasons for this heterogeneity. These initial findings warrant further attention in order to clearly establish whether the tendency amongst European associations to engage with a wider array of institutional representatives is a strategic choice or a product of constraints on national associations. Lastly, the large variation in the means whereby access goods were supplied saw position papers as the only constant, with fact sheets, events, plant visits, after-work meetings, and voting recommendations were some of the means whereby associations supply access goods. Although some of these means of delivery were closely connected with the type of access good supplied, such as the presentation of amendments in position papers, most means of delivery saw a combination of different types of access goods. For instance, a plant visit in a MS by an MEP would involve both the provision of political intelligence on a particular constituency, and the supply of highly technical and specific information by national experts. This lends further credence to the notion that associations tend to act instrumentally insofar as adapting their method of delivery to the demands of the institutional representative in order to maximize access.

6.5 The Theoretical Implications of the Findings

Generally speaking, this thesis has been able to show that the expanded theoretical framework and the revised typologies for access goods and associations hold explanatory power. To varying degrees, the inclusions of the intermediary level of regional knowledge and political intelligence as a distinct type of access goods provide specificity and nuance to Bouwen's original framework. In light of the findings, this section will discuss two ways in which the findings diverge from Bouwen's framework, which were in part accounted for by the expanded theoretical framework applied by this thesis.

6.5.1 The Importance of a Brussels Presence

The importance of a Brussels presence is not sufficiently accounted for in theories on access goods, where European associations enjoy a competitive advantage over nationally-based associations by being 'in situ' as negotiations are underway. National associations appear to be missing out on the competitive advantage provided by a Brussels presence, as it facilitates both lower 'production costs' of information, and additionally allows for the supply of a separate, distinct type of access good in the form of European political intelligence. Although niche theory could explain why different types of national associations are capable of providing certain types of technical or economic information, they can only provide national political

intelligence, whereas European-level associations can rely on their national members. This would seem to apply to both umbrella, production-chain, sectoral and hybrid associations. A permanent presence in Brussels makes it easier to access the Commission in the early stages of the legislative process, and reduces transactional costs involved with supplying access goods in a timely and efficient manner. Furthermore, it facilitates institutional learning and the development of professional or personal relationships with institutional representatives, which is connected to the next discrepancy touched upon in the previous paragraph, where personal relationships and long-standing working relationships are a clear factor in facilitating a higher degree of institutional intelligence. By working in Brussels over longer period of times, many European associations manage to establish themselves as 'go-to' suppliers of access goods, and also foster and facilitate the development of personal and private networks between different institutional representatives and the associations themselves.

6.5.2 The Role of European Associations as Political Entrepreneurs

This section makes the argument that the prominent role of political intelligence in promoting greater associational access calls for a revised understanding of associations as political entities in their own right. European networks help explain the superior ability of European associations to provide political intelligence on a European level, which is a highly demanded access good by especially the EP and the Council. By acting as a source of such political intelligence, many associations appear to engage in what can be called political entrepreneurship, with associations utilizing political intelligence to leverage institutional access between different institutions, engaging more tangibly in the legislative process by facilitating compromise amendments, building majorities, and monitoring of political positions amongst supporters and opponents to certain political positions. European associations are especially adept at deftly approaching and utilizing different MEPs and Council MS to their advantage by providing political intelligence that supports their favoured outcome. These sophisticated European associations are more adroit in understanding the functioning of the European legislative process and are capable to navigate the policy cycle presented in the findings chapter. These types of associations use national members, individual firms, and national concerns instrumentally to maximize the access granted, and the level of consultation by institutional representatives. This in turn fosters the creation of a positive feedback loop, where a higher degree of access amongst European associations facilitate higher quality political intelligence, which in turn make for a higher degree of access and consultation. Interestingly, this finding runs counter to the assumption underlying the framework of supply and demand of access goods, where views associations as self-interested, yet useful partners to legislators, that are one step removed from the negotiations. Hence, the findings suggest that there is room for future research to reconsider theories of access goods in light of the tendency of certain associations to engage in such political entrepreneurship.

6.6 Implications for Associations and Other Lobbying Groups

Arriving at the final aspect of the conclusion, this thesis has managed to identify some associational best practices, which provide lessons for associations seeking to influence legislative negotiations on the European level. On the European level, the sectoral association CEWEP stood out as an example of how a relatively small association could gain a very high degree of access to institutions, especially the Commission by providing highly technical, trusted and timely information, where intimate knowledge of EU legislative processes allowed them to play an outsize role in the negotiations of the Waste Package. By combining this technical expertise with a cooperative approach, they were brought up by a number of varying institutional representatives as an instance of an influential association.

On the side of LULUCF, CEPF constitutes an example of how an umbrella association can engage in inter-associational cooperation through a single, dedicated Brussels representative that acts as a liaison between the European, the regional and the national associations, leveraging the advantages of each level to maximize institutional access in all three associations. This goes to show that despite limited resources, the right associational representative at the right time can achieve a high degree of access by being well-connected, and managing to coordinate internally and externally from a Brussels office. The example of CEPF also goes to show that an instrumentalist approach to influencing a negotiation is often the most effective, where the provision of a key message and some political intelligence overtly and covertly effectively ensures a wider acceptance of a certain position or amendment proposal. A general lesson is that associations that manage to combine technical expertise with institutional and political know-how are the most likely to gain a high level of institutional access, suggesting that knowing how to supply access goods are almost as important as what access good you are supplying in the first place.

The question then becomes what the implications of these best practices are for associations. In light of the need for specialization amongst associations, associations seeking to gain a high degree of institutional access should consider which institution they prioritize, and at what stage of the policy cycle a high degree of access is most desirable. Having decided to focus on one or two institutions, the next key issue is what type of access goods the association should specialize in. Since different types of associations have competitive advantages based on their base of operation and the nature of their niche, the key to a high degree of access appears to be an ability to provide more than one type of access good. This holds especially true when seeking access to more than one EU institution. The very tangible resource constraints facing associations struggling to provide more than one type of access good can be overcome through inter-associational cooperation or coalition-building on a national, regional, or European level. Through cooperating with other associations, it becomes possible to specialize in the provision of a certain type of access good, whilst maintaining a degree of flexibility when it comes to the ability to supply additional types of access goods. This has the added value of increasing the encompassingness and representativeness of the interests represented. Lastly, any association should take supply tactics seriously. Given that the medium many times is the message, associations should take care to adapt the way in which they supply their goods to the institution they wish to gain access to. The establishment of a Brussels presence appears crucial to building the necessary networks and relationships facilitating the supply of access goods.

Bibliography

Baroni, L., Carroll, B J, Chalmers, A W, Muñoz Marquez A M, Rasmussene A. (2014). Defining and Classifying Interest Groups. Interest Groups & Advocacy Vol. 3, 2, 141–159. Available at: https://pdfs.semanticscholar.org/8844/377a203f4dade48bbcc89e3199b4ff71820a.pdf

Beach, D. & Pedersen, R. B. (2013). Process-Tracing Methods: Foundations and Guidelines. Ann Arbor: University of Michigan Press: 9-22

Bennedsen, M. & Feldmann, S. (2002). Lobbying Legislatures. *Journal of Political Economy*, vol. 110, no. 4. The University of Chicago.

Bennett, A., & Elman, C. (2006). Qualitative research: Recent developments in case study methods. Annual Review of Political Science, 9, 455-476.

Bernhagen, P., & Bräuninger, T. (2005). Structural Power and Public Policy: A Signaling Model of Business Lobbying in Democratic Capitalism. Political Studies, 53(1), pp. 43-64.

Bernhagen, P. & Mitchell, N. J. (2006). Global Corporations and Lobbying in the European Union. In 64th Annual National Conference of the Midwest Political Science Association, Chicago.

Beyers, J. & Braun, C. (2014). Ties that Count. Explaining Interest Group Access to Policymakers. Journal of Public Policy 34(1), pp. 93-121. Available at: https://www.researchgate.net/profile/Jan_Beyers/publication/237196649_Ties_that_Count_Explaining_Interest_Group_Access_to_Policymakers/links/0c96053201caf566df000000/Ties-that-Count-Explaining-Interest-Group-Access-to-Policymakers.pdf

Biernacki, P., & Waldorf, D. (1981). Snowball Sampling: Problems and Techniques of Chain Referral Sampling. Sociological methods & research, 10(2), 141-163.

Bilas, B. (2018). Interview on Climate change: Using EU forests to Offset Carbon Emissions. Croatian political weekly Nacional, March 2018 Edition

Bouwen, P. (2002). A Comparative Study of Business Lobbying in the European Parliament, the European Commission and the Council of Ministers, MPIfG discussion paper, No. 02/7, Max-Planck-Institut für Gesellschaftsforschung, Köln

Chalmers, A. W. (2013). Trading Information for Access: Informational Lobbying Strategies and Interest Group Access to the European Union, Journal of European Public Policy, 20:1, pp: 39-58.

Coen, D. (2007). Empirical and Theoretical Studies in EU Lobbying, Journal of European Public Policy, 14:3, pp: 333-345.

Coen, D. (2009). Business Lobbying in the European Union. Published in Lobbying the European Union: Institutions, Actors, and Issue, Eds. Coen, D. & Richardson, J. Chapter 8, pp: 145-168. Oxford University Press.

Commission (2016). Summary of Stakeholder Feedback to the Land Use, Land Use-Change and Forestry (LULUCF) proposal. Available at: https://ec.europa.eu/clima/sites/clima/files/docs/pages/summary_lulucf_stakeholder_feedback_final_en.pdf

Commission (2018). European Commission - Press release. Circular Economy: New Rules Will Make EU the Global Front-Runner in Waste Management and Recycling. Available at: http://europa.eu/rapid/press-release_IP-18-3846_en.htm

Commission (2019). Land Use and Forestry Regulation for 2021-2030. Available at: https://ec.europa.eu/clima/policies/forests/lulucf_en

Cotton, C. & Dellis, A. (2015). Informational Lobbying and Agenda Distortion, Queen's Economics Department Working Paper, No. 1348, Queen's University. Available at: https://www.econstor.eu/bitstream/10419/122020/1/833811053.pdf

Dahm, M. & Porteiro, N. (2005). Informational Lobbying Under the Shadow of Political Pressure, Discussion paper. Center for Mathematical Studies in Economics and Management Science, No. 1409, Northwestern University.

Douglas, M. & Ney, S. (1998). Missing Persons. A Critique of Social Sciences. Berkeley. The University of California Press.

European Parliament (2016). Circular Economy Package - Four Legislative Proposals on Waste. Available at: http://www.europarl.europa.eu/EPRS/EPRS-Briefing-573936-Circular-economy-package-FINAL.pdf

European Parliament (2018). Briefing - Land Use in the EU 2030 Climate and Energy Framework. Available at: http://www.europarl.europa.eu/RegData/etudes/BRIE/2016/589798/EPRS_BRI(2016)589798_EN.pdf

European Parliament (2019). Legislative Train Schedule – Resilient Energy Union With a Climate Change Policy. Available at: http://www.europarl.europa.eu/legislative-train/theme-resilient-energy-union-with-a-climate-change-policy/file-jd-lulucf-regulation

Gillies, D. (1998). Lobbying and European Community Environmental Law. European Environment, 8(6), pp. 175-183.

Goldstein, K. (2002). Getting in the Door: Sampling and Completing Elite Interviews. PS: Political Science & Politics, 35(4), pp. 669-672. Available at: https://dornsife.usc.edu/assets/sites/298/docs/interviewing_techniques_sampling.pdf.

Hawkins, B. & Holden, C. (2014). 'Water Dripping on Stone'? Industry Lobbying and UK Alcohol Policy. Policy & Politics, vol 42, No 1, pp. 55–70. Available at: https://www.ingentaconnect.com/contentone/tpp/pap/2014/00000042/00000001/art00004?crawler=true

King, G., Keohane, R. O., & Verba, S. (1995). Designing Social Inquiry - Scientific Inference in Qualitative Research. Princeton University Press, pp. 479.

Klüver, H. (2010). Europeanization of Lobbying Activities: When National Interest Groups Spill Over to the European Level, European Integration, 32:2, pp. 175-191.

Klüver, H. (2011a). The Contextual Nature of Lobbying: Explaining Lobbying Success in the European Union. European Union Politics, 12(4), pp. 483-506.

Klüver, H. (2011b). Lobbying in Coalitions: Interest Group Influence on European Union Policy-Making. Nuffield's Working Papers Series in Politics, 4, 1-38.Available at: http://www.nuffield.ox.ac.uk/Politics/papers/2011/Heike%20Kluever_working%20paper_2011_04.pdf

Klüver, H., Braun, C., & Beyers, J. (2015). Legislative lobbying in Context: Towards a Conceptual Framework of Interest Group Lobbying in the European Union. Journal of European Public Policy, 22:4, pp: 447-461.

Leech, B. L. (2002). Asking Questions: Techniques for Semistructured Interviews. PS: Political Science & Politics 35:4, pp: 665-668.

Lowery, D. (2007). Why Do Organized Interests Lobby? A Multi-Goal, Multi-Context Theory of Lobbying. Polity. Volume 39, Number 1.

Mahoney, C. (2007). Networking vs. Allying: The Decision of Interest Groups to Join Coalitions in the US and the EU. Journal of European Public Policy Vol. 14.2. Available at: http://aei.pitt.edu/7958/1/mahoney-c-12f.pdf.

Nabuurs, G. J., Arets, E. J., & Schelhaas, M. J. (2018). Understanding the Implications of the EU-LULUCF Regulation for the Wood Supply from EU Forests to the EU. Carbon balance and Management, 13(1).

Naurin, D., & Lindahl, R. (2008). East-North-South: Coalition-building in the Council Before and After Enlargement. In Unveiling the Council of the European Union (pp. 64-78). Palgrave Macmillan, London.

Olson, M. (1971). The Logic of Collective Action: Public Goods and the Theory of Groups, Cambridge, USA: Harvard University Press.

Panke, D. (2011). Lobbying Institutional Key Players: How States Seek to Influence the European Commission, the Council Presidency and the European Parliament. JCMS 2012 Volume 50. Number 1. pp. 129–150.

Santiago López, F. A. (2015). The Europeanization of Regional Interest Groups - Catalonia, Tuscany and Wales in a Comparative Perspective. Available at: https://ddd.uab.cat/pub/tesis/2014/hdl_10803_285197/fasl1de1.pdf

van Schendelen, M. P. (2002). Machiavelli in Brussels: The Art of Lobbying the EU. Amsterdam University Press.

Schnakenberg, K. E. (2015). Expert Advice to a Voting Body. Journal of Economic Theory, 2015, vol. 160, issue C, 102-113. Available at: https://econpapers.repec.org/article/eeejetheo/v_3a160_3ay_3a2015_3ai_3ac_3ap_3a102-113.htm

VoteWatch (2019a). Regulation of the European Parliament and of the Council on the Inclusion of Greenhouse Gas Emissions and Removals from Land Use, Land Use Change and Forestry in the 2030 Climate and Energy Framework, and Amending Regulation (EU) No 525/2013 and Decision No 529/2013/EU. Accessed on 22/4 2019. Available at: https://www.votewatch.eu/en/term8-regulation-of-the-european-parliament-and-of-the-council-on-the-inclusion-of-greenhouse-gas-emission.html

VoteWatch (2019b). Directive of the European Parliament and of the Council Amending Directive 2008/98/EC on Waste. Waste Package. Available at: https://www.votewatch.eu/en/term8-directive-of-the-european-parliament-and-of-the-council-amending-directive-2008-98-ec-on-waste-first.html

Votewatch (2019c). Directive of the European Parliament and of the Council Amending Directive 94/62/EC on Packaging and Packaging Waste. Waste Package. Available at: https://www.votewatch.eu/en/term8-directive-of-the-european-parliament-and-of-the-council-amending-directive-94-62-ec-on-packaging-and-2.html

VoteWatch (2019d). Directive of the European Parliament and of the Council Amending Directive 1999/31/EC on the Landfill of Waste. Waste Package. Available at: https://www.votewatch.eu/en/term8-directive-of-the-european-parliament-and-of-the-council-amending-directive-1999-31-ec-on-the-landfil.html

VoteWatch (2019e). Directive of the European Parliament and of the Council Amending Directives 2000/53/EC on End-of-Life Vehicles, 2006/66/EC on Batteries and Accumulators and Waste Batteries and Accumulators, and 2012/19/EU on Waste Electrical and Electronic Equipment. Waste Package. Available at: https://www.votewatch.eu/en/term8-directive-of-the-european-parliament-and-of-the-council-amending-directives-2000-53-ec-on-end-of-lif.html

Woll, C. (2006). Lobbying in the European Union: From Sui Generis to a Comparative Perspective, Journal of European Public Policy, 13:3, pp. 456-469.

Appendices

Appendix 1: Élite Interview Questions for Institutional Representatives

1) What associations did you meet with in connection to the legislative process?
2) Could you walk me through a normal day of negotiating this file?
3) Could you map the interest groups involved in the negotiations of the file?
4) What were the characteristics of these interest groups?
5) Were there both national and umbrella associations involved in the negotiations?
6) What was the decision-making process behind meeting with certain stakeholders and not others?
7) Did the nature of the associations (in terms of size, interests represented, scope, nationality) play a role in who was granted access?
8) Did the nature of the associations (in terms of size, interests represented, scope, nationality) play a role in who was consulted?
9) What decided who was consulted – did associations approach you, or did you also reach out to associations?
10) Do you have any long-standing working relationships with certain associations? If so, what determines which associations you meet with?
11) What were the nature of the legislation? Were they contentious, technical,
12) What were the interests represented by different associations?
13) What were the sticking points or main bones of contention during the negotiations?
14) What was the stances/substantive points raised by the associations?
15) What was the role of associations play in your work on this legislative file?
16) Do you consider these negotiations as a typical, representative process in the area of environmental policies?
17) Do you consider the role of associations in these negotiations as typical for similar legislative files?
18) Do you have any institutional rules for who you meet with?
19) Do you have a meeting register for who you meet with?
20) Do you make a conscious effort to achieve a balance in who you meet with?
21) Do you prefer to work with a certain type of associations?
22) What type of information do you receive from different associations?
23) Do you consider the negotiations a success?

Appendix 2: Élite Interview Questions for Association Representatives

1. What type of association would you describe yourself as?
2. Could you walk me through a typical day in negotiating this file?
3. Was this file typical for the type of consultations you were involved in?
4. How did you become involved in the negotiations of this file?
5. Were you sufficiently involved?
6. To your mind, was there a sufficient consultation or involvement/concern taken for your views in connection to your file?
7. What institutions did you approach, and why?
8. Did any institution approach you, and why?
9. Which institution did you feel was the most welcoming?
10. Which was the easiest to access? Which was the most difficult?
11. Do you have any personal connection to any institutional representative?
12. How do you think you are perceived by EU institutions?
13. Are you often involved in consultation for legislative processes in this area?
14. What interests do you represent?
15. Do you feel that there are any differences between what you do and what you are perceived to be representing amongst EU institutions?
16. What would you do or what do you actively do to attempt to manage these perceptions?
17. What are your relationships to national/EU level associations or umbrella confederations?
18. What type of information do you exchange with the institutional stakeholders? Why do you want access?
19. What can you provide EU stakeholders, and what do you get out of them?
20. Are there any institutional rules or barriers that pose difficulties to you in gaining access?
21. Were the negotiations of the file contentious?
22. What was your stance in the negotiations, and what was to you the most important issue to address?
23. What do you think of the outcome?
24. Were you successful in influencing the institutions?
25. Were you successful in gaining access and in consulting the institutions?
26. Is there something you would change?
27. Do you cooperate with other associations or EU-level associations?
28. Did you think that personal connections or a shared kinship/nationality played a role in your interactions with EU institutions? Did they facilitate access?
29. Could you map the interest groups involved in the file?
30. Was it easy or difficult for you to gain access to the institutions?

Appendix 3: List of Interviews

Interviews numbered in accordance with date of transcription and relevant institution/association.

Nr.	File	Organization	Position	Type	Date	Location	Nationality
1	LULUCF	European Parliament	MEP	Interview	April 11	Email	German
2	LULUCF, Waste Package	European Parliament	MEP Assistant	Interview	June 19	EP	Finnish
3	LULUCF	The Council Secretariat	Head of Unit	Interview	March 19	The Council	Dutch
4	LULUCF	Swedish Permanent Representation	Counsellor for Environmental Affairs	Interview	March 21	Swedish Permanent Representation	Swedish
5	LULUCF	Finnish Forest Industries	Manager Energy and Climate Policy	Interview	April 29	Email	Finnish
6	LULUCF	CEPF, Bureau of Nordic Family Forestry, MTK	Policy Advisor	Interview	April 29	CEPF Brussels Office	Finnish
7	LULUCF	EPF	Managing Director	Interview	May 3	Telephone	English
8	LULUCF, Waste Package, RED II	H+K Strategies	Executive Strategy Director	Interview	April 2	H+K Brussels Office	French
9	LULUCF, RED II	Kreab	Associate	Interview	March 15	Café in Brussels	French
10	Waste Package	European Parliament	MEP Assistant	Interview	April 11	EP	Czech
11	Waste Package	European Parliament	MEP Assistant	Interview	April 11	EP	Italian
12	Waste Package	European Parliament Party Secretariat	Policy Advisor	Interview	April 12	Café in Brussels	Finnish
13	Waste Package	European Parliament Greens/EFA Secretariat	Advisor	Interview	April 9	Café in Brussels	German
14	Waste Package	Estonian Council Presidency	Negotiator	Interview	March 15	Café in Brussels	Estonian
15	Waste Package	Maltese Council Presidency	Attaché	Interview	April 1	Café in Brussels	Maltese
16	Waste Package	Council Secretariat	Policy Officer, TREE	Interview	April 2	The Council	German
17	Waste Package	Swedish Permanent Representation	Policy Officer	Interview	April 3	Telephone	Swedish

18	Waste Package	European Commission	Policy Officer	Interview	March 15	European Commission	German
19	Waste Package	MWE	Policy Officer	Interview	May 21	MWE Brussels Office	Greek
20	Waste Package	EuRIC	Secretary-General	Interview	April 17	Telephone	French
21	Waste Package	CEWEP	Managing Director & Office and Communication Manager	Interview	April 25	CEWEP Brussels Office	German, Lithuanian
22	Waste Package	FTI Consulting	Senior Director	Interview	March 28	FTI Brussels Office	French
23	RED II	Lantmännen	Director Public and Regulatory Affairs	Exploratory Interview	April 24	Telephone	Finnish
24	RED II	ePure	Secretary-General	Exploratory Interview	April 26	ePure Brussels Office	French

Appendix 4: Detailed Findings on the Role of Access Goods in Gaining Institutional Access During LULUCF Negotiations

Note: Associations within brackets were involved according to interview subjects or institutional documents. Associations in brackets were therefore not interviewed by the author of this thesis.

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Umbrella	European	CEPF, (EUSTAFOR, CEPI, CEI-Bois, Confederation of European Forest Owners, and the European State Forest Association)	Commission	**Technical & Economic Information:** Short infographs, fact sheets	**Intermediate:** CEPF had low access to DG CLIMA, with some lack of stakeholder access to the Commission. However, the Commission wants to get European information from European interests.	Policy Officers, Heads of Unit. For the Commission, it was easier to access DG Agri than DG ENVI, and DG CLIMA was okay. Commission is difficult to influence compared to the Parliament.	**Initial Stage:** During public consultations before publication of proposal
			EP	**Technical & Economic Information, Political intelligence:** A short fact sheet, a short position paper, amendments	**High:** Connections to Finnish MEP facilitated access, but easier to access likeminded MEPs from EU association.	Mapping and targeting the EPP, the rapporteur of ITRE opinion, ALDE for compromises. Relied on MEP champions, need for good relations with advisors.	**Initial Stage:** Directly after publication of Commission proposal
			The Council	**Political intelligence:** A short position paper, amendments	**Intermediate:** Lower access to MS opposed to forest management. MS very divided. CEPF has 16 private forest owners, which gives better access, and they were one of the organizations asked to speak.	Met with permanent representations, where CEPF met some negotiators in the corridors, but it is nothing established.	**Initial Stage:** Directly after publication of Commission proposal
	National	Finnish Forest Industries	Commission	**Technical & Economic Information**	**Low:** Involved in public consultations.	Policy Officers, Heads of Unit & Cabinet members	**Initial stage:** During public consultations before publication of proposal.
			EP	**Technical & Economic Information**	**Intermediate:** Forest industries were able to communicate to other EU & domestic players in this file. Delivered their views to many representatives in person in the institutions.	Some MEPs, as well as some assistants.	**Intermediate & final stages.**
			The Council	**Technical & Economic Information**	**Intermediate:** Forest industries were able to communicate to other EU & domestic players in this file. Delivered their views to many representatives in person in the institutions.	Finnish decision-makers nationally and in the Finnish permanent representation	**Intermediate & final stages.**

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Mixed-membership & Sectoral	European	EPF	Commission	**Technical & Economic Information:** EPF provided complex and detailed factual information.	**High:** EPF is registered with all the DG's, and is typically informed directly concerning developments by DG representatives. All DGs were accessible if approached professionally, and correctly.	Policy Officers, Heads of Unit. Focus to 90 % on the Commission, devoting 10 % to the EP. DG Grow was the first stop, followed by DG ENVI, CLIM, AGRI, DG ENER according to the particular points.	**Initial stage:** EPF were involved with the Commission and agencies first, even before the idea comes up.
			EP	**Technical & Economic Information, Political Intelligence**: Key technical facts. Directly applicable information and intelligence prioritized.	**Intermediate:** It is harder to get in with EP. EP is found farther down the legislative chain, which made access much harder.	Good access to S&D MEPs. For the Parliament, it was necessary to have friendly MEPs, with EPF relying on them and their assistants enormously. MEPs are national, so EPF told their national association members to contact them.	**Intermediate & final stages:** EPF went to Parliament to get support for amendments.
	National	MTK, (Skogsindustrierna, LRF, Skogsägarna)	Commission	**Technical & Economic Information.**	**Intermediate:** Connections to Finnish MEP facilitated access, but wanted to avoid playing the card of nationality too much.	Policy Officers, Heads of Unit & Cabinet members	**Initial Stage:** After publication of proposal.
			EP	**Technical & Economic Information, Political intelligence:** MTK provided position papers, facts, ideas, and proposals for amendments. Focus on substance of legislation.	**High:** MTK and other national associations from MS with a lot of forest tried to see the rapporteur more often. MTK enjoyed easier access to national MEPs (SE & FI).	MEP assistants, MEPs. High access to Swedish MEPs from ALDE and EPP for Swedish associations, and high access to Finnish MEP for MTK. Relied on MEP champions, need for good relations with advisors.	**Intermediate and final stages.**
			The Council	**Technical & Economic Information:** Providing information on the technical aspects and consequences of Council positions. Focus on substance.	**High:** National associations prioritized over EU associations. MTK had previous contacts with national ministries. Council secretariat not involved a lot.	Targeted permanent representations. Very high access to Swedish, Finnish, Austrian, and Slovenian permanent representations. Use of Swedish representative by MTK when contacting Swedish permanent representation. Swedish associations also brought in positions through the presidency.	**Intermediate and final stages.**

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Mixed-membership & Sectoral	Nordic	Bureau of Nordic Family Forestry	Commission	**Technical & Economic Information:** Some role of technical and economic information on the regional level within and between countries.	**Low:** Access made more difficult by representing specific Nordic interests rather than European interests.	Policy Officers, Heads of Unit.	**Initial stage.**
			EP	**Political Intelligence:** Concerned with the regional level within and between countries.	**High:** High access to Swedish and Finnish MEPs, as well as likeminded MEPs from Estonia, Slovenia, and Austria. Nonetheless, when the Bureau met with Parliament representatives, they never referred to the Nordic component in order to avoid it being viewed as "only a Nordic problem".	Finnish MEPs, Swedish MEPs, German Rapporteur (Lins).	**Intermediate and final stages.**
			The Council	**Technical & Economic Information, Political Intelligence:** Concerned with the regional level within and between countries.	**Intermediate:** Swedish permanent representative interested to find out what it looks like for the Nordic industries and the Nordic members within the EU-associations. Strong Nordic cooperation due to strong common industry, and there are now coordination ministerial meetings.	Nordic Permanent Representations. French permanent representation as important political player, the Swedish permanent representation as an important ally, national ministries.	**Intermediate and final stages.**

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Associational coalitions	Nordic	Ad hoc cooperation between SE, FI, EE, national associations	Commission	**Technical Information:** Transnational information important due to heterogenous levels of knowledge within DGs: DG AGRI has a good unit, but difficult for other units.	**Intermediate:** basic level of access means that a good argument from us can win. It was difficult initially, you need to bring something tangible in the form of data and information.	Policy Officers and Heads of Unit.	**Initial stage.**
			EP	**Political Intelligence:** In the Parliament it is less about convincing arguments than good PR.	**Intermediate:** When we met with Parliament representatives, we never referred to the Nordic component in order to avoid it being viewed as "only a Nordic problem". Coalitions have a stronger influence, which applies if cross-sectoral or transnational.	MEP assistants, MEPs. For MEPs its more about their ideology than their nationality. EPP is generally easier. Many Scandinavian clients creates a link as well.	**Final stage.**
			The Council	**Technical & Economic Information, Political Intelligence:** On the ground information is sought after in all three institutions, in the Council they know their domestic situation, but there are many ministerial silos.	**Intermediate:** The coalition enjoyed high access to Nordic permanent representations as facilitated by national permanent representatives, and bigger coalitions are prioritized. Nordic members are generally prioritized by Nordic permanent representations.	Maltese, Estonian presidencies and coalition-member permanent representations. The Nordic Council was also important by publishing a report. The coalition went via MS into Council unless there are permanent representatives that we can approach.	**Final stage.**

Appendix 5: Detailed Findings on the Role of Access Goods in Gaining Institutional Access During Waste Package Negotiations

Note: Associations within brackets were involved according to interview subjects or institutional documents. Associations in brackets were therefore not interviewed by the author of this thesis.

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Umbrella	European	EuRIC, DigitalEurope, Municipal Waste Europe, (Eurometaux, Eurofer, European Aluminium, CEPI, Europen, Eurochambres, FEVE, FEAD, Orgalime, CEFIC, EXPRA, BusinessEurope, & Plastics Recyclers Europe)	Commission	**Technical & Economic Information:** EuRIC worked with the Commission to provide facts and expertise supporting their interests. They do not like position papers with amendments. DigitalEurope struggled to explain for 18-24 months a sentence or parts of a sentence with impact the industry. Municipal Waste provided local and regional knowledge and expertise. **Political Intelligence:** DigitalEurope provided intelligence on practical and legal issues, and would go to MEPs providing an amendment aimed at solving an issue. Municipal Europe provided amendments and suggestions for compromises.	**High:** EuRIC spent a lot of time with the Commission. EU associations enjoy easier access to institutions by being in Brussels. Can act as a bridge between national experts or a technician at plant, and the Commission representative. When assessing legislation, we are the only ones who can provide industry feedback. EUROPEN had a strong public position and were successful in lobbying. The Commission weighs the pros and cons of getting an amendment formulation from the outside, but does not mention this openly. Municipal Waste Europe had one to three meetings with representatives from each institution, and equal access to all relevant DGs (CLIMA, ENV, REGIO, GROW, ENER).	EuRIC has good relations in the responsible unit, constructive, within boundaries. Especially in meetings with DG ENV and policy officer Langendorff. Municipal Waste had good relations with all DGs.	**Initial stage:** Provided data during impact assessments and consultations before publication of proposal.
			EP	**Political Intelligence:** Practical examples and arguments. Umbrella organizations often provide detailed legal amendments. Input-dependent. Provide practical examples and arguments, not many	**High:** DigitalEurope arranged a visit, as one of their members has a plant. The EP experts do not say if the proposals they brought to the table [during trilogues] were provided by associations. Municipal Waste Europe had one to three meetings, and were close friends with the rapporteur. They also arranged a visit.	Approaching assistants to arrange events. Green MEPs are definitely more receptive than conservative MEPs. Municipal Waste, EuRIC, DigitalEurope and EUROPEN visited the rapporteur and shadow rapporteurs, approached committee members and raised key points and issues. Political	**Intermediate and final stages:** After publication of Commission proposal, but were not directly part of trilogue negotiations. Provide voting

				details or technical information.		and committee secretariats were also involved, where these representatives preferred sectoral associations.	recommendations and amendments in last vote.
			The Council	**Technical Information & Political Intelligence:** Position papers that are adapted to who you send it to, includes facts and technical arguments on a detailed level. Can also provide legal and regularly issues by phrasing the argument.	**Intermediate:** EUROPEN and EuRIC successfully made a big fuss with the legal basis, shaking the whole EP and all the MS. BusinessEurope went predominantly through the Commission and the EP. Municipal Waste Europe had one to three meetings, and arranged multiple events in Brussels.	EuRIC, Municipal Waste and Digital Europe spent a lot of time with Permanent Representations, the four Council Presidencies, MS. Associations are slow, especially when contacting the Council. Estonian and Maltese presidency often contacted, but they preferred national contacts or were not accessible. TREE secretariat contacted, but not meeting with associations is part of a Presidency policy. Associations are often trying.	**Intermediate stage:** After publication of Commission proposal, but were not directly part of trilogue negotiations. Provide voting recommendations and amendments in last vote.

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Umbrella	National	(CONFINDUSTRA, Svenskt Näringsliv, British & American Chamber of Commerce)	Commission	**Technical & Economic Information.**	**Low:** Little access outside of publicly accessible consultations.	Policy Officers, Heads of Unit.	**Initial stage:** During public consultations before publication of proposal.
			EP	**Technical & Economic Information:** The Parliament on the other hand is dependent on technical input from stakeholders.	**Intermediate:** Sometimes the Swedish MEPs ask their MS. MEPs get more of the national associations and individual companies. Associations included in technical level meetings. Meet with EU-level associations, not a priority to meet with associations from other MS.	Normally an investment in getting a lobbyist pays off more, especially in the Parliament.	**Intermediate & final stages.**
			The Council	**Technical & Economic Information:** These associations provide fact sheets and position papers. The Swedish national associations did not have detailed facts, due to such lobbying being resource intense.	**Intermediate:** The Swedish and Italian associations were able to communicate to other EU & domestic players in this file.	National associations in particular are seen as slow.	**Intermediate & final stages.**

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Sectoral	European	CEWEP	Commission	**Technical & Economic Information:** Commission representatives come to sectoral association for very specific information.	**Intermediate:** Access to the Commission largely depends on time when it comes to how often we can meet with them. For the Commission, associations try to summarize the facts on a one-pager. Commission was invited to events, and we sent statements and published joint papers. We met in person.	Commission representatives reached out to CEWEP on policy officer or head of unit-level.	**Initial stage:** CEWEP was involved with Commission and the agencies before the idea comes up.
			EP	**Technical & Economic Information:** A one-pager with sources and references.	**High:** There were bilateral meetings with MEPs. MEPs occasionally reach out. Sometimes nobody picks up the phone– it's usually the result of how some MEP offices are organized, or having a general attitude against answering calls. MEPs and everyone else were invited to events. CEWEP were successful in accessing the EP.	MEPs are very restricted in terms of time and interest, but it is not always necessary to talk to the MEP, can also talk with their assistants. Secretariat representatives prefer sectoral associations.	**Intermediate & final stages:** CEWEP went to Parliament to get support for amendments.
			The Council	**Technical Information:** The technical aspects of the position, and explaining the integrated approach to waste management.	**High:** CEWEP invited permanent representation attachés to visit plants, and to attend events such as breakfast meetings. The Council is generally not very transparent.	Permanent representations are often only reporting without getting too involved in the files, but this depend on their internal structures. In those cases, it's easier to go directly to the ministries. CEWEP gained access to permanent representations after having been introduced by national association member.	**Intermediate & final stages:** CEWEP less involved during trilogue negotiations.
	National	(NovaMonde, French Paper Recycling Industries)	Commission	**Technical & Economic Information:** Associations provide position papers, and invite to conferences.	**Low:** France saw some association visiting DG ENV at the Commission concerning paper recycling, it was ad hoc. Polish companies would write, but would not come. DG ENV attends annual waste conference and have a talk. Most lobbies are EU-based federations or big multinational companies.	Policy Officers. Occasionally move up in the DG or to Commission cabinets in general.	**Initial Stage**: Approached the Commission during public consultations on a technical level.
			EP	**Technical & Economic Information, Political intelligence:** All types of information such as amendments position papers.	**High:** Associations contacted MEPs. Other political groups [apart from S&D] have very close connections to industry. EU associations with many members such as CEFIC create a head or leading association from a MS. The associations appealed to national or regional big recycling constituencies, especially for MEPs.	MEP assistants, MEPs. Focus on committee members and rapporteurs, and partly on committee and political secretariats on a technical level. No apparent focus on national MEPs.	**Intermediate stage.**
			The Council	**Technical & Economic Information:** Providing information on the technical aspects and consequences of Council positions. Focus on substance.	**High:** MS are more influential than associations in these negotiations, as they are needed to reach any agreement. Associations are aware that they are not important, and therefore let national associations go via MS to influence the negotiations.	Associations predominantly approach their national permanent representations, that in turn serve as sources of information and political intelligence for MEPs.	**Intermediate and final stages:** Associations feed their position to the working group.

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Sectoral	Nordic	Unspecified	The Council	**Technical & Economic Information, Political Intelligence:** On the regional level within and between countries	**Low:** Concerning a potential Nordic approach, the Commission did meet companies with a Nordic basis, providing their particular perspective on the Package	Permanent Representations	**Intermediate and final stages.**

Association Type	Level	Associations	Targeted Institution	Types of Access Good	Degree of Access	Targeted Institutional Representative	Stage of Involvement
Associational coalitions	European	CEWEP & EuRIC. Municipal Waste Europe, EuRIC, CEWEP, CEPF, (Eurocities, Single Waste Europe, EUROPEN)	Commission	**Technical & Economic information.**	**Intermediate:** CEWEP and EuRIC try to cooperate with other national and EU associations, we must all pull together if we share a stance. This collective action is a complement to our own lobbying activities, and is an exception rather than a rule, but it happened during the Waste Package negotiations.	N/A	N/A
			EP	**Technical & Economic information.**	**Intermediate:** EuRIC have most success if we ally with other associations. There are two to three from the secretariat that are big experts, who talk with the real experts. They conduct site visits.	This enables a broader, integrated approach, which is part of our argument concerning the importance of considering the whole value-chain. This way, we can provide a holistic picture and a coherent argument. Doing this also makes it easier for MEPs to coordinate and gain an overview in an efficient way instead of having to deal with individual associations.	**Final stage.**