NGO Lobbying on EU Environmental Policy

Understanding the institutional and policy context to optimise the influence achieved.

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List of Abbreviations

DG – Directorate General
DG CLIMA - Directorate General for Climate Action
DG ENVI - Directorate General for Environment
DG GROW - Directorate General for Internal Market, Industry, Entrepreneurship, and SME's
EC – European Commission
ENVI Committee - European Parliament Committee on Environment, Public Health and Consumer Policy
ENGOs – Environmental Non-Governmental Organisations
EP – European Parliament
ETS – Emissions Trading System
EU – European Union
GHGs – Green-house Gases
ITRE Committee – European Parliament the Industry, Trade, Research and Energy Committee
PWD - Packaging Waste Directive
RQ – Research Question
SG – Secretary General
SQ – Sub-Question
WFD - Water Framework Directive

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1. Introduction

1.1 Overview of Chapter

This thesis fundamentally seeks to investigate the influence achieved by environmental non-governmental organisations (ENGOs) on European Union (EU) environmental policy through their lobbying activities towards different EU institutions. In doing so, this chapter begins by providing a brief outline of the research topic and objective. This will be followed by the formulation of the research question and the explanation of a number of sub-questions. After this, the meaning behind lobbying influence is elaborated on given its centrality to the whole research. Subsequently, this thesis will outline the societal and scientific value of this research. Finally, this chapter will provide a flavour of how this thesis broadly seeks to attain its research objectives.

1.2 Background of research topic

"The wildlife and its habitats cannot speak, so we must and we will"

Theodore Roosevelt (1904)

In light of the statement above, ENGOs are non-profit organisations who broadly speaking serve the objective of "promoting the intrinsic and priceless value of the environment" (Biliouri, 1999: p173). Most of their activities, whether directly or indirectly, aim to attain this objective by influencing the decision making of the relevant competent state authorities. In recent decades, there has been significant Europeanisation of environmental policy of the EU, meaning that most decision-making capacities have been "brought to Brussels" (Anderson and Liefferink, 1997: p1). In response to this change and consolidation of power, vast amounts of ENGOs have established offices in Brussels to monitor and influence EU-level environmental policy activities (Biliouri, 1999: p174). Such activities come primarily in form of lobbying, which has been defined as the "contact with – and activities directed at – decision makers in an attempt to influence public policy" (Gullberg, 2008: p2965). In other words, it reflects on attempts by individuals and organisations to ensure that public policy is more aligned with their desirable position.

In policy terms, the lobbying activities of ENGOs at the EU-level serves the most basic objective of encouraging high-level harmonisation of environmental regulatory standards

across Europe (Dür et al, 2015: p957). However, given their non-profit status, they naturally lack the resources which many of their business or corporate counterparts possess (Biliouri, 1999). As a result, understanding and optimising the factors which determine and shape the level of influence achieved through lobbying activities is a "central concern" (Dür, 2008: p1212) for ENGOs' strategies and success. It follows that investigating such factors: particularly factors which have not yet been academically explored, in order to provide a set of recommendations on how to optimise the lobbying activities of ENGOs, is the central aim of this research.

Fundamental to addressing this research objective is to recognize that the study of EU interest groups "is not a matter one-size-fits all theories, but rather involves the careful development of theories that are attentive to the contextual nature" (Klüver et al, 2015: p179). In other words, in order to understand the factors that determine and shape the success of lobbying efforts of ENGOs, a holistic theory cannot account and apply for all scenarios. Rather, to understand the influence achieved by ENGOs on EU institutions, it is necessary to develop a detailed understanding of the contextual background behind their activities.

This thesis identifies two factors that are of paramount relevance for understanding the contextual background of ENGO lobbying efforts: Which institutional venue is being lobbied, and the specific strands of environmental policy which is being lobbied on. Briefly, it is noted that EU institutions are highly heterogeneous. They are composed of different types of actors, they have different mandates, and operate according to different rules – all of which condition how and to what extent interest groups are able to influence their policy making activities. Moreover, environmental policies are also far from being homogenous. For instance, different strands of environmental policy concern different actors and interests, factors which can condition the extent to which ENGOs are able to influence any given policy. This is something broadly referred to as environmental policy variation. Understanding the interplay between these two factors is crucial for accurately understanding lobbying influence, a key element of this research which is discussed below.

1.3 Research Question

In light of the contextual considerations and the potential for variation among them, it is questionable whether ENGOs that are concerned with different strands of environmental policy are equally capable of exerting influence on all the EU institutions. The variations noted above

implicate two central considerations for ENGO lobby activities. To begin with whether ENGOs who lobby on different strands of environmental policy differ in their ability to influence any given institution. Secondly, whether there exists a single policy venue whereby all ENGOs can maximise their influence over a policy. Thus, the central research question collectively addresses these two inter-connected consideration from a strategic point of view:

RQ: Does the influence achieved by ENGOs through lobbying activities towards different EU institutions vary depending on the strand of environmental policy that is of concern, and in light of this, what are the implications for ENGO lobbying strategies?

The length of this research question is justified by the objective of this thesis to account for the interplay among multiple contextual factors on shaping lobbying influence. Taking account of these numerous factors is necessary to draw an accurate and realistic understanding of lobbying influence. Thus, the research question looks at how collectively, the specific EU institutional venue which is being lobbied, and the precise strand of environmental policy which is of concern, together shape the influence which ENGOs are able to achieve through lobbing activities. In light of these findings, the practical and strategic implications for ENGOs who seek to maximise their influence on the policy will be discussed. Moreover, in order to really address the essence of this question and to fully realise the research objective of this thesis, a number of key sub-questions arise. Within these sub-questions, specific questions and issues necessarily ought to be addressed.

SQ1: How can different strands of environmental policy that ENGOs lobby on be distinguished?

Addressing this is a necessary first step for answering the research question. This is because it is necessary that the strands of environmental policies which ENGOs lobby on are appropriately distinguished, in order to test any potential differentiation between the levels of influence which can be achieved when ENGOs lobby on them. Once such a distinction is created, a second sub-question must be addressed:

SQ2: When lobbying on different strands of environmental policy, how comparable is the influence achieved by ENGOs on the EU institutions?

In essence, this ancillary question addresses the first comparison required to be made by the RQ. This is between the different strands of environmental policy, examining how their concerned ENGOs differ in their ability to influence the any given institution. This sub-question addresses a number of issues and questions. Firstly, which EU institutions and actors are lobbied by ENGOs? Many different EU institutions and actors exist and it is necessary to find which are most relevant for this research. Once these are identified, for each individual institution, it is necessary to examine what level of influence ENGOs are able to achieve when lobbying different strands of environmental policy. For each institution, once the levels of influence achieved by ENGOs lobbying on different standards has been measured, it must be asked how these levels of influence compare. Building on what has been uncovered from the first two sub-questions, the final sub-question is the following:

SQ3: For each strand of environmental policy, which EU institution is most significantly influenced by the concerned ENGOs through their lobbying activities?

This question addresses the final part of the research question, which seeks to take further the findings of previous sub-questions, in order to analyse the strategic and practical implications for ENGO's who seek to maximise their influence on policy. Thus, for each strand of environmental policy, a comparison is made between the ability of the concerned ENGOs to influence each EU institution, in order to find which EU institution can be most significantly influenced. In order to address this sub-question, it must first be asked what level of influence an ENGO promoting a certain strand (i.e. either broad or narrow) of environment policy is able to achieve on each on EU institution? Following this, it must be asked how these levels of influence compare? Crucially, the precise outcome of this sub-question will lead to the development of the recommendations for optimising ENGO lobbying activities. Moreover, in light of the centrality of the term 'influence' in the research questions, it is pertinent to first demonstrate a solid understanding of it.

1.4 Understanding Lobbying Influence

When studying lobbying in the EU political system, many academics avoid using the term 'influence'. Instead, they have focused on other resources of influence such as "access" (Bouwen, 2002), "information exchange" (Hix and Hoyland, 2011) or even the "contact frequency with decision makers" (Eising, 2007). However, none of these definitively and substantively reveal the impact achieved through lobbying activities. This thesis attempts to

directly employ and measure the influence, due to the fact that is what practically matters when determining the significance and success of lobby activities.

The work of Michaelowitz (2007) is particularly useful for creating an understanding of this term. She promotes an understanding of influence based on the Max Weber's (1980) definition of power. This is the ability of an actor to make another actor, even against their own preferences, to pursue a certain course of action. It follows that influence "may be understood as a form of power" (Michalowitz, 2007: p134). In this light, a more precise understanding of power is also necessary, and power has been described the "causal relation between the preferences of an actor regarding an outcome and the outcome itself" (Nagel, 1975: p29). Thus, one uses their power to exert a causal influence over particular outcome, and as consequence of the influence, the outcome is brought in line with their preferred outcome. Additionally, it has been noted that a political outcome can come in "two guises" (Dür & De Bièvre, 2007: p3): The official policy position taken by public authorities, and the actual implementation of the position into the policy. However, for this research, what is of concern is the former. This is because the official policy position taken by public officials illustrates to what extent the ENGO are able to bring the position of the given EU institution in line with its own position. Understanding this enables comparisons to be made on the level of influence achieved by ENGOs on different EU institutions.

It is important to note that an enhanced theoretical conceptualisation and empirical measurement of lobbying influence and success will be elaborated further in the methodological section of this thesis. The following section discusses the societal and scientific relevance of this thesis.

1.5 Societal and Scientific Relevance

In light of the research question and objective outlined above, the societal relevance of this investigation is fairly clear and simple: To better understand and empirically measure the lobbying influence ENGOs are able to achieve towards the various EU institutions, and to use this knowledge to contribute towards optimising their lobbying activities and strategies. Put another way, through creating a credible categorisation of strands of the environmental policies which ENGOs lobby on, and investigating the optimal way to lobby on these different strands of environmental policy, a practical guide will be developed which helps ENGOs navigate around and exploit the EU institutional venues for achieving their desired policy outcomes.

Importantly therefore, a key assumption is that such ENGOs are rational and goal orientated in their activities and would utilise such information.

Scientifically, there are also multiple reasons for undertaking this investigation. On a more general basis, the EU is an "especially fruitful, albeit complex, context in which to study interest groups" (Cirone, 2011: p1). In recent years, there has been a considerable growth in the studies on interest group lobbying in the EU, nonetheless, studies explicitly investigating the lobbying activities of environmental interest groups are reasonably scarce. The most notable pieces which reflect on how ENGO's directly attempt to influence EU environmental policy have been lobbying on environmental policy are those written by Biliouri (1999), Imig & Tarrow (2001), Gullberg (2008) and Smith (2008). These are all relevant for outlining the background of this research, however, none of these studies look at explicitly investigate the factors which the present research looks at. Indeed, they do not look at which EU institution ENGOs can influence more significantly. Nor do they look at how for each EU institution, whether the strand of environmental policy being lobbied makes a different on how much influence is achieved. Rather, Imig & Tarrow (2011) investigate whether ENGOs lobby strategies can be characterised as 'inside' or 'outside' lobbying, something to be discussed in the next chapter. Moreover, Gullberg (2008) examines whether ENGOs lobby allies or opponents within the institutions, however this does not compare the influence achieved on the different EU institutions. Further, Smith (2008) comes closest to addressing the topics in this thesis, as he investigates the different levels of influence ENGOs achieve in lobbying the Parliament. However, the findings of this study are restricted to one single institution, the Parliament.

Additionally, other interest group studies which investigate interest group influence on different EU institutions (Bouwen, 2002) are somewhat outdated. This is due to institutional changes in EU, namely the Lisbon Treaty which came into effect in 2009 and considerably empowered the role of the European Parliament in the co-decision-making process. Such changes in decision making powers means that interest groups in the EU now have a growing amount of opportunities EU policy making process (Dür & Mateo, 2012: p97). The widening of choice matters, given that the choice of which institution to lobby which could determine the influence achieved (Cirone, 2011: p19). In this regard, it has been said that "promiscuity, rather than monogamy, is more rational for interest group behaviour" (Mazey & Richardson, 2001) which suggests that certain institutional venues may be more susceptible to lobbying

influence than other. Nevertheless, Cirone (2011) acknowledges the fact that although these differences in institutional access points has significant implications for lobby success, the "mechanisms behind these are underexplored" (ibid). Addressing the research gaps on how different EU institutions can be influenced to different extents has already been demonstrated to constitute a key research theme of this thesis. Furthermore, the present research is carried out taking into account these institutional changes noted above. Finally, there is a complete gap in the literature looking at how the specific strand of environmental policy which is being lobbied on may determine the level of influence achieved. Such an understanding is sought in a manner which is consistent with contemporary research approaches, which have "begun to move beyond descriptive studies of organized interests in Europe to empirically test theories of group behaviour" (Cirone, 2011: p2).

1.6 Readers guide

The structure of this thesis is as follows. Chapter 2 will serve to build on existing literature to develop the theoretical framework of this thesis. Chapter 3 then proceeds by setting out the methodological approach to test the theoretical framework. Chapter 4 analyses the findings from the empirical activities, and tests the validity of the theoretical framework Section 5 reflects on the outcomes, develops recommendations for ENGOs, and explores avenues for future research.

2. Theoretical Framework

The theoretical framework of this thesis is divided into two complimentary sections. The first section seeks to create and cement a firm theoretical foundation for the research. It does so by individually elaborating on and justifying *why* it is important to examine institutional context and environmental policy variation as determining factors of lobbying influence on EU environmental policy. Subsequently, on this basis, the second section seeks to directly apply the first section to make a series of precise hypothesis about *how* the two factors: particularly the interplay between them, shape ENGO lobbying influence on the EU institutions.

2.1 What shapes lobbying influence in the EU?

As outlined in the introductory chapter, this thesis identifies and focuses on two factors that are of paramount relevance for understanding the contextual background and influence achieved by ENGO lobbying efforts: Which institutional venue is being lobbied, and the specific strands of environmental policy which is being lobbied on. This chapter serves to further elaborate and justify the decision to explore these impact that these two factors have on the lobbying influence achieved by ENGOs. To begin with, the importance of looking at institutions and the institutional context will be outlined, followed by a demarcation of which institutional venues are elevant for the present research. Secondly, this chapter will discuss the relevance of specific policy strands in determining lobbying influence, which will be followed by the provision of a practical basis on which environmental policies can be distinguished for the purposes of subsequent empirical activities. Thirdly, this section will make note of other relevant control factors which also shape lobbying influence, but fall outside the scope of this research. In doing so, this chapter already seeks to address a number of the research sub-questions posed in the introduction.

2.1.1 Importance of Institutions

The present section serves to further justify and elaborate on why the institutional context is a key determinant of lobbying influence. Thus, the section begins by exploring why institutions are practically relevant for ENGO lobbying activities on EU policy, and outlines the precise mechanisms by which institutions are capable of shaping the influence achieved by lobbying efforts. In light of this, this thesis introduces the term 'venue shopping' to describe the potential for ENGOs to rationalise and utilise their understanding of institutions to enhance

their influence on policy. Finally, this chapter demarcates the scope of the institutions and institutional actors which are most relevant for the study of ENGO lobbying activities.

Explaining the relevance of Institutions for ENGO lobbying

With regards to the lobbying activities of ENGOs on EU-level policy making, it has been noted that these groups largely engage in what is called "inside lobbying" (Imig & Tarrow, 2001). This form of lobbying is largely addressed directly towards public institutions: politicians and bureaucrats, who have competence over any given issues (Schlozman and Tierney, 1986). Such an activity can be contrasted to activities which are directed towards members of the public, which serve to indirectly send policy cues to decision makers. Consequently, ENGOs in Brussels have been described as a "power orientated movement", who chose to engage and lobby decision in the EU institutions directly (Imig & Tarrow, 2001: p29).

Consequently, institutions are a significant consideration when seeking to better understand lobbying activities, given that the level of influence achieved by lobbying activities "is affected by the institutional context" (Bernhagen et al, 2015: p571). This proposition has been further supported by Eising (2007) who states that the "institutional context" (ibid: p332) defines the opportunities for actors to interact with decision makers in order to influence their positions. This is particularly true in the EU policy processes, whereby institutional variation at the EU level has been argued to play a highly influential role for interest group lobbying (Binderkantz et al, 2015). In this regard, a well-established understanding is that, as with any other political system, that the different institutions which collectively form bedrock of the EU political system are comparatively very heterogeneous, each possessing "very different mandates" (Cirone, 2011: p4). Moreover, they are composed of different types of actors, whose policy making roles differ by nature, and who represent different interests. Additionally, their internal functioning: procedures and rules also vary to a great extent. Each of these serve to condition the opportunities for ENGOs to lobby any given institution, because such variations shape the structure of "incentives and constraints for actors" to get involved in the policy process (Beyers, 2004: p212). This idea is supported by Bunea (2013), who argues that the EU institutions can "empower or disenfranchise" interest groups through their internal rules and procedures. Such rules and procedures include consultation rules, access points and decision-making procedures. Consequentially, due to the variation among EU institutions, interest groups seek to access and influence the EU policy making processes "through a wide variety of institutional venues at

the EU level" (Klüver et al, 2015: p448). In light of these findings, the present thesis introduces and explores the term venue shopping. It is used as a foundation for some parts of the theoretical framework, in order to analyse and explain precisely how and why institutional characteristics and factors determine lobbying activities.

Venue Shopping

Venue shopping has been defined as the activity whereby those seeking to influence policy "avoid the obstacles to the realisation of their policy preferences by looking for new policy venues that appear more favourable to the attainment of their goals" (Kaunert et al, 2013: p185). Thus, venue shopping is a "rational exercise" (Pralle, 2003: p238), where the fundamental objective of an actor is to consider and assess the political landscape in order find a policy venue that is most responsive to its claims. Successful venue shopping should eventually lead to a change in policy in favour of the interest groups desired outcome (Pralle, 2003). The mechanisms driving this change are numerous, for instance the involvement of new actors and decision makers who may be more positively responsive to the lobbying.

The work of Princen & Kerremans (2008) provides a more succinct understanding the causal mechanisms driving substantive policy change due to a change in the policy venue. Indeed, they argue that what determines when and whether there will be a change of the policy in the favour of the lobbying organisation is the notion of "receptiveness" (ibid: p1137). This refers to the ability and willingness of an institutional venue to respond and act upon the lobbying efforts of an interest. Thus, in order to successfully venue shop, it is necessary to examine whether or not any given institutional venue is likely to be receptive to the lobbying efforts of that interest. A key method of explaining whether institutions will be receptive to lobbying activities is the "resource exchange" theory (Bouwen, 2002). This looks at how the exchange of resources among lobbyists and decision makers determines lobbyists "become active and gain access to decision making processes and influence policies" (Cirone, 2011: p3). More specifically, it assumes a level of interdependence between interest groups and policy makers (Cirone, 2011). Such an interdependence is based on factors such as informational needs, expertise, credibility, reputation and legitimacy. It follows that the extent to which an interest groups can influence a policy through exchanging information and expertise "depends on political actors' demand for such resources" (Dur, 2008: p1214). In light of what has been discussed, venue shopping and finding an optimal policy venue to lobby is particularly

important for interest groups, given the fact that often are under-resourced. This means they have more incentives to increase the efficiency and influence achieved through of the lobbying activities.

In sum, it has been established that institutional context is highly relevant for determining and conditioning interest group lobby strategies, justifying the fact that institutions form a key focus of this research. The following two sub-sections demarcate which specific institutional venues are relevant for the lobbying activities of ENGOs and therefore the present research.

Scope of Institutions

Before examining in further depth the extent to which ENGOs are able influence the decision-making processes of various EU institutions, it is important to briefly explain the scope of the EU institutions which are relevant for this investigation. Although chiefly there exists three political institutions in the EU who are directly and significantly involved in the policy process (the European Commission, the European Parliament and the Council of Ministers), the Council of Ministers is excluded from the scope of this investigation. This because much academic commentary has illustrated the fact that the Council of Ministers is "the most intergovernmental institution" in the EU legislative procedure (Bouwen, 2002: p281). This means that the Council is constituted of national figures, who largely demand information about how policy will affect their national interests (ibid). This does not fit well with the function of Brussels-based ENGOs, who are the focus of this investigation. These groups focus on Europe-wide issues, given that their national sections or partners are the ones who focus lobbying and developing on national issues. Additionally, the Council of Ministers is commonly considered as the least accessible institution (Hayes-Renshaw, 2009). This is particularly true for European-level interest organisations, who engage in a "limited [amount] of direct lobbying activity" with the Council's bodies (Coen, 2007: p341).

Thus, the highly restricted access and activities of Brussels-based ENGOs to lobby the Council, supported by the fact that the vast majority of academic studies on EU lobbying focus on either the Commission the Parliament (Bunea & Baumgarner, 2014), justify the exclusion of the Council from the scope of this current research. Rather, the focus of this investigation is to more intensively examine lobbying efforts on the Commission and the Parliament. The subsequent section looks at precisely who ENGOs lobby in these two institutions.

Which actors to ENGOs lobby?

Given that each institution consists of thousands of people, it is necessary to examine precisely who in the institutions is lobbied by ENGOs, in order to subsequently measure the influence achieved through their lobbying activities. In this regard, there has already been some academic focus on whether ENGOs in the EU lobby their 'friends or foes' in order to achieve influence over the policy process (Gullberg, 2008). This study is useful because of the fact that it helps identify and understand who specifically the ENGOs lobbying in each given institution. More specifically, 'friends' are described as figures, groups and/or institutions who are likely to share the same position and belief as that of the lobbyist. Thus, they share "an aim to further a common cause" (Gullberg, 2008: p2970). On the other hand, a 'foe' opposes the position and belief of the lobbyist, thefore the objective of lobbying the latter is to change their position in favour of that of the lobbyist.

There is a "general consensus" (Rasmussen, 2012: p247) that for interest groups in general and ENGOs more specifically, that these groups predominantly lobby their legislative allies (Baugartner & Leech, 1996; Gullberg 2008). The 'friends' for ENGO have been identified by Smith (2008) as "the European Commission's Directorate General for Environment [DG ENVI] and the European Parliaments Committee on Environment: public Health and Consumer Policy [ENVI Committee] represent sympathetic institution venues" (p64). In short, this is due to two inter-related number of reasons. Firstly, because they have better "access" to these policy makers (Gullberg, 2008: p2979). Secondly, because "lobbying clear opponents is inefficient and often a waste of time" (Rasmussen, 2012: p247) due to the natural difficulties and more demanding efforts required for doing so. Rather, ENGOs seek to furnish their allies with relevant information to convince other fellow policy makers. Therefore, for empirical purposes which of this research, the lobbying activities towards the 'friends' of the ENGOs will be investigated. In light of this, their ability to encourage their 'friends' to further promote their policy objectives will be what determines the influence they have achieved on that given institution. The following section moves onto explore how the specific strand of environmental policy can determine ENGO lobbying influence.

2.1.2 Importance of Policy Strands

The present section serves to further justify and elaborate on why the specific strand of environmental policy which is being lobbied on is a key determinant of influence achieved by ENGOs. In order to so, this section firstly serves to outline the general argument as to why the specific characteristics and type of a policy are highly important determinants of the degree of influence that can be achieved through ENGO lobbying. On the basis for the first part of section, next subsequent part examines precisely and substantively how different strands of environmental policy can be distinguished and categorised. This directly addresses SQ1 and serves a highly practical purpose for the subsequent sections which develop specific hypothesises on ENGO influence based on this distinction.

Explaining the importance at looking at policy strands

To begin with, Klüver et al (2015) argue that that each specific policy entails a different nature and set of characteristics, which consequently have significant practical implications for lobbying strategies and success. This suggests that by examining the specific type of policy which is being lobbied on, one may be able to predict more or less the influence achievable can be achieved through lobbying activities. A recent illustration of the plausibility statement provided by the work carried out by Smith (2008), who demonstrated in a case study comparison, that ENGOs who lobbied the European Parliament were particularly successful in the air pollution strand on the Directive on End-of-Life Vehicles 2000/53/EC. On the other hand, a different, unsuccessful ENGO outcome occurred with regards to the regulatory framework for the chemicals sector, REACH Regulation (EC) No 1907/2006.

The theoretical foundation of the argument that the specific policy type can determine and condition the extent to which an actor can influence the policy process is rooted in the work of Lowi (1972). Lowi set out to investigate policy types because of the fundamental belief that it would help to better understand the decision-making processes. Thus, he argued that policy typologies would help to objectively indicate the likelihood of adoption or implementation of a given policy, implying that 'policy determines politics'. In other words, a political process is linked to, and can be predicted by, a policies' substance and characteristic. In both the current investigation and the research carried out by Lowi, the substance refers to type of the policy.

More specifically, in this research, the type of the policy refers to the differentiation between the strands of environmental policy which are of concern, which will be elaborated below.

Nevertheless, Lowi's work has been subject to various critiques, most notably by Steinberger (1980), who states that ambiguity and elusiveness are feature of public policy. Consequently, Steinberger believes that the categories created by Lowi, and indeed generally objectively categorising policies, are neither accurately possible nor desirable. More specifically, any conceptual categorisation constitutes a subjective interpretation, whereby individuals would categorise different policies in different ways, thus eliminating the potential objectiveness of any such classification. Despite this critique, Lowi's intent to create policy typologies to better explain the policy process remains a highly influential and useful idea: particularly given the absence of other variables which can sufficiently explain the difference in outcomes between different policies. Importantly, the approach towards such policy typologies and categories should not serve as definitive rules, but rather as likely indicators of how a particular policy will pan out in the policy process.

In sum, creating policy typologies can provide a fruitful, although not perfect, understanding of the policy process. Such an approach is adopted this research, to create a policy typology which explains any potential differences in influence achieved by ENGOs' lobbying when they lobby on different strands of environmental policy. In light of what has been discussed above, a key assumption posed by this thesis is that when lobbying EU institutions, ENGOs lobbying different strands of environmental policy differ in the extent to which they can influence the relevant institution. The following sections explores this more precisely. However, in order to so, the next section develops a theory on how to create a credible and practical typology of the strands of environmental policies which ENGOs lobby on.

Differentiating between strands of environmental policy

It has already been argued by this thesis that different strands of environmental policy are considerably heterogeneous. However, a key question to address is "how might we account for this difference in outcomes [between environmental NGO lobbying efforts]? (Smith, 2008: p65). Existing literature has indicated that in the EU policy processes, "issue context is an important source of variation in lobbying success" (Klüver, 2011: p484). Thus, it has been argued that in order to comprehend and explain why an interest group may in certain

circumstances succeed or fail in its lobbying activities, "it is important to take into account the policy context at hand" (ibid, 486). More specifically, 'issue context' refers to factors such as the "policy type, degree of technicality and public salience" (Dür, 2008a: p1217).

In light of the current literature, this thesis argues that the issue scope of the environmental policy is the variable which best distinguishes the influence achieved by ENGOs when lobbying on different strands of environmental policy. Thus, the strands are categorized and distinguished along a continuum of two ends: broad or narrow scope. A broad scope refers to an "[environmental policy strand] having far reaching policy implications" (Browne, 1990). On the other hand, narrow scope strands have much more constrained and less far reaching implications. Thus, it will be tested whether the strand of environmental policy is of a narrow or broad scope can condition how much influence can be achieved through lobbying.

The underlying explanation of how 'issue scope' can be employed as a distinguishing variable relates the actors and policy areas which are affected. Such actors and policy areas can be accounted for through 3 dimensions which are interlinked and collectively constitute the scope of a policy issue, illustrated in the diagram below. The 3 dimensions are the following: Firstly, the *number* of actors the policy concerns, thus the sum of actors that the given environmental policy may be of interest to. The second factor is the *types* of actors concerned. This entails whether a policy concerns individually, or mix of, any of the following: businesses, interest groups, member states, EU institutions: public bodies: private bodies etc. Thirdly, the *number of non-environmental policy fields* that the policy may overlap and intersect with is relevant. Thus, the environmental policy may intersect with one or maybe other fields, such as competitiveness, employment, urban development, health etc. Importantly however, an environmental policy for the purposes of this research is defined as a policy which is led in the Commission by DG Environment or Climate Action and is also led by the Environment Committee in the European Parliament. DG Climate Action is included because it fundamentally serves an environmental objective. Such a definition avoids bringing any policy which might have a slight environmental concern into the scope of the findings. Thus, although a broad environmental policy can intersect with many other policy fields, it must have environmental policy as its core policy area.

Figure 1: The 3 dimensions of issue scope
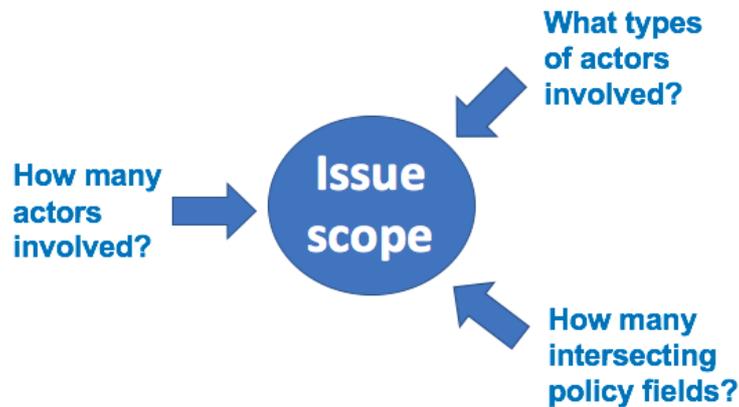
. The research of Mahoney (2007) and Smith (2008) broadly relate to, and lend support to the creation of a typology of policies on this basis. To begin with, Mahoney (2007) provided evidence that the scope of a policy issue has a causal impact on the success of interest groups lobbying on the issue. She found that in the EU, lobbying activities are "less likely to succeed in their goals the larger the scope of the issue they are active on" (ibid: p40). She explains that this is due to the fact that issues with a wider scope naturally involves a larger portion of the population, and thereby concern a wider array of interests. Thus: policy makers are less likely to follow a single or individual groups advice, and their voice is diluted among the various other voices concerned. This is illustrated in the diagram below, as the level of influence is represented on the Y axis, and the scope of the issue is represented on the X axis.

Figure 2: The relationship between lobbying success and issue scope (Mahoney, 2007: p40)
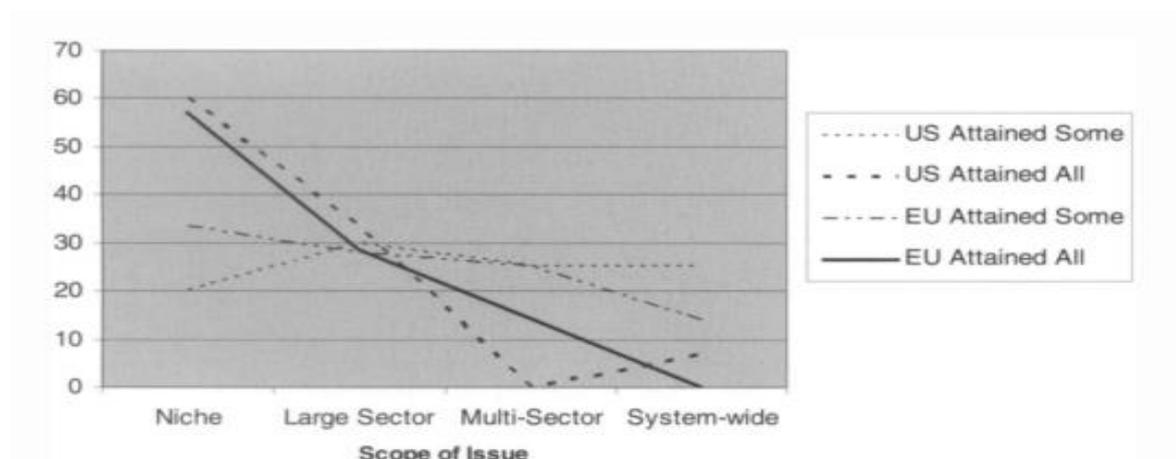
This broad logic was applied more specifically by Smith (2008) to environmental policy lobbying in the European Parliament. In comparing two policies which came from different strands (ELV and REACH listed above), he found that lobbying activities on ELV was more influential than on REACH. This was explained to be because ELV had a more limited and narrow scope, given that it was more confined strand of environmental policy which did not intersection and impact significantly on other policy. On the other hand, REACH had a much broader scope, given that it attracted a large number of concerns from those intersect with competitiveness and producer costs. He went onto further elaborate on the precise causal mechanisms in operation that enhanced ENGO influence in ELV, which were said to depend on two interrelated factors. Firstly, "the extent to which they have privileged interactions with a node in the policy-making apparatus" (Smith, 2008: p64). This refers to the situation in which ENGOs have strong access to the lead Committee. Here ENGOs lobbying ELV they did have close connection to the ENVI Committee, given the absence of other lobbied and relevant Committees which could have damaged this strong connection. Secondly, he referred to the degree to which actors on the policy process defer to the particular institutional mode" (Smith, 2008: p64). This refers to the situation in which other Parliamentary Committees defer to the position of the lead Committee, who the ENGOs have strong access to and abstain from creating any obstacles or proposing further amendments. In this case, the other Committees deferred to the lead Committee as they had no expertise or interest in the relevant policy.

Additionally, it is argued that as a consequence of the existence of different issue scopes, the type of information which is provided when lobbying differs depending on which strand is being lobbied. More specifically, it is argued that when ENGOs are promoting broad environmental policies, they predominantly lobby using political information. In essence, this means that primary objective the ENGO when the policy is of broad scope is to ensure that its broader ambition and objectives (in political, economic, sociological and environmental terms) are reflected in the policy or action as a priority. Given the existence of competing and different interests who also seek to be prioritised and accommodated for, there is little room for specific details and technical issues. What the most important thing to do is to ensure that the direction of the policy is a favourable one, that the policy more generally serves to promote environmental protection. This is achieved by discussing the broader picture and raising the general ambition of the policy.

On the other hand, when ENGOs are promoting narrow environmental policies, they strive to

provide more technical and policy specific information to the institutions. This is because there are less actors and interests present who may be seeking to enhance their own broader policy objectives, thereby competing with the objectives of ENGOs. Consequently, ENGOs are more able to focus on technical and specialised information, which serve to deepen or enhance the level of environmental protection provided for in the policy. In other words: the objective of ENGOs when lobbying narrow strands is not to convince the actors to protect an environmental issue, but rather to enhance the protection for the issue through enhancing the technical qualities required by the policy.

In sum, it has been demonstrated that that the specific strand of environmental policy which is of concern determines how successful ENGOs are in their lobby efforts towards EU institutions. Furthermore, the distinction made between lobby activities concerned with either broad or narrow strands of environmental policy fundamentally serves to provide a practical basis to address the core issues in research question. So far in this chapter, the argument that the institutional context and the specific strands of environmental policy both determine the level influence achieved through lobbying has been provided with considerable theoretical support. Before theorising more specifically on how these factors determine influence of lobbying, a number of other relevant factors determining lobbying influence must be noted and controlled for.

2.1.3 Control factors

It is noted from the outset that numerous other factors are also likely to play a significant role in shaping the success and influence achieved by ENGOs in their lobbying efforts towards EU institutions. One of the most significant is the issue "characteristics of the advocate itself" (Mahoney, 2007: p41). This fundamentally concerns the resources and structural characteristics of an organisation (Bunea, 2013: p554), which are formed by the "size of the firm, and the economic strategy of the firm" (Bouwen, 2002: p373). Furthermore, the existence of counter lobbies will be highly relevant, given that ENGOs are not the only groups lobbying on environmental issues. Moreover, naturally, the political climate and incumbency will be important in shaping the priorities and intrinsic motivations of policy makers, rendering them either more or less inclined to respond positively to environmental lobbies. It is therefore conceded that the institutional and policy contexts discussed by this thesis above are not exclusively and absolutely indicative of the ENGO lobbying influence. An assumption of the

findings of research which are based on the institutional context is that - ceteris paribus – all other control and conditioning factors remain the same. In light of the fact that if ENGOs interviewed are a reasonably similar size and significance, given that fact that they have enough resources to establish an office in Brussels, this size and resources of NGOs is already fairly controlled for. Moreover, most of the lobbying on policies discussed in this thesis were of the last 4 years. This means that the political context has been consistent, entailing the same ideologically orientated figures and leaders in the Parliament and the Commission.

In light of the theory developed in this chapter, the following chapter seeks to develop a more specific and rigorous theory to understand and optimise ENGO lobby activities, by more directly addressing the elements set out in the research question.

2.2 Venue Shopping in Environmental Policy

The present section seeks to employ and combine the theoretical basis developed in the previous chapter, which emphasised the importance of the both the institutional context and specific strand of environmental policy, in determining the level of influence achieved by ENGO lobbying activities. To begin with, the typology created among the strands of environmental policy is practically applied to consider whether the issue scope of an environmental policy may determine the level of influence ENGOs are able to exert on any given EU institution. Subsequently, the second section will build on what is found in the previous section, to more specifically address the practical and strategic implications for ENGO lobbying activities. This will involve the development of a theory about which institutional venues may be most significantly influenced by ENGOs when lobbying on different strands of environmental policy. Both sections enhance the understanding of lobbying activities of ENGOs in order to develop venue shopping strategies, namely by highlighting the obstacles and favourable access points for such activities. However, the second section more explicitly addresses the issue how of ENGOs can improve their venue shopping activities, by stating which institution can be most significantly influenced by their lobbying activities.

2.2.1 Comparing the influence achieved by ENGOS on EU institutions

In the following subsections, this research seeks to employ the typology created in the previous chapter, to compare the lobbying influence achieved by ENGOs when promoting narrow and

broad strands of environmental policy. This will involve comparing whether the level of influence such ENGOs are able to exert on each institution (the EP and the Commission) is the same or different. In order to do so, some specific background is provided on each EU institution to help develop of a theory on the institution's receptiveness to lobbying efforts. More generally, this section serves to address SQ1, which asks how comparable is the influence achieved on the on the various EU institutions by ENGOs when lobbying on different strands of environmental policy. In sum, it is argued that for both institutions, ENGOs lobbying narrow strands of environmental policy are able to exert more influence on the institutions in order to follow their policy objectives and desired outcomes.

Lobbying the European Commission

In the EU policy process, given its the right of policy initiation, the European Commission plays the role of 'agenda setter' (Bouwen, 2002: p379). In this regard, the Commission is considered as an "exceptionally accessible" institution for interest groups (Dür, 2009: p1216). This is largely thanks to the Delors initiated policy of 'open dialogue' which practically requires the involvement of NGOs in the policy process (Pedlar, 2001: p119). Academic attention has reflected on the motives for engaging deeper with interest groups. Majone (2002) has argued that the involvement of such groups relates to the improvement of both the input and output legitimacy. Improving the output legitimacy relates to the understaffing issues and restrictions in its budget constraints in the Commission, which sometimes means that they are dependent on external resources to realise its necessary levels of knowledge (Spence, 1997: p71). Thus, the Commission may require some of such expertise from NGOs. Input legitimacy relates to the Commission's desire to improve the democratic and representative justifications for its policies, which the involvement of NGOs facilitates given their grass-roots connections.

Moreover, empirical evidence has suggested that in policies which entail more political consequences, thereby probably entailing a broad issue scope, the Commission and its Directorate Generals (DGs) will have a "greater demand for political information" (Coen and Katsaitis, 2013: p1108). In other words, for such policies, the Commission "places higher utility on input legitimacy" (ibid: p1117). This encourages a wide variety of actors and interests, both private and public interests, to get involved. Thus, when a concerned policy is a broad strand, the greater extent of participation and lobbying activities on these policies means that the lobbying of concerned ENGOs is naturally crowded out and diluted amongst other

interests. Additionally, when the policy is a broad strand of environmental policy, which is processed the friendly DG (ENVI/CLIMA) who is leading the policy does not have an exclusive or strong power in the Commission stage of the decision-making process. Rather, there is a great amount of intersection and participation of other DG representing other policy fields in the policy proposal and draft, coming in the form of significant 'impact assessment' (Hartlapp et al, 2013: p430). The participation of other relevant DGs naturally contributes towards the further dilution of the influence which is achieved by ENGOs. This is because other relevant DGs are unlikely to champion and prioritise environmental protection, and rather will seek to promote the interest of their own policy domain.

It follows that the influence achieved by ENGOs promoting narrow strands of environmental policy is more less significant than the influence achieved by ENGOs promoting broad strands of environmental policy. This is because DG ENVI/CLIMA's decision making power is much less diluted by both other DGs, and also DG ENVI is subject to less competing lobby activities by other groups who may compete with the interest of ENGOs. Therefore, the relevant DG has more capacity and freedom to develop the environmental policy to in line with the objective desired by the ENGO lobbying them. This leads the first hypothesis of this thesis.

H1 a - *In attempting to influence policy through lobbying the European Commission, ENGOs promoting narrow strands of environmental policy are more successful than those promoting broad strand.*

Lobbying the European Parliament

As mentioned above, in recent decades there has been a shift in the balance of power between EU institutions and this has most significantly positively impact the powers of the Parliament. Moreover, for European interest groups, the Parliament has been traditionally considered as a particularly "friendly" institution (Gullberg, 2008: p2967). In terms of its practical activities, it has been rightly noted that the Parliament is "structured by its committee system" (Klüver et al, 2015: p454). Therefore substantively, a great proportion of the policy work is carried out in the Committees, whose work is "crucial for determining the Parliaments, and in the end, the EU's final outcome" (Rasumussen, 2012: p234). In light of this, the Committee is where the large majority of the lobbying efforts are directed towards when seeking to influence the policy process through the Parliament. More specifically, it has been said that most of the lobbying towards the Committee happens via "contact during the three stages of committee scrutiny"

(Marshall, 2010: p557). These are the rapporteur's draft report phase, the open amendment phase and the voting phase. Given the existence of various power dynamics within the Committees, it has been suggested that the only viable targets are the rapporteur, shadow rapporteur, committee chair and the secretariat officials (Mahoney, 2008).

In light of the work of Smith (2008), it has been clearly and empirically shown that NGOs promoting different environmental policies do not all achieve the same level of success when lobbying the European Parliament. More specifically, it was established that ENGOs were not able to achieve the same level of influence when lobbying on the REACH Chemicals Regulation as when lobbying on the End-of-Life Vehicles (ELV) Directive. In these cases, the scope of the issue was the key variable differentiating the success achieved, as the REACH Regulation had a much broader issue scope than the ELV Directive. As a consequence of this broader scope, the re-enforced Hughes procedure was invoked. This procedure invokes enhanced cooperation with other relevant Committees where a piece of legislation intersects with that Committee's remit (Corbett et al, 2007: p136). In this regard, just as the ENVI Committee has a natural bias towards environmental interests, other such Committees are also "biased towards their policy priorities" often in completion against environmental interests (Rasmussen, 2012: p249). For instance, in the REACH case, the Industry, Trade, Research and Energy Committee (ITRE) was seriously concerned about the competitiveness of the EU chemicals industry and the expense of the environmental standards which were desired. Moreover, industry interests also engaged in a significant amount of lobbying towards the ENVI Committee members, in order to encourage them to lower their environmental ambitions. This crowded out much of the lobbying efforts of the concerned ENGOs.

In sum, when the strand of environmental policy is of a broader scope, not only is the ENVI Committee subject to increased lobbying of private interests, but the institutional procedures mean that the ENVI Committee loses power and influence over the final report. Collectively, these result in a dilution of the influence achieved by ENGOs when promoting broad strand of environmental policy. Rather, when the issue scope has been narrower, such obstacles have not have been so significant. ENGOs would enjoy greater influence over the ENVI Committee, and the overall power of the ENVI Committee on the final report would be greater. This leads to another hypothesis of this thesis.

H1b - In attempting to influence policy through lobbying the European Parliament, ENGO's promoting narrow strands of environmental policy are more successful than those promoting broad strands.

In light of these first two hypotheses, it has been predicted that ENGOs lobbying on narrow strands of environmental policy will be more successful than those promoting broad strands in their lobbying activities towards both EU institutions. Thus, the section above has provided an important understanding and comparison one key element of this research question. It has explored how the influence achieved by ENGO's on EU institutions through lobbying activities may vary depending on the strand of environmental policy which is of concern. The next subsection builds on what is theorised in the present section, to explore the more strategic and practical implications for ENGO's lobbying activities.

2.2.2 Identifying the optimal institutional venue to lobby

It has been predicted above that ENGOs are able to exert less influence on the EU institutions when lobbying on broad strands of environmental policy compared to when they lobby on narrow strands. However, this does not directly address the issue of whether ENGOs can exert the most significant level of influence over the Parliament or the Commission when lobbying broad strands of environmental policy. The same has not been conisdered for when ENGOs lobby on narrow strands, it is not clear on which specific institution ENGOs can exert the significant influence. As Pralle (2003) has noted, the search for a "decision-setting that offers the best prospects" is a crucial element of a lobbying strategy (ibid: p223). Therefore, these considerations are highly relevant for ENGOs venue shopping strategies, as it will help identify the "venue that is most favourable to the attainment of their goals" (Kaunert et al, 2013: p185).

Whichever institution is identified as that which the ENGOs are most significantly above to influence through their lobbying efforts, that institutions represents the most attractive and optimal venue to further invest in lobbying. This is because ENGOs must guarantee that that the given institution continues and intensifies its promotion of the ENGOs policy objective in the interinstitutional discussions. In light of this, it has been said that the key objective lobbying EU institutions is to influence that given EU institution's "inter-institutional negotiating position" (Marshall, 2010: p555). Crucially though, finding one particular institution and concentrating more significant amounts of pressure on them does not entail ignorance towards

lobbying other institutions. Given the significant involvement of both institutions in the policy process, a consistent and healthy presence is necessary within all institutions involved in the process. This reflects on the fact that few interest groups now dare leave any policy arena entirely to their opponents, and most interest groups adopt "a belt-and-braces approach in which 'the institutional trio' (the European Commission, Council and the EP) are lobbied throughout the policy process" (Rasmussen, 2012: p253). Rather, what is suggested, is it that one particular institution could form the core and main focus of lobbying efforts of an ENGO when lobbying a particular strand of environmental policy. The following subsections investigate which EU institutions constitute the optimal venue to be lobbied for ENGOs promoting both broad environmental policies, following by looking at the optimal venue to lobby for narrow environmental policies.

Indeed, SQ3 is addressed when exploring these issues, which for each strand of environmental policy, asks which EU institution can be most significantly influenced by the concerned ENGO's through their lobbying activities? The following subsections explore this issue individually for both narrow and broad strands of environmental policy.

Broad Strands of Environmental Policy

This subsection will proceed by outlining the key objectives for ENGOs when promoting broad strands of environmental policy. In light of a number of arguments which relate to political accountability and procedural rules, it will be argued that the Commission's DG ENVI/CLIMA are the venues which ENGO's can exert the most significant influence over.

As noted above, when ENGOs lobby on broad strands of environmental policy promoting, the type of information they provide is mainly political information. Thus, the key practical objective is to promote the ambition of that policy. Crucial to promoting the ambition is preventing the environmental considerations being crowded out by non-environmental considerations. Should institutional organs, such as other DGs or Committees, who are not primarily concerned with the environment obtain a strong role in the decision-making process, it means that the primary body (DG ENV/DG Clima or the ENVI Committee) will have a weaker competence and influence on the outcome of the policy. As a consequence, the 'friend' of ENGOs will possess weaker influence on the policy proposal, which will be detrimental to significance of influence achieved by that ENGO on the policy process. This is because such

groups can largely on achieve influence by means of the friend, and if the friend has a less significant say over the institution's position, so does the relevant ENGO.

Consequently, ENGOs must identify which body (either DG ENV/CLIMA or ENVI Committee) can maintain a stronger share of the decision-making power when the policy is in their institution. When this is identified, the ENGO must intensify lobbying efforts on that venue, because it provides the greatest opportunity for them to influence the overall policy process. Fundamentally, this thesis submits that the European Commission's DG ENVI/CLIMA are in a stronger position to defend their decision maker powers, and thereby provide ENGOs with more influence over the policy outcome. This is explained by the fact that when the EP ENVI Committee is working on a broad strand of environmental policy, the reinforced Hughes procedure is invoked. This procedure allows a stronger involvement of relevant actors than when the Commission is required to carry out an equivalent activity through its impact assessments. More specifically, this is because of the fact that members of other Committees are often strongly identified with and represent the given policy area they are involved in, in order to directly benefit their own constituency. Thus, they have strong political and elective incentives to battle for those interests. Failure to do so may mean they are held accountable and therefore have negative political consequences for them.

Furthermore, the involved Committees have both a strong formal and political voice on the outcome of the Parliaments output of the policy. Should the involved Committee not be satisfied with the proposal of the ENVI committee, it can block the proposal when submitted to the plenary. Additionally, given the more significant visibility and levels of media coverage on the Parliament, it is easier for involved Committees to make more noise and draw negative attention to a given policy issue if it has not sufficiently addressed their concerns. Indeed, this was demonstrated to be particularly true during the policy process of the VANS Directive (2007/46/EC) which concerned motor vehicles. Here, the ENVI Committee demonstrated very little strength and capacity to raise the level of protection at the expense of other policy interests, and was thereby described as an "environmental pragmatist (Rasumussen, 2012: p240). This reflects on the fact that the Parliament and its Committees are generally regarded "a better aggregator of demands" (ibid p253). On the other hand, the Commission's DG ENVI/CLIMA have less of pressure on them to dilute the policy by coming to a compromise with other policy fields. This is because of a number of reasons: Firstly, members from other concerned DG's are not as heavily invested and incentivised to ensure their policy field is

defended. They will not be held to account by their constituents and they do not rely on the public recognition for promoting such interests for maintaining office. Furthermore, given the Commission's strong desire to appear as a united body, other DGs would not seek to draw media attention or make lots of noise if they believe their interest are not sufficiency accounted for in the policy proposal.

However, this is not to say that internally, there is no contestation among the DGs. The work of Hartlapp et al (2013) has been particularly insightful for illustrating the 'bureaucratic politics'. They acknowledge and reflect on the existence of certain formal requirements to involve other relevant actors and DGs who may be concerned with the policy, for instance through the Impact Assessment Boards and Impact Assessment Steering Groups. Nevertheless, they come to the finding that there exists a significant "systematic advantage for the lead DG" (ibid: p430). These advantages come in a number of forms. For instance, in the first stages of policy formulation, the lead DG (ENVI/CLIMA) "can establish tight relations with external stakeholders and is able to build a solid stock of relevant information" (ibid: p430). Furthermore, later down the line, when the consultations reveal conflicting positions with the lead DG, the lead DG is able to determine whether or not it will take account of the opposing position immediately or whether it will transfer the issue to the political level (ibid). In other words, the lead DG has plenty of opportunities to purposefully select the decision-making venue which is beneficial to its own interests and "protect is own turf" (Rasmussen, 2012: p253). This argument is lent significant support by the fact that during the VANS Directive, unlike the ENVI committee, DG ENVI was better able to defend of the environmental standards issue. Here it framed the VANs Regulation "as a pure environmental issue" (Rasmussen, 2012: p246) and thereby was able to provide more influence for ENGOs. Moreover, in its attempts to maintain a strong share of the decision-making powers, the main opponents to the environmental standards of the proposed policy described DG ENVI as "confrontational and evangelical, as if they were on moralistic crusade" (ibid).

In sum, given the significant political and elective pressures on MEPs concerned with the impact of the environmental policy on their own policy field, combined with the fact that bureaucratic politics in the Commission strongly favours lead DG (ENVI/CLIMA) when other interests also must be account for, it is argued that the Commission's DG ENVI/CLIMA are the venues which ENGOs are most significantly able to lobby. This leads to the next hypothesis:

H2 a – When seeking to maximise their lobbying influence on the policy process, when ENGOs promoting broad strands of environmental policy will find the European Commission's DG Environment/Climate Action as the venues which they can most significantly influence.

Narrow Strands of Environmental Policy

To begin with, it has already been mentioned above that when ENGOs promote narrow strands of environmental policy, the type of information they use mainly concerns technical and scientific information. For the objectives of such ENGOs to be optimally maximised by a venue, the technical and scientific standard for environmental protection prescribed for by the policy should be raised as a high as possible. Consequently, when ENGOs are concerned with these strands of environmental policy, they must concentrate on lobbying the institution which is most responsive to the technical information which they provide, thereby providing them with more influence over the policy. Such an argument fundamentally relates to the discussion on 'resource exchange theory' (Bouwen, 2002), as it requires ENGOs to examine which institution most demands the information that they provide.

Scaffolding

Crucially it is argued by this thesis that the optimal venue for ENGOs lobbying on narrow strands of environmental policy is the European Parliament's ENVI Committee. Despite the fact that the Commission is where a large amount of the important work on such technical aspects of policy takes place, the DG ENVI/CLMA also demand less of such information compared to the ENVI Committee. This is because that the European Commission itself employs many technical and scientific experts, whom are able to provide most of this required information (Bouwen, 2002) Thus, generally speaking, the Commission will tend to be rely be confident with its own expertise. However, when the Commission does demand such additional expertise, there is a stronger presence and influence achieved by industry and business interests (Coen and Katsaitis, 2013: p1108). This is because such actors are often more directly and financially affected by the technical legislation, and therefore command greater expertise on the issue compared to the ENGOs (Rasmussen, 2012: p243). In light of this, the Commission prefers to receive such information from businesses due to the perception that their information may be more accurate and reliable. Thus, in this regard, "business associations have privileged access" (Dür & Mateo, 2012: p970).

On the other hand, it has been argued that ENGOs providing such information have "privileged access to the Parliament" (ibid). More specifically, in the Parliament, the key actors "rely extensively on interest groups" (Rasmussen, 2012: p243) because they often provide them with relevant information and help them digest complex technical information. Furthermore, there is generally a greater demand among Committee members for such information. This is because of their "extensive workload" (ibid) combined with the fact that are "less resourced" (Marshall, 2010: p558) in terms of staff to deal with such issues. In other words, many of these actors are "policy generalists lacking detailed policy information" (Marshall, 2012: p1377) and thereby they are more receptive to the lobbying of such information by ENGOs. Moreover, given the technical nature of the policy, it is highly likely that other Committees and MEPs will simply defer to the position of the ENVI Committee when it comes to the plenary voting (Smith, 2008). Such consideration makes the Parliament highly attractive for ENGO lobbying on narrow strands of environmental policy. In sum, rather than trying to shape the policy and advance the environmental standard at the Commission stage, whereby there is less demand and more competition for such information, it makes more sense for ENGOs promoting narrow strands of environmental policy to lobby the Parliament's ENVI Committee to make amendments which will raise the standard of protection in the policy. This leads to another hypothesis of this thesis:

H2 b – When seeking to maximise their lobbying influence on the policy process, ENGOs promoting narrow strands of environmental policy will find the European Parliament's Environment Committee as the venue which they can most significantly influence.

The following chapter of the thesis sets out how this theoretical framework will be empirically tested.

3. Methodology

This section will proceed by outlining the way in which the research question will be operationalised, followed by setting out in detail the research design of this thesis. In sum, a case study will be employed as the core methodology, relying on semi-structured interviews as the central means of data collection.

3.1 Operationalisation

In order to operationalise some of the key elements of the research question, this section examines the variables, the different strands of environmental policy (broad and narrow), and the measurement of influence.

3.1.1 Variables of Research

This sub-section elaborates on the variables of this research in order to help structure the empirical understanding of what is being investigated. Indeed, the independent variables in this research are two-fold. The first is the EU institution which is subject to lobbying activities of ENGOs. This is operationalised by instances in which ENGOs engage in activities which have an objective of influencing the decision of policy decision makers, most notably through emails, meetings, calls and policy/recommendation thesis's and reports. The second independent variable is the specific strand of environmental policy which is being lobbied, which is further explained in the subsection below. The dependant variable therefore is the influence achieved by ENGOs on an EU environmental policy, which in the previous chapter already been defined as any policy which is led by DG ENVI/CLIMA in the Commission and by the ENVI Committee in the Parliament. Due to this thesis's case study research design which will be outlined below, understanding the mechanisms that lie between the independent and dependant variables will be the core focus of this research. This is because the small-N nature of this study does not provide for a purely correlative approach, and therefore understanding what the causal mechanism in operation will be of critical value.

3.1.2 Operationalising Broad and Narrow Strands of Environmental Policy

The previous sub-section sets out to explain how to operationalise policy strands and make the distinction between broad and narrow strands of environmental policy. As noted in the previous

chapter, three notable dimensions which collectively constitute the scope of the issue were also outlined. Briefly, these were the *number* of actors involved with a policy, the *types* of actors concerned, and the *number of non-environmental policies fields* which intersect the policy.

Importantly, for the operationalisation and the practical determination of the issue scope of a policy, various steps must be taken. In order to determine the *number* of actors and the *types* of actors involved, the EU's Transparency Register provides the best and most comprehensive preliminary insight. Indeed, on this register, it is possible to identify quantifiable information about both the policy areas which any given entity lobbies on, and also a description of what *type* of actor the given entity is (such as an NGO, business, local authority etc). More specifically, by searching a specific policy name/theme on the register, the register cumulates the *number* of entities who are involved and registered in that particular policy field. Finally, in order to determine the third factor, that is whether the policy field intersects with other policy fields, what is required is a more contextual examination and understanding into the policy field, for instance through examining similar past policies.

On a final note, it is submitted by this thesis that in practice, whether an environmental policy strands is broad or narrow is not binary question, rather the characterisation as broad or narrow is one of relativity. However, for empirical purposes, a dichotomy of two distinct categories is created in order make the variables more manageable in empirically. For instance, certain strands may be narrower than others, they are nevertheless categorised as one for empirical purposes.

3.1.3 Measuring Influence

A definition of influence was already provided in the introductory chapter of this thesis, which finds its basis in the concept of 'power'. Moreover, the specific guise of influence which is being examined is the ability of the ENGOs to bring EU policy actors and institutions in line with their own position, rather than looking specifically on the policy outcome. However, it is crucial for the empirical purposes of this research that a method of measuring influence must is provided. Nevertheless, this is by no means a simple process, given that such an activity has been described as a rather problematic enterprise in political science (Huberts and Kleinnijenhuis, 1994). This is due to the "key difficulty" in operationalising the term (Mahoney, 2007: p35). However, despite these difficulties, measuring interest group influence "is not impossible" (Dür, 2008a: p560). In order to do so, the work of Mahoney and Dür are

particularly useful. Mahoney rejects the existing "simplistic discussions that suggest a zero-sum game in which policy outcome are winner- takes-all" (2007: p37). This is because in reality, influence is far from a zero-sum game, and rather most often there are some sort of compromises and varying degrees of influence achieved. In this light, influence can also come in the form of watering down a policy which an interest group had highly objected in the first place. Consequently, she suggests comparing the objectives of interest groups "from their stated goals, triangulated with contextual issue information and interviews with other actors active on the issue – with final outcomes" (ibid). More specifically, this can be measured on an "ordinal scale of: attained none of their objective, attained some of their objective, fully attained their goal" (ibid). Dür (2008a) elaborates further by stating that in this method, "the outcomes of political processes are compared with the ideal points of actors" (2008: p566). Therefore, what is essentially measured is the distance been the particular position of the institution which is being lobbied, compared with the preferred policy position of an actor who seeks to influence that policy. Such a measure has also been used by Schneider and Baltz (2003) and is thereby employed as the means of measurement of ENGOs when lobbying the EU institutions.

Dür (2008a) has identified a number of advantages of using this ordinal scale of measurement for measuring influence. Most importantly, it "can detect influence even if nothing visible happens" in policy terms (ibid: p576). In other words, it is able to detect when an EU institution has been influenced, even when the final policy outcome has not. On the other hand, a problem which has also been identified is that the "black-boxing of the process through which influence is exercised" (ibid: p568). Thus, despite the usefulness of the theory of being able to identify various channels of influence, it is flawed in that it does not precisely identify which channels of influence are exerted. This in general is a significant problem with measuring lobbying success. Nevertheless, this ordinal scale of measurement seems the most pragmatic and empirically viable option. The following section outlines the specific research design of this investigation.

3.2 Research Design

In the determination of the research design of this thesis, it is important to consider a key point made by Aberbach et al (2002), that "studies must be designed with the purpose [of the research] as a key criterion" (p675). The key purpose of this research is to investigate whether

the influence achieved by ENGOs through lobbying activities towards different EU institutions vary depending on the strand of environmental policy that is of concern, and in light of this, what are the implications for ENGO lobbying strategies? In order to effectively address this research purpose, the following research design has been selected. Fundamentally the thesis employs a case study research strategy, which uses semi-structured interviews as the central data collection strategy. This process serves to identify the casual mechanisms in operation in order to provide a descriptive theory. Below, each of these are explained and the limitations will be outlined at the end.

3.2.1 Case Study Research

To begin with, this thesis defined case study research as an empirical inquiry "that investigates contemporary phenomenon (the cases) in depth and within the real-world context" (Yin, 2014: p18). Similarly, Blatter and Haverland (2012) have described this type of research as "an intensive reflection on the relationship between concrete empirical observations and abstract theoretical concepts" (ibid: p19). This approach seems appropriate for the present research because of the necessity to engage in a real life and in-depth manner towards the issue which is being studied, that is the lobbying influence achieved by ENGOs on EU institutions. Furthermore, given that case study research is most valuable for theory building stages where such "candidate theories are tested" (Eckstein, 2000: p111), this method provides an excellent opportunity to test the theoretical hypothesises outlined in the previous section. Such a process has also been described as a "congruence method" (George and Bennett, 2005: p180), whereby observational expectations are created, tested, and the level of compliance is measured. Additionally, case study research is particularly well suited for small-N research (Blatter and Haverland, 2012: p19), a characteristic of this research which reflects on the nature of this study. Finally, Yin (2014) also states that case studies are the "preferred method" under various conditions (ibid: p2). For instance, when 'how/why' questions are being posed; when the investigator has little control over events; and when the focus is on a contemporary phenomenon within a real-life context. Each of these are satisfied by this research, given that this thesis is investigating how and why lobbying influence differs according to the strand of environmental policy that ENGOs lobby on. Furthermore, the present researcher cannot control such lobbying activities and rather can just observe the actions of others. Additionally, such lobbying activities occur on a daily basis in real life in the EU political context.

Case Selection

In any case study research, case selection plays a critical role in the quality of the research, given that inappropriate case selection can to be hugely detrimental for "making valid causal inferences" (King, Keohane & Verba, 1994: p115). A first step for case selection is defining the universe of cases. In the present research, the universe of cases are the *specific* strands of environmental policy, which are confined within the limits of policy strands which are led by either DG ENVI/CLIMA in the Commission and the ENVI Committee in the Parliament.

Furthermore, the specific case selection strategy is that of 'diverse cases' proposed by Gerring (2007). With regards to this strategy, "where the individual variable of interest is categorical, the identification of diversity is readily apparent. The investigator simply chooses one case from each category" (ibid: p98). In other words, two cases must be chosen from opposing and highly differentiated categories based on a dependant variable. However, given that there are two independent variables, four case studies are adopted for systematic variation. Practically speaking, two narrow strands of environmental policy and two broad strands will be selected, because both categories represent diverse ends of the issue scope spectrum. Gerring (2007) highly recommends this method, given that it encompasses a large range of variation which enhances the representativeness of the sample of cases. More substantively, the following cases are adopted for the case studies:

Table 1: Case study selection

Broad Scope Strands	Narrow Scope Strands
Climate Policy	Birds Conservation Policy
Waste Policy	River Water Policy

The table below employs the operationalisation strategy set out in the previous section, to illustrate and justify in a preliminary way why these case studies fall under their chosen typology.

Table 2: Preliminary operationalisation strategy

	Policy Strand	Number of Actors on Transparency Register	Types of Actors	Intersecting Policy Areas
Broad Policy	Climate	463	NGOs, Think tanks, public authorities, professional consultancies, companies and groups, EU wide business associations,	Competitiveness Trade Industry Energy Health
Broad Policy	Waste	343	NGOs, Think tanks, public authorities, professional consultancies, companies and groups, EU wide business associations,	Internal Market Health and Food Safety Development Cooperation
Narrow Policy	River Water	271	NGOs, public authorities, professional consultancies	Agriculture Food safety
Narrow Policy	Bird Conservation	27	NGOs, public authorities, professional consultancies	Forestry

3.2.2 Interviews

The subsections below will outline and justify the choice to carry out interviews, then an explanation of who will be interviewed. Subsequently, the precise interview strategy combined with what to be done with the interviews will be set out. The shortfalls of this research strategy will finally be reflected upon

Why Interviews?

As part of the data collection strategy and method of analysis, interviews are used as the central source of data. Interviews allow for in-depth understanding on a certain issue in order to uncover the causal mechanisms in operation: particularly in small-N studies such as this. Moreover, in order to understand lobbying influence achieved by interest groups, Mahoney (2007) has argued that a good way to do so is "interviewing those involved on all sides, asking

them what they were trying to make happen, and then seeing what actually occurred" (ibid: p39). Similarly, Dür has stated that as part of the determination of preferences which is required in order to measure the influence achieved (i.e. the distance between preference and outcome), such determination is "mostly done by way of interviews" (Dür, 2008a: p567). This method is also one which is recommended by many leading EU interest group scholars adopt for studying interest group strategies (Beyers, Braun, Marshall & De Bruycker: 2014). Consequently, this data collection strategy forms the central basis for gathering data on ENGO lobbying activities towards the EU institutions.

Who to Interview?

When carrying out interviews, respondents are selected based on their knowledge and experience of a certain topic (Aberbach et al, 2002: p673). As a result, Mahoney (2007) has argued that in order to enhance the understanding of lobbying effects, it is important to "interview those involved on all sides" (ibid: p39). Practically, this means that it necessary to both interview those who carry out the lobbying (ENGOs), and also those being lobbied (the EU policy makers/institutions). With regards to ENGOs, at least one policy/public affairs officer is chosen for each strand of environmental policy. The ENGOs are then chosen on the basis of reputation for a strong involvement in that given EU policy area. This can be determined by examining the listed objectives on their websites. In relation to policy makers: personnel from the European Parliament and the European Commission are included in the research. More specifically, for the Commission, the personnel are selected from DG Environment and DG Climate Action, given that these DGs are theorised to be subject to most of ENGO lobbying activities (Gullberg, 2008). More specifically, they are selected on the basis of their involvement with a relevant Directorates or Unit which concerns one the strands of environmental policy in the research. One figure from the Commission is also selected who has no particular expertise on a policy strand and rather is an advisor the Director General of DG ENVI, and thereby provides valuable overview over all the strands of environmental policy. In the European Parliament, the only participant was a parliamentary assistant to a leading Green/EFA figure in the ENVI Committee. Given that most interviewees did not want to be explicitly named, the format in the table below is provided to ensure consistency when describing the interviewees. Finally, it is noted that 11 interviews were carried out in total.

Table 3: Descriptions of interviewees

Policy Area	Organisation	Reference in Text
Waste Policy	European Commission DG ENVI Circular Economy and Green Growth Unit	CEGG Officer
Waste Policy	Zero Waste Europe	Zero Waste Europe Officer 1
Waste Policy	Zero Waste Europe	Zero Waste Europe Officer 2
Climate Policy	European Commission DG Climate Action	DG CLIMA Officer
Climate Policy	Climate Action Network	CAN Officer
Water Policy	European Commission DG ENVI Quality of Life Unit	QL Officer
Water Policy	European Environmental Bureau	EEB Officer
Bird Conservation Policy	European Commission DG ENVI Nature Conservation Unit	NC Officer
Bird Conservation Policy	Birdlife Europe	Birdlife Officer
General ENVI Policy	European Parliament Parliamentary assistant to a senior Green/EFA Member who sits in the ENVI Committee	Parliamentary assistant
General Environmental policy	Advisor to Director General DG ENVI	Advisor to Director General

What type of interview?

Given that there are many different types of interview, it is important to briefly analyse these in order to determine the optimal form interviewing for this research's purposes. Indeed, Bryman (2001) has illustrated the existence of a continuum of interviews, from structured, to semi-structured, to unstructured interviews. Whereas structured interviews are "at the quantitative end of the scale" (Edwards & Holland, 2013: p2), semi-structured and unstructured interviews are "occupied by qualitative researchers" (ibid) and these are characterised by a more flexible approach. In light of this, Aberbach et al (2002) have outlined 3 major

considerations which determine whether an open-ended approach should be adopted rather than a close-ended one. The first is the level of prior research of the subject, thus if there exists a strong assumption, then close ended questions should be used. The second relates to the desire to maximise response validity, open-ended approaches facilitate carrying out more in-depth explanatory work. Thirdly, the receptivity of the respondents must be considered. This looks at whether they are educated and elite respondents, who do not wish to be put in "the straightjacket of close-ended questions" and rather must be able to elaborate on their answers (Aberbach et al, 2002: p674). It follows that for the purposes of this research, all 3 of these considerations are in line with the objectives and nature of this thesis. Although there is a prior level of knowledge on the topic, the specific hypothesises are novel and untested, thus cannot be confined to close-ended questions. Secondly, a core goal of this thesis to provide an in-depth understanding of the studied subject, that is ENGO lobbying activities towards EU institutions. And finally, those who are being interviewed are elite policy makers or highly educated policy experts/lobbyists, who would rather have the opportunity to elaborate on their answers.

Moreover, among the open-ended approach, it is necessary to determine whether semi-structured or unstructured interviews would be optimal. It has been said that unstructured interviews are "best used as a source of insight, not for hypothesis testing" (Leech, 2002: p665). Given that there are a number of hypothesises that this research would like to test, semi-structured interviews would seem the most appropriate. Indeed, this method provides a good compromise: providing for "detailed, in depth and insiders perspective, while at the same time allowing hypothesis testing and the quantitative analysis of interview responses" (ibid: p665). Thus, questions will be asked from a pre-written interview guide (see ANNEX 1), however elaboration and further inquiry will be pursued when coming across a valuable issue.

How to carry out the interview?

In carrying out the semi-structured interviews, two considerations were noted. These relate to how the design the questions and creating rapport. Regarding the structure of the questions, the work of Spradley (1979) was particularly useful. He states that for such interviews, "grand tour questions" ought to be used. More specifically, this requires respondents to "give a verbal tour of something they know well" (Leech, 2002). Another type of question which can was utilised were "example questions" (Spradley, 1979), where the interviewer asks the respondent to give an example on a particular issue. These are useful as they provide a slightly more specific

understanding for any given topic than grand tour questions, thus when this research needs to know something in more depth, it is able to delve in deeper.

The second issue to consider during the interviews is ensuring that rapport exists, something which can significantly enhance the quality of the data gathered. In the absence of rapport, it has been said that even the "best-phrased questions can fall flat and elicit brief, uninformative answers" (Leech, 2002: p665). Thus, in order to ensure rapport, this interview took a middle road approach towards being slightly dim and agreeable, and professionally knowledgably, in order to ensure that the subject is aware that what they are saying is being understood. However, this also guaranteed that they do not miss anything because they assume that the interviewer knows everything already. Furthermore: prompts were used "in order to keep people talking" (ibid: p667). The best form of this has been described by Leech as "informal prompts" (ibid) which are unscripted reassuring noises which ensure that the subject knows that you are listening and that you are interested. Crucially, "excellent interviewers are excellent conversationalists" (Berry, 2002: p679) thereby this researcher strived to converse as naturally as possible through the interviews. These interviews were all carried out face-to-face in Brussels and thereby provided maximum potential for creating rapport. All the interviews were recorded and lasted between 30 minutes to 1 hour.

How to analyse the interviews?

Coding interviews has been described as of "paramount importance" (Aberbach et al, 2002: p675) when open ended questions are used in interviews. Responses in elite interviews are often well formulated, thus a well-structured coding system is important richness of the data. Thereby the interviews were fully transcribed. Moreover, the coding frame consists of categories and sub categories that serve as indicators for the meaning and significance that is identified, in other words, it is a frame of interpretation. Practically speaking, most responses were coded on the basis of what topic/question concern, what type of actor provided the response, and what the perception on the influence achieved by the ENGOs.

Limitations of this Research

In light of the research design outlined above, it is necessary to outline some acknowledged limitations of the research, which were namely based on the interview data collection strategy. This sub-section also outlines how some of these were addressed. Indeed, Mahoney (2007) has

stated that due to the choice of using interviews as a data collection strategy, it may not be possible to precisely identify every possible factor driving influence when uncovering the influence achieved by interest groups lobbying activates. As a result, the present researcher was not able to engage in participant observation of the lobbying activities of the ENGOs, which would have provided more insight into the factors driving ENGO influence on EU institutions. Moreover, the data gathered through interviews was restricted in a number of ways. Firstly, given the highly busy work schedule of many of the interviewees, many were only able to devote just 30 minutes of their time in order to resume with their working day. Secondly, given that spring is a particularly intense and chaotic period for the Parliament, combined with the fact that MEPs and their staff are already under resourced, it was particularly difficult to get more than one parliamentary assistant who could provide insight from the Parliaments perspective. However, this person's insight was particularly valuable, given that her MEP was a leading figure in the ENVI Committee and rapporteur for a number of policies, meaning that she witnessed and encountered a great deal of ENGO lobbying. The fact that only one parliamentary personnel were involved, and indeed the fact that only 11 figures in total, suggests that what has been gathered is a good flavour on the topic however the external validity and generalisability of the findings is not optimal.

Furthermore, it has been argued that when interviewing elites, "serious methodological issues" exist for ensuring high quality research outcomes (Berry, 2002: p679). Such methodological issues involve two notable considerations: validity and reliability. The former examines how appropriate a measuring instrument is for the given investigation, the latter relates to whether the outcomes uncovered have the potential to be repeated. Consequently, the work of Berry (2002) and other authors specifically address these issues. They recommend a number of approaches to take in order to ensure that validity and reliability are not compromised in elite interviews. With regards to issues of validity, Berry (2002) highlights that interviewers must be aware that the interviewees will not always be entirely objective and truth-telling. In this light, Dür (2008a) has noted a number of issues with regards to the problem of interviews for the purposes of measurement of preferences. He states that "such interviews are likely to uncover the – possibly strategic - positions of actors rather than the [genuine] underlying preferences" (ibid: p567). This is particularly true for the European Commission, who do not want to appear biased or subject to excessive influence by any actor. In order to slightly mitigate this, the Commission was asked to consider themselves in the position of ENGOs, to

determine how they think it is possible to more significantly influence the Commission. This inquired into a sensitive issue in a more indirect manner. With regards to issues of reliability, it is widely acknowledged that "qualitative interviews are inherently impossible to replicate" (Edwards & Holland, 2013: p93) given the personal and subjective nature of the outcomes. More specifically, Berry (2002) has stated that serious concerns arise in this regard if the interviewer probes different subjects at different points during the interview (ibid: p681). Consequently, in order to resolve these issues, before the interview the interviewer wrote probe notes in the copy of the protocol to carry out the interview and also create a coding template (ANNEX 1). These increased the likelihood that the interviewer probed consistently on each topic and for each interviewer. Furthermore, Yin (2009) suggests that that an interviewer ought to carefully and precisely take note of the procedures carried out throughout the interviews, in order to ensure that it is possible to replicate the research. These suggestions were both followed by the present researcher, as can be seen in the interviewing template.

On a final note, it has been argued by Beyers, Braun, Marshall & De Bruycker (2014) that in order to enhance the validity of research on lobby activities, document analysis can be used to complement the findings of the interviews. Although in principle this could have been a fruitful activity for the present research, after surveying a series of documents, it became apparent that this was not practically possible or appropriate for this thesis. Conventionally, such document analysis compares whether an interest group's position, reflected in documents such as policy papers, corresponds with the policy outcome. However, given that this research seeks to investigate and compare the influence ENGOs are able to achieve on individual institutions rather than the final policy outcome, document analysis could not support this because the individual EU institution's positions are not readily available. Neither can document analysis make a comparison on how lobby on different strands of environmental policy may determine how much influence ENGOs are able to exert on the EU institutions. Such information is not published in documents, and rather largely depends on personal description, thus interviews serve the best and perhaps only way of gathering relevant data on these issues.

4. Analysis of Findings

In the present chapter, the findings acquired in the empirical activities will be reflected upon and analysed. These will be presented in an order which corresponds with the theoretical framework presented in the previous chapter, and thereby will be based on a number of the central themes and sub-questions. To begin with, the assumptions behind the actors and EU institutions which ENGOs direct their lobbying activities towards will be verified. Secondly, this chapter will examine the merit of the creation of a typology between broad and narrow strands of environmental policy. Thirdly, the analysis will attempt to uncover whether or not the influence achieved by different ENGOs towards the institutions can be differentiated according to the policy strand which is being lobbied. Finally, building on all the findings, this chapter will explore how different ENGOs may be able to more significantly influence certain EU institutions compared to others, thereby explicitly explaining any strategic potential for venue shopping opportunities. Throughout this process, where relevant, the hypothesises made in the section above will be discussed.

4.1 Identifying the actors and institutions that ENGOS lobby

In the theoretical framework, this thesis demarcated various actors and institutions which would be most relevant for this research, and thereby focused the empirical investigation on these points. The demarcation concerned which EU institutions ENGOs lobby, and which actors within those institutions ENGOs lobby. The appropriateness of these demarcations is verified in light of the data gathered on ENGO lobbying activities. This is because, if the demarcation was incorrect and ENGOs in practice lobby different EU institutions and different actors to the ones investigated, then the findings and analysis would be skewed and not representative of the actual lobbying activities of ENGOs towards the EU institutions.

4.1.1 Which institutions do ENGOs lobby?

To begin with, it was stated by this thesis that ENGOs mainly focus on the Commission and the Parliament when lobbying the EU institutions. The interviews showed this to be fairly accurate, as it was clearly apparent that most ENGO activities were directed towards the Commission and the European Parliament. However, policy officer 1 from Zero Waste Europe stated that they also directed a significant amount of their lobbying activities towards the

Council on one of their engaged policies. Moreover, although the Brussels-based ENGOs, did not themselves directly the Council of Ministers themselves, it was mentioned on a couple of occasions that their national sister/member organisations did attempt to do so through lobbying their national ministers. The implications of this will be further discussed in the next chapter, however for the present purposes, what can be taken away is that only looking at the Commission and the Parliament was largely justified. In light of this, the findings of this research are sufficiently representative of ENGO lobbying activities towards EU institutions.

4.1.2 Friends or foes: Who do ENGOs lobby in the institutions?

As outlined above in previous chapters, only personnel from DG ENVI/CLIMA and the ENVI Committee were interviewed about their interactions with ENGOs, given that they were considered to be the friends in the institutions. Broadly speaking, this was explained by the ease of access to the friendly sections of the institutions (Gullberg, 2008) and the lack of resources to lobby others (Rasmussen, 2012); these assumptions were largely confirmed in the findings. For instance, the CEGG Commission official stated that that "ENGOs want us [DG Environment] to give a more sympathetic ear to what they are saying, and they are right to expect that". This confirms that it is justified to consider DG ENVI as an easier access point than other DGs, and it was clear that ENGOs did focus their activities towards this body. In relation to the Parliament, it was evident from the interviews that ENGOs also focused their lobbying efforts towards the ENVI Committee. For instance, when the CAN policy officer was asked who he lobbied in the Parliament, his response was "mainly the lead Committee [because CAN] try to influence the key stakeholders such as the rapporteur and the shadow rapporteurs". Given that only policies which are led by DG ENVI/CLIMA and the ENVI Committee are considered in this research, inherently the lead committee which they seek to influence is the ENVI Committee. Furthermore, the policy officer 2 in Zero Waste Europe, stated that they focused their lobby activities on the ENVI Committee because they "were much more helpful than any other committee". He added that another reason they lobbied ENVI Committee was because his ENGO "have a limited capacity" to lobby other committees.

In sum, it can be confirmed that ENGOs did indeed largely the Commission and Parliament, and within each institution they lobbied DG ENVI/CLIMA and the ENVI Committee respectively. The following sections explore the levels of influence achieved on these institutions and actors.

4.2 Differentiating between environmental policies which ENGOs lobby on

Given that a general argument of this thesis is that when ENGOs are lobbying certain strands of environmental policy, they are able to more significantly influence different EU institutions, it is crucial to first ensure a credible and practical typology exists among different strands of environmental policy. Thus, this section serves the objective of examining the credibility and appropriateness of using issue scope as the central variable by which to differentiate between strands of environmental policy, something which directly seeks to address SQ1 of this research. Thus, the following subsection investigates whether or not it was appropriate to differentiate among environmental policies on this basis. Subsequently, this section will investigate whether the categorisation of certain strands of environmental policy as broad or narrow was indeed accurate. This will create a strong foundation on which to more substantively and specifically analyse the findings on ENGO lobby activities.

4.2.1 Differentiating based on Scope

The credibility of differentiating between policies on the basis of issue scope was already lent considerable support by the previous research of Mahoney (2007) and Smith (2008), as outlined above. Nevertheless, given its centrality of this issue to present research, it is necessary to further strengthen this distinction. This entails testing whether the 3 dimensions used to determine the issue scope were in fact relevant. Briefly, they were the number of actors involved, the types of actors involved, and the number of intersecting policy fields.

When asked questions relating to these 3 dimensions, the interviewees provided clear and confident answers when they were asked about the scope of their relevant policy issues. For instance, they were asked whether they were aware if their concerned policy field attracted attention from a large or small number of actors who also lobbied on the policy. Moreover, they were asked whether such actors varied to a great or small extent in the type of interests that they represented. Further, they were also asked if the given strand of environmental policy that they were involved with strongly intersected with non-environmental policy fields. Most responded without any consideration, suggesting that the scope determining factors had were clearly apparent throughout the policy processes. The number and types of actors was most easily quantifiable for the personnel of the EU institutions and also for the ENGOs. The institutions knew who were lobbying them, and ENGOs knew who else was lobbying on the

same issues. On another note, the Commission and Parliament personnel were naturally fully aware of which other non-environmental policy fields intersected with the concerned policy, given that this has a direct and real impact on their decision-making capacities. However, ENGOs were in some cases less certain about full extent of the intersections, particularly when such intersections were relatively weaker. This is understandable, given that their more limited time and resources make it difficult for them to be fully conscious of every single detail and consideration behind the policy. Nevertheless, they seemed to be aware if any major intersections with other policy fields existed.

Furthermore, with regards to the complementarity of the 3 dimensions in order to determine an issue scope, the dimensions seemed to reinforce each other. In other words, when there was a large number of actors, there also seemed to be a wide variety of stakeholders, and the policy field also intersected with a broad range of non-environmental policy fields. Consequently, using these determining dimensions, it was practically easy to conclude whether a policy was of broad or narrow scope. However, this was with the exception of Bird Conservation policy. Although this will be discussed in further detail below, 520,000 people were directly engaged with the policies public consultation (European Commission, 2015). However, there was not a particularly wide variety of types of actors as almost all of these were individuals; and there were no significant intersections with non-environmental policy fields.

The readily available and clear responses on questions relating to issue scope, combined with the success of the determining dimensions in complimenting each other, show that issue scope is indeed a significant and practical way of differentiating among environmental policies. The section below looks at whether the categorisation of the chosen case studies as broad or narrow were indeed accurate.

4.2.2 Appropriateness of Categorisations and Lobbying Assumptions

In the theoretical framework, 4 specific strands of environmental policy were selected for this case study research. Two represented broad strands (Climate and Waste), the other two narrow strands (River Water and Bird Conservation). These were initially selected on the basis of various factors, which were outlined in the methodology section. Although these were very valuable for providing a preliminary insight, these methods were based on quantitative and more shallow calculations. Providing real qualitative insight into the matter is needed to comprehend the issue more precisely. Such an activity is particularly important because the

verification of the accuracy of the categorisations is critical in order to come to more substantive conclusions and generalisations about the impact of issue scope on the lobbying activities of ENGOs towards EU institutions. If the case studies do not represent the true nature of their assigned category, the findings would be skewed and irrelevant. Following this, if the categorisations are confirmed as appropriate, a further assumption is tested. This assumption concerns how and with what objective ENGOs carry out their lobbying activities. In brief, it was argued in the previous chapters that when ENGOs lobby on broad strands they focus on promoting the ambitions and broader objectives of a policy, whereas ENGOs lobbying on narrow strands rather focus on technical and scientific issues.

To further understand the roles and activities of the interviewed personnel, the respondents were asked a number of questions. For instance, regarding what specific policies they had been involved on with, and what sort of objectives they had when lobbying on the policy. Additionally, a number of questions were designed in order to better understand the scope of the policies which they had been involved in. This was followed by questions about whether they thought the scope of the policy that they had discussed was representative of the scope of policies in that field. Below, for each strand of environmental policy, the responses concerning issue scope given by both personnel from institutions and ENGOs are reflected upon, leading to a conclusion as to whether the categorisation was indeed accurate and appropriate. Finally, for each policy strand, the type and objectives of lobbying activities is examined to see if it corresponds with assumption for that strand.

Climate Policy

In this strand, from those who were interviewed, it became apparent that the main policy in this domain in recent years has been the revision of the EU Emission Trading System Directive EU ETS) 2003/87/EC. The core objective when the revisions began was to broaden its scope as to cover further sectors, such as aviation. This was combined with the more general objective of reducing the amount of carbon which would be allowed and permitted in the market. In this light, after the United Nations Paris Agreement was signed, an objective for the revisions was to even further reduce the carbon output of the EU, in order to bring the EU ETS further in line with the outcomes intended in the agreement. The revision of the ETS was finally concluded between the Council and the Parliament in November 2017, under the Estonian Presidency.

Given that EU ETS is widely regarded as the EU's flagship policy on climate change, the reflections on its scope very much confirmed the policy is indeed a highly broad one. The policy officer from the ENGO Climate Action Network (CAN) stated that "throughout the entire chain of the legislative process, there was a lot of interest from different stakeholders in the outcome of the revision". Additionally, the policy officer from DG CLIMA said that the revision drew the attention and strong involvement of DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) in the process. In light of this, there was also significant involvement of the industry lobby, given that €10 billion worth of free allocation were available (DG CLIMA officer). However, he stated that the revisions were in some senses "fairly technical issues, which didn't gauge so much interest from NGO". This led to his remark that the policy "could have had a wider scope", compared to previous Climate policies. Despite this, the scope can still most certainly be considered as one with a wide scope, given that a significant amount of ENGOs and industry lobbies were involved on the issues and in light of the fact that the policy strongly intersects with other areas, namely industry. Furthermore, the fact Climate policy can be unquestionably considered as a broad scope policy area is most clearly established by the reality that Climate policy has been separated from DG ENVI and now has its own DG, Climate Action.

Additionally, concerning the objectives and types of lobbying carried out by NGOs in this field, the assumption that ENGOs largely work on policy ambitions and objectives is to some extent confirmed. When the DG CLIMA policy officer was asked what he thought the key goal of the ENGOs was, he stated that it was "broadly to ensure a stronger ETS through less reallocations to industry". This was confirmed by the CAN policy officer, who stated that their key goal was to "reduce green-house gases (GHGs) under the ETS" in order to bring the outcome in line with the obligations under the Paris Agreement. Although achieving these goals entailed lobbying in this broader sense, there also existed somewhat of a technical element. This related to the trajectory for the reduction of green-house gases, a crucial element of the revisions, demonstrated by the fact that the Commission officer stated that "the devil lies in the detail". Consequently, a key goal of CAN was to address and "steepen" the trajectory in order to make more significant reductions in GHGs. In sum, although the lobbying on the Climate policy issue was largely concerned with the ambition and objectives of the ETS, it also required attention to some more technical issues in order to deliver this.

Waste Policy

In this strand of environmental policy, the key policy activities in recent years have been concerned with the review of the six directives within the Waste Framework Directive 2008/98/EC. During the interviews, the focus was largely on the review of the Packaging Waste Directive Review 94/62/EC (PWD), which resulted in the creation of a new Directive 2015/720 amending the previous version. The main issue here was the consumption of lightweight plastic bag carriers and the insertion of new clauses to compel member states to take action to reduce the consumption of such bags in their territory.

As for the scope of the policy, it was strongly confirmed from the responses of the interviewees that this policy had a very broad scope. The policy officer from the Commission's Circular Economy and Green Growth Directorate (CEGG) stated that there was "hundreds of responses to the Commissions call for public consultation". This illustrates that a large number of actors were involved with the policy. Moreover, a policy officer from Zero Waste Europe further elaborated on the scope, stating that there were many different types of actors, often with influential powers, involved in the process. For instance, he stated that "Business Europe was involved, as they had big concerns among various economic actors who would be negatively affected. Gradually the trade unions and other business associations also got involved, so there was a huge scope generated which covered the whole value chain". The point regarding actors throughout the value chain being involved in the policy process was reiterated by the CEGG policy officer from the Commission. He explained that many non-environmental policy fields were also involved, namely those relating to "single market issues". Thus, DG GROW was significantly involved, given that packaging waste has implications for the production of goods.

The respondents were then asked whether they thought the broad scope characterising the PWD was representative of scope of Waste policy in general. Policy officer 1 from Zero Waste Europe responded by stating "yes absolutely – often other policies are even broader". On the other hand, the CEGG policy officer from the Commission stated that "I think it can differ enormously". Although conceding that generally speaking, Waste policy does generate a considerable amount of public attention, he made the distinction between two types of Waste Policies. Firstly, electrical equipment waste issues, which are very specialised and do not attract much attention or interest. Conversely, municipal waste relates almost anything which is packaged therefore generates a huge scope on interest. Thus, for the purposes of this present

investigation, given that the PWD which was the focus of the interview discussions, it can be can considered as a municipal waste issue. Thus, it is concluded for the purposes of generalisability of the findings, the appropriateness of categorising Waste as a broad scope policy in this research has been confirmed. However, it is important to note that not all Waste policy can be considered as broad.

Moreover, concerning the types and objectives of lobbying by ENGOs on this field, from both the Commission and ENGOs perspectives, it was confirmed that they were lobbying on the ambitions and broader objective of the policy. This is reflected in the statement of the Commission CEGG policy officer who found that the ENGOs were mainly concerned with the "recycling targets in general term and whatever makes the headlines". This was confirmed by the policy officer from Zero Waste Europe, who stated that they wanted to "secure high ambitious targets". Moreover, they also wanted to change the language of the text, to ensure that mandatory language would be used rather than discretionary. This broader approach can be explained by the fact that it is what gathers the most amount of attention among the general public and is easily comprehendible, something which is necessary for the public support of ENGOs. However, it is important to note that although such forms of lobbying were the predominantly used type, the ENGOs did also provide some more precise submissions. For instance, Zero Waste Europe provided a number of best practice case studies of municipalities and their recycling records. According to their policy officer, this served to support their ambitious targets, proving that they are "manageable achievements". Nevertheless, within this particular case study, the assumption on the type and objectives of lobbying on broad environmental policies is lent further support.

Bird Conservation Policies

Within this case study, the main policy related activities concerned the fitness checks and guidance documents provided for the Birds Directive 2009/147/EC and the Habitats Directive 92/43/EEC. However, no major legislative activities have taken place in this field for some time. With regards to the fitness checks, this concerned attempts in 2015 to push for a review of the two Nature Directives. Moreover, guidance documents have been drawn up issues relating to the periods of bird migration and reproduction, which would restrict hunting activities.

Regarding the migration and reproduction periods, a policy officer from DG ENVI Nature Capital (NC) Directorate stated that this was a very "technical example" which only really attracted attention from the Bird-focused ENGOs and the hunting organisations. Such an indication of narrow scope was further by the officer's statement that "there was no direct influence and inputs from other DGs", thereby suggesting that there was minimal intersection with other policy fields. However, the policy officer did state that both Birdlife and the hunting organisations collectively possess almost 10 million members across Europe. This huge support basis, combined with the fact that for the Commission's proposed fitness checks of Nature Directives received over 540,000 responses in the public consultation, carries significant weight in suggesting these issues may not be as narrow as the previous two dimensions suggest. However, with the proposal for the fitness checks, almost all of the respondents were individuals and ENGOs. There were few respondents from business and industry, or of any other type of actor. The Commission NP policy officer stated that this was because "less people are directly involved and whose interests are affected in the short term". Additionally, when asked to compare the scope of interest to other environmental policy fields, he stated that "of course other policy areas are much broader – but it is relative". This point very much reflects on an argument made in the methodology chapter, that in reality scope cannot be determined in a binary way, and must be considered relatively. Additionally, the claim that Bird Conservation policy is not as broad as other environmental policy fields was further supported by a policy officer at Birdlife, who stated that when comparing the scope of the policy, "if you talk about Bird policy it is not the same as Waste". She did however state that it is crucial "to look at the specific issue to determine what scope it is", something which has been reflected upon a number of times already. But for the purposes of this research, it can be concluded that the findings for Bird Conservation policies, which will be discussed in the subsequent sections, on the balance this strand of environmental policy be accurately and appropriately be considered as entailing a narrow scope.

Moreover, concerning the type and objectives of lobbying activities by ENGOs on this field, it can unquestionably be confirmed that Bird Life was lobbying on technical and scientific issues. The policy officer for Bird Life stated that they their strongest asset is their "conservation team, who catches numbers and [the policy officers] approach the institutions with this". Furthermore, she outlined how they also have a network of organisations who are "locked into monitoring and science-based issues". The fact that Birdlife lobbies in such a manner was

confirmed by the Commission policy officer, who said that he considerers Birdlife to be a "scientific institution". This lends strong support to the assumption when ENGOs lobbying on narrow strands of environmental policy, they lobby using technical and scientific information.

River Water Policy

In relation to River Water policy, the two policies of concern were the revisions in 2012 of the Flood Directive 2007/60/EC, which concerned taking precautionary and preventative measures to mitigate the effects of floods. The other concerns reviewing and refining the Water Framework Directive 2000/60/EC (WFD). Importantly, the Commissions Quality of Life (QL) policy officer has only had experience with the latter, therefore the findings on the Floods Directive are confined to the opinions of the European Environmental Bureau policy officer. With regards the WFD, although during its inception in 2000 this was an extremely broad issue, the activities which have been taking places in recent years have been more confined and specialised issues. These have not attracted interest from many types of actors, rather those have been interested have come from water treatment plants or those agricultural interest who may use the water for their consumable products. Moreover, the QL Commission official stated that other DGs have had a "very slight involvement but nothing significant". This serves to indicate that such activities concerning the WFD can be regarded as a relatively narrow scope issue. Additionally, with regards to the Floods Directive, it was stated by the policy officer at EEB that the policy "did touch on a number of industries and actors" such as insurance, regions, and cultural organisations. However, he stated that "compared to Waste and Climate policy, no, it was not as broad as them. Many of the actors of those negotiations were not involved". Thus, as with Bird Conservation Policy, River Water policy can therefore be considered as a narrower strand in relative terms.

Moreover, concerning the type and objectives of lobbying by ENGOs on this field, the interviews seem to lend support to the argument that ENGOs mainly lobby using technical and scientific information. This is explained by the fact that the Commission's activities concerning the WFD have largely aimed at improving its implementation, given that the Directive itself only sets out goals, with no indication of how to achieve them. Thus, the guidance documents are naturally highly technical. An illustration of this was given by the policy officer of the EEB, who stated that when they were working on guidance for certain "priority substances, this involved monitoring and taking measurements to bring certain substances to appropriate

concentrations". Moreover, concerning the Floods Directive, further examples of technical forms of lobbying was provided. For instance, ENGOs wanted "flood plans to be fully integrated in the river basin management plans". Admittedly, this was not as technical and specific as the guidance's for the WFD, given that it involved lobbying for nature-based solutions as opposed to grey infrastructure to prepare for floods management. Nevertheless, the general form of lobbying on these strands can still be considered to be largely based on technical issues, broadly confirming the presumption about lobbying on this type of policy.

4.2.3 Reflection

In sum, various strands of environmental policy were chosen in order to serve as case studies to represent both broad and narrow environmental policies. Once the certain strands were chosen, relevant personnel were interviewed, and they gave insight into specific policies of their concerned strands of environmental policy. As evidenced above, the scope of the specific policies discussed by interviewees did in every case, on the balance, correspond with the predictions made for the scope of their relevant policy field. Moreover, it was noted by many of the respondents that although most specific policies in that strand do correspond with the scope of policy expected from strand, certain specific policies may deviate from this scope. Thus, it appears that the scope of policies *within* a certain strand can differentiate. This has important implications for the findings and generalisability of the forthcoming analysis. It signifies that the findings will not always be accurate and relevant for all policies within a certain strand of environmental policy. What is important is that before basing actions on the findings which are to come about any given strand, the assumption behind a policy being narrow or broad must be verified. Thus, it must be considered in further detail whether the relevant policy can indeed be categorised as broad or narrow. This is reflected in the argument of the policy officer at Birdlife, who stated "you have to look at a specific policy issue to determine what the scope is".

On a final note, the assumptions about the differences in the types and objectives of the lobbying activities between ENGOs when concerned with broad and narrow was largely confirmed. Thus, it was demonstrated that when ENGOs are promoting narrow strands, they mostly lobbying using technical and scientific information to raise the standard of environmental protection. On the other hand, ENGOs promoting broad strands had more political information in order to raise the ambitions of the policy. Bearing in mind the

qualification and considerations noted above, for the purposes of this investigation, the existence of that two broad and two narrow policies have been confirmed means that it is possible to proceed with the more specific and substantive analysis of this thesis.

4.3 Comparing the influence achieved by ENGOs on EU institutions

This section of the thesis practically analyses the results concerning the issue of how comparable the influence achieved on EU institutions is when ENGOs lobby on different strands of environmental policy. In other words, it explores whether the scope of the environmental policy which is being lobbied on determines how successful the concerned ENGO is in their lobbying activities towards the EU institutions. Thus, a comparison is made between the significance of the influence achieved on each EU institution by ENGOs lobbying on broad and narrow scope policies. Crucially, this examination will both contribute towards directly testing H1a and H1b, and addressing SQ2 of this thesis. To begin with, some general remarks about the relevance of scope for lobbying success will be outlined. This remark will then be examined in light of further evidence for each EU institution. Thus, the relevance of policy scope for determining lobbing influence towards the Commission is explored, followed by a similar examination for the Parliament.

4.3.1 General remarks about the relevance of scope for lobbying success

In this regard, many remarks came from directly is a response to a general question, which essentially asked if respondents think that issue scope is a determinant of the level of influence achieved by lobbying on a policy. Indeed, there was striking consensus on this issue from all types of respondents: ENGOs, the Commission and the Parliament. The consensus was that the scope of a policy is a key factor in determining the significance of influence achieved by the activities of ENGOs towards EU institutors. As the policy officer from Birdlife put it, "yes, scope definitely matters". The policy officer from EEB further added that "of course scope is something which we take into consideration in our activities, we plan who are the relevant actors involved, and how they are involved". In light of this consensus, it is important to examine in what way this is so. The EEB policy officer stated that "the scope and complexity determines how successful you are, because the water is much muddier [when it is a broad scope]". This opinion that broad scope policy issues are more difficult to successfully lobby was shared by others too. For instance, it was affirmed explicitly by the parliamentary assistant,

who stated that the lobbying of ENGOs is "more effective when it is a narrow scope policy". Similarly, policy officer 2 from Zero Waste Europe stated that when a policy is narrow and technical, it would often "pass easily".

Despite the clarity of the general consensus, many noted the fact that the scope of an issue would not absolutely and certainly determine the success of lobbying efforts. In this light, the EEB policy officer stated that scope "is not a guarantee, as even with a smaller scope issue you could fail". Moreover, it was argued by a number of interviewees that when a policy is of broad scope, but all the different actors and stakeholders are united as one with a consensus on an issue, having this "broad alliance will help us significantly" (Zero Waste Europe Officer 1).

Nonetheless, the following section provides some more specific insight into each individual institution, and explore whether this general consensus holds for both institutions. If so, the precise reasons are explained. Before measuring such influence, it is important to reiterate Mahoney's (2008) measurement of influence, which this thesis has adopted and that will be used in the following subsections. This is based on an "ordinal scale of: attained none of their objective, attained some of their objective, fully attained their goal" (ibid).

4.3.2 Importance of scope for influencing the Commission

In practical terms, the empirical investigation looking at whether ENGOs achieved more influence on the Commission when lobby broad or narrow policies was always going to be a tricky task. This is due to the fact that questions asked in the interviews were unlikely to provide a highly accurate and relevant answer. Firstly, this is because the ENGOs had largely been working on a single policy issue which entails the same scope, thus they do not have a good basis to compare the influence achieved when lobbying both types of policies. Secondly, although the Commission may have a better oversight on the comparison, they are naturally more careful not to look biased against certain interests and lobbying efforts compared to others. Consequently, in order to uncover this particular issue, the sections below look separately at the responses concerning the significance of influence achieved by lobbying efforts towards the Commission. This is done firstly for ENGOs when promoting broad strands, and then subsequently when promoting narrow strands. For each of these types of policies, what this thesis did was firstly to positively, neutrally or negatively code all potentially relevant responses about lobbying influence achieved towards the Commission. In doing so, the responses included statements from both ENGOs and the Commission's personnel. After, these

responses were examined in further depth, in order to explain more precisely why there was a difference in the influence achieved on the Commission. Once an understanding has been created for each of these types of ENGOs, an overview is provided to compare which type of ENGO was able to exert influence more effectively over the Commission.

Influence achieved on the Commission by ENGOs promoting broad polices

With regards to ENGO activities promoting broad strands of environmental policy, from the coding which took place, the vast majority of responses showed to be either negative or neutral. To begin with, the Commission interviewees were asked a number of questions which sought to uncover this issue. For instance, they were asked what they would like to receive from ENGOs who lobby them, whether there were many ENGOs involved in the lobbying on the relevant policy, and thereby whether they thought the ENGOs managed to get much influence on the final policy. With regards to both broad policy strands, Waste and Climate policy, the Commission largely avoided answering whether they thought the ENGOs were significantly influenced lobbying during the Commission's proposal. Rather, they (unsurprisingly) focused on their concerns about balancing and practical realities. Indeed, the CEGG officer in DG ENVI emphasised the need to "achieve a balance", whereas the advisor to the Director General stated that there was a "big sentiment for fairness", which involved listening to all stakeholders, not just ENGOs. Moreover, a policy officer from DG CLIMA stated that they would only propose policies which they "believe can go forward", illustrating a pragmatic approach which acknowledges the potential for heavy resistance further ahead in the policy process. These serve to demonstrate the practical difficulties understood and foreseen by the personnel of DG ENVI/CLIMA when faced with a broad scope policy. Fundamentally, this also lends support to the arguments made by this thesis, regarding the significant obstacles and considerations that the lead DG is faced with when proposing a broad environmental policy, through impact assessments and participation and other DGs (Hartlapp et al, 2013).

The only direct responses given by the Commission to the issue of the significance of influence achieved by ENGOs was given by the officer in DG CLIMA, who stated that he "didn't see a huge amount of unhappiness with the Commission's proposal". However, he added that with regards to prices for Carbon in the ETS, "NGOs got annoyed at [the Commission] for not having a favourite price", which resulted in them often talking past each other. This response serves to suggest a very mild degree of influence achieved by ENGOs on the Commission,

with some clear dissatisfaction present. This was partially confirmed by the relevant policy officer from CAN, who stated that the Commission was "relatively progressive" in its proposal. However, he stated that during the later negotiations, they were "not a fair broker and were taking sides", suggesting that ENGOs were not entirely satisfied with the Commissions responsiveness. This indication that the Commission is somewhere in between positively and negatively responsive towards the lobbying of ENGOs concerned with broad policies is lent further support by another interviewee from Zero Waste Europe (Officer 1). He stated that with regards to the Packaging Waste Directive, "for some things [the Commission was responsive] and for others not". More specifically, they were able to prevent the proposal from being taken off the table by the business lobby, however the proposal was not ambitious enough due to the Commission's concerns about implementation.

In empirical terms, using Mahoney's measurement index, to measure much influence ENGOs lobbying on broad strands have exerted on the Commission in these cases, this thesis submits that the middle category of "attained some of their objects" would be most appropriate. The following subsection seeks to explore how the influence of ENGOs promoting narrow strands of environmental policy compares.

Influence achieved on the Commission by ENGOs promoting narrow polices

From coding the responses acquired concerning the significance of influence achieved by ENGOs promoting narrow environmental policies, it became apparent that there were considerably more positive responses. Although once again, some of the Commission's personnel reiterated the need to "take a balanced view of what we put out" (QL policy officer), there was certainly a more positive and open perception on influence achieved by ENGOs by their policy proposal. This was true for both River Water and Bird Conservation policy. The Commission QL officer stated that with regards to the some of the revisions of the WFD, such as promoting the number of fish in rivers, the ENGOs who were involved had their "natural sympathy" and that they were "fairly successful" in their lobbying efforts. Furthermore, when discussing the Floods Directive revisions, the policy officer from the EEB stated that they were not successful in getting the Commission to propose the policy as part of the WFDs river basin management plans. However, he said he had experienced many old guard civil servants on other similar policy issues, who had been highly willing to push ahead the objectives of the ENGOs. This more positive perception on the influence achieved by ENGOs on the

Commission was enhanced when looking at Bird Conservation policy. When asked about the success of ENGOs influence on the fitness check of the Nature Directives, the NC Commission policy officer stated, "I think that Birdlife was success". He explained that this was because they were able to draw attention to issues which the Commission perhaps did not remember to consider. Moreover, the policy officer from Birdlife was even more positive about their influence of the Commission, by stating that they were "very successful – [their] relationship with DG ENVI is excellent".

It follows that, using Mahoney's measurement index, in empirically measuring how much influence ENGOs lobbying on narrow strands were able to achieve, this thesis submits that it would not be appropriate to state that they "achieved all their objectives". Rather, it would be more appropriate to state that they "attained some of their objectives", however to a stronger degree than evidenced when ENGOs lobbied the Commission on broad strands. Consequently, this addresses and confirms the first hypothesis (H1a) of this thesis, that when attempting to influence policy through lobbying the European Commission, ENGOs promoting narrow environmental sub policy fields are more successful than those promoting broad sub policy fields.

4.2.3 Importance of scope for influencing the Parliament

Unfortunately, in this regard, the data concerning lobbying on the Parliament is less rich and scarcer than that of the Commission, given that only one Parliament personnel participated in the research. Thus, her ability to make comparisons between lobbying on broad and narrow environmental policies was limited to the policies which she directly worked on or was particularly aware of. Therefore, the insight gained for this dimension of the research is largely that provided by ENGOs, and partially the understanding and oversight of the policy process that Commission officials have. Furthermore, given the more restricted amount of data available concerning the Parliament, the quantitative coding of responses as positive, neutral and negative carried out for ENGOs lobbying the Commission is not necessary, and rather a quantitative analysis is directly provided.

To begin with, it is most useful to look at the response from the parliamentary assistant. When she was asked whether she thought ENGOs are more successful in lobbying if they are concerned with broad or narrow strands, she confidently stated they are "more effective when it's a narrow scope". The explanatory factor that she outlined was that "there is less politics"

involved around narrow policies. More specifically, she believed that when ENGOs are promoting broad environmental policies, they had to convince a much wider variety of politicians from all over Europe, something which ENGOs often "don't have the reach to make it happen". In other words, ENGOs largely do not have the resources to invest in convincing the wide range of actors needed to be on board for pushing through their objectives in a broad environmental policy. This is lent further support by the statement made by a policy officer 2 at Zero Waste Europe, who stated that when lobbying the Parliament, they "haven't had got many contacts with people dealing with these issues". Additionally, the parliamentary assistant believed that convincing many policy makers on narrow issues was much easier because of the absence of significant attention and publicity on the issue. Essentially, the policy makers "electorate won't really be interested", thereby making it easier for them to follow the position of environmental figures are really invested in the issue. These arguments provides strong support to the arguments made above by this thesis based on the research of Smith (2008). More specifically, in the REACH policy case which had a highly broad issue scope, ENGOs were largely unsuccessful. This was because a wide variety of MEPs, Committees and lobby organisations were involved in the issue. Indeed, this precisely translates to what the parliamentary assistant means by "more politics".

Furthermore, in many interviews it was stated that the Parliament lacked technical expertise. As a consequence, one Commission official stated that the Parliament "offer more access to technical knowledge from groups" (CEGG officer). This issue will be elaborated on in further subsequent sections. Nevertheless, as noted above, ENGOs lobbying on narrow strands of environmental policies are the ones who focus more heavily on providing such technical and scientific data. In light of the "resource exchange theory" of Bouwen (2002), these findings suggest that ENGOs gain more influence on the Parliament when lobbying on narrow policies due to the match between the information they supply and what is demanded. Such an argument is lent support by the parliamentary assistant, stating that the EP is more "susceptible" to such lobbying because they don't have any expertise on technical issues. For instance, she stated that on the discussions around the Fluorine Gases Regulation (842/2006), the ENVI Committee was very responsive to the lobbying of ENGOs because the policy "involved a lot of technical issues, and of course we did not have many of these". Although F-gases regulation is considered as a Climate policy, thereby a broad scope issue, engaging in careful consideration to the specific policy (which was advised in the sections above) suggests that it is not a

significantly broad scope policy. The parliamentary assistant in fact described the policy to be "a more specialised issue, as it affects way less industries than ETS". It must however be noted, that although on the balance, it is clear that the Parliament has been more influenced by ENGOs promoting narrow rather than broad environmental policies, plenty of positive remarks were given about the influence achieved by ENGOs when promoting broad policy on the EP. These will again be particularly relevant for subsequent sections when comparing the level of influence achieved by ENGOs promoting broad strands on the Commission and the Parliament. Rather, what has been found is that the Parliament is more receptive to information and lobbying on technical issues, rather than on broad/political issues. Importantly though, Parliament is fairly receptive to both.

In sum, once again, it has been established that in attempting to influence policy through lobbying the European Parliament, ENGOs promoting narrow strands of environmental policy are capable of exerting more significant influence than when promoting broader strands. Consequently, this confirms the second hypothesis H1b of this thesis, and indeed shows that the broader the scope of the policy of concern, the harder it is for ENGOs to influence both institutions. In light of what has been found here, the following section explores each type of environmental policy more specifically, to determine which EU institution the relevant ENGOs can lobby.

4.4 Identifying the optimal institutional venue to lobby

This section examines and analyses the results gathered which more directly concern the potential for the venue shopping among ENGOs and their attempts to find an EU institutional venue which is most favourable for the attainment of their goals. Such analysis involves an examination, for each type of environmental policy, how ENGO lobbying efforts towards the different EU institutions compared. This will be followed up by a reasoned conclusion on which EU institution can be most significantly lobbied by ENGOs when lobbying on either type of policy. Fortunately, richer data exists here for the Parliament than in the section above, thanks to wider responses to questions which sought to draw a comparison between the significance of influence achieved through lobbying efforts towards the Parliament and the Commission. A similar approach is taken as the previous section, whereby for each type of environmental policy, responses regarding the influence achieved on either institution were coded as positive, neutral or negative. This coding provides a starting point for a more in-depth

discussion, whereby for each institution, the positive and negative remarks will be reflected upon. Following this a conclusion is provided on which institution there relevant ENGOs could most significantly influence. Broad environmental policies will be explored first, followed by an examination of narrow environmental policies.

4.4.1 Optimising influence on broad strands

To begin with, it was clearly apparent from the data gathered that ENGOs concerned with broad environmental policies heavily lobbied both institutions. Much was said in a both positive and negative sense about the influence they achieved towards either institution. Regarding the Commission, although there was a limited amount of positive opinion, on the balance the opinions weighted towards negativity. With regards to the Parliament, there was significantly more positive remarks than negative. This reflects on the outcome which will be outlined below, that when ENGOs lobbied on broad strands of environmental policy, they were able to exert more influence on the Parliament than the Commission. The following paragraphs shed further light on the findings.

With regards to the lobbying the Commission, there was a limited degree of positivity coming from all types of interviewees about the significance of influence achieved by ENGO lobbying activities. Indeed, from the viewpoint of the parliamentary assistant, the Commission was freer to go ahead and promote the environmental objectives lobbied for by ENGOs. She explained this is because "they don't have to deal with voters – they are not responsible for making sure that certain factories in the constituency or coal plants in their region close due to what is being proposed". Furthermore, the policy officer from CAN stated that the Commission was "normally relatively progressive" in their attempts to advance the environmental objectives of the ENGOs. The CEGG Commission policy officer also added that the Commission were particularly engaged with ENGOs when they were "looking for the weight of public concern". This reinforces the idea that ENGOs often provide broad political information when they lobby the Commission.

Furthermore, a key argument made in the theoretical framework was that the Commission could better isolate a policy issue and ensure that it remained exclusively an environmental issue, thereby providing ENGOs with better influence on the policy. In light of a number of statements, their ability to better isolate the policy compared to the ENVI committee was proven to exist. Firstly, the QL Commission official stated that when a policy goes to the

Parliament, the policy is "far less contained in the number of topics that it picks up". This strongly supports the statement adopted by Ramussen (2012) in the theoretical framework, that the Parliament is a stronger aggregator of demands. Secondly, this finding is supported by the parliamentary assistant, who stated that Commission can "better fence off industry due to its greater personal and technical expertise". However, she added that although the Commission may be in a better position to fence off a policy's remit, in practice the Commission "don't come up with very ambitious policies". This was explained to be due to their concerns about the policy not making it through the remainder of the political process, particularly in the Council. This argument was supported by the CEGG Commission officer, who stated that "it is not the role of DG Environment to launch an attack on another policy area". In essence, although this research finds that DG ENVI may indeed be able to isolate a policy issue, it also finds that it is not particularly willing to take considerable action to promote the policy against other policy field. The contrary was assumed in the theoretical framework.

The disappointing accommodation of the Commission's DG ENVI/CLIMA officials of the ambitious objectives of ENGOs can largely be explained by two reasons. The first relates to practical concern. This is both in the sense that they are worried by political obstacles to come further down the policy line, namely Member States objections. Similarly, as policy officer 1 from Zero Waste Europe put it, "the Commission acknowledges that implementation would be extremely challenging". Secondly, this weak prospect of lobbying the Commission for the on broad strands of environmental policy is furthered by the fact that there is an apparent mismatch between the type of lobbying activities that the Commission prefers to receive concerning broad policies, compared to what ENGOs provide. As noted above, ENGOs tend to provide more of the ambition setting and broader political input when lobbying on these issues. Although this sub section has already shown that this can indeed be something which the Commission wants, there is consensus behind the statement of the GECC Commission official who stated that "in general it is not good enough to say we want more of this". Rather, what they are looking for is "technical expertise" (DG CLIMA official) and "scientific evidence, peer reviewed evidence" (CEGG official). Thus, the DG ENVI/CLIMA additional input of this type as what the stock of information they have may be insufficient. The failure of ENGOs lobbying on such broader measures was illustrated when they sought to include international imports from China into the ETS. The official from DG CLIMA stated that "that was never going to happen". Furthermore, the lack of the DG ENVI's responsiveness to ambition raising

lobbies of the ENGOs was also seen in the initial proposals for the PWD. A policy officer from Zero Waste Europe stated that the Commission took the initial proposal off the table in order "to later deliver something more ambitious… but they didn't deliver anything more ambitious".

Interestingly, there was general consensus that there be might space for such political and ambition raising forms of lobbying activities towards the European Commission, but directed at different figures other than the lead DG. In light of this, the DG CLIMA Commission official stated that on the basis of current types of lobbying activities of ENGOs on these strands of environmental policy, senior and political figures of the Commission such as would be more receptive such as "Junker or the Vice Presidents. This is because these people do not have operational DGs working for them and the people in their cabinets are people who receive information from different sources. So that area is hugely important to exploit – not people like me". The validity of this was lent support by Zero Waste Officer 1, who stated that with regards to last month's highly ambitious Commission proposal on banning the use of Single Plastics. their lobbying efforts during the Commission stage "only succeeded because vice-president Timmermans had a really big role in order to improve his political capital". Additionally, it was argued by the CEGG official that "ENGOs would be far more effective if they go downstream and talk to other DGs". He explained that this would mean that ENGOs "would be perceived less of a problem and more of a solution". Such a line was agreed by the DG CLIMA official, who stated that "it is important to say is that what NGOs can do is to go more to other cabinets and commissioners and try and persuade them". Furthermore, the advisor the DG on environment also strongly believe that talking to the secretariat general would be of value for ENGO's purpose. However, ENGOs currently do not engage enough in these activities, resulting in the fact that they are not able to achieve significant influence over Commission.

More specifically, in measuring the influence achieved by ENGOs promoting broad strands of environmental policy towards the DG ENVI/CLIMA, it cannot be said that they achieved 'none of their policy objectives'. Although they did not achieve many of their objectives, they certainly achieved some of their policy objectives, and would be categorised in the middle category of Mahoney's measurement index. In light of this, it is apparent from the analysis that the Commission's DG ENVI/CLIMA are not particularly responsive to the lobbying efforts of ENGOs. It is thereby argued that Parliament's ENVI Committee better accommodates for the lobbying of ENGO's concerned with broad environmental policies. The most explicit evidence

is the fact that both the CEGG and DG CLIMA Commission officers agreed with point that for promoting their objectives in their respective fields, "ENGOs are more able to shape policy in the Parliament" (DG CLIMA officer). This was further supported by the CEGG officer who stated that "if I was an NGO, I would go to the Parliament… because they have much better relationship with the Parliament". Moreover, the parliamentary assistant demonstrated that ENVI Committee was highly responsive to the lobbying of ENGOs, given that many amendments put forward by NGOs "are directly adopted by the committee and the plenary". One key reason for this stronger reception of ENGO lobbying efforts, and therefore greater willingness to raise policy ambitions, was explained by the fact that the Parliament's reports and amendments do not have to go through any impact assessments. Thus, the they are much freer to propose what they want, whereas on the other hand, the Commission has to "follow millions of rules" (QL Commission officer).

The strong positive perception on the ENVI Committee's receptiveness to lobbying on broad strands was further illustrated by the concerned ENGOs. For instance, with regards to the PWD, it was noted by the policy officer 1 from Zero Waste Europe that despite the fact that Commission did not raise the ambition of the policy after it was re-tabled, "the Parliament turned around and said, ok, we're going to set the ambition high ourselves in line with what the NGOs were promoting". Thus, he said that it was easier to lobby the Parliament. Furthermore, when the policy officer from CAN was asked whether he thought that the Commission or the Parliament was more in line with their preferred trajectory for the ETS, he responded by saying "I would say the Parliament, but not much more". The explanatory factor behind this actually goes contrary to what was predicted to in the theoretical framework. It was predicted that due to populist and electoral fears, the Parliament would be worried to push too far with environmental protection as they would be concerned with negative economic consequences. But rather, it seems that on the balance, most interviewees think that raising environmental standards is positive for their electoral purposes. This was reflected in the fact that for the PWD, this policy was "it was an opportunity for the socialists to shine" (Zero Waste Europe official). Indeed, the CEGG Commission official stated that the MEPs "want to be seen as pushing things further", and the CAN officer further stated MEPs are generally more eager to see what civil society organisations are saying.

Nevertheless, neither ENGOs thought they were fully successful in their lobbying efforts towards the EP, although they believed they had made considerable progress. Thus, they cannot

be considered to have 'achieved all of their outcomes' in the Parliament. However, the influence they possess/have on the Parliament has been demonstrated to be considerably stronger than the in the Commission. It follows that the third H2a hypothesis of this thesis has been refuted. This states that when seeking to maximise their lobbying influence on the policy process, ENGOs promoting broad strands of environmental policy will find the European Commission's ENVI Committee as the policy venue who they can most significantly influence. Indeed, although it has been shown that the Commission has to a small extent positively responded to their lobbying efforts, the Parliament has been much more significantly influenced. The following section explores the same practical and strategic issues, but for ENGOs promoting narrow strands of environmental policy.

4.4.2 Optimising influence on narrow stands

As with ENGOs promoting broad strands of environmental policy, from the data gathered, it is clearly apparent that ENGOs promoting narrow environmental policies also exhibited a strong presence and variety of lobbying efforts in both institutions. The objective of such ENGOs was argued in the previous chapters to be to maximise the technical and scientific details and standards within policies. For both institutions, there was plenty of positive feedback on the influence ENGOs were able to achieve in this regard. Such positive perceptions came from the ENGOs and the personnel of both institutions. The positivity is not of a huge surprise, given that it was established in the previous section that ENGOs promoting narrow strands of environmental policy achieve more influence on both institutions than ENGOs promoting broad strands of environmental policy. Nevertheless, comparatively, it can be confidently said that there was greater influence achieved on the Parliament, the reason for which are explained in more detail below.

With regards to the Commission, there was plenty of positive remarks on whether the ENGOs thought they were successful in their lobbying activities. For instance, the QL unit stated that when lobbying on the guidance documents for the WFD, he thought that the ENGOs were "fairly successful". Moreover, the NC policy officer stated that they were "very successful" in lobbying on the fitness checks, given that the Nature Directives were eventually not opened up properly for review and revision. This positive opinion on ENGO lobbying on Bird Conservation policy was further illustrated by the statement of the Birdlife policy officer, who also stated that she thought they were "very successful [and their] relationship with DG ENVI

is excellent as [they] are very likeminded". The explanatory factor for this perceived success is that the Commission largely demands what is provided by ENGOs when they are promoting narrow strands of environmental policy: namely, technical and scientific expertise. Indeed, it was already outlined in the sections above, that such ENGOs do largely provide such information. However, this is with the exception of outlined by the EEB official, who stated that they do provide political information to the Commission when it is necessary to "examine and critique industry claims, for instance on scientific uncertainty, when they are being used in order to advance political goals".

Nonetheless, DG ENVI's demand for technical and scientific information was confirmed by both interviewed Commission officials. The QL official stated that "we are pretty interested in the technical level from NGOs… because the Commission doesn't always have a huge amount of expertise in all areas". This was supported by the statement of the NC policy officer, that they "listen to anyone who provides the best data". This serves to argue to the contrary of the predictions made in the theoretical framework, based on Bouwen's (2002) research, that the European Commission demands less of this type of information because it has its own experts. However, despite the fact that the statements from the Commission personnel about wanting the best data and expertise, which seem to suggest that narrow ENGOs are more capable of gaining strong influence over the Commission, it must be noted that ENGOs are often not the best perceived candidates to provide such information. As predicted, on the basis of Coen & Katsaitis (2013), it appears that industry and business is in a stronger position to provide this sort of information. This was confirmed by a statement by the CEGG Commission official who stated that he thought that "industry was rather more efficient in dealing with very specific issues". This matter was also illustrated by the policy officer of EEB, who stated that when lobbying on the technical issues concerning the Floods Directive, they "were definitely outnumbered by industry". Indeed, he gave an example of where various substances were being reviewed, and in that situation "industry would have 2 experts on each of the substances, whereas NGOs would have 1 expert on all the substances". Thus, although it has been proven that when promoting narrow strands of environmental policy ENGOs do have the appropriate tools to influence the Commission, it is often hard for them to do so given the more significant presence of industry and business. It follows that according to the measurement index, it seems that the influence achieved by ENGOs promoting narrow environmental policies on the

Commission can be considered as reasonable but not highly significant. Thus, they can be considered to have attained 'some of the objectives'.

Thus, it is necessary to investigate whether the influence achieved by such ENGOs on the Parliament's ENVI Committee. Indeed, it was noted by the EEB policy officer that the Parliament does not require as highly detailed level of expertise on a particular policy, given that they themselves have a "lack of background" in such polices. The parliamentary assistant elaborated on this by stating that given that they have various files and issues to deal with at once, the MEPs and their assistants "cannot be an expert on a policy". Thus, ENGOs address this by breaking down the technical issues and "go through the practical sides rather than scientific" in hope that the argument makes sense for them. In this regard, it was noted by the QL Commission official that such ENGOs have "good cooperation with the Parliament… who have got their ears to the grounds".

On the other hand, it was argued that the Parliament may not always be positive towards lobbying on these issues. The policy officer from Birdlife stated that within the ENVI Committee, "you also have people who are there to make sure that the policy comes out is not too strong". Nevertheless, following a number of specific statements by various interviewees from all sides, it can be concluded that the Parliament is the venue which can be most significantly influenced by ENGOS when lobbying on narrow strands of environmental policy. Indeed, it was said by the QL Commission officer that he thinks that for ENGOs, "the Parliament is easier to address". This was supported by the assistant to the Director General of DG ENVI, who stated that "generally the Parliament is more ambitious, particularly for technical issues". This increased ambition makes the EP more likely to follow the lobbies of ENGOs. Moreover, the close relationship between the ENGOs and the Parliament, combined with the higher demand of the Parliament for such information, are both reflected in a statement of the parliamentary assistant. She said that "for sure the Parliament" would be more readily influenced by ENGO's on the matter. This confirms Dür & Mateo's (2012) theory that ENGOs have privileged access to the EP. Moreover, the policy officer from EEB further reinforces these points, by stating that in the Floods Directive, the Parliament was more responsive as they achieved some of the amendments that the EEB wanted. He added that "NGOs have always had a better access [to the Parliament], particularly stemming back to when they were a talking shop". He did however add that the Commission is becoming increasingly attentive, and the Parliament less so, due to the increase of the Parliaments increasing powers resulting

in the fact that it is subject to more lobbying by others. Thus, he states that the picture now is more complex and not always "so clear cut".

Although in promoting narrow strands of environmental policy, ENGOs lobbying the Parliament also can also be said the have 'achieved some of their objectives', it can be confidently concluded that they are able to exert more significant influence on the Parliament than the Commission. Subsequently, this serves to confirm the final hypothesis of this thesis (H2b), that when seeking to maximise their lobbying influence on the policy process, when ENGOs are promoting narrow strands of environmental policy, they will find the European Parliament's ENVI Committee a better venue to promote their policy objectives. In light of the analysis which has been carried out, the table below summarises the different levels of influence which ENGOs have been shown to exert on each EU institution.

Table 4: Level of influence achieved by different ENGOs on the EU institutions

	Commission	Parliament
Broad Strands	Low	Medium
Narrow Strands	Medium	High

The following chapter discussed further summarises the findings, discusses their implications and points towards future research.

5. Discussion and Conclusion

The research objective of this thesis was to better understand and empirically measure the lobbying influence ENGOs are able to achieve towards the various EU institutions, and to use this knowledge to contribute towards optimising their lobbying activities and strategies. This thesis did so by developing a theoretical framework to explain their lobbying activities, followed by the provision of a methodological approach to empirically test the theoretical framework. Subsequently, this research executed the empirical activities based on case study research and interview methods proscribed. On the basis of the data gathered, the results were analysed. The present chapter serves a number of objectives. To further summarise the findings and to reflect on them in light of the research question and sub-questions posed by this thesis. On the basis of the understanding developed, a number of recommendations will be provided for ENGOs on how to optimise their lobbying strategies. Finally, a critical appraisal combined with potential future avenues for research will be provided.

5.1 Summary of findings

The summary of the findings will be ordered to follows the structure set out in the theoretical and analytical sections, which in fact reflects on the logical order that needs to be followed for addressing the sub-questions of this thesis. Thus, this section will begin with reflecting how different strands of environmental policy that ENGOs lobby on be distinguished. In light of this, the following sub section reflects on whether the influence achieved by ENGOs when lobbying the EU institutions depends on the strands of environmental policy they are lobbying on. This will be followed by looking at which EU institution were most significantly influenced when ENGOs lobbied on broad environmental policies, followed by a similar comparison of institutions for when ENGOs lobbied on narrow environmental policies. Where appropriate, the sub-questions posed by thesis will be addressed. In sum, this will provide an overview of the current setting within which ENGOs operate in.

Identifying the actors and institutions that ENGOs lobby

The first findings related to which EU institutions ENGOs lobby and who in the EU institutions they lobby. It was argued in the theoretical framework that the European Commission and the European Parliament were central in this regard, and more specifically, DG ENVI/CLIMA and the ENVI Committee. These were both largely supported in the interviews.

Differentiating among ENGOs who lobby on environmental policy

SQ1 asked *'how can different strands of environmental policy that ENGOs lobby on be distinguished?'* In order to address this, the theoretical framework provided an argument that ENGOs could be differentiated based issue scope as the determining variable. Thus, the different types of strands of environmental policy which ENGOs lobby on could be distinguished as either broad or narrow scope strands. The interviews demonstrated that this is indeed a relevant and practical way to differentiation between ENGOs, given the relative ease of making such a distinction using a number of determining factors. Furthermore, with regards to the 4 case studies, the interviews showed that the scope of each of the case studies corresponded with the issue scope which they were theorised to be associated with. Importantly though, it was stated that in practice, these two categorisations must be considered in relative rather than absolute or binary terms, and that there is a chance that certain policies within a particular strand may deviate from their expected issue scope. Lastly, it was by and large shown that the types and objectives of the lobbying activities differs depending on what type of environmental policy is being lobbied on. Overall, these findings have served to address the first sub-question posed by this thesis, which is a key starting point for answering the other sub-questions. More specifically, it has been empirically shown that the different strands of environmental policy that ENGOs lobby on can be distinguished based on whether the policy entails a broad or narrow scope of interest. The following sub sections look at how this typology was used for more specifically understanding the lobbying influence of ENGOs.

Comparing the influence achieved by ENGOs on EU institutions

SQ2 asked '*When lobbying on different strands of environmental policy, how comparable is the influence achieved by ENGOs on the EU institutions?* In order to address this question, a number of more specific questions were posed. One inquiry was to find out for each of these identified institutions, what the level of influence exerted by ENGOs was when lobbying different strands of environmental policy. Once the level of influence was measured for each strand of environmental policy, on each institution, another question asked how these were compared? In this regard, both H1a and H1b were confirmed in finding that when ENGOs lobby on narrow strands of environmental policy, they achieve more influence compared to when they lobby on broad environmental policies. This finding held for both the Commission and the Parliament. Thus, the direct answer to SQ2 is that they are not particularly comparable,

given that when ENGOs lobby on narrow strands of environmental policy, they achieve a sizable amount more influence on both EU institutions than when lobbying on broad strands. However, it is noted that when lobbying the Parliament, the difference in the influence achieved is somewhat less significant than when lobbying the Commission. These findings served as an import basis for answering the final sub-question.

Identifying the optimal institutional venue to lobby

SQ3 asked *"For each strand of environmental policy, which EU institution is most significantly influenced by the concerned ENGOs through their lobbying activities?"*. Thus, to answer this, the lobbying activities of ENGOs on both types of policies was examined. For instance, for broad strands, the level of influence ENGOs exerted on the Commission was compared to how much influence was exerted when lobbying the Parliament. The same was done for narrow environmental policies. To begin with, when ENGOs lobbied on broad strands of environmental policy, ENGOs were found to be able to more significantly influence the Parliament. This served to refute hypothesis H2a, which argued that the ENGOs could more significantly influence the Commission. On the other hand, when ENGOs lobby on narrow strands of environment policy, the Parliament was again found to be the venue which they could be most significantly influenced through ENGO lobbying activities. This confirmed hypothesis H2b.

Combining the findings

All of these sub-questions have served to answer the central research question of this thesis which was:

"Does the influence achieved by ENGOs through lobbying activities towards different EU institutions vary depending on the strand of environmental policy that is of concern, and in light of this, what are the implications for ENGO lobbying strategies?"

In sum, it has been established that the influence achieved by ENGOs through lobbying activities towards the EU institutions does indeed vary depending on the strand of environmental policy that is of concern. When ENGOs lobby on narrow strands of environmental policy, they are able to achieve more influence on the EU institutions than compared to when they lobby broad strands of environmental policy. The understanding and

data used to come to this finding was further developed in order to comprehend the implications for ENGO lobbying strategies, who naturally want to maximise the significance of the influence they achieve. Thus, it was found that when lobbying both broad and narrow strands of environmental policy, the European Parliament is the EU institution where they can exert the most significant amount of influence over. The basic strategic implications for ENGO lobbying activities was therefore that they should focus their lobbying efforts towards the Parliament in order maximise their influence over the policy process. However, using the knowledge gathered about the success and failures of their lobbying activities towards all the EU institutions, the following section elaborates in further detail about the implications for ENGO lobbying strategies, in order to provide some specific recommendations.

5.2 Recommendations to ENGOS

Building on the findings, this section will explore a number of strategic and practical recommendations for ENGOs. This reflects on a central element of both the research objective and the research question of this thesis: to employ the understanding of the various factors which determine the significance of the influence achieved by ENGOs in their lobbying activities towards EU institutions, in order to provide a set of recommendations on how to optimise such lobbying activities. In other words, it outlines how ENGOs can better coordinate their venue shopping activities, and thereby find the decision-making venue which is most favourable towards their objectives. These recommendations are provided individually, thus firstly for when ENGOs lobby on broad strands of environmental policy, followed by recommendations for they lobby on narrow strands. Before doing so, it is important to reiterate the argument made in the theoretical framework, that although ENGOs should focus lobbying on venues which they are most capable of exerting influence over, this does not mean they should refrain from lobbying other institutions. In light of this, the recommendations will outline which EU institution ENGOs ought to intensify their lobbying efforts towards, combined with a suggestion on how they can improve their lobbying activities towards the secondary institution.

When ENGOs lobby on broad strands

As previously already, for ENGOs lobbying broad environmental policies, intensifying lobbying activities is the key recommendation, given that it was shown that they are able to

exert more significant influence over this institution compared the Commission. More specifically, lobbying the Parliament with a greater proportion of their resources will be particularly important given the wide range and number of actors which exist in the Parliament. Should they continue the current strategy of lobbying their friends, there are many more figures in the ENVI Committee and the Green/EFA group who require additional encouragement and furnishing. Such lobbying will enable the MEPs to more effectively promote the relevant policy objectives among other MEPs, in to bring them in line with the desired environmental objective.

With regards to the lobbying activities towards the Commission, in the analysis it was apparent that there was a limited degree of success in lobbying DG ENVI/CLIMA. Thus, two suggestions are provided about how such ENGOs can change their lobbying activities to enhance their influence on the Commission's policy position. These relate to *how* they lobby, and *who* they lobby in the Commission. Firstly, ENGOs lobbying on broad environmental policies may be able to more significantly influence the personnel in DG ENVI/CLIMA if they change the type of information which they use. As noted above, the Commission is highly conscious of issues such as political obstacles and implementation issue. ENGOs ought to focus on being more solution orientated and strive to provide practical suggestions on how to resolve issues such as implementation. This can for instance be done through the provision of successful case studies or providing examples and ways in which such obstacles can be resolved, making their arguments more credible and attractive for the Commission.

Secondly, should ENGOs not be able to change the type of information that they are able to provide in order to satisfy what was outlined in the above paragraph, they ought to vary more who they lobby in the Commission. It has been established in this research that they largely lobby their friends: DG ENVI/CLIMA. But the analysis of responses, particularly from the Commission personnel, clearly showed that if ENGOs want to be more influential in the Commission, they should focus on lobbying other Commission figures too. For example, they suggested further lobbying the more senior/political figures of the Commission, given that they are particularly responsive towards political information, and could themselves use it to advance their own political purposes. Furthermore, it was suggested the ENGOs ought to also lobby other relevant DGs and the SG. Such dialogue would enable ENGOs themselves to encourage a more favourable compromise, rather than relying on DG ENVI/CLIMA do so on behalf of them. The effectiveness of lobbying other DGs is in principle questionable given they

also have loyalties towards their own field, but this remains something to be explored more substantially in practice.

When ENGOs lobby on narrow strands

As outlined already, for ENGOs lobbying narrow environmental policies, intensifying lobbying activities is the key recommendation, given that it was shown that they are able to exert more significant influence over this institution compared to the Commission. More specifically, intensifying lobbying activities towards influential figures (e.g. rapporteurs and shadow rapporteurs) in the ENVI Committee will improve the probability of getting amendments in line with their desired outcomes. This provides an immensely valuable opportunity for raising the environmental standards of the given policy.

Given that when ENGOs lobby on narrow environmental policies they have been shown to exert more influence towards the Commission than when lobbying on broad policies, there is naturally less potential for them to improve in this regard. Nevertheless, two interrelated points are made. Firstly, it was clear from the interviews with the relevant Commission personnel that what they ideally demand from ENGOs is strong data and scientific and technical expertise. Although such ENGOs have already been shown to focus on providing such forms of lobbying information, this is something which they ought to invest even more resources in, in order to become as credible and attractive to the Commission as possible. However, at the same time, in order to make their lobbying more effective, such ENGOs ought to also improve their ability to detect any hidden political motives behind the scientific and technical data within business lobbying. Thus, ENGOs must be able to detect such politically motivated claims and bring them to the attention to the Commission in order to counteract them. The following section looks at some critiques and difficulties involved with this research.

5.3 Critical Appraisal and Future research

Given that most of the limitations of this research have been outlined in the methodological chapter of this thesis, this section elaborates on one other shortfall briefly mentioned in the analysis. This relates to the absence of the Council of Ministers from the research. Although it was found that the ENGOs predominantly refrained from any such direct lobbying, it became apparent that influencing the Council was not completely disregarded. Given that many

ENGOs in Brussels are often umbrella or representative organisations of a national NGO, certain activities were shown to be carried out in the member states in order to stimulate the national NGOs to lobby their respective ministers, who sit in the Council. Accounting for this would have made this research more comprehensive, and consequently this constitutes a topic for future research: To investigate to what extent Brussels based ENGOs actually focus on Council lobbying, whether directly or through their sister/member organisations in member states. This would inherently also entail an examination of the significance and success of these activities.

Furthermore, on a more general policy level, it would be interesting to investigate whether the findings on issue scope and how it determines the significance of influence achieved by lobbyists also holds for NGOs and civil society organisations from different policy fields. Thus, an examination of fields such as education, health or asylum policy, to see if NGO success on any given EU institution depends on the specific scope of the policy. Similar to the present research, this could be followed up by discussion and recommendations on the strategic implications for enhancing their lobbying strategies.

5.4 Final Note

Given that ENGOs have such limited resources compared to their many different counterparts, venue shopping is imperative to enhance the efficiency of their activities and the maximise the influence achieved through their lobbying activities. Thus, in this regard, the present research has practically and strategically contributed to ENGO lobbying activities. Academically, this thesis has contributed towards the literature on lobbying in the EU by highlighting and elaborating on the roles of institutional context and policy variation as important variables which determine the success of lobbying efforts. In this light, the terms 'venue shopping' and 'issue scope' and have been demonstrated to possess significant explanatory value for influence achieved through lobbying. It is therefore necessary they are incorporated into current and future research on EU interest group lobbying, along with the many other relevant determinants of lobby influence, in order to paint a succinct and comprehensive picture on the topic.

6. Bibliography

Books and Articles

Aberbach, J. D., & Rockman, B. A. (2002). Conducting and coding elite interviews. *PS: Political Science & Politics*, *35*(4), 673-676.

Ainsworth, S. (1993). Regulating lobbyists and interest group influence. *The Journal of Politics*, *55*(1), 41-56.

Ainsworth, S. H. (1997). The role of legislators in the determination of interest group influence. *Legislative Studies Quarterly*, 517-533.

Andersen, M. S., & Liefferink, D. (Eds.). (1999). *European environmental policy: The pioneers*. Manchester University Press.

Baumgartner, F. R., & Leech, B. L. (1996). The multiple ambiguities of" counteractive lobbying". *American Journal of Political Science*, 521-542.

Bernhagen, P., Dür, A., & Marshall, D. (2015). Information or context: what accounts for positional proximity between the European Commission and lobbyists?. *Journal of European Public Policy*, *22*(4), 570-587.

Berry, J. M. (2002). Validity and reliability issues in elite interviewing. *PS: Political Science & Politics*, *35*(4), 679-682.

Beyers, J. (2004). Voice and access: political practices of European interest associations. *European Union Politics*, *5*(2), 211-240.

Beyers, J. (2004). Voice and access: political practices of European interest associations. *European Union Politics*, *5*(2), 211-240.

Beyers, J., Braun, C., Marshall, D., & De Bruycker, I. (2014). Let's talk! On the practice and method of interviewing policy experts. *Interest Groups & Advocacy*, *3*(2), 174-187.

Beyers, J., & Kerremans, B. (2012). Domestic embeddedness and the dynamics of multilevel venue shopping in four EU member states. *Governance*, *25*(2), 263-290.

Biliouri, D. (1999). Environmental Ngos in Brussels: How powerful are their lobbying activities?.

Binderkrantz, A. S., & Rasmussen, A. (2015). Comparing the domestic and the EU lobbying context: perceived agenda-setting influence in the multi-level system of the European Union. *Journal of European Public Policy*, *22*(4), 552-569.

Blatter, J., & Haverland, M. (2012). *Designing case studies: Explanatory approaches in small-N research*. Palgrave Macmillan.

Bouwen, P. (2002). Corporate lobbying in the European Union: the logic of access. *Journal of European public policy*, *9*(3), 365-390.

Browne, W. P. (1990). Organized interests and their issue niches: A search for pluralism in a policy domain. *The Journal of Politics*, *52*(2), 477-509.

Bryman, A. (2001) *Social Research Methods,* Oxford: Oxford University Press

Bunea, A. (2013). Issues, preferences and ties: determinants of interest groups' preference attainment in the EU environmental policy. *Journal of European Public Policy*, *20*(4), 552-570.

Bunea, A., & Baumgartner, F. R. (2014). The state of the discipline: authorship, research designs, and citation patterns in studies of EU interest groups and lobbying. *Journal of European Public Policy*, *21*(10), 1412-1434.

Burns, C. (2006). Co-decision and Inter-Committee Conflict in the European Parliament Post-Amsterdam 1. *Government and Opposition*, *41*(2), 230-248.

Cirone, A. (2011). Patterns of Interest Group Lobbying at the EU: Examining How Group Characteristics Affect Venue Choice. *borrador, en http://www. princeton. edu/europe/events archive/repository/05-04-2011Conference/Cirone_Princeton_May2011. pdf (Accessed 01/05/2018)*.

Coen, D. (2005). Environmental and business lobbying alliances in Europe: Learning from Washington. *The business of global environmental governance*, 197-220.

Coen, D. (2007). Empirical and theoretical studies in EU lobbying. *Journal of European Public Policy*, *14*(3), 333-345.

Coen, D., & Katsaitis, A. (2013). Chameleon pluralism in the EU: an empirical study of the European Commission interest group density and diversity across policy domains. *Journal of European Public Policy*, *20*(8), 1104-1119.

Corbett, R., Jacobs, F., & Shackleton, M. (2000). *The European Parliament* (Vol. 5). London: John Harper.

Crombez, C. (2002). Information, lobbying and the legislative process in the European Union. *European Union Politics*, *3*(1), 7-32.

Dür, A. (2008a). Measuring interest group influence in the EU: A note on methodology. *European Union Politics*, *9*(4), 559-576.

Dür, A. (2008b). Interest groups in the European Union: how powerful are they?. *West European Politics*, *31*(6), 1212-1230.

Dür, A., & De Bièvre, D. (2007). The question of interest group influence. *Journal of Public Policy*, *27*(1), 1-12.

Dür, A., & Mateo, G. (2012). Who lobbies the European Union? National interest groups in a multilevel polity. *Journal of European public policy*, *19*(7), 969-987.

Dür, A., Bernhagen, P., & Marshall, D. (2015). Interest group success in the European Union: When (and why) does business lose?. *Comparative Political Studies*, *48*(8), 951-983.

Eckstein, H. (2000). Case study and theory in political science. *Case study method*, 119-164.

Edwards, R., & Holland, J. (2013). *What is qualitative interviewing?*. A&C Black.

Eising, R. (2007). The access of business interests to EU institutions: towards élite pluralism?. *Journal of European Public Policy*, *14*(3), 384-403.

George, A. L., & Bennett, A. (2005). *Case studies and theory development in the social sciences*. mit Press.

Gerring, J. (2006). *Case study research: Principles and practices*. Cambridge university press.

Gullberg, A. T. (2008). Lobbying friends and foes in climate policy: The case of business and environmental interest groups in the European Union. *Energy Policy*, *36*(8), 2964-2972.

Gullberg, A. T. (2015). Lobbying in Oslo or in Brussels? The case of a European Economic Area country. *Journal of European Public Policy*, *22*(10), 1531-1550.

Greenwood, J. (2003) *Interest group representation in the European Union*. Palgrave

Greenwood, J., & Dreger, J. (2013). The Transparency Register: A European vanguard of strong lobby regulation?. *Interest Groups & Advocacy*, *2*(2), 139-162.

Hartlapp, M., Metz, J., & Rauh, C. (2013). Linking agenda setting to coordination structures: Bureaucratic politics inside the European Commission. *Journal of European Integration*, *35*(4), 425-441.

Hayes-Renshaw, F. (2009) '*Least accessible but not inaccessible: lobbying the Council and the European Council*', in D. Coen and J. Richardson (eds), Lobbying the European Union: Institutions, Actors, and Issues, Oxford: Oxford University Press

Huberts, L. W. J. C., & Kleinnijenhuis, J. (1994). Methoden van invloedsanalyse. *Amsterdam: Boom*.

Imig, D., & Tarrow, S. (2001). Studying contention in an emerging polity. *Contentious Europeans: protest and politics in an emerging polity*, 3-26.

Kaika, M., & Page, B. (2003). The EU Water Framework Directive: Part 1. European policy-making and the changing topography of lobbying. *European environment*, *13*(6), 314-327.

Kaunert, C., Léonard, S., & Hoffmann, U. (2013). Venue-shopping and the role of non-governmental organisations in the development of the European Union asylum policy. *Comparative Migration Studies*, *1*(1), 179-200.

King, G., Keohane, R. O., & Verba, S. (1994). *Designing social inquiry: Scientific inference in qualitative research*. Princeton university press.

Klüver, H. (2011). The contextual nature of lobbying: Explaining lobbying success in the European Union. *European Union Politics*, *12*(4), 483-506.

Klüver, H., Braun, C., & Beyers, J. (2015). Legislative lobbying in context: towards a conceptual framework of interest group lobbying in the European Union.

Leech, B. L. (2002). Asking questions: techniques for semistructured interviews. *PS: Political Science & Politics*, *35*(4), 665-668.

Long T, Salter L and Singer S (2002*) 'WWF: European and Global Climate Policy in European Union Lobbying* by Pedlar, R.(eds) European Union Lobbying. Palgrave

Lowi, T. (1972) *'Four systems of policy, politics, and choice'* Public Administration Review 2(3) 298-310

Mahoney, C. (2007). Lobbying success in the United States and the European Union. *Journal of Public Policy*, *27*(1), 35-56.

Majone, G. (2002). The European Commission: the limits of centralization and the perils of parliamentarization. *Governance*, *15*(3), 375-392.

Marks, G., & McAdam, D. (1999). On the relationship of political opportunities to the form of collective action: the case of the European Union. In *Social movements in a globalizing world* (pp. 97-111). Palgrave Macmillan, London.

Marshall, D. (2010). Who to lobby and when: Institutional determinants of interest group strategies in European Parliament committees. *European Union Politics*, *11*(4), 553-575.

Marshall, D. (2012). Do rapporteurs receive independent expert policy advice? Indirect lobbying via the European Parliament's committee secretariat. *Journal of European Public Policy*, *19*(9), 1377-1395.

Mazey, S., & Richardson, J. (2006). Interest groups and EU policy-making. *European Union: Power and Policy-Making, Nueva York, Routledge*, 247-265.

Michalowitz, I. (2007). What determines influence? Assessing conditions for decision-making influence of interest groups in the EU. *Journal of European Public Policy*, *14*(1), 132-151.

Pollack, M. A. (1997). Representing diffuse interests in EC policy-making. *Journal of European Public Policy*, *4*(4), 572-590.

Pedlar, R. (2001*) European Union Lobbying*. Palgrave

Pralle, S. B. (2003). Venue shopping, political strategy, and policy change: The internationalization of Canadian forest advocacy. *Journal of public policy*, *23*(3), 233-260.

Princen, S., & Kerremans, B. (2008). Opportunity structures in the EU multi-level system. *West European Politics*, *31*(6), 1129-1146.

Rasmussen, M. K. (2012). Is the European Parliament still a policy champion for environmental interests?. *Interest Groups & Advocacy*, *1*(2), 239-259.

Schlozman, K. L., & Tierney, J. T. (1986). *Organized interests and American democracy*. Harpercollins College Div.

Schneider, G., & Baltz, K. (2004). *Specialization pays off: Interest Group Influence on EU Pre-negotiations in four Member States* (pp. 129-146).

Schreier, M. (2012). *Qualitative content analysis in practice*. Sage Publications.

Smith, M. P. (2008). All access points are not created equal: explaining the fate of diffuse interests in the EU. *The British Journal of Politics & International Relations*, *10*(1), 64-83.

Spence, D. (1997) '*Staff and personnel policy in the Commission'*, in Geoffrey Edwards and David Spence (eds), *The European Commission*, London: Catermill International.

Spradley, J. (1979) *The Ethnographic Interview.* New York: Holt, Rinehart and Winston.

Steinberger, P. J. (1980). Typologies of public policy: Meaning construction and the policy process. *Social Science Quarterly*, *61*(2), 185-197.

Weber, M. (1980) [1921] *Wirtschaft und Gesellschaft* (5th edn), Tubingen: Mohr.

Ydersbond, I. M. (2014). Multilevel 'venue shopping': The case of EU's Renewables Directive. *Interest Groups & Advocacy*, *3*(1), 30-58.

Yin, R. K. (2009). Case study research: Design and methods (applied social research methods). *London and Singapore: Sage*.

Yin, R. K. (2014). Case study research: Design and methods (applied social research methods). *London and Singapore: Sage*.

EU Official Documents

European Commission (2015) Press Release 29/07/2015 [available online at http://europa.eu/rapid/press-release_MEX-15-5452_en.htm] [accessed 02/05/2018]

EU Regulations

Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)

Regulation (EU) No 517/2014 of the European Parliament and of the Council of 16 April 2014 on fluorinated greenhouse gases and repealing Regulation (EC) No 842/2006 Text with EEA relevance

EU Directives

European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste

Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora

Directive 2000/53/EC of the European Parliament and the Council of 18 September 2000 on end-of life vehicles

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy

Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC (Text with EEA relevance)

Directive 2007/46/EC of the approval of motor vehicles and their trailers, and of systems, components and separate technical units intended for such vehicles

Directive 2007/60/EC of the European Parliament and of the Council of 23 October 2007 on the assessment and management of flood risks

Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives (Text with EEA relevance)

Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds

Directive 2015/720 of the European Parliament and of the Council amending Directive 94/62/EC as regards the consumption of lightweight plastic carrier bags

Public Speeches

Roosevelt, T. (1908) Speech on 'conservation as a national duty' 13th May. [Available online at http://voicesofdemocracy.umd.edu/theodore-roosevelt-conservation-as-a-national-duty-speech-text] [Accessed 01/07/2018]

7. ANNEX

ANNEX I - Interview Guide and Prompts

Greetings and asking how they are

Thank you for agreeing to participate in this interview. Given that you must have a very busy schedule, I will aim to finish between 45 minutes to one hour, is this fine by you?

Before we begin I would like to ask if you consent to this recording? I plan to transcribe and code the recordings – these will not be published or disclosed other than to my supervisors.

Would you like to me refer to you as anonymous in my work, or could I explicitly refer to you?

Broadly speaking, I am researching the influence achieved by Brussels-based environmental organisations in their lobbying activities towards EU institution and how they lobby different EU institutions.

Interviewing NGO's

1. Can you please name and very briefly describe 2 of the main policies or issues that your organisation and you personally have been involved in lobbying on during the past 18 months?

2. With regards to the policies you have just noted, would you say that have they attracted a lot of attention from a variety of interests and lobby groups?
   - Do think that the given policy/issue intersects strongly with non-environmental policy fields?

3. With regards to the policy (X) that you that you have been involved in, what were you specifically trying to achieve through your lobbying activities?

4. Generally speaking, how successful would you say your lobby efforts on these policy issues have been on the final policy outcome / current state of the policy?

5. What institutions did you lobby in this process? In what ways did you lobby them?

6. How successful were you in lobbying each institution?
   - How did the level of influence that you achieved on each institution compare?
   - Did you lobby them in an equal way or with different levels of effort?

7.. What determined the extent to which you lobbied each individual institution?
- What sort of obstacles did you face when trying to lobby any given institutions?
- What did you do to get around the obstacles in the institutions? (e.g. did you find it more effective to lobby a different institution?)

8. Why do you think that the institution X (EC / EP) was more/less responsive to your lobbying efforts?
- Potential follow up for broad env policies: Do you think that when there are lots of competing interests, that a particular institutional venue (DG ENV or ENV committee) may be better able and willing to protect your interest in the overall policy process?
- Why?
- Potential follow up for narrow env policies: Do you think the type of information you provide makes your lobbying any more effective towards either of the institutions? Or their ability to change policy?
- Why?

9. Would say most policies in your field of expertise (eg water/climate policy) are of similar nature, in the sense that when a policy is proposed in this subfield, it usually involves a similar number of actors and interests?

10. Generally speaking, do you think when trying to influence a policy, it matters how many other lobby groups are involved or doesn't that make a difference in the end?

Interviewing the Commission and Parliament

1. Can you please name and very briefly describe 2 of the main policies or issues that your organisation and you personally have been involved in or developing on during the past 18 months?

2. With regards to the policies you have just noted, have these issues attracted a lot of attention from a wide variety of interests and lobby groups?
   - Please can you briefly state some examples of the types of actors involved?
   - Does policy (X) you are involved in intersect strongly non-environmental policy fields and therefore involve other relevant Directorate General's/Parliamentary committees?

3. With regards to the policy (X that you mentioned), what were the engaged and relevant environmental NGO's trying to achieve by lobbying you?

4. Generally speaking, how successful would you say the environmental NGO's have been in influencing/shaping the Commission's/Parliaments drafting of the policy?
   - Why do you think that they were successful or not?

5. What do you look for when determining whether or not you are responsive and receptive to the efforts of environmental NGOs who try to influence and shape policy?

6. Do you think that the European Parliament watered down or strengthened the proposal you submitted to them?
   - Why do you think that was?
   - Narrow policies: Do you think that compared to the European Parliament, the European Commission demands more or less of the type of information NGO's offer on the given policy issue?
   - Broad policies: Compared to the European Parliament's ENVI Committee, do you think that is because the European Commission DG Environment is more or less responsive to the lobbying efforts of environmental NGO's on these given policy issues?

7. Would you say most policies in your field of involvement (eg water/climate) are of the similar nature, in the sense that when a policy is proposed, it involves similar numbers and types of actors and interests?