Navigating between Access Points:

Mapping institutionalised Lobby Actions of Civil Society Organisations in the European Union

by

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Author's declaration

I, Thea Goslicki, candidate for the MA degree in Political Science declare herewith that the present thesis is exclusively my own work, based on my research and only such external information as properly credited in notes and bibliography. I declare that no unidentified and illegitimate use was made of the work of others, and no part of the thesis infringes on any person's or institution's copyright. I also declare that no part of the thesis has been submitted in this form to any other institution of higher education for an academic degree.

A portion of this work has previously been submitted as coursework for the course The Politics of Government Transparency at the Department of Public Policy. Specifically, this includes the introduction of the EU Transparency Register (p. 29-30) and smaller elements in the Theoretical and Conceptual Background, which are based on the theoretical elaboration of the logic of access (p. 11-12).

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Abstract

This thesis investigates the lobbying activities of Civil Society Organisations (CSOs) within the European Union (EU), specifically focusing on their utilisation of various access points provided by EU institutions. Previous research has often treated CSOs as a homogenous group facing uniform challenges in accessing EU decision-making processes. However, this study, drawing on data from 1300 CSOs registered in the EU Transparency Register and interviews with CSO officials, analyses broad and narrow access points comparatively. Revealing significant differences in how various types of CSOs leverage these institutional access points. The findings highlight a pronounced dominance of umbrella organisations in accessing EU institutions. Additionally, the research explores the extent to which CSOs need to be insiders to effectively utilise these access points, raising questions about the true nature of political pluralism and interest representation in the EU.

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List of Abbreviations

Abbreviation	Definition
CoR	Committee of the Regions
CSO	Civil Society Organisation
DG	Directorate General
EECS	European Economic and Social Committee
EK	Expert Knowledge
EP	European Parliament
EU	European Union
EUT	Treaty of the European Union
EUTR	Transparency Register of the European Union
EU COM	European Commission
IDEI	Information about Domestic Encompassing Interest
IEEI	Information about European Encompassing Interest
NGO	Non-governmental Organisation

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“While not all inequalities can be offset by positive measures […] the participatory and advocacy capacity of any relevant actor can be enhanced so as to equalise opportunities of access over time.”

(Alemanno 2020,p. 121)

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1 Introduction

In the early 2000s, as the European Union embarked on a series of reforms to its Common Agricultural Policy, environmental civil society organisations (CSOs) found themselves at a significant disadvantage. The policy-making arena was heavily dominated by agricultural interests and member state governments, leaving little room for the voices advocating for environmental sustainability. Umbrella organisations like the European Environmental Bureau or BirdLife Europe faced numerous challenges in gaining access to key working groups and influencing the discussions that would shape the future of European agriculture. Institutionalised access points specifically for considering the voices of CSOs were not afforded at this time.

Despite the European Commission's announced commitment to integrate environmental concerns into agricultural policy, the influence of well-established agribusiness and farmer associations often overshadowed the efforts of these CSOs and limited access. The transparency of the decision-making process was frequently called into question, as environmental NGOs struggled to have their perspectives heard and considered. Their limited access forced these organizations to rely on public campaigning and protests to draw public attention to the need for greener agricultural policies. This form of advocacy is known as outside lobbying, referring to efforts by interest groups to influence public policy by mobilizing public opinion and engaging in activities outside formal political channels. The type of advocacy the CSOs were looking to pursue is defined as inside lobbying. Inside lobbying entails gaining access to decision-making circles, engaging directly with policymakers, and participating in the formulation of legislation and policy through meetings, consultations, and expert advice. It is characterised by its aim to influence legislative or regulatory outcomes through direct engagement with officials and legislators (Dür 2008). Inside and outside lobbying are practices utilised by both business organisations and CSOs at local, national, and increasingly important European levels. Researchers have observed that business organisations tend to utilise inside

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lobbying more, while CSOs more often engage in outside lobbying (Dür and Mateo 2016c). These findings are particularly intriguing considering the longstanding focus in the research of interest representation and lobbying on the inequality of interest representations in their influence and representation within legislative institutions (Dür and Mateo 2016c; Schattschneider and Pearson 2017; Hacker and Pierson 2010; Woll 2019). Studies in the corresponding research area have also highlighted that business organisations tend to exert stronger influence than CSOs (Dür and Mateo 2016b; Kriesi, Tresch, and Jochum 2007).

Even though CSOs often choose to engage in outside lobbying to draw attention to their demands, institutionalised access points for inside lobbying are crucial to upholding the principles of democratic governance and to ensuring political pluralism (Alemanno 2020). The European Union currently offers numerous opportunities for CSOs to engage with and potentially influence EU decision-making processes. These opportunities are available both within the formal EU policy cycle and outside of it. They encompass a range of tools, such as petitions to the European Parliament, the European Citizens' Initiative, and participation in expert groups for the European Commission. Additionally, there are mechanisms for providing input during policy formation, such as public consultations on new initiatives and membership in Intergroups within the European Parliament (Alemanno 2020). Mechanisms for ex-post review, like lodging complaints with the EU Ombudsman, are also in place.

Some of these participatory mechanisms are available to both citizens and CSOs, while others are restricted to organised interest groups, including business entities and CSOs. The overarching goal of these mechanisms is to ensure access to EU institutions and the decision-making process. The European Union emphasises equality in this context, as outlined in the Treaty of the European Union: “In all its activities, the Union shall observe the principle of the equality of its citizens, who shall receive equal attention from its institutions, bodies, offices, and agencies” (Treaty of the European Union 2016, Art. 9).

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Emerging publications on unequal interest representation in the EU foreground differences between business interest and non-governmental organisations (Junk 2016; C. S. Thomas 1999; M. K. Rasmussen 2015), as well as the Europeanization of lobby actions in general terms (Klüver 2010; Dür and Mateo 2014). However, the question that has remained unanswered thus far is: What impact does the type of association of civil society organisation have on the utilisation of institutionalised access points in the European Union? Therefore, this thesis delves into inside lobbying by civil society organisations in the EU, measuring the utilisation of institutionalised access points provided by the EU institutions and bodies, focusing on various types of CSOs – namely European Associations and Networks, Umbrella Organisations, National Associations, International Associations and Foundations[1] (in no particular order) – and their strategies and challenges.

By engaging with the data provided by the EU Transparency Register and analysing interviews conducted with EU Policy Officers responsible for external relations and strategic operations, this thesis offers a new perspective on institutionalised access mechanisms in the EU, controlling if and how they can be utilised in practice. In doing so, my thesis follows two overarching lines of argument. Firstly, I argue that a division into non-profit and profit organisations is not sufficiently granular to determine access points' use to vastly different types of CSOs. To structure the field of access points not only from the perspective of 'usage' but also from the institutional side, institutional access points were categorised and characterised, allowing for a more detailed, comparative analysis. This is relevant for the second part of the argument: If fundamental differences in the potential for utilisation are identified, questions about the current state of political pluralism must be raised. The EU prides itself with ensuring political pluralism, but if significant differences exist, it can be argued that substantial barriers to inside lobbying are the reason for civil society organisations engaging more frequently in outside lobbying. This underscores the relevance of this research.

[1] The various types of CSOs and their characteristics are elaborated in Chapter 2.3.

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This thesis addresses and analyses the above mentioned puzzle as follows: First, it lays out the theoretical and conceptual background, beginning with the establishment of the theoretical foundation that highlights the inherent inequality among interest groups, which is evidenced by the absence of active measures such as participatory access mechanisms. Following this, the concepts of inside and outside lobbying, on which the overarching approach of this study is based, are introduced. Inside lobbying is particularly relevant and is conceptualised alongside the logic of institutional access gain. Lastly, different types of CSOs are identified and categorised based on their characteristics.

The third chapter of the paper delves into the operational aspects, engaging with and expanding upon the theoretical concepts introduced earlier. This section summarises the conceptual framework to clarify the thesis' argument. It then explores the operationalisation, focusing on the identification and categorisation of institutionalised access points within the EU. These access points are classified as either narrow or broad, based on their function, position within the policy cycle, and the specific EU institutions they facilitate access to. This classification forms the basis for developing three overarching hypotheses relating to how different types of CSOs utilise access points. Additionally, four sub-hypotheses are introduced, conceptualised through a typology that correlates high and low utilisation with narrow and broad access mechanisms. The chapter concludes by outlining the case selection for the subsequent analysis.

The next chapter outlines the methods used for the analysis, focusing on the different sources of data collection and the steps and approaches used for the analysis, introducing an original index of access utilisation. Lastly, the scope and the limitations of the analysis of the data are considered. Following the outlined components, Chapter 5 conducts the analysis by presenting comparative results on the utilisation of broad and narrow access points, along with the main findings. The subchapters delve deeper into the results from the index of access utilisation, focusing on individual access points by type of organisation. Each subchapter

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maintains a dual focus: presenting descriptive quantitative results alongside a contextualisation and integration through qualitative analysis. The chapter concludes with a discussion that addresses the interpretations, implications, and limitations of the study. Finally, it ends with a summarising conclusion.

The research aims to contribute to the debate regarding conditions of political pluralism in the EU, especially through an institutional lens. Moreover, it is relevant for two further perspectives: Firstly, to improve existing and future points of access. Secondly, it can provide interest groups[2] themselves with relevant information, particularly national associations who want to rearrange their external strategies or aim to enter lobbying[3] in the EU.

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[2] The terms interest groups and interest group representation are used interchangeable with the term lobby groups and lobbying.

[3] CSOs often do not refer to their actions as "lobbying" but rather as "policy advocacy". This is because the term "lobbying" carries negative connotations, from their perspective. Many people automatically associate lobbying with non-transparent behaviour that seeks to exert influence through informal channels. By using the term "policy advocacy," CSOs try to distance themselves from this perception and create a more positive view of their efforts to influence policy.

2 Theoretical and Conceptual Background

Interest representation of different groups and businesses is a core aspect of political pluralism in democracies. Political pluralism refers to a concept where multiple groups and interests coexist within a society, and political power is distributed among different actors such as parties or institutions. It recognizes the existence of various ideologies, parties, and interest groups, fostering a healthy competition of ideas and policies (Dahl 1967). Interest groups clash over the distribution of access to and influence over decision-making within a certain policy field. Therefore, one might view the fundamental premise of pluralism theories — the clash between diverse interest groups and opinions — as the basis for interest group conflict. In theory, different groups' ability to influence decision-making and shape political deliberation on a voluntary and non-discriminatory basis through lobbying[4] should render the results of decision-making processes more equitable (Michalowitz 2007). Some interest groups rely on active citizen engagement and participation mechanism, while others harness "indirect participation" (Barnard and Vernon 1975). Therefore, interest representation is crucial in shaping policy change, laws, and regulations by serving as a channel through which diverse voices within society can influence decision-making processes (Richardson 2000).

However, the representation of interests in a pluralistic framework is fundamentally characterised by inequalities. In particular, there are large discrepancy between the lobbying power of companies and that of civil society organisations (CSOs). The disadvantage of CSOs and the dominance of corporate lobbying have been extensively researched and examined from various perspectives, the following section provides a corresponding overview.

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[4] Defined as „Lobbying is a legitimate act of political participation. It grants all those influencing governments access to the development and implementation of public policies." (OECD 2013).

2.1 Inequality of Interest Representation

Although the importance of interest groups for political pluralism is widely acknowledged, there is concern about whether they adequately represent non-business interests. This issue is particularly addressed by the concept of biased pluralism. Biased pluralism refers to a pattern within a democracy where the preferences of certain interest groups or stakeholders have disproportionately more influence over government decisions than those of others. This pattern often aligns with the interests of rich and well-connected entities, such as large corporations or industry associations, rather than the interests of the general public or non-profit organised groups (Schattschneider and Pearson 2017; Schlozman et al. 2012). Biased pluralism is central in explaining how political inequality is connected to bias in representation within politics. It also emphasises that, as a primary step, certain dominant groups are better able to access the political landscape.

Biased pluralism is highly intertwined with another theoretical approach forwarded by Hacker and Pierson (2010) – namely 'elite perspective'. Foundational to the theory is the observation that, since the 1970s, business organisations have gained in influence within the policy arena, whereas middle- and working-class organisations such as trade unions and CSOs have lost in relevance. Consequently, so the authors argue, preferences of businesses, and particularly of those with substantial resources, prevail over those of the average voter; the policymaking process is dominated by "organised combat" rather than democratic consensus (Hacker and Pierson 2010, 116). Exploring this trend, Hacker and Pierson's (2010) analysis reveals how this reconfiguration of influence has fostered an environment of "winner-take-all" politics in capitalist democracies. In such a political landscape, the policies passed tend to disproportionately benefit business interests, which are often conflicting with policies that promote economic redistribution or the welfare of the broader public (Hacker and Pierson 2010,

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196–197). This model of elite dominance in politics challenges the notion of egalitarian access[5] to institutions and the potential success of organised civil society.

Both of the abovementioned approaches were influenced by Lindblom's (1982) concept of 'the market as prison'. Lindblom (1982) emphasises the substantial impact of business decisions on societal outcomes, due to the role of businesses in managing the workforce and having influence over macroeconomic factors through choices regarding investment, hiring, and relocation of headquarters. Lindblom explains the idea of 'prospective punishment', where the fear or anticipation of how businesses might respond to specific policy changes hinders the creation of certain proposals. This results in policymakers limiting their own ability to introduce new ideas. Often, proposed changes are either put off for a long time or altered to satisfy business groups. Consequently, the policymaking process is imprisoned within the confines of the market (Lindblom 1982). This imprisonment does not need businesses to openly work together. Instead, it prevails because businesses naturally tend to put their own interests first.

Another indicator of the advantage enjoyed by business-interest groups prominently featured in the literature is the phenomenon known as 'revolving doors'. This refers to the practice of individuals moving from their roles as legislators to executive positions within the industries affected by the legislation they previously oversaw. This practice can work both ways, as individuals may also transition from industry positions to roles within the public sector, potentially influencing policy making (LaPira and H. F. Thomas 2014).

This (common) behaviour brings up conflicts of interest, as individuals may use their insider knowledge to bring advantages to their new position. LaPira and Thomas (2014) further stress the aspect of informal access creation.

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[5] The aspect of issue characterisation and access options is going to be elaborated further in a later part of this chapter.

2.2. Aspects shaping lobby influence

In addition to the aspects connected to market mechanisms, the inequality of interest representation is further determined by factors directly linked to organisational conditions. Scholarly literature highlights diverse factors that shape policy influence, including financial resources, issue characteristics, types of lobbying, institutional structures, and opportunities for access (Dür and Mateo 2016c; Weiler and Brändli 2015).

As pointed out by many researchers, a dominant factor determining lobby groups' influence is their financial resources (Binderkrantz and A. Rasmussen 2015; Dür and Mateo 2014; Hanegraaff and van der Ploeg 2020; Klüver 2010). Unsurprisingly, business organisations tend to have more financial resources to invest into lobby actions. CSOs, on the other hand, are often financed by members and donors, disadvantaging them in terms of financial and consequently human resources[6].

Another significant factor impacting interest group influence are the characteristics of the policy issue in question (Beyers 2008; Binderkrantz and Krøyer 2012; Dür and Mateo 2013). Dür and Mateo (2013) point out that lobbyists' potential influence varies across regulatory, distributive, and redistributive policy issues. In distributive politics, groups with concentrated benefits tend to overpower those with diffuse interests due to their ability to monitor policy implementation. Regulatory issues often lead to conflicts between groups with opposite interests, limiting individual group power. Redistributive policies produce diffuse costs and benefits, attracting minimal interest group influence. Generally, technical issues attract greater interest group influence due to politicians' higher demand for specialised information and the need for domestic cooperation in policy implementation (Dür and Mateo 2013). Binderkrantz and Krøyer (2012) add that organisations with broad objectives primarily engage in lobbying parliament and the media, whereas those with more technical objectives

[6] As human capital is an aspect dependent on salary.

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engage in more extensive lobbying of bureaucrats. This leads to CSOs often being disadvantaged in influencing lobbying behaviour due to interests typically aligning with broader, more diffuse benefits rather than concentrated ones (Dür and Mateo 2016c).

Different lobbying strategies also contribute to determining influence. The greatest strategic distinction is the difference between inside and outside lobbying, a concept widely used (Hanegraaff, Beyers, and Bruycker 2016; Junk 2016; Weiler and Brändli 2015). Inside lobbying refers to acts by different interest groups to gain influence in public policy by directly interacting with policymakers and government officials. In other words, it entails engagement to shape legislation directly. This type of lobbying demonstrates versatility in its application and can include building relationships with legislators, providing expert information, securing memberships in committees, engaging in direct negotiations with legislators, and criticising regulatory decisions from within the political system (Baumgartner et al. 2009; Weiler and Brändli 2015). By contrast, outside lobbying describes actions used by interest groups to shape public policy indirectly. This approach involves efforts to shape public opinion, create public pressure, and develop a favourable environment for policy change by engaging with civil society through campaigns, demonstrations, workshop and other forms of public outreach (Beyers 2004; Weiler and Brändli 2015).

Business organisations are argued to prioritise inside lobbying, whereas CSOs are generally seen to engage more in outside lobbying (Dür and Mateo 2016a). Dür and Matteo (2016) futher argue that this pattern is based in their different challenges in facing collective action problems.[7] According to the authors, business organisations face fewer challenges in organising collective action than CSOs due to their more substantial membership base, the ease with which they may offer selective benefits, and the presence of a shared identity (Dür and Mateo 2016d). This thesis acknowledges these findings. Yet, it argues that the distinction

[7] Olson elaborated that collective action is made considerably more difficult when there is a large group of people whose individuals are rationally egoistic (Olson 1971).

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between business organisations as insiders and citizen groups as outsiders lacks nuance when considering the diverse array of groups within CSOs that could be classified as either insiders or outsiders (see section 2.3 for additional elaboration).

Regarding inside lobbying and the interactions between decision-makers and interest groups, the configuration of institutional frameworks represents an important factor determining the extent to which lobby groups can exert influence (Dür 2008; Eising 2005; Immergut 1998). It plays a decisive role in shaping interest groups' access to decision-makers, impacting policy formation, fostering opportunities for collaboration, and influencing the regulatory environment. Moreover, the structural design of institutions dictates resource allocation, strategic information sharing, network building, coalition formation, and the establishment or absence of feedback mechanisms. Moreover, the context of institutional access affects the choice and options of lobbying strategies used by CSOs (Weiler and Brändli 2015).

Over the last decades, business interest groups have been pivotal in shaping the institutional structures that govern inside lobbying, largely due to their longstanding influence and power. Their sustained engagement and expertise in targeted policy areas have allowed them to significantly impact the creation and modification of rules governing lobbying activities. This historical dominance has enabled these groups to bring forward institutional frameworks in ways that favour their interests, ensuring they maintain strategic advantages in policy-making processes (Dür 2008). "Often, the rules and procedures in government decision-making reflect a specific (past) balance of power among societal interests; powerful interests may have been able to shape the rules in a way that favors[sic!] their interests" (Dür 2008, 1217).

Given the relatively "recent" emergence of CSOs as lobby actors in policymaking, compared to the long-established role of business entities as stakeholders, CSOs arguably face institutionalised disadvantages.

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An essential part of the institutional structure and the resulting potential influence of the interest group relate to the possibilities of access. In this regard, Bouwen's (2002) theory of access is a revolutionary approach to the logic of gaining access to institutional decision-making. It explains the degree of accessibility of European institutions for profit-oriented companies/associations[8]. He states that access to European Institutions is dependent on demand and supply of access goods.

Bouwen (2002) defines access goods as forms of information the EU institutions need in the legislative process. In turn, interest groups' degree of access to the 'goods' provided by EU institutions – namely the opportunity to influence policymaking processes – is determined by the amount of access goods an interest group holds. He categorises three types of access goods: (1) *Expert Knowledge* (2) Information about *European Encompassing Interest* (3) and Information about the *Domestic Encompassing Interest* (Bouwen 2002, p.369; italics in Original). Due to their internal nature, certain forms of interest groups possess more or less of the access goods (2002). Furthermore, Bouwen argues that different EU institutions differ in their demand for different access goods; therefore, certain interest represantitives have more access than others.

According to his theory, the European Parliament (EP) has the highest demand for access goods supplied by European associations which provide the most information about *European Encompassing Interests*. The reason for this is the EP's role in the legislative process. Furthermore, Bouwen argues that Information about the *Domestic Encompassing Interests* are demanded by the EP as well, albeit to a lesser extent compared to the *European Encompassing Interests*. This is highly relevant as the legislative process determines what possible for of lobbying a bill.

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[8] Important to stress: not for CSOs.

Table 1 provides an overview of the supply and demand of access goods for different EU institutions according to Bouwens (2002).

Considering that the first draft of the legislative proposal with particular suggestions and technical aspects is already completed by the European Commission, when the EP starts its consideration, Expert Knowledge provided by private firms is less needed than the other access goods.

Table 1: Supply and Demand of Access Goods

	Most demanded resource	**Most demanded resource is best provided by**
European Commission	Expert Knowledge (EK)	Individual Firms
European Parliament	Information about European Encompassing Interest (IEEI)	European associations (profit)
Council of Ministers	Information about Domestic Encompassing Interest (IDEI)	National associations (profit)

Table 1: Derived from Bouwens Tables 1 & 3 (Bouwen 2002, 378 -382)

Following Bouwen's work, several other researchers have forwarded institutional-level analyses examining interest groups' access, primarily focussing on business organisations (Coen 2011; Chalmers 2013; Binderkrantz, P. M. Christiansen, and Pedersen 2015). Most of these contributions are shaped by assumptions and structures of the EU legislative procedure and the policy cycle. To date, a wide range of researchers have confirmed importance of such an 'institutional approach' for advocacy work by various interest groups (Coen 2007; Crombez 2002; Zippel 2004). Although some contributions within the field do consider CSOs, most refer to the categorisation of insiders and outsiders, determined by the pre-existing advantages or disadvantages such as financial resources, location, networks, expert knowledge. The overall result shows that insiders are more successful in influencing policies, as they possess more of the aspects explained in the theoretical part, in summary, "a group that contents itself with low-cost political activities" (Maloney, Jordan, and McLaughlin 1994, p.26).

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Other aspects identified in the literature lead to a greater ability to exert influence are the degree of professionalisation of the organisation and the embeddedness in lobby coalitions (Dür and Mateo 2014; Junk 2020a). These two factors lead to the last aspect which should be considered as a determining factor of lobby behaviour in the EU: the type of organisation going beyond the categorisation of business groups and non-profit groups, which is discussed in the next subchapter.

2.3. Different Types of Civil Society Organisations in the EU

Besides the aspects discussed earlier, the type of organisation that tries to achieve lobby influence is an essential factor that is distinctly highlighted in the literature. Klüver (2012) identifies two types of lobby organizations: sectional and cause groups. A more detailed categorisation is provided by Dür & Mateo (2013), who distinguish between business associations, professional associations, and citizen groups. Weiler and Brändli (2015) classify lobby organisations into cause groups and specific interest groups. Literature on the behaviour and lobbying strategies of business enterprises (Bouwen 2002; Woll 2019) frequently discuss CSOs only in contrasting comparisons. A further strand of the literature does not look at the type of organisation, but at the level at which the organisation is located, such as national or international (Klüver 2010; Zippel 2004). However, no contribution has coherently classified interest groups with view to explaining their ability to exert influence within a given institutional context beyond the (overly simplified) identification of lobbying insiders and outsiders.

Accordingly, this paper aims to build on the literature discussed thus far to integrate the different strands. So far, CSOs have been viewed as a unified type of organisation. This section therefore looks at different types of organisations within CSOs and outline their characteristics on the basis of the previously highlighted aspects. The five groups of CSOs identified and

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characterised in this research are national associations, European associations and networks, umbrella organisations, international associations and foundations (see table 2 for a comprehensive overview of all characteristics).

National associations are based in a specific country and represent the interests of their country specific members. The fact that they are registered in the EU Transparency register indicates that they have extended their lobby interest to the EU-level. I argue that they seek any available opportunity to gain access to EU decision-makers if they decide to lobby at this level due to their outsider status. Typically, national associations concentrate on rather specific local or national issues (Beyers 2002). They often operate independently but may join larger umbrella organisations for more specific access. Generally, they have fewer members compared to larger CSOs, staff numbers can vary widely and often fewer financial resources at their disposal (Bouget and Prouteau 2002).

European associations are organisations specifically focused on the EU and its member states. Unlike national associations, which tackle specific national or local issues, they often represent the interests of their members at European level and within a European context. They can be perceived as well-integrated into the EU lobbying environment, often with headquarters in Brussels and staff specifically working on EU policy (Scaramuzzino and Wennerhag 2015). European networks share these characteristics but often have a wider range of associated members, such as local government authorities, cities or think tanks. They need to comprise the demands of these different stakeholders, however. Both European associations and networks have a greater likelihood of securing European project funding, often attributed to their insider knowledge of available opportunities. Lastly, and notably, they lobby for specific interests across different countries and levels (Bouget and Prouteau 2002).

Umbrella organisations represent a wide range of member organisations, providing a collective voice without the typical challenges of individual member engagement. All of their members are organisations in the same operational sector. Umbrella organisation can be seen

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as highly professional and specialised, their staff are often experts in EU policy, and meetings typically involve high-level representatives (Hanegraaff and van der Ploeg 2020). From the institutional perspective, they provide significant incentives for EU institutions to consult them as they represent such a broad spectrum of CSOs in the sector (Hanegraaff and van der Ploeg 2020).

International associations are organisations that operate across borders and have members from different countries. They aim to promote specific goals at a global level, such as environmental protection, human rights or professional standards. These organisations often operate on the basis of membership fees and can have both state and non-state actors as members (Long and Lörinczi 2009). Due to their size and scattered nature, they have a broad structure with international boards, sub-groups, and national chapters, therefore they need to rely on substantial internal resources and significant communication efforts to coordinate activities across different levels. Furthermore, EU lobbying is only one of their many focus areas. However, international associations are often highly professional and embedded in international networks.

Foundations are non-profit organisations that use their capital to support specific social, cultural, or scientific objectives. They can be both operational and promotional, that is, they carry out their own projects or support other organisations financially. Foundations are typically resource-rich entities primarily focused on redistributing their substantial funds to various causes (Anheier and Leat 2006). They engage in a wide range of issues without specialising in technical expertise. Unlike European associations or national associations that rely on membership fees, foundations are more dependent on donor funding to sustain their operations. Their interests are generally diffuse, aiming to raise awareness and support individuals and other organisations rather than lobbying for specific policies (Toepler 1999). An overview of the distinctive categories with characteristics is presented in Table 2.

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Table 1: Overview of various types of civil society organisations and their characteristics

	Foundations	**International Organizations**	**Umbrella Organizations**	**European Associations and Networks**	**National Associations**
Issue Characterisation	Broad, focus on redistribution and awareness	Wide range of international issues	Represent a variety of CSOs within specific sector	Specific interests across different countries, European focus	Specific local or national issues
EU Insider/Outsider	Outsiders	Outsiders, potential EU chapter	EU Insiders	EU Insiders	Outsiders, potential insights due to membership in umbrella Organisation
Type of Members	Donors, varied stakeholders	International boards, sub-groups, national chapters	Member organizations, not individuals	Many members, including associate members	Few members, varies widely
Expert Knowledge	Broad, less specific	High, international scope	High, broad across multiple areas	High, specific to various countries	Limited, specific to national context
Complexity of Organisational Structure	Moderate to high	Very high	High	Moderate to high	Simple to moderate

3 Operationalisation

Following the above theoretical considerations, the first key argument of this thesis stresses the interconnection of political pluralism and equal access to interest representation. As a second step, the access points for CSOs that are relevant for inside lobbying in the EU are elaborated on. To this end, access points were mapped, characterised and categorised into 'broad' and 'narrow' access mechanisms. Among other things, this categorisation forms the basis for the hypotheses that are set out in the last part of the chapter. Lastly, the case selection is elaborated, presenting the best-suited case of organisations in the environmental and climate protection sector.

3.1 The Argument

This thesis differentiates various types of CSOs in the EU and analyses their inside lobbying actions, on the use and non-utilisation of different access points provided by the institutions of the EU. The theoretical aspect of the study outlined the current imbalance in the representation of interests within the EU, the asymmetry of insider and outsider access and the asymmetry of inside and outside lobbying in the EU. The EU provides mechanisms for contributing input during policy formation, the overarching goal of all these mechanisms is to ensure access to EU institutions and the decision-making process. The EU emphasises equality in this context, stressed even by the Treaty of the European Union (EUT) (Art. 9& 11), and the EU Democratic Action Plan, which sets out the EU's commitment to promoting democracy and political pluralism (European Parliament 2020). However, considering this field of research, potential inequality of access was primarily measured by characterising organisations in profit-organisations vs. non-profit. I claim that this form of categorisation of type of CSO should be multi-layered to create distinctive categories. I examine the various types of interest groups

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operating within the EU, moving beyond the conventional categorisation of profit-oriented versus non-profit organisations, following the research question: What impact does the type of association of civil society organisations have on the utilisation of institutionalised access points in the EU?

I argue that a division into non-profit and profit organisations is not sufficiently granular to determine access points' use to vastly different types of CSOs, following the logic of access by Bouwen (2002). To structure the field of access points in the EU not only from the perspective of utilisation but also from the institutional side, I categorise institutional access points, allowing for a more detailed and comparative analysis.

When fundamental differences in the potential for utilisation by various CSOs are identified, I argue that questions about the state of political pluralism must be raised. As elaborated in the theory part, the research suggests that cause groups primarily engage in outside lobbying (Dür and Mateo 2016d), but what if the access points implemented cannot get utilised by the cause groups? If this is the case, the affected types of cause groups are 'compelled' to resort to outside lobbying which would lead to a lack of political pluralism in the EU.

The dominance of business organisations in their lobby actions challenges the very essence of political pluralism, and the EU's commitment to democratic principles comes under scrutiny (Heidbreder 2012). However, if the institutionalised access points[9] are not tailored to the active use of different CSOs, the challenge to political pluralism is even greater than assumed. The basis for this argument is the acknowledgement that access opportunities is one of the matters that is highly adjustable institutionally, regardless of the effectiveness that these access points bring with them. As Alemanno points out: „While not all inequalities can be offset by positive measures […] the participatory and advocacy capacity of any relevant actor can be enhanced so as to equalise opportunities of access over time." (Alemanno 2020, p.121).

[9] In this thesis defines a established mechanism or entity within an institution that provides structured access to information or decision-making processes.

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This underscores the potential for institutional mechanisms to progressively level the playing field in EU policymaking.

3.2 Mapping Access Points for CSOs

The EU has implemented public participation structures, to ensure access mechanisms for civil society, CSOs and business, but mainly focusing on the first two, stressing equal access, as promoted in TEU Art. 9 & 11 (Treaty of the European Union 2016), as means of enhancing accountability and legitimacy (Saurugger 2008). To strengthen democracy, public participation is seen as a fundamental aspect of democratic governance. This is highlighted by the Democratic Action Plan 2020 (European Commisson 2020), which underlines that policy makers conscious of the dominance of business representation and the inequality in knowledge they are provided with by stakeholders (Beyers 2004). By involving CSOs in the decision-making process, the EU aims to make its actions more reflective of the diverse interests and concerns of its citizens (Hierlemann et al. 2022). However, the implementation of the access mechanism developed incrementally and without following a visible pattern, and no EU institution has published a general concept on the topic (Hierlemann et al. 2022). Some of them are usable for citizens and CSOs, while others limit access to CSOs and business entities. Table 2 maps all possible access mechanisms for CSOs, categorising them into narrow and broad ones. This categorisation defines access points as institutional mechanisms or institutionally embedded mechanisms, officially advertised for integrating "third parties." Furthermore, narrow access points are characterised by requiring extensive pre-existing knowledge about internal procedures or ongoing bills, or by their higher scarcity. In contrast, broad access points are characterised by their lower threshold for accessibility, requiring less institution- specific knowledge, and are more readily available. The structure of the individual access points and the reasons for the categorisation are outlined in the following:

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Table 2: Mapping of narrow and broad access mechanisms; Orange = Point of Access provided by the European Commission, Green = Point of Access provided by the European Parliament, Blue = Point of Access provided by another EU Body/ Self-Institutionalised

Narrow Access Mechanisms	Broad Access Mechanisms
Membership Commission Expert Groups	Membership in Intergroups
Meeting with Commission Representatives	Membership in 'Friendship Groups'
Meeting with Directors General of the EU Com	Petition to the EP
Ombudsman inquiry	Accredited Persons in the EU Parliament
Public Consultations/ Amendments	Meetings with MEPs
Contribution to Roadmaps[10]	Participation in other EU-supported forums
	Interactions with Committee of the Regions, European Economic and Social Committee,
	EU Citizen Initiative

3.2.1 Narrow Access Mechanism

Six access mechanisms[11] were categorised as narrow. Five of them are docked to the EU Commission, who is obliged to carry out as broad consultation with parties concerned when drafting legislative proposals. One additional mechanism represents a supplementary, an independent controlling mechanism (Ombudsman inquiry) respectively. All narrow mechanisms are outlined in more detail below.

The commission – as the initiator of legislation- is required to engage with interest groups on proposals as set up in Article 11 of the TEU: "The European Commission shall carry out a broad consultation with parties concerned" (Treaty of the European Union, Art.11); the Better Regulation Guideline (2017) was stressing and deepening the Commission's responsibility to embed external voices "stakeholders should always be consulted when

[10] Strategy plans, such as Horizon.
[11] Interchangeably used with access point.

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preparing a Commission legislative or policy initiative […]" (European Commisson 2017, p.71), this is set out in the following mechanisms:

1. Expert groups of the EU Commission consist of external advisors from the public and the private sector that support the Commission in the preparation of its legislative process. The expert groups advise the Commission on legislative proposals, initiatives and acts. It is a group for high-level input from a wide range of stakeholders, including CSOs, Member States authorities and people from the private sector. The input is not binding; however, it provides the chance to shape the Commission's decisions. Members are selected mainly through public calls and can be permanent or temporary, they are chaired by a Commission representative or an elected member. This deeply institutionalised structure provides CSOs with significant opportunities to engage impact pre policy formation in narrow sense (European Commission n.d.-b).

2. Meetings with representatives of the European Commission – understood as Commissioner, cabinet members, or executive vice presidents – offer the opportunity to speak directly with decision-makers and present their views. However, among the narrow access mechanism, general meetings with such representatives are the least institutionalised, even though they are traced and registered in detail by the EUTR. Meetings with Commission representatives occur following requests or a formal invitation by organisation. For organisations, meetings with the high-level representatives represent significant lobbying opportunities. However, Commission representatives generally approach these meetings with stakeholders with a broader, forward-looking perspective, focusing on agenda-setting through formats such as Green Papers and White Papers (Dreyfus and Patt 2012).

3. Meetings with the Directors General (DGs) of the EU Commission offer CSOs a high level of direct contact to influence the highest administrative levels of the Commission. DGs are the policy departments of the (European Commission n.d.a). Commission. They are responsible for creating, executing, and overseeing policies in the EU. As the departments are

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considered the highest expert authority in EU legislation, their meetings are both technically in-depth and detailed. They also have the potential to exert significant influence on legislation when CSOs are able to present their concerns (Bouwen 2002). DGs can be invited to events, as well as host events on current legislative relevant topics.

4. The European Ombudsman investigates complaints about maladministration in the EU institutions. CSOs can contact the Ombudsman to report cases of mismanagement. This is done based on complaints from EU citizens or organisations, or on the Ombudsman's own initiative. Although its powers are mainly advisory, his recommendations usually meet the approval of the EU institutions (Hierlemann et al. 2022). The complaint must pertain to the administrative conduct of a specific EU institution, and it is presumed that the complainant has already attempted to resolve the matter directly with the institution in question (Hierlemann et al. 2022). Once the complaint has been received, the Ombudsman's team assesses whether it provides sufficient grounds for investigation. If the complaint is accepted, the Ombudsman initiates an investigation, may request opinions and information from the institution concerned, arrange meetings, carry out inspections and obtain further information and opinions from the complainant (Vogiatzis 2018).

5. Public consultations and 6. contribution to roadmaps offer CSOs the opportunity to provide feedback on new legislative proposals. CSOs can also submit amendments to proposed legislation, they are provided via the platform *Have Your Say* and have to be online for twelve weeks. The access mechanism relies on systematic input and comes to bear at an early stage of the legislative process (Bunea 2017; Hierlemann et al. 2022).

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3.2.2. Broad Access Mechanisms

Five out of seven listed broad points of access are hosted by the European Parliament. Following Bouwen's logic of access (2002), the EP's need for (technical) expert knowledge – and thus the demand for the corresponding expert good – is relatively limited. This is because,

by the time a proposal reaches the Parliament, the European Commission has already developed a detailed and often highly technical draft. While basic expertise is needed, the level of technical knowledge required to make amendments and decisions is significantly lower than in the Commission. The Parliament requires external information that allows it to assess the legislative proposals made by the European Commission thoroughly. Thus, the Parliament focuses on ensuring that the proposals align with the EU's overall objectives, values and the interests of its citizens, making its role more about scrutiny and evaluation rather than technical drafting (Bouwen 2002). Furthermore, EP/MEPs are aware of their role of representing a broad public spectrum and space for debate (Beyers 2004). Accordingly, CSOs have broad access to mechanisms provided by the EP, all of which provide opportunities to influence decision-making at later stages in the legislative process.

Further access points provided through other EU bodies principally follow the same logic, yet with these institutions often taking on marginal roles within legislative processes, opportunities to exert meaningful influence are even more limited. Lastly, the EU citizen Initiative is categorised as ‘broad’ for its participatory access and strongly deliberative, albeit non-binding character. All broad mechanisms are detailed in the following:

1. *Intergroups* are established by MEPs from various political groups and committees that share a common interest in a certain issue. Although these groups do not represent official bodies of the EP, but they are officially recognised. Their formation requires the political support of at least three political groups within the EP. The primary objective of intergroups is to exchange information on specific issues among MEPs, stakeholders, and civil society. Stakeholders are often invited to participate in meetings present research, and contribute to discussions (European Parliament n.d.).

2. *'Friendship Groups'* are informal groups and are typically formed by MEPs who share an interest in deepening their relations and knowledge with specific regions or thematic issues,

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therefore engaging with different external groups, including local officials, businesses and CSOs. Unlike intergroups, they are not officially recognised by the EP but are widely used and commonly acknowledged. From the next legislation period starting in 2024, Friendship Groups are going to be banned, with the Qatar-gate in 2022 having been a deciding factor (European Parliament 2023).

3. Citizens as well as CSOs can initiate *Petitions to the European Parliament* to raise specific issues or complaints, which are then examined and dealt with in the EP Committee of Petitions. It is one of the oldest participation mechanisms and was constitutionalised through the Treaty of Maastricht (Hierlemann et al. 2022). Petitions can exert far-reaching influence, making them an important lobbying tool for CSOs, which face low thresholds in initiating petitions and can decide on the specific call to action contained in them (Hierlemann et al. 2022).

4. *Accredited persons* can enter the EP buildings during working hours and when sessions are in progress. They receive access badges that allow them to enter the EP buildings, however do not grant unrestricted entry at all times. Access can be restricted during sensitive times, such as high-level meetings or security alerts (M. K. Rasmussen 2011). CSOs need to schedule appointments with MEPs or staff members to enter, they cannot wander freely and must have a clear purpose engagement. Accreditation still serves as an indicator of the capacity within which meetings or the observation of meetings by CSOs can take place. This relates directly to the next access point:

5. Direct Meetings with MEPs. For CSOs, direct meetings with MEPs are important to raise specific concerns and gain support for particular issues. Due to the national affiliations and issue specialization of MEPs, some organisations can often reach out to certain MEPs more quickly and effectively than others.

6.CSOs can engage in *EU-supported forums* that offer a platform for discussion and influence. These forums are typically open to CSOs and citizens alike. Two prominent

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examples are SINAPSE and Fit for Future, both designed to improve policy by incorporating suggestions for greater expertise in EU policymaking and governance (European Union n.d.-b)

6. The *EU citizen initiative* is originally designed for in citizens, however, organised stakeholder groups can influence the EU Citizens' Initiative by even launching initiatives themselves or supporting certain initiatives (European Union n.d.a). Furthermore, they can provide expertise and resources, and engage in public debates and advocacy for the initiative within EU institutions. Hence, it can serve as a lobby tool for CSOs, albeit being located almost on the edge to outside lobbying.

7. The *Committee of the Regions (CoR) and the European Economic and Social Committee (EESC)* are consultative bodies of the EU. CSOs can interact with these bodies to bring in regional and socio-economic perspectives, plenty of CSOs have partnership agreements with specific representatives in those bodies or are even members of Group III of the EESC (Loughlin 1996; EESC n.d.).

3.3 Hypothesis

The above sections outline the prevailing finding among scholars that interest groups' ability to influence decision-making processes and their outcome is unequally distributed. Although existing research has foregrounded differences between profit- and non-profit organisations, this thesis contends that the role of organisational features of different types of CSOs and the nature of institutionalised access mechanisms in determining CSOs' ability to utilise access points has not received sufficient attention. In reference to Bouwen's (2002) logic of access and based on a mapping of types of CSOs and access mechanisms within EU institutions, the following three overarching and four sub-hypotheses can be derived:

Overarching Hypothesis:

H1: There are strong disparities in the utilisation of institutionalised access points between types of CSOs.

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H2: Particularly in the narrow access points, substantial differences exist.

H3: Broad mechanisms are utilised by different types of CSOs approximately equally.

Table 3: Level of utilisation due to access mechanisms by types of CSO, Hypothesis; Graphic based on Beyers (2002); Own visualization and content

	Actors' strategies seeking access to EU Institutions	
	Narrow Access Mechanisms	**Broad Access Mechanism**
High Utilisation	**A.** Umbrella organisations can utilise narrow mechanisms most intensively → targeted access	**B.** National associations, foundations and international associations can better utilise broad access mechanisms than narrow ones → seeking-general-access
Low Utilisation	**C.** Foundations do not utilise narrow access points → diffuse-interest problematic	**D.** Umbrella organisations and European associations do not perceive broad access mechanism as efficient → no benefit perception

3.4 Case Selection: the Environmental Sector and the Transparency Register

As the last step of the operationalisation, a case selection is conducted, elaborating on the choice for the CSOs in the Environmental sector, with the overarching scope of organisations registered in the EU Transparency Register.

3.4.1 Environmental Sector

The following analysis focuses on the types of CSOs and their use of institutionalised access points, with a particular focus on organisations that are included in the EU Transparency Register and registered in the area of environment and climate action. The reasons for choosing the environmental sector are manifold. Firstly, the most important requirement for the case

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selection was that the chosen policy area exhibits a considerable share of multi-level governance and is consistently relevant at global, European, and national level (Eckerberg and Joas 2004). In addition, a sector should be chosen that attracts a broad spectrum of stakeholders, encompassing governments, businesses, the public, and – most importantly – a big variety of CSOs, so as not to create one-sidedness. Figure 1 provides an overview of the major clusters of sectors in which CSOs registered under the EUTR are categorised. Notably, the environmental sector forms the largest cluster, comprising over 1,000 of the approximately 3,400 CSOs[12]. The sector does not only contain lot of organisations in absolute numbers, the organisational diversity within the sector also provides an opportunity to explore how various CSOs navigate institutionalised access points. All types of CSOs are well-represented, with national associations and European associations and networks leading the way, each with over 400 organisations. This is followed by international organisations. Umbrella organisations and foundations occupy the lower ranks (see Appendix 1 for visualisation).

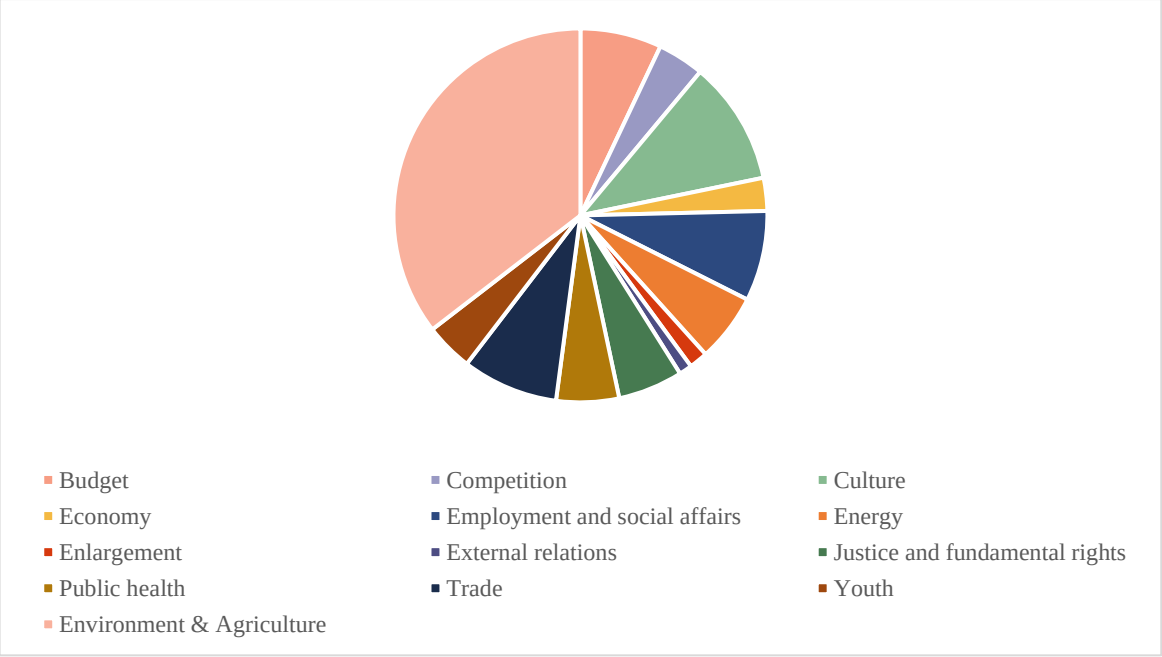

Figure 1: Broad overview of CSOs registered in the EUTR. Source: EU Transparency Register 2024; Own visualisation

[12] The final selection of organisations in the environmental sector was based on a more detailed categorisation, which is explained in chapter 4.3. For figure1, the superordinate categorisation of the EUTR was used to provide a comparative overview

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The environmental sector was further selected because it comprises a variety of (continuously evolving) issue areas and policy stances. In some policy sectors, the cleavage lines are so hardened that static pro-contra lobbying arises, for example, the healthcare policy sector, particularly regarding universal healthcare versus private healthcare systems(Tierney 1987). In addition, the EU institutions have pursued ambitious environmental and climate policy agendas themselves, indicating the topics' heightened relevance and influence (Oberthür and Dupont 2021).

Lastly, environmental issues attract significant public interest, offering a rich context for studying how CSOs utilise the access points at times of high issue salience, which is argued to shape organisations' ability to exert influence (Mahoney 2007).

3.4.2 EU Transparency Register

The EUTR is designed to enhance transparency and accountability in the EU's decision-making processes. It records the activities of stakeholders and individuals who influence EU policy, promoting openness about interactions between decision-makers and interest representatives. Since 2021, it has been mandatory for organisations to be registered in the EUTR to make use any form of lobbying mechanism in the EU. Holman and Luneburg (2012) evaluated that originally, European lobbyist rules aimed to facilitate business-legislator connections rather than public transparency. To restore trust after numerous scandals, there was a push for greater transparency, leading many European nations to adopt stricter laws (Holman and Luneburg 2012). Despite facing criticism during that period, the EUTR was argued to be a 'vanguard' of strong lobby regulation, not least for its provision of large quantities of publicly available information and the broad participation despite the voluntary character of the register (Greenwood and Dreger 2013).

The political and societal calls for improvement ended in a reform in 2021. To guarantee higher standards and more openness for lobbying, the EP was pushing forward

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for a mandatory registration for interest representation dealing with EU institutions (EU Parliament 2023). An Interinstitutional Agreement on a Mandatory Transparency Register was ultimately reached by the Parliament, Council, and Commission; it became effective on July 1, 2021. Especially the Council signing the act was perceived as an enormous negotiating success. The act makes registration obligatory but leaves the implementation of conditionality measures up to the three signatories, while offering some guidelines to strengthen a shared culture of openness (EU Parliament 2023).

The reform of the TR resulted in new evaluations of its effectiveness for capturing interest representation. Fyhr (2021) elaborated that the compromise reached during the negotiating adds value and improves the EUTR significantly. He showed that due to the combination of different components, this compromise has shaped the EUTR into a hybrid transparency system, meaning that softer components, such voluntary actions by the Permanent Representations of the Member States, are added to the mandated register (ibid.) Given its compulsory nature and the comprehensiveness of information on lobbying activities across EU institutions, the EUTR represents a suitable source of data on CSOs utilisation of EU institutions‘ access mechanisms.

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4 Method

This chapter is dedicated to the method employed in this thesis to identify the utilisation of access points in the EU. First, I explain the quantitative aspect, including the applied descriptive statistics. Then, I present the thematic analysis of the qualitative data, detailing the data collection and analysis process. The quantitative approach is central, with qualitative data providing essential insights to support the argument. This combination allows for detailed hypothesis testing. Given the sensitivity of lobbying, anonymous interviews offered deeper insights into access points beyond the quantitative findings.

In the context of this study, which focuses on the utilisation of institutional access points by CSOs within the EU, descriptive statistics are particularly well-suited. This study aims to employ descriptive statistics to analyse large-scale patterns in the use of these access points and to map these patterns within the theoretical framework outlined earlier. By leveraging the strengths of descriptive statistics - as emphasised by Buttolph, Reynolds, and Mycoff (2016) and Grigsby(2012)- this research can effectively summarise the extensive data obtained from the EU Transparency Register and provide clear, interpretable insights into how different types of CSOs utilise institutional access points. Given the study's emphasis on institutional access points and its input-oriented nature, the application of descriptive statistics is instrumental in gaining a comprehensive understanding of the subject matter.

Descriptive statistics are particularly valuable in sensitive topics like lobbying, where large volumes of data are involved. They provide clear summaries without assuming relationships or causality, which is crucial when detailed understanding is needed without overstepping data boundaries. Using correlational statistics in such contexts can imply unjustifiable relationships and lead to misleading conclusions due to incomplete or selectively disclosed information. Descriptive statistics, however, accurately highlight trends and patterns, maintaining research integrity and respecting the limitations of sensitive data.

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In addition to using descriptive statistics, interviews were conducted to support the quantitative data with qualitative insights. This mixed-method approach is essential for a topic like lobbying, where understanding the nuances and context behind the data is crucial. The quantitative data provides a broad overview of patterns and trends, but qualitative data offers depth and context, revealing the underlying mechanisms and motivations that drive lobbying activities. This qualitative supports the analysis, providing a more comprehensive understanding of lobbying in the EU and ensuring that the findings are validity.

4.1 Data Collection

For conducting the quantitative data for the analysis five data sets were combined. Three of them originate from the EU Transparency Register (EUTR), and the fourth from the platform LobbyFacts, an initiative of Corporate Europe Observatory and LobbyControl, providing essential information on lobbying in European institutions. Lastly, I included requested data from the Office of the Ombudsman. The qualitative data was collected from four interviews with five EU Policy Analysts from different CSOs in the sector of environment.

The analysis utilised three data sets from the EUTR. The main Transparency Register Data set[13] and the data from two additional Secretariat-General data sets[14]. The EUTR holds data on organisations involved in influencing EU policy, including their details, areas of interest, financial information, clients, and memberships. It also covers lobbying activities, personnel involved, and records of meetings with EU officials. As of February 2024, 2,469 Organisations were registered in the EU Transparency Register. According to the data, 66% of

[13] Published by the Secretariat-General on 28 April 2022, was used, with the updated version from 7 February 2024.
[14] Namely "Meetings of Commission representatives of the Von der Leyen Commission (2019-2024) with interest representatives" and "Meetings of the Directors-General of the European Commission with interest representatives (2019-2024)".

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these Organisations advocate for their own interests or those of their members, such as business associations. In contrast, 29% do not represent commercial interests, primarily due to the collective mission characteristic of NGOs, this percentage is likely comprised solely of Cause Groups. The remaining Organisations, including law firms, represent the interests of their clients (see Appendix B for overview). Furthermore, the data provides a categorisation of organisations according to their type[15]. In light of the case selection, further filters were required to be applied: The organisations also identified the field of interest of their organisation. Therefore, all organisations that indicated their field of interest in either *Environment* or *climate action* were included in the final dataset. This led to a sample size of 1330 Organisations. The independent variable of this analysis is the type of Civil Society Organisation a factor not considered in the data collection of the EUTR, therefore the type of all 1330 CSOs got coded[16]. The coding followed the characteristics of the described organisational differences (see 2.3).

Three data sets from the EUTR serve as main source for the qualitative data analysis. However, the data was cross-checked against the database from LobbyFacts (Lobbyfact.eu n.d.). Specifically, information about lobby budget purely dedicated to lobby actions towards the EU institutions is information not provided by the EUTR. The amount is a derivate from various means and it is certain that LobbyFacts does not portray the entirety of budget from every organisation who actually has lobby budgets however, it provides good estimations, creating valuable variable from tracing trends.

Additionally, I reached out to five different institutionalised access points in the EU to request information about the utilisation of those access points by cause groups[17]. The Office

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[15] Only those organisations which had previously identified themselves as non-governmental organisations were included in the dataset.

[17] The requested access points were 1) the portal "Have Your Say"; an online platform through which members of the public can submit suggestions for amendments to the policy in question; 2) A portal called 'SINAPSE', which provides resources to encourage the better utilisation of knowledge in EU policymaking, where CSOs can register and participate; 3) the European Citizens' Initiative and 4) the petition towards the EP asking how often both of those mechanisms got initiated by CSOs. Lastly, I requested 5) the Office of the Ombudsman. For the

of the Ombudsman accepted my request and provided a document about all CSOs using the service of the EU Ombudsman between 2019 and 2024[18] with comprehensive information, only the EUTR ID is missing. This seems like paradox lack of information considering the proactive reveal of information the office had to this point[19]. After coding this 42 inquiries by 31 Associations are part of the case selection (see Appendix C, for a detailed summary and examples).

To gather further information on the use of access points for lobby actions, four in-depth semi-structured interviews were conducted (see Appendix Interview 1- 4). The focus was on the access points that were not covered by the EUTR data and on the challenges faced by the organisations to participate through institutionalised access points, furthermore, informal lobby dynamics and choices about outside lobbying were asked too. To this end, a large number of CSOs in the environmental sector were contacted, ensuring that all forms of identified organisations were involved. Within the organisations, contacts were made with senior or executive staff responsible for EU policy, external relations and/or strategic advocacy work, meaning that the interviews can be categorised as expert interviews[20]. A total of four interviews were conducted, one of them with two experts at once. One interview was with staff responsible for EU policy and advocacy action from a large European network and a second with an established Umbrella organisation. The other two interviews were with senior staff of national NGOs, one of them very large and embedded in an international association, the other national association is young and with few staff but very committed also at the European level[21].

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first two mentioned access points did not accept my request. I receive non-committal responses or refusals based on data protection concerns, although I was not asking for the names of the associations. Two access points, the European Citizens' Initiative and the tool to petition the European Parliament did not reply to my request at all. These interactions/non-interactions are very revealing by themselves, considering institutional transparency aspects.

[18] Containing the case type, the Organisation that initiated the complaint, a reference number, and a brief description of the complaint data provided is rich and particularly useful; the categorization into different case. types offers deep insights into the ombudsman's data management system.

[19] Therefore, I manually coded the 404 cause groups with the binary variable: 0 = Organisation belongs to the Environmental sector; 1 = Organisation does not belong to the Environmental sector.

[20] Positive feedback was sparse, often on the grounds that policy advocacy is a sensitive topic.

Table 4: Categorisation of Organisations the interview partners are associated with

Umbrella Organisation	1
European Association or Network	1
National Association	2
Total	4

4.2. Data Analysis

To compare the utilisation of narrow and broad access points for different types of CSOs, I transformed the collected data of access point into an index of access utilisation. The elaboration of the procedure in detail:

To quantify and compare the utilisation of access points for different types of CSOs, I firstly calculated two indices: the Index of Access Utilisation for narrow access points and the Index of Access Utilisation for broad access points. These indices were derived using the following formulas:

$$Index\ of\ Access\ Utilisatio_narrow = \sum_{i=1}^{n} (\frac{x_i}{mean(x_i)})$$

where, n: number of narrow access points and x_i :The i-the narrow access point usage, for $i = 1,2, \dots, n$. Similarly, the Index of access Utilisation for broad access point

$$Index\ of\ Access\ Utilisatio_broad\ = \sum_{j=1}^{b} (\frac{y_j}{mean(y_j)})$$

b representing number of broad access points and $y_{j:}$ the y-the broad access point usage, for j = 1, 2, …, b.

By normalizing the usage values x_i and y_j with their respective means, I ensure that the indices reflect relative usage, thus allowing for a more straightforward comparison between the two types of access points across different CSOs. The overarching goal of this analysis is to

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enable to study the CSOs utilisation of narrow versus broad access points. Through converting the usage data into indices, I can identify patterns and discrepancies in access point utilisation testing Hypothesis 1-3, using type of Civil Society Organisation[22] as independent variable and type of access point (see 3.2) as dependent variable.

To enable a detailed comparison of individual access points within the categories of narrow and broad access points, I normalised the usage values for each access point. This normalisation process helps to understand how frequently each type of organization utilised the respective access points relative to the average usage. Each usage value for the narrow access points was normalized by dividing it by the mean usage of all narrow access points. The formula used is:

$$normalised_{x_i} = \frac{x_i}{mean(x_{i)}}$$

The same was done for y_j.

The qualitative data are fundamentally supportive of the quantitative analysis. The interviews are analysed thematically, with a focus on knowledge that could not be captured by the data but is still relevant for answering the hypotheses. The following main topics were included in the analysis, (1) further information on the Utilisation of Narrow Access Mechanisms, (2) additional information on the Utilisation of Broad Access Mechanisms, (3) information on the relevance of informal processes and (4) decisions regarding outside mechanisms; the biggest challenges of CSOs to lobby their topics in the EU and finally, whether they have demands regarding access mechanisms in the EU.

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[22] (1) European Association or Network; 2) Foundation; 3) International Association 4) National Association and 5) Umbrella Organisation

4.3. Limitations

As one would reasonably expect this thesis is restricted by upcoming limitations. Firstly, the registration process in the EUTR is mandatory (see. 3.4.2.), but the organisations themselves are responsible for updating the information in the register. The commission verifies the registered information regularly, and organisations must anticipate penalties in the event of inconsistencies. However, on occasion, organisations fail to update the information for an extended period without being identified by the commission (Interview 3, pos.400-417).

Secondly, as outlined in section 4.1 data collection, not all mapped access points are included in the data sets[23], some specific access points can only be summarised and indicated in the binary variable 'Participation in other EU-supported forums'. A similar limitation applies to the binary variables representing outside lobbying. Due to the structure of the data processed in the EUTR and the broad scope of organisations included in this thesis, the analysis only presents whether outside lobbying is taking place and cannot cover the intensity of it. Information on the latter would have been valuable for deepening the argument.

Finally, it is important to keep the general nature of lobby actions in mind. The growing interest in lobbying, stakeholder engagement and interest representation in political science is of considerable relevance and has already led to many fundamental insights. This work also aims to contribute to this. However, it is crucial to remember that connections and informality in lobbying still play an significant role.

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[23] Limited by not receiving all requested data.

5 Analysis

This chapter presents and analyses the work, beginning with an overview and categorisation of the quantitative results. The Index of Access Point Utilisation reveals the primary finding, comparing the use of narrow and broad mechanisms, and addressing hypotheses H1-H3. Subsequent analyses focus on specific access mechanisms, examining hypotheses A-D. The chapter then considers additional factors, including binary variables of outside and informal lobbying, enriched with qualitative data. It concludes with a discussion of the results and the challenges CSOs face in pursuing institutionalised lobbying in the EU.

5.1 Access Point Utilisation Overview and Main Findings

The quantitative comparison of the utilisation of narrow and broad access points revealed notable differences in the use of these by different types of CSOs. Table 6 presents the index that calculated the usage of narrow and broad access points, the *Index of Access Utilisation* describes the relative usage intensity of access points compared to their average usage. The results of the index (see Figure 2 for a visualisation of the results) show that broad access points were used more extensively by all types of CSOs compared to narrow access points. The index varies significantly, ranging from 0.61 to 9.19 points. This wide fluctuation supports the derived *Hypothesis 1,* indicating that the 'classical' classification profit-oriented versus non-profit organisations is insufficient for examining insider lobbying actions. Further differences in the utilisation of access points among civil society organizations' lobbying behaviours are apparent. These differences warrant more detailed examination in the following sections. However, the results can be attributed to the varying characteristics of the organisations, which affect their capacity to uniformly utilise EU access points.

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Table 5: Index of access utilisation

	Narrow Access Mechanism	Broad Access Mechanism
European Association or Network	2,77	3,49
Foundation	1,94	2,73
International Association	1,94	2,77
National Association	0,61	1,85
Umbrella Organisation	7,75	9,16

The outstanding dominance of umbrella organisations is especially noticeable, with index scores twice as high as those of next ranked European associations and networks. In other words, umbrella organisations tend to use narrow access points 7.15 times more frequently than an average organisation uses them, and they tend to use broad access points 9.16 times more frequently. Recent research highlights the prominent position of umbrella organisations, showing that national CSOs that are members of these umbrella organisations are more influential in the EU (Hanegraaff and van der Ploeg 2020). Building on these findings, the results of this research also seem to suggest that umbrella organisations posses a thorough knowledge of access points and utilise them more extensively than other organisations - thereby effectively navigate lobbying actions. Representing the quintessence of an EU insider CSO. Particularly, the interactions of umbrella organisations with the Commission, categorised as narrow access points, are perceived as the most influential (Interview Partner 1, pos. 231-232; Interview Partner 3, pos. 78). These interactions are highly contested and dominated by umbrella organisations with the goal of influencing the foundational agenda. Besides the noticeably large difference in quantitative findings (see Figure 2), similar patterns were also strongly emphasised by interview partners (Interview Partner 1, pos. 231-232; Interview Partner 3, pos. 78). This underscores the power of umbrella in shaping policy advocacy agendas for their members and sometimes even non-members in the civil sector.

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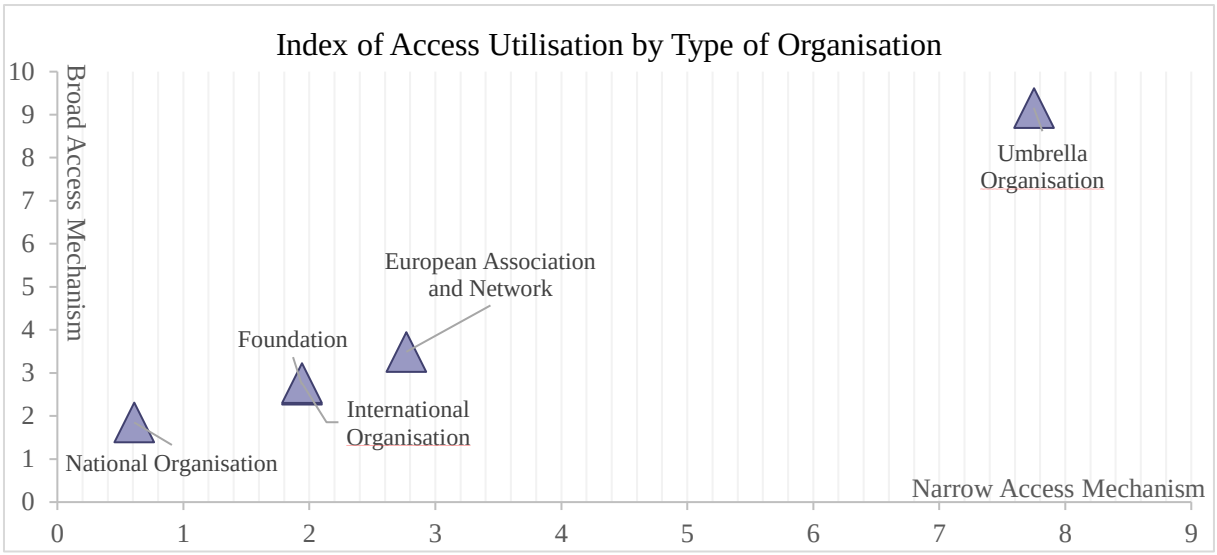

Figure 2: Index of access utilisation by type of organisation; Source: EU Transparency Register 2024 and Lobbyfacts; Own visualization

Beside the dominance of umbrella organisation, the study reveals that national, international organisations, international associations and foundation interested in lobbying the EU utilise access points far less than European associations. This observation is logical to the extent that some national associations lobby the EU alongside institutions in their home countries and can concentrate all their resources to it. However, the organisations that aim to lobby European level, bring along the premise that they try to utilise access points to advocate for their issues, with the overarching goal of influencing as much as possible, therefore it is not given automatically that the group of non-European primed organisation are using broad access points more than narrow ones.

Therefore, the results stress how narrow access mechanisms seem less reachable for those types of organisations, as emphasises by an interviewed national organisation: "*It just seems European level advocacy [has] a lot of big heavy doors […]*" (Interview Partner 3, pos.612-613). Hence, the comparative analysis reveals that non-European organisations, which we might classify as outsiders, are only able to make greater use of broad mechanisms compared to narrow ones. This supports *Hypothesis 3: Broad mechanisms are generally utilised more*

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extensively by various types of Civil Society Organisations due to a lower threshold of accessibility.

The combination of lower utilisation of access by smaller organisations and the dominance of umbrella organisations points to a different underlying problem. National organisations that choose not to join umbrella organisations are automatically at a disadvantage, as they cannot utilise the intensity of access that membership in an umbrella organisation would provide. However, some national organisations actively decide against joining an umbrella organisation. This is because there is a risk for small national associations that they may not align with the stances of the umbrella organisation. The coalition-building character leaves little room for such discrepancies, which is particularly problematic for national networks due to their coordinating role with various partners in their home country (Interview 3, pos. 117-121).

Hypothesis 2, which posits that *substantial differences in utilisation exists, particularly in narrow access points,* cannot be confirmed. Substantial differences in in utilisation of narrow access points are visible, but not more substantial than in broad ones. The difference between the highest and lowest narrow index values is high with a span of 7.14 (see table 6). Nevertheless, the difference is slightly less than the broad access points one with 7.31[24]. Therefore, the "target-access-only" hypothesis is not supported. The hypothesis predicted significant differences due to the high demands of using narrow access points. It expected that more outsider CSOs, like national organisations and foundations, would have larger difficulties in using narrow access points, while insider organisations, like European associations, would only focus on using these narrow points. Outsider organisations rather use broad access points, but this expectation underestimated how little mutually exclusive narrow and broad access points are, especially since European-focused organisations have more staff and financial

[24] Highest index minus lowest index value for narrow and broad access mechanism each.

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resources to participate in both, therefore insider organisation utilised broad access points frequently as well. The results show that insider organisations can use multiple pathways for access. While insider organisations strongly prefer narrow access points, they do not limit their lobbying efforts to them (Interview Partner, pos.155, 174,188,198).

5.2 Trends of the Utilisation of Narrow Access Points

Narrow access points, as defined in Section 3.2, refer to access points that require a high level of insider knowledge to utilise effectively. This subchapter explores the detailed outcomes of these narrow access points, specifically focusing on expert groups, meetings with EU Commission representatives, and meetings with the Directorates-General of the EU Commission. It elaborates on which types of CSOs can effectively utilise these access points and the associated benefits and drawbacks. The quantitative results are supplemented by insights from interviews, highlighting that gaining access to these narrow mechanisms is perceived as the primary objective and the most efficient method for influencing lobbying efforts for CSOs. Moreover, the narrow access mechanisms not covered by the quantitative data are elaborated on – namely public consultations and contribution to roadmaps. Lastly, the external analysis of searching access through the Ombudsman is presented.

Table 6: Index of access utilisation of narrow access mechanisms

	Expert Groups	**Meeting with Com. Rep.**	**Meeting with DG's of Com.**
European Association	1,40	0,69	0,67
Foundation	0,51	0,74	0,69
International Association	0,93	0,59	0,41
National Association	0,39	0,11	0,10
Umbrella Organisation	1,77	2,86	3,12

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Table 7 displays the results of the index by type of organisation exclusively on narrow access mechanisms, where each point of access is individually rated. The comparative insights from the table above are echoed and deepened here: The data reveals that national associations, international associations, and foundations consistently utilise access points less than the average across all three access mechanisms. Specifically, national associations have index values of 0.39 for Expert Groups, 0.11 for Meetings with Commission Representatives, and 0.10 for Meetings with DGs of the Commission, indicating their minimal engagement. Similarly, international associations show lower utilisation with indices of 0.93, 0.59, and 0.41, respectively.

Foundations also demonstrate below-average usage with indices of 0.51 for Expert Groups to 0.74 for Meetings with COM Representatives These results emphasised that national associations, international associations and foundations engage less frequently in access mechanisms with “high insider demands” compared to the overall average utilisation by organisations with an EU focus (see. 2.3 for characteristics of the organisation). Consequently, Hypothesis C, which suggests that 'Foundations do not extensively utilise narrow access points due to their *diffused interests* cannot be fully confirmed. While it is true that foundations use narrow access points less frequently, it is not apparent that foundations have particularly less interest in inside lobbying. However, it aligns to the characteristics of the access points (3.2) that foundations tend to exhibit a higher presence in general Commission meetings as the Commission members are typically formal and overarching, aimed at creating white papers and outlining future scenarios within the sector (Interview Partner 1, pos.43-45), not like more specific participation in expert groups and DG meetings (see table 7)

Independent from the results, these three “disadvantaged” types of organisations still perceive the narrow lobby actions as crucial (Interview 2, pos. 22; Interview 3; 447). Due to this, non-EU focus organisations turn to umbrella organisations and European associations for

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intermediation, as they experience how much better umbrella organisations can implement their aspirations and find access to the commission (Interview Partner 2, pos.24).

The results show how umbrella organisations strategically leverage their insider status to advocate strongly for their interests. CSOs' primary objective within the realm of inside lobbying is to influence and alter the original agenda set by the Commission (Interview Partner 1, pos. 231-232). This is only possible thru a high usage of narrow access mechanisms, as it is the only form of direct contact with the 'government' which is seen as the most important path for CSOs in lobby actions (Interview 2, pos. 154 – 155) to provide the commission with their expert knowledge. CSO representatives view meetings with the commission as crucial to influence the setup and shaping the broader agenda *" […]because when you're at the start, the earlier you're in the process, the more likely your demands are going to get into the first draft. Trying to change something that's already on the train is already left, you know, is just becomes words and things, but if you really want to present ideas and get them in, you want to know who are the desk officers writing them, literally crafting the proposals […]" (Interview Partner 1, pos.168-173).*

Furthermore, umbrella organisations take on the responsibility of organising and coordinating the actions of other types of organisations for their members, but even for those that are not members. As a result, other organisations benefit from their high level of interaction with the Commission (Interview 3, pos. 254-261). In conclusion, the findings on the utilisation of narrow access mechanisms strongly support Hypothesis A, which posits that umbrella organisations can most intensively utilise these mechanisms (see Figure 3 for visualisation).

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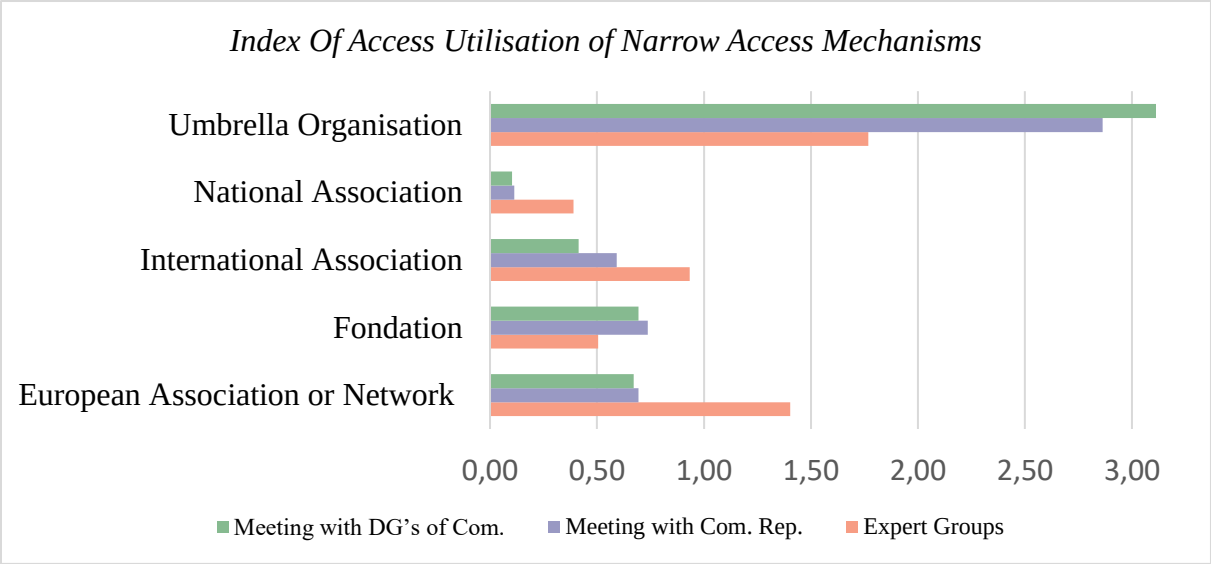

Figure 3: Index of access utilisation of narrow access mechanisms; Source: EU Transparency Register 2024 and Lobbyfacts; Own visualition

To contextualise the data further the dominance of umbrella organisations should be interpreted supplementary: The Commission is an institution with high technical demands, as noted by Bouwen (2002) (see 2.2 and 3.2). This technical aspect is primarily addressed by expert groups and meetings with Directorate-Generals that focus on the technical details of drafting legislation. Here, the focus shifts from broad agenda-setting to direct involvement in the drafting of initial legislative proposals. Overall, meetings with the DGs are meticulously coordinated, influencing the pace, priorities, and technical aspects of the policy cycle within the European Union. The high utilisation of DG meetings by umbrella organisations aligns with the view that they possess substantial technical expertise (Interview Partner 1, pos. 48-52). A similar pattern is observed for European Associations, which participate less frequently in general meetings with the Commission but are relatively more active in expert groups.

As elaborated in the limitations section of this thesis (see 4.3), the data from the EUTR does not cover every narrow access point identified (see 3.2). However, due to dual data collection, further insights were gained about the utilisation of access points:

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The insides from the policy experts showed those contributions to roadmaps, characterised as narrow access points, were not utilised by national associations but were highly utilised by European associations and umbrella organisations (Interview 1, pos.192-194; Interview 4, pos. 200-202).

From this context, contributions to roadmaps can be equated with meetings and outcomes of meetings with DGs, an access point for organisations searching for targeted access to influence initial proposals, following *Hypothesis A.*

Public consultations and associated amendments are furthermore characterised as the most institutionalised forms of access mechanism (Alemanno 2020, 116–18p.) and their perceived efficiency makes them highly sought after by organisation. Simultaneously, these access points are highly criticised in their execution. Word counts for amendments are limited to 4,000 characters (Interview Partner 1, pos.162-165), presenting a fundamental challenge for CSOs to suggest precise amendments to lengthy bills.

In this context, a national CSO elaborated that they frequently email the Commission to communicate additional information or positions not conveyed through other access points (Interview 3, pos. 283-287). However, this often results in little more than an automated reply. Therefore, one of the demands by the EU policy officer to improve current access mechanisms is to require mandatory responses from the Commission, similar to procedures followed by the Freedom of Information Act or the EU Ombudsman's office (Interview 3, pos.445-447).

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Regarding the role of the Ombudsman as an access point, the findings are very interesting and unexpected. After requesting data concerning the initiation of inquiries by cause groups through the Ombudsman, a comprehensive list of all requests from the previous legislative period of the EP (2019-2024) as sent. Of the 406 cases where CSOs initiated inquiries, 42 were identified as belonging to the environmental sector – the case scope of this study-, initiated by 31 different groups. Interestingly, a high number of these 31 Organisations

were not registered in the EUTR (16 in total; see Appendix C red part of the table) and therefore also not in the sample. This suggests that these Organisations are not engaging with any other access points within the EU, because otherwise they would have been asked to register.

Interviews reveal that the Ombudsman is perceived as a potent and intensive tool, with many CSOs feeling too diminutive or under-resourced to engage with it (Interview Partner 1, pos. 273-283), many because a legal team seems as needed. The data illustrates that, aside from a few very large European/umbrella organisations (see Appendix C), the Ombudsman primarily serves smaller groups – which are not registered in the EUTR- that lack a broader lobbying interest in the EU (see Appendix C). This put up an interesting dichotomy, of an access points utilised by the very ends of the insider-outsider spectrum. The unique pattern speaks against the categorisation of the Ombudsman as narrow access. As the sole access point enabling involvement in post-decision phases of the legislative process, appently different types of CSOs see their opportunities.

5.3 Trends of the Utilisation of Broad Access Points

Access points analysed and categorised as broad access mechanisms (see 3.2 for more insights) include membership in intergroups, unofficial groups, accredited persons in the European Parliament, and participation in EU-supported platforms.

The results of their utilisation are presented in the Index of Access Utilisation in Table 8. Notably, Umbrella Organizations have the highest utilisation indices across all access points again, particularly in intergroups (3.30x above average) and accredited personnel in the EP (2.88 x above average), stressing they are significantly more active compared to their average usage. European associations and international associations show relatively balanced access utilisation across all mechanisms, with values close to 1. Foundations and national associations

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exhibit lower indices. From the initial part of the analysis (5.1), it is known that broad access mechanisms are utilised more frequently than narrow ones, confirming *Hypothesis 3.*

Table 7: Index of access utilisation of broad access mechanisms

	Intergroups	Unofficial group	Accredited Pers. EP	Participation in EU-supported forums
European Association	0,35	1,07	0,91	1,15
Foundation	0,65	0,73	0,49	0,84
International Association	0,47	0,86	0,51	0,93
National Association	0,22	0,69	0,20	0,74
Umbrella Organisation	3,30	1,65	2,88	1,33

Moreover, the results about broad access mechanisms reveal three key insights, presenting the willingness of the CSOs to coalise for EU-supported forums, the unexpected high utilisation of broad access points by umbrella organisation and the easier access for "outsider" organisations to braod access points.

(1) Participation in EU-supported forums shows the least variance among all the access mechanisms analysed. This is supported with the finding that there is great support and willingness to contribute to pre-existing forums and initiatives others created. The data shows participation in forums without differentiating the role of CSOs in said forums - e.g., whether they were the founders, initiators, or purely actors who joined a pre-existing forum, and, thereby, utilised mechanisms and resources already created by other actors. If the data had presented the initiated forums instead of those where CSOs participated, the variance would likely have been greater due to the increased effort required. Accordingly, it clarified that every type of CSOs demonstrates a strong willingness to support the initiatives of others and to engage

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in coalitions (Interview 1, pos. 59; Interview 2, pos. 75-83). However, institutionalised broad EU-supported platforms are considered less efficient (Interview Partner 3, pos. 651-653).

(2) This leads to *Hypothesis B*, which suggests *that Umbrella Organisations and European Associations do not perceive broad access mechanisms as efficient*. The hypothesis can be partially confirmed. Hypothesis B anticipated that umbrella organisations and European associations would not always have the highest index value across all access points, based on the assumption that broad access mechanisms are perceived as too inefficient to warrant extensive participation, this has not been the case. The interviews reveal the reason: umbrella organisations and European associations participate in broad access points to encourage the lobby actions of their members, which also leads to the use of these platforms and forums (Interview 4, pos. 268-278 and 280-284), even though they have personal preference for narrow access points (Interview 4, 46-49 and 64 – 65). European and national associations revealed that mechanisms such as initiating a petition to the EP or participating in the participation portals[25] are considered good but not effective. Even very young associations agree on that perception, reflecting how widely this view is shared (Interview Partner 3, pos.651-653), Therefore, *Hypothesis B* is not entirely rejected. It becomes evident that the more insider the organisations are, the more they support effective measures, particularly through narrow access mechanisms (Interview Partner 3, pos.651-653), but utilise broad mechanisms as a wide tool of lobby coalition.

(3), *Hypothesis A*, which posits that national associations, foundations, and international organisations are more effective in utilising broad access mechanisms compared to narrow ones, can be strongly confirmed. Referring to Table 8 and Figure 4, it is evident that these three types of organisations are capable in leveraging broad access mechanisms well. Since foundations have notable participation in intergroups (0.65) and unofficial groups (0.73), while

[25] Such as "Have a Say"-Portal or the SINAPE Portal.

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international associations show a balanced use across various mechanisms, with values like 0.47 for intergroups and 0.86 for unofficial groups, in comparison to narrow access points. As elaborated in the theory this can be attributed to the structure of the EP and access options broad access points offer (see 3.2), such as the lower participation thresholds in EU-supported platforms, and the accessibility of EU bodies[26] (Bouwen 2002; Interview 1, pos. 215-229; Interview 4, pos. 181-192). The EP, the Committee of the Regions, and the European Economic and Social Committee are particularly accessible to national organisations through regional connections. This makes it easier for these organisations to engage with members who share regional concerns (Interview Partner 1, pos.215-219) and allows them to provide specific national contributions (Interview 3, pos.315-316).

However, lobbying within the European Parliament is less formalised compared to the European Commission (see 3.2). The Parliament, being significantly larger in terms of personnel and encompassing a wider array of opinions and stakeholders, makes broad participation perceived as less efficient than the more targeted communication possible with the Commission (Interview Partner 1, pos. 259).

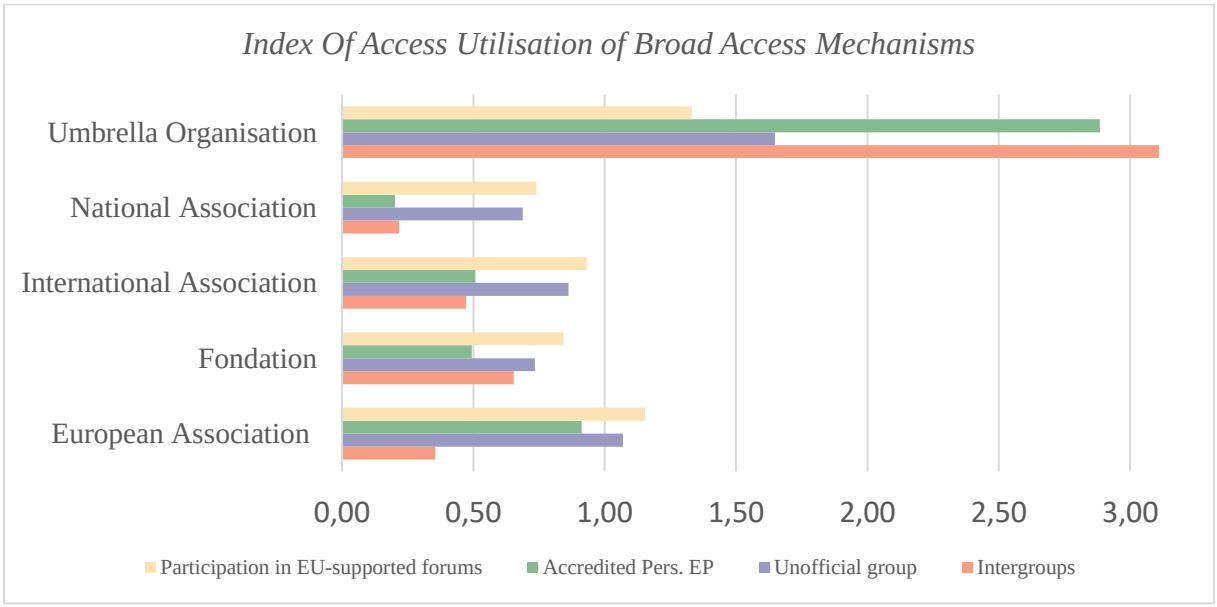

Figure 4: Index of access utilisation of broad access mechanisms; Source: EU Transparency Register 2024 and Lobbyfacts; Own visualisation

[26] Meaning the Committee of the Regions and the European Economic and Social Committee

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5.4 Outside Lobbying & Informal Lobbying

After presenting the results of the utilisation of narrow and broad access points for inside lobbying, the focus will shift to outside lobbying and potential organisational strength for informal lobbying. These indicators represent the other two major channels for lobbying action and can thus be considered as control variables.

A strong utilisation of outside lobbing by CSOs is a premise used in this thesis (see 2.2). However, existing research results also do not consider the different types of CSOs. A strong participation in outside lobbying is assumed due to their membership-dependent structure, which is consistently important for acquiring new members and retaining existing ones. This is clearly visible in the Index of Utilisation (see Table 9), where all types of organisations have high and almost equal indices. Due to the binary nature of the variable (see 4.3), it is evident that almost every CSO initiates and participates in outside lobbying. Foundations, which participate more limitedly in inside lobbying, have a stronger index for outside lobbying at 1,02.

Table 8: Further indicators: Index of utilisation

	Outside Lobbying[27]	**Offices in Brussels**
European Association or Network	1,05	1,77
Foundation	1,02	0,58
International Association	0,99	0,75
National Association	0,92	0,17
Umbrella Organisation	1,02	1,73

Looking at umbrella organisations, it becomes apparent that fewer of these organisations conduct outside lobbying compared to other types of organisations. Since their members are

[27] The outside lobbying covered here involves the creation or participation in campaigns, workshops, and similar activities. This is represented as a binary variable; see sections 4.1 and 4.3 for further details.

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other organisations that conduct outside lobbying themselves. An umbrella organisation conducts outside lobbying mainly in the context of large coordinating campaigns that include the entire sector. One notable result within the scope of outside lobbying is that none of the interviewed organisations would initiate a demonstration. (Interview1, pos. 294-298; Interview 2, pos.112-117; Interview 3, pos.298-299; Interview 4, pos. 397-403). Demonstrations are considered a common type of outside lobbying (Dür and Mateo 2013; Panda 2007; Rosental 2011). However, various reasons prevent them from doing so: the umbrella organisations state that they cannot initiate demonstrations because their members are organisations themselves; thus, demonstrations would have to be initiated by the individual member organisations. Interviewed European networks and national associations, embedded in national network structures, represent cities, mayors, think tanks, etc., and therefore would not call for demonstrations as a form of lobbying. Another national organisation, an independent national chapter of a large international association, also feels limited in calling for demonstrations. While demonstrations and strikes are just one tool of outside lobbying, their public nature and the social mobilization they generate make the focus on the availability and utilisation of inside lobbying even more relevant (ibi.).

Informal channels play a significant role in lobbying within the EU (T. Christiansen and Neuhold 2012;Interview Partner 1, pos. 46-49). Informal lobbying encompasses all activities not institutionalised, such as network building. Measuring informal lobbying with the methods applied in this study is not possible. However, using indicators like lobby budgets, the presence or absence of offices in Brussels or Strasbourg, and insights from interviews, it can infer informal lobbying actions by various CSOs. Having offices in Brussels is a strong indicator of informal lobbying capabilities, as it facilitates in-person networking, short-notice event participation, and other forms of informal lobbying. Table 9 and Figure 5 illustrate that European associations have the highest proportion of offices in Brussels relative to their total

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number, followed closely by umbrella organisations. This supports the argument that umbrella and European associations have an advantage in lobbying due to their physical presence.

The importance of in-person contributions is acknowledged and emphasised by European associations and umbrella organisations themselves: *"[…] you can also feel it when headquarters are not in Brussels 'cause people are a little out of touch and they're just caught up in their more national stuff. They just can't relate*" (Interview Partner 1, pos.336-342).

Conversely, national associations perceive a disadvantage due to distance, as highlighted: "*We had a retreat with Name of European Association […] with a lot of different organisations that work in the Name of European Association […] and I did feel a lot of them are a lot closer to the action. A lot of them that do work in Brussels. A lot of them. You know, we can't, we're not, we're not there. We can't go at the drop of a hat to advocate right there and respond as quickly*" (Interview 3, pos.224-229). From the perspective of umbrella organisations, two further advantages of informal in-person lobbying emerge. Firstly, informal conversations with DGs help in understanding the underlying logic of proposals, which sharpens lobbying actions and goals (Interview 4, pos.219-221). Secondly, and even more importantly, informal meetings facilitate the creation of informal institutions[28], which can open new access mechanisms, benefiting umbrella organisations the most.

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[28] Definition of informal Institution by Helmke and Levitsky (2004) "the rules and procedures structuring social interaction by constraining and enabling actors' behaviour." As exemplified in Interview 4 (pos.204-208), an unofficial but well-established mechanism between two institutional actors can be categorized as this. In the sampled case the Umbrella Organisation in question goes to meetings with the Commission on behalf of a DG. However, the DG is going to register it in their EUTR profile.

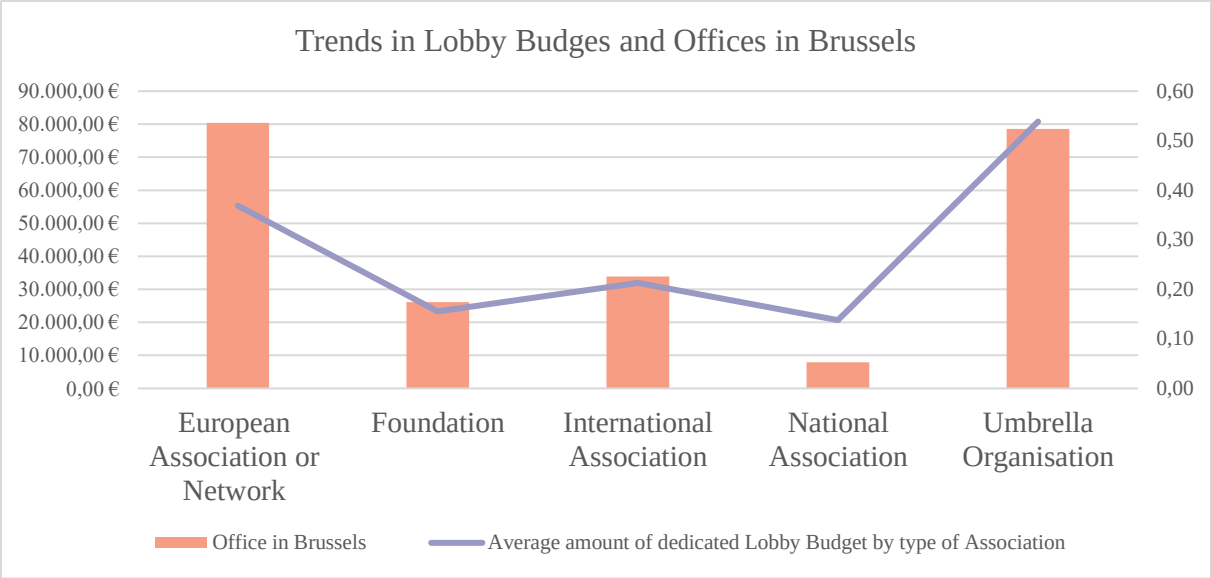

Figure 5: Trends in Lobby budgets and offices in Brussels; Source: EU Transparency Register 2024 and Lobbyfacts; Own visualisation

Regarding the lobby budget, the data should be considered an approximate value because it reflects the budget for lobbying purposes as specified by the CSOs themselves, which is somewhat problematic. Firstly, many CSOs do not acknowledge the term "lobbying" and consider their activities as policy advocacy. Therefore, it is questionable whether they would disclose a lobbying budget if they do not perceive their activities as such. Secondly, disclosing a specific lobbying budget is technically challenging. The work of EU policy officials and directors is inherently lobbying, especially when they interact with access mechanisms. Following this logic, their salaries could already be considered part of the lobbying budget (Interview 4, pos.320-322)

However, the values provide a good estimation (see Figure 5), showing that lobbying budgets are generally higher for organisations with more offices in Brussels. Figure 5 illustrates that while lobby presence in Brussels is not necessarily correlated, it is related to higher lobbying budgets. In other words, this analysis already showed strong differences in lobbying activity concentration towards umbrella organisations. This is also evident when examining lobbying budgets and office presence in Brussels and Strasbourg.

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5.5. Discussion

Access points were established to promote participation and equalise the process of gaining access for interest groups. However, the analysis indicates that these goals are not being fully met. Firstly, it became evident that even within the context of CSOs, having a strong insider position is often necessary to utilise institutionalised access points frequently. As a result, only umbrella organisations and European associations can effectively use these access points. National associations and international organisations struggle to utilise these mechanisms effectively, particularly the narrower ones. This leads to the dominance of umbrella organisations, especially during the initial legislative steps of the ordinary legislative procedure.

This raises the question if there is an issue with the dominance of one type of organisation using access mechanisms that are theoretically designed to be participatory. While it is inevitable that some groups will be stronger than others in a multilevel system, this must be considered within the context of existing political inequalities between business interest representation and non-profit interest representation. This disparity disadvantages non-EU associations, undermining the pride of the EU that the inclusion of CSOs leads to 'full' representation of European civil society.

The strength of umbrella organisations is not inherently problematic, as they unify and coordinate various organisations in the sector. However, my analysis highlighted that these umbrella organisations are essential for utilising access points in the sector of CSOs. Therfore it would only be rational that all types of associations should consider joining umbrella organisations. Hanegraaff and Ploeg (2020) noted that national organisations -business and CSO ones- are more successful when they are members of umbrella organisations. However, my findings extend this point and shows the necessity of umbrella organisations for effective utilisation of lobbying within the CSO sector, an infomation also needed for organisations themselves. However, the dominance by umbrella organisations brings along the classical

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dilemma of social corporatism. (Social) corporatism while emphasising cooperation among key stakeholders, can sometimes be criticised for limiting political pluralism by concentrating power in the hands of major interest groups, such as large corporations and trade unions or large umbrella organisations.

Moreover, some access mechanisms are viewed as participatory mechanisms for citizens and CSOs at the same time, such as petitions to the European Parliament or participation in EU-supported forums. This presents a dual illusion and challenge. The currently existing mechanisms are partly too difficult to access for loosely gathered groups of citizens (Hierlemann et al. 2022), yet at the same time, their low threshold makes them well-suited for more organised forms of citizens—namely, CSOs (see 5.3). However, these CSOs find the access points insufficiently effective for their goals, which go beyond mere participation.

Secondly, the qualitative analysis revealed that civil society organisations still perceive lobbying as a crucial informal process where presence and personal connections are influential. This is evidenced by the high 'office in Brussels' indicator for all types of organisations except national ones, even though not all types of organisations actively use the access points. While the 'office in Brussels' indicator is not conclusive evidence, it strongly suggests that in-person/informal lobbying plays a significant role. Some organisations were even unaware of all access points or viewed the broad access mechanisms as inefficient. These limitations in the study prevent broader claims about lobbying patterns but highlight the shortcomings of institutionalised lobby access and open the discussion on what institutionalised lobby access should look like:

The theoretical part of the analysis highlighted how inequality in interest representation manifests and biases exist within the current system. This suggests that efforts should be made to level the playing field for different types of organisations and counteract biases, making institutionalised access mechanisms crucial for achieving this goal. Moreover, increased transparency in lobbying activities is often equated with better lobbying regulation. Greater

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transparency is expected to reduce informality and enhance equality in interest representation, as emphasised by the OECD in their Good Governance approach (OECD 2013, 2021). However, the fact is that the EU is significantly more advanced in terms of transparency compared to many national states (see. 3.4.2 for more detailed elaboration on the quality of the EUTR). Therefore, the focus should be on expanding on the institutionalised access mechanisms rather than merely increasing transparency. In other words, the existing transparency in access points is excellent but ineffective if the institutionalised channels are only utilised by certain CSOs. Informal lobbying will not disappear, but developing well-functioning access mechanisms tailored to different lobbying groups and aligned with the legislative timeline can decrease it further.

Lastly, in the interviews a variety of challenges came to the surface, where the different CSO voiced their concerns and problem in carrying out lobby actions. One very relevant aspect in that regard is the 'noise' in Brussels (Interview Partner 1, pos. 177-183), meaning so many new lobby groups – mainly international industries - enter the playing field "flooding" the offers, even if European associations or networks have a high amount of members is can seem like irrelevant because the orders of magnitude are shifting, talking up institutional space, especially considering that the capacities of the institutions like the Commission can not grow with the demand: "*He hired 20.000 people and he is putting them one after another into Brussels to the point where they're creating a group of people to work on city network stuff. But it's not legitimised. Because it's not even European.*" (Interview 1, pos. 237-239). Lastly, an overarching challenge got raised: The utilisation of access points is only the first step; another crucial step is being recognised and classified as experts for their expertise by the instituions. This is particularly relevant for highly professionalised CSOs, despite their knowledge they see their recognition still partly in question.

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6 Conclusion

This thesis examined the impact of different types of civil society organisations on the use of institutionalised access points within the European Union. By focusing on CSOs in the environmental sector and their engagement with these mechanisms, the study revealed that the type of CSO significantly influences their ability to utilise access points. This finding challenges the common practice of treating CSOs as a homogeneous group and highlights the existence of distinct insiders and outsiders within this category of CSOs. Additionally, this thesis uncovered a number of important findings.

(1) CSOs actively engage in inside lobbying, demonstrating high ambition and considering it as very pivotal. While they make use of available access points, they also find some of these points insufficient. As a result, they adapt to informal procedures, seek insider status, or rely on the guidance of established insider organisations, which can limit their individual approaches.

(2) The study revealed a pronounced dominance of umbrella organisations in utilising access points. Its co-ordinating and agenda-setting role even determined the utilisation of the access points by other organisations. This indicates that CSOs need to be insiders to effectively use these access points, raising questions about the true nature of political pluralism and interest representation in the EU.

(3) The research highlights the underutilisation of access points by both national and international organisations. This points to the need for more effective strategies in this area and pointing out an overseen lack of political pluralisation in terms of public participation and access equality in interest representation within the EU.

(4) There was scepticism about whether CSOs feel the need for physical representation in Brussels to gain access. However, CSOs consider Brussels crucial for their interest representation and perceive disadvantages due to their national base. Quantitative indicators

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show a clear association between an organisation's budget and having an office in Brussels, indicating that well-resourced CSOs always consider Brussels key. Interviewees additionally highlighted the importance of informal contacts in the EU capitals.

(5) Lastly, my analysis contributes to the discussion on inadequacy of institutionalised access mechanisms in multilevel governance systems, concluding that current approaches may not adequately support the diverse needs of CSOs.

All interviewees stated that they perceive a change in the European landscape, with CSOs gaining more influence and being taken more seriously. However, it also became clear that much of this influence still occurs through informal procedures and institutions, which is not surprising given that lobbying has traditionally been an informal activity. Nevertheless, there is a pressing need for more effective and efficient institutionalised access mechanisms for CSOs and businesses. The perceived increase in the seriousness with which CSOs are taken is largely due to a certain political momentum advocating for the inclusion of CSO voices, but this change is not yet institutionally embedded. With the upcoming EU elections in June 2024 and the likely possibility of new leaders in European institutions it is unclear whether the possible change observed continues in the same direction .

The first step should involve strengthening existing mechanisms and organising access points in a more visible and structured manner. Currently, these points are a scattered patchwork of options rather than fully developed mechanisms which are taken serious in the legislative process. Additionally, certain lobbying actions should be de-informalised. The qualitative analysis made clear that CSOs navigate their ways through a system which was originally not made for a wide range of participatory action to find access. However, this leads to a situation in which only organisations with a high degree of insider knowledge are able to embed themselves in the European framework and can effectively utilise access mechanisms.

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The EU has not managed to be perceived as more participatory over the last few decades (Hierlemann et al. 2022), which weakens its democratic legitimacy and raises questions about the status of political pluralism in European interest representation.

Further research may focus on the importance and strength of lobbying coalitions. Researchers like Junk (2020b, 2019, 2020a) or Weiler and Reißmann (2019) have already emphasised this point to a great extent, but the research focus on CSOs remains marginal. This study has underlined, that research only focusing on lobby actions by individual organisation is not sufficient, therefore access point for CSO-coalition should be further examined in the future. Additionally, it would be interesting to extend this study to an outcome perspective, researching the effectiveness and outcomes of different types of CSOs as an extension to the utilisation-input approach chosen in this thesis.

Moreover, exploring lobbying behaviour within EU bodies like the Committee of the Regions and the European Economic and Social Committee would greatly enhance this line of research. As the presented thesis revealed, CSOs perceive these EU bodies as accessible yet inefficient. However, they are highly lobbied due to their regional and more inclusive approach. Therefore, it would be interesting to see which types of organisational interest representation achieve lobbying success within these under-researched[29] EU bodies. The fact that lobbying is influenced by informal situations to a certain extent will always remain. However, the debate on lobbying regulation and the restructuring of participatory processes should be conducted on a larger scale. While involving citizens is of utmost priority, institutionalised pathways should be expanded and restructured to integrate already organised citizen movements at the European level.

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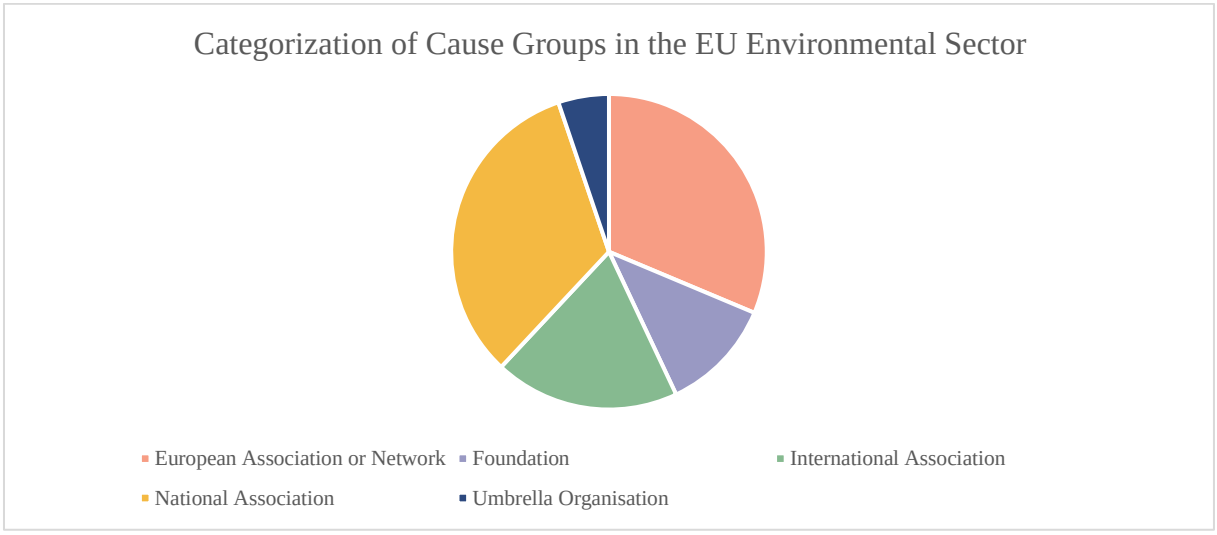
[29] Compared to the EU Institutions.

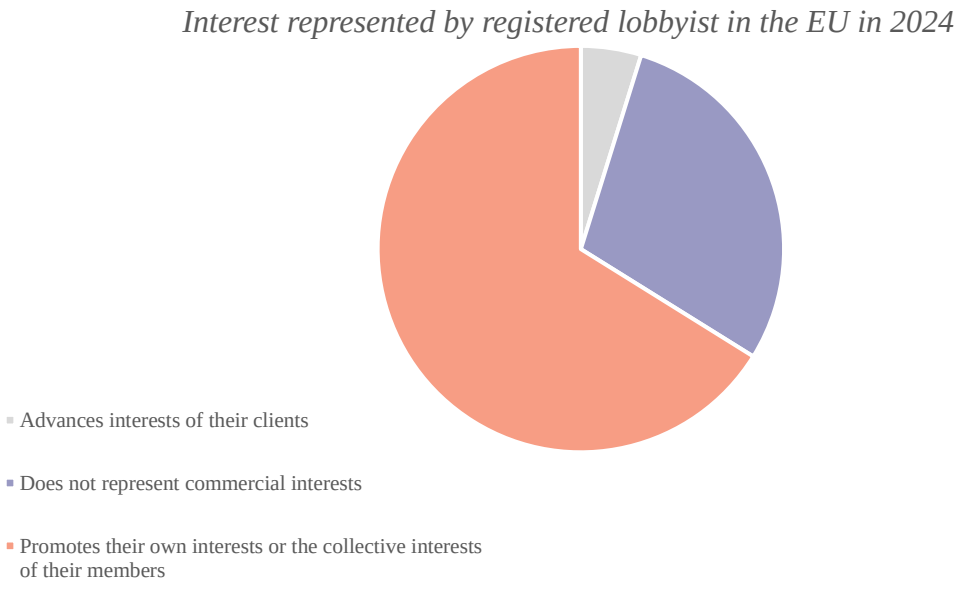
7 Appendix

Appendix A



Source: EU Transparency Register 2024, Own visualisation

Appendix B



Source: EU Transparency Register 2024, Own visualisation

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Appendix C

Coded extracts of the requested Ombudsman data with the reason of the complaint

Association	NR.	Reason of Complaint
Agriculture & Progress Platform Platform	1	Commission and failure to conduct an impact assessment with respect to its strategy for a fair, healthy and environmentally-friendly food system
Animal Welfare Foundation e. V.	1	Failure of the European Commission (DG SANTE) to address properly a complaint concerning mistreatment of horses farmed for blood serum production in certain South American countries
BLOOM Association	1	The European Commission´s handling of two infringement complaints concerning fishing practices in the Netherlands
CEE Bankwatch Network	1	How the European Investment Bank (EIB) took into account the environmental impact of the Trans Adriatic Pipeline and the Trans-Anatolian Pipeline before financing the projects
CEE Bankwatch Network (CZ)	1	The Commission`s approval of EU funding of a motorway in Bulgaria and the respect of the EU environmental law
ClientEarth	4	The failure by the European Commission to finalise an updated 'sustainability impact assessment' before concluding the EU-Mercosur trade negotiations
European Environmental Bureau	1	The European Commission's refusal to give public access to documents concerning the energy consumption and greenhouse gas emissions of the ceramics industry reported under the EU's emissions trading system
Food & Water Action Europe	3	How the European Commission ensures that the sustainability and climate impact of gas projects are assessed before their inclusion on the list of 'Projects of Common Interest'

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Friends of the Earth Europe	3	How the European Commission applied its internal rules on conflicts of interest concerning the appointment of a special adviser to the EU High Representative and Commission Vice- President
Friends of the Earth Europe and Zelena Akcija/Friends of the Earth Croatia	1	The European Commission's decision to include a gas terminal project in Croatia on the list of Projects of Common Interest (PCI) - cross-border energy infrastructure projects - and subsequently grant the project EU funding
Global Witness	1	How the European Commission dealt with a number of public access requests concerning meetings with energy companies
Hungarian Habitat Protection Society	1	FTR - the European Commission's failure (DG Environment) to acknowledge receipt of an infringement complaint concerning a Natura 2000 area in Hungary
PAN Europe - Pesticide Action Network Europe	1	Alleged refusal by the European Commission (DG SANTE) to perform risk assessment and apply hazard-criteria against active substances in line with Art. 4.1 of the Pesticides Regulation 1107/2009
PAN Europe - Pesticide Action Network Europe	3	An alleged conflict of interest in the work of the Commission's Scientific Advice Mechanism due to an inadequate policy on declarations of interest for invited experts

ANIMAL RESCUE POLAND	1	
Asociatia Proprietarilor de Terenuri din Zona Zetea	1	Complaint against the Ministry of the Environment in Romania
Comitato NO-TIR centro abitato	1	Compliant against the Italian authorities concerning the circulation of heavy good vehicles in an Italian town
Ecologistas en Acción	3	The European Commission's refusal to give full public access to documents concerning statistical data on pesticide active substances reported by Spain
Filoi Archeologikou Mouseiou Marathona	1	How the European Commission dealt with a complaint that Greece breaches EU environmental law as regards restoration of a landfill site - CHAP(2021)04039

Foundation Kanal	1	The EU Publications Office refusing to publish a notice for tender in the Official Journal of the European Union
Gauss International	1	The fairness of the Commission´s assessment of a bid submitted in the context of a public procurement procedure concerning monitoring and reporting on the UN Framework Convention on Climate Change
Grupo Moradores Alcarraques	1	Complaint against the Portuguese local authorities for granting a permit for the enlargement of a factory located in a residential area and failing to address complaints about the pollution caused by that factory.
Institute of Energy for SE Europe	1	The European Commission's failure to inform an applicant of the follow up to tender procedure "Fighting Energy Poverty in the Ionian Adriatic Macro-Region" (NoENER/C2/2017-463)
IWFA - The Irish Wind Farmers Association	1	How the European Commission dealt with a State aid complaint about commercial rates for electricity producers in Ireland
Killybegs Fishermen's Organisation Limited	1	The European Commission's refusal to give public access to documents concerning an audit of pelagic and tuna fisheries in Ireland
Plastic Planet Austria	1	The European Commission's failure to reply to a letter concerning the use of micro-plastics
SEA SHEPHERD NEDERLAND	1	How the European Commission dealt with a complaint that Denmark had breached EU environmental law (Habitats Directive) (KT 21/02/2020)
Sipiada - Platania Environmental Association	1	The European Commission's alleged failure to assist the complainant in making a complaint about the Greek authorities' management of an EU-funded project – Platania harbour
Stowarzyszenie Pracownia na rzecz Wszystkich Istot	1	The European Commission's failure to take action to prevent infringement of EU law in the context of a road investment project in the region of Lesser Poland and its detrimental consequences on the European hamster (Cricetus cricetus)
VAS Associazione Onlus	1	The European Union Aviation Safety Agency (EASA)'s failure to reply to correspondence concerning the environmental certification of an Italian airport
Zukunftsforum Natur & Umwelt Ortenau e.V.	1	The European Commission's failure to acknowledge receipt of an infringement complaint against Germany (Natura 2000)

Source: Requested data from the Office of the European Ombudsman, Own visualisation

Interview 1

Speaker 1 (00:00):

So, this is a European Network. Ours is the oldest one, the one that focuses solely on more the climate, energy environment that sort of green stuff rather than social issues and, you know, some city networks also have a very strong international first focus and then they parachute down into various regional levels. But we are really a European, meaning the member states of Europe. We have cities, 2000 cities and small towns, particularly across, the different countries of the EU. So, we have a Brussels office here with 15 odd people, couple people work in different countries remotely. And then the main headquarters is in **** with about 50 or so people. And all together, this is a real project based focused network. So, we bid on projects with other NGOs to get funding from grants like Life and Horizon.

Speaker 2 (01:23):

European grants.

Speaker 1 (01:26):

We also have a paid membership from the members. And the members are towns and cities. So, we're really representing the voice of mayors trying to bring key policy messages up to the European and or national level. And often when you do a project, there's some recommendations at the end of the two years or, you know, so we kind of get to know the real on the ground challenges of implementation, of adaptation plans, things like that. And then how we work is, you have your staff that are dedicated, people that are hired by *name of the organisation*, but a lot of us, mainly work on projects that are that have been bid on by *name of the organisation*, but it's really the staff that run those projects with their own names and everything. My work is to kind of coordinate the EU level policy stuff for *name of the organisation*, basically disseminating and making sure that members are aware of what's coming up on EU stuff and or feeding messages from working groups of cities like climate practitioners back up to the EU and attending conferences. Like there's a kind of classic Lobby group of activities that most of the NGOs do.

Speaker 3 (02:40):

Do you consider yourself as an umbrella organisation? Because like, your members as cities and not other, but also other organisations?

Speaker 1 (02:52):

We don't have other organisations of organisations. We're not even an organisation. We're actually an association. We're a network. We're not an organisation with a, like, philosophy, trying to push something. We're an association of a network of the voice of cities. So that little guys who never get to say anything to the top level, have a way of collective voice.

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Speaker 2 (03:18):

They subscribe to like certain goals that we have, right. On like climate neutrality, on nature, reputation. So like before you become a member, a paying member, you need to be subscribed to our goals in the manifesto that we have, which you look on online. So, in a way, by becoming a member, you already politically taking a stance by joining a network. And also, this gives us the kind of the legitimacy to talk, for our members to national and European counterparts, right. And I think it's also really important that I think generally, if you talk about policy advocacy, there's probably three channels -How we do- So. One is we present them nationally and on the European level in the form of "Name of **Speaker 1"** and European policy coordinators, national coordinators. The other thing is through our project, we have all the, most people working from *name of the organisation* are project officers, but they are also many times in direct contact with people working for the European Commission. And European Commission, they do have like a very hard stance. They have goals, they have targets, there's laws, but also in these kinds of more informal meetings, of course, we are working on the ground. So, when you are doing project on advocating, they're like "Hey, what's working and what's not? Can we get your advice?" So, these are more informal ways of policy advocacy. So that's the second channel. And then of course, there's a third channel in a way that we have bigger projects, especially for example, the "Name of project", which is a project that represents all mayors, almost 10.000 mayors within Europe. And when we were always organizing meetings, we give them a stage talking to the DGs, to the highest level DGs to the commissioners, and also give their message, their messages across to the European commission. So, in this way, we are facilitators less actually the policy advocate ourselves. So these are kind of maybe the three. And then, actually in the fourth way, I think is also that we join coalitions as well. So, for example, I am,

Speaker 3 (05:27):

And I also see like a lot of joint letters, for example on your website.

Speaker 2 (05:32):

yes so, the Community Power Coalition that I represent climate lines there. And you at the

Speaker 1 (05:38):

Coalition for energy savings.

Speaker 2 (05:40):

Yeah. So, these are ways in which we, I think these are, and talking

Speaker 1 (05:44):

A collective issue.

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Speaker 2 (05:45):

It's a collective issue. And because you were asked, I think the main challenges, like the question that you had like challenges of NGOs and CEOs, I think we consider ourselves an NGO while we are officially an network, right. Experience

Speaker 1 (05:58):

We act like one.

Speaker 2 (05:59):

[experience] curing social influence. So these are the kind of the four ways we have. I think we don't really measure these. I think when I, when I've looked in the past, to what extent we have been effective, I think there are probably scientists like yourself have smart ways in doing so. But if I look at my own work, like the only way I kind of saw that maybe there was like an effect, like there's two things that I have to say about this. One is that there's, I've read a report, and maybe you know about it as well, is that when you look generally at, policy advocacy influences and the policy advocacy environment within Europe, you see that actually there's more people and more money going to over the past 10 years, more people and money representing private interest versus CSOs and NGOs. So, this has been the trend, right. More money, more people. But although, so that would, with these kinds of factors, you would expect that those lobby groups have more influence. What you see as well, and that's research is so, is that even though in those infrequent moments when with coalition letters and with that we talked policy letters, they take the European Commission tends, or maybe MEPs as well, tends to take our concerns more seriously and maybe we representing European public goods, and therefore in this way, we do tend to have an unrepresented, like an over like our, like influences overrepresented for the numbers that we actually have, right? So that is, at least what I got from this other research paper. When I'm looking at my own activities as being a small kind of radar within the machine of the power coalition, there are people who are much more expert on this than myself. But just to give you an idea about this, is that there was the Electricity Market Directive, which was recently I think it had not gone through dialogues, but it is pretty far right now. And with this community power coalition, we focus on, energy communities, energy sharing, self-consumer, et cetera and we did write a letter to them before it was published and people were consulted. And we actually ended up having a talk with the people who were drafting this letter. And they really felt, we really felt we were listened to, although not all demands ended up within the final electricity market directive, we did see that some of the suggestions we made actually were picked up, right. So yeah, this is kind of showing an example of how we do have impact. Again, we, I can't guarantee you that this is because of our work. But I do feel that there are still, but I can also give you another, a bad example and then I think **Speaker 1** can add a bit, as well on our recent policy advocacy, more from *name of the organisation*. Is that, I think generally this is more kind of meta, but I'm not a scientist. Don't take my word for it. I feel you generally, you have three kinds of

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bigger issues when we're talking about climate and the climate issue, it's like energy, nature versus transport. These are kind of the big topics and I feel that we are more taking seriously within the energy domain. So, energy sharing, renewables, et cetera. You see, there's rising ambitions. I do think the reason for this is that generally the industry has also have seen the light, and they also want clear guidance from the commission on becoming more sustainable and stuff like that. So I think we have the winds in our back in this case, right. So, there's a generally understanding, especially after the invasion of Russia in Ukraine that we need to become more self-sufficient. So also, this was like a big push for renewables. And it tends to see that organisations like us seem to be more successful policy advocacy rise on these topics. When you look at nature, for example, I did a recent analysis, and this was more out of my own interest, but also because it was relevant for the city network as itself of what the last, the past six months, or even four to five months, what kind of negative influence or, and the big influence of agricultural lobby, but also pharma protests have had on changing or reducing the imaging green deal legislation. And that's huge. Like, I think it's insane. Of course, you can say like, Hey, this whole green deal thing, like, right. The fact that, there should prove that, green organisations have had a really big influence of the fact that this kind of extreme ambitious legislation was formalised. But I think it was also just the ambition of the political party within the European Parliament and we can't claim a lot of that effort. But it is also, it is an example of this agricultural lobby and this former protest. How big of an influence this type of private lobby has. And against the interest of all CSOs and NGOs who hold the climate and nature and biodiversity dear, right? Like I can even send you an overview after this talk of what kind of the facts were. Of, because I did the research for myself in the presentation. What huge parts of the green deal, and I think you probably heard already, the natural nature restoration. But also, like more or less known legislations on pesticides on the world water resiliency strategy, et cetera, have been delayed, independently delayed in going forward. And this has happened only in the past five months. Again,

Speaker 1 (11:51):

it's a backlash.

Speaker 2 (11:54):

But then again, like, I don't know to what extent, it is less an answer to your question. What are our own challenges? I think it's more an answer to the question how powerful these other interests are. So I think that's maybe, the better answer to that, to another question maybe, but it

Speaker 3 (12:19):

So, this is also more about like how powerful inside and outside lobbying can be?

Speaker 1 (12:26):

And the forces,

Speaker 3 (12:27):

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Like inside lobbying and outside, it would just, like, most of the time, like more specific, more efficient in the sense of like changing certain nuances. What you're saying backlash about outside lobbying or demonstrations in general.

Speaker 2 (12:43):

Yeah, it was probably, it was inside plus outside, right. It was like a strategic attack because the agricultural lobby as well, the question is and then I think it was a good combination of agro lobby and outside lobby and inside lobby together. Again, I don't know the details of this. I only saw the results and these were against the interest of our organisation and many other NGOs and CEOs. That's the only thing I can know. And that also kind of says a bit about our own influences, right? Or to get this message through

Speaker 1 (13:18):

What for your research, what else, what is it precisely you'd like me to

Speaker 3 (13:22):

What do you perceive as your most influential policy, advocacy instrument? because like now you were mainly speaking about the commission

Speaker 1 (13:46):

which is very powerful!

Speaker 3 (13:49):

Which is very, powerful.

Speaker 1 (13:49):

Very informal, is direct, you know.

Speaker 3 (13:51):

I'm also interested if you would see having more access to the commission and to the parliament as useful? If there would be like a new public participation mechanism you could create, where in the point of legislation would you perceive it as useful to delve into?

Speaker 1 (14:15):

So, well, first of all, you know, all these public. There are always public consultations which are required by, you know, after they do an assessment where they do all the technical assessment of like, there's a classic policy cycle and then, so we often will write as *name of the organisation* an opinion within 4.000 characters of what we feel it needs to change, like in the governance regulation. But you know, for public, the parliament is important when it's final amendments on a draft, you know. But really the

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most important thing is the coalitions and the groups of people who have relationships with the negotiators and those drafting inside the commission, the proposal. Because when you're at the start, the earlier you're in the process, the more likely your demands are going to get into the first draft. Trying to change something that's already on the train is already left, you know, is just becomes words and things, but if you really want to present ideas and get them in, you want to know who are the desk officers writing them, literally crafting the proposals, or even the communications that come out, if we're talking about European level policy, when communication is written, it doesn't just come out of nowhere. There's lots of millions of, you know, meetings going on all the time and getting the right meeting with the right level and saying, we, you know, so for an example right now with it being a, it's an odd year 'cause of it's the elections year and everything's wrapped up. You know, the problems now are like, how will they implement the green deal? Will there be further edits to it? I would say that now it's really about the bigger voices get heard in the noise. And there's a lot of noise in Brussels right now. You've got 2.500 different lobby groups, groups out there. Many of them mainly paid for by lots of money from industry or even international groups that it shouldn't really be meddling in European politics or policy, but who have no cash to pay for people to take a nice shiny job in Brussels and go and spit it out. So, what we, for example, as one city network, which sounds kind of cool with 2.000 members, but it's actually just peanuts. So, with the seven other European city networks we've bound together in the last few months, called ourselves the local alliance. So, we can speak with the media. Written a fancy letter, called out our three main points, backed it up with policy asks, got the directors to sign it and sent it to van der Leyen and the seven main commissioners that, and all the DGs that matter waiting for reply.

Speaker 1 (17:09):

Was made public yesterday, but like, we sent it to them for three weeks ago to give them a chance to see. So stuff like that gets messages up there. But that's more classic lobby letter.

Speaker 3 (17:21):

There are all the more other public participation mechanisms. You already mentioned the open consultations I saw on the transparency register. You're member in an intergroup of urban areas. You have contribution to roadmaps, but I'm just like naming some others. Can you just say yes or no if you used or heard them before? Like, have you used the "have your say portal" for the consultations?

Speaker 3 (17:59):

The "have your say" portal ?

Speaker 1

but we have used it. We have used it in the past for the governance regulation

Speaker 3 (18:09):

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Have you, have you initiated or participated in petition the EP?

Speaker 1 (18:16):

Petition the European Parliament?

Speaker 3 (18:17):

Yeah.

Speaker 1 (18:18):

As in gone and talk to them and tried to lobby and chat with them?

Speaker 3 (18:22):

No. NGOs or citizens can initiate petition.

Speaker 1 (18:28):

Um, we haven't really petitioned them, but we're planning to try to make contact with them. Once the elections are gone through.

Speaker 3 (18:36):

Do you interact with – what I could see as very useful – the committee of the regions?

Speaker 2 (18:43):

All the time. Yes. Strong tries there. We have a favorite partnership agreement with them directly.

Speaker 3 (18:49):

And also, with the EESC?

Speaker 1 (18:53):

Not so much, but yes, for the energy poverty advisory hub, they work more closely because they've been covering topics of energy poverty in the last year. So, they've invited some of our colleagues to go there and talk to the European Economic and Social Committee. Yes.

Speaker 3 (19:10):

Okay. Great.

Speaker 1 (19:12):

You know that that's more of the formal organised civil society treaties thing. But the real stuff honestly gets done months and months before by the main NGOs in Brussels. The EESC is a bit of a playful parliament thing.

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Speaker 3 (19:29):

These are the nuances which are so hard to grasp, as a researcher and obviously as a citizen as well.

Speaker 2 (19:39):

if you want more you go to *names prominent Umbrella Organisations of the sector* those guys are the ones that set the agenda. But I'll say like, he kind of touched on that private side of pushing people's agendas through. There are more and more private investment people who are kind of setting up shop, hiring people to do whatever they, whatever their charity believes is important for, and then they just use their agenda. And that's a little bit more dangerous if it's not even European kind of democratic, you know, collective voice. It's like someone with, just like Bloomberg for example, is just behind so many things in Brussels now. Because he makes a billion euros a month. So, he has lots of money. He's hired 20.000 people and he is putting them one after another into Brussels to the point where they're creating a group of people to work on city network stuff. But it's not legitimised. Because it's not even European.

Speaker 2 (20:46):

I think another thing of the most powerful policy advocacy, apart from us kind of combining, representing more cities within Europe or teaming up with other people are proponents of energy sharing and energy community. I think also one of our things that we can do really well is you have, for example, these NECPs, the national Energy Climate Plans, as we represent about five to six countries within Europe, we also really, try to push not only on the European basis, but also on the national basis. We show that, and hold also the European Commission responsible is that a lot of their legislations is not properly transposed within state.

Speaker 3 (21:52):

So, complaining to the commission?

Speaker 2 (21:53):

Exactly. Complaining about it. So, I think in a way, although this is policy advocacy, but this is actually policy not so much for more legislation, but just for things to be actually implemented.

Speaker 3 (22:06):

Also maintaining?

Speaker 2 (22:07):

Yeah, exactly. To maintain. And I think our power is that we have with *name of the organisation*, but also with other networks which we're involved in, we have direct insight because we have people on the ground there who know the very details of this legislation. They speak the language, et cetera. So that

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gives us an edge as well. I think directly to MEPs, I think we don't do that so much as a network. Like there are other

Speaker 1 (22:38):

Networks do it though. So, they might invite us to join the meeting and pop in a few of our key points. But like, I think that's also why we all join forces is if there aren't enough staff and resources to do it all in one go. So, by being in a coalition, you'll have like the geeky energy efficiency expert with a PhD just on energy efficiency. Then you'll have like the other NGOs that have all the communication contacts for the media. And the next group is really good at networking, has all the commission contacts. You put that all together and then you know, you get somewhere with that.

Speaker 3 (23:10):

Amazing. Thank you so much for your insights. I have two super short questions. Because you were speaking about claiming towards the commission or complaining: do you also use the Ombudsman for like keeping the commission accountable?

Speaker 1 (23:29):

No. Too strong. That's more for bigger legal issues.

Speaker 3 (23:33):

Okay.

Speaker 1 (23:35):

But other NGOs would do that a bit.

Speaker 2 (23:38):

You think? You think *Name of an Umbrella Organisation* would do that?

Speaker 1 (23:40):

Like the German NGO *name of Organisation* is hiring a legal team because Germany didn't do a proper public consultation on the NECPs. So, they were like, that's not okay. And then what are they going to do when the social climate fund asks for the same thing and Germany pushes it aside.

Speaker 2 (23:59):

They said also the Ombudsman, though

Speaker 1 (24:02):

That's not the Ombudsman thing. We don't use it too much, but

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Speaker 2 (24:08):

No, not at all.

Speaker 3 (24:11):

Okay. And the last question is: Would you, as a network, also do like outside lobbying in the sense of calling for demonstrations? Or is this also something you would not do?

Speaker 2 (24:27):

Not so much as city networks don't do that so much, 'cause we're kind of like a light public body. We're representing small governments and governments don't tell the people to go to the street. They try to tell them to go home and not go to the street. So if you're in *Name of an Umbrella Organisation* Europe, sure you can go and make a campaign in front of the Berlaymont-Building of the commission. But if you're in a group like us, we have to be a little more careful because the mayors will freak out.

Speaker 2 (24:51):

But two things. And I think that's interesting is that we do, I think it is a fine line between outside lobbying and campaigning, right. So, like, campaigning in a way I feel is also outside lobbying. So, we do, so we do have campaigns, like big campaigns that like, have gained a lot of attraction and a lot of attention. So, one of them is the "green footprint". Climate footprint. So that is big. Like kids walk to school instead of taking the car or whatever. And we collect like millions of them in Austria and Germany. And we actually go to the union secretary at the cop, and like present that to the union secretary and say like, kids with policy advices from kids on these footprints. So that is a very big deal. Those are like one of our key moments on the international level, although we don't have a lot of influence, there generally, but this is a big moment. And we also organize very successful campaigns regarding the energy caravan, which is like getting people to renovate their houses, renovate make them more energy efficient.

Speaker 2 (25:59):

And then we also have a campaign that's extremely successful, is getting people to bike more, mainly in Germany but also in Austria. And we're thinking of like exporting this as well. So, we do have big outside Lobby activities, but this is also something we believe in, but it's also a product. So, we sell these campaigns too. We are nonprofit, but to help municipalities organize these things are our members. Those are actually a couple of moments of, of outside campaigning, which I feel are, are quite successful. But they are more German based than European.

Speaker 2 (26:51):

So, and then I think maybe that's also good because we are in the Brussels bubble. And then the final thing that is more Brussels bubble based is that, again, this is really weird, but we have a, a project called

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"Climate Pack". Well, not really weird, which is bottom up, right? A top down, citizen Climate Action. So, like the European Union says, "here's a lot of money to get people involved with the climate". So, it's weird right, creating it's top-down citizen movement. But actually, as climate lines, we are one of the bigger partners of this climate impact. And then in this way we do partake and organize people to get to climate protest. I'm not the banner of the Climate Pact, which is a project by the European Union. But we are also co-coordinating. We actually do pull Climate Pact ambassadors to protest. So, in a way, this is also an outside lobbying activity, but we do that because also we are paid for it, but we also believe in it.

Speaker 2 (28:00):

Everything we do get paid, right. Because we otherwise we need to run our business. So, in a way, we do get paid for everything, but we are very transparent about our values and our positioning.

Speaker 3 (28:10):

And I guess like all of that is kind of preconditioned to be based in Brussels? So, do you have the feeling that networks like yours could also do that without having a headquarter in Brussels?

Speaker 1 (28:24):

You don't need a headquarters in Brussels, but just about everybody who has an interest in European affairs has a side or a branch or a person on, like, there's a lady who works down the hall here. He's just a single person looking at food issues, food law. But all of them are based in Hamburg and London and wherever. So Brussels has a little bit of everybody, because if you're not here, you're not going to be able to attend the conferences and the working events and the socials and get the contacts. And you can also feel it when headquarters are not in Brussels 'cause people are a little out of touch and they're just caught up in their more national stuff. They just can't relate. So, it's very useful to have an office. It's also more European based. Everybody in our office is from a different country. Like, we're just not, even though we might have stuff going on in Germany, he's Dutch, you know, like everybody's from Bulgaria or wherever. So, it's cool that way.

Speaker 3 (29:18):

Thank you so much. This was very, very, very helpful. Thank you for all the insights and like from my side, good luck.

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Interview 2

Speaker 1 (00:00):

Speaking about what you just said working on the national level, so how would you, so *NAME OF ORGANISATION* is such a big organisation? Your Organisation has an international level, and you have the European level and you also have the national level. *NAME OF ORGANISATION* of Romania is also part of the *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION*?

Speaker 2 (00:26):

Yes.

Speaker 1 (00:27):

EUROPEAN ASSOCIATION OF THE SAME ORGANISATION I mean. And how from what, uh, from what your experience so far, how is it interconnected? So *NAME OF ORGANISATION* Romania is an entire entity by itself. And you only work on national policies or do you also work on European policies?

Speaker 2 (00:50):

Yes, it is of course interconnected. We also have another layer of *NAME OF ORGANISATION*, which is the *NAME OF ORGANISATION*. The work of *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION* is mainly coordinating our input from the different countries. So, in *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION* there is also Ukraine. Which is outside of the EU. So, they normally collect our inputs and then, represent our different position in Brussels. But in some cases, we are liaising directly with Brussel. So some topics are all the same. Others that are not. So, in some cases, for example, for forest, we are working directly with our office in Brussels. So we don't work directly with the commission. So we work with our office in Brussels, which is trying to represent all of the different, 27 member states. Yes, but we have to analyze, different levels of policy. For example, one of, the last inputs we sent was the UDR deforestation-free regulation, because we saw that, it had some repercussions on the Romanian forestry system, which is peculiar to Romania. And so, we informed our *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION* colleagues, but we wrote directly to Brussel, bringing our concern. So yes, there is a lot of work also at European the parliament.

Speaker 1 (02:39):

So, these are the two channels of communication for *NAME OF ORGANISATION* Romania in case, you want to impact EU policy, it's through the *NAME OF ORGANISATION* European Brussels centre. And then *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION* is also communicating to the Brussels office?

Speaker 2 (03:03):

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Yes, but we're quite free to work directly with our European office.

Speaker 1 (03:10):

Okay.

Speaker 2 (03:11):

The *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION* level is mostly, working with us on projects. So, they help us a lot in raising funds or in some contact with some corporate partners. But on the policy, we are quite free to work directly with Brussel. Yes.

Speaker 1 (03:32):

And then how would you decide if something is important to also do policy advocacy on a European level? If it's, if there are certain acts which is it more, sector-wise, that forest or is it policy specific?

Speaker 2 (03:51):

In general, it depends on where we have competence because we don't cover all the fields the international level has and where the specific threats are. I can give you an example that is hydropower. So hydropower we have one colleague who is particularly competent in this. And the threat in Romania is quite big. And it's something where we work a lot, for example, with our Balkan colleague in Serbia. Other colleagues in *NAME OF ORGANISATION*, for example, don't work as much as us on hydropower. So in that case, we communicate directly to the European office. And also, in that case, they don't have much competence, in Brussels. So, they take whatever we say as the position of Romania and they try to integrate it into a wider discussion on renewables. And so, on that, on our peculiar problem, we can also try to make to include it in the wider position. It's not always easy when some only come from a country, but we are trying to, you know, make our case strong.

Speaker 1 (05:11):

For example, the European Council, the Council of Ministers, is then more related to the national level. Is it something that would it be an active strategy decision to meet the national ministers more often as a gateway for policy advocacy positions in the council or is it something which is not worth it?

Speaker 2 (05:38):

No, no, definitely. So depending on where we are in the discussion in Brussels, if it's something on the commission, then we work through our *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION*. But then if it's something in the council, it's the other way around. So, the *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION* asked us to work with our ministers. And it's the case, for example, on the wolf protection, I don’t know if you're aware of this story. And so, in this case, we have to work on our national office so we can have similar positions, but then it depends on our ministers. So that's national.

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Speaker 1 (06:16):

And within this national work, do you also work together, or strategically work together, with other civil society NGO organisations or other businesses for policy advocacy? Or is this mainly because you're already so embedded in *NAME OF ORGANISATION* in general that there is no one you reaching out to.

Speaker 2 (06:44):

No. Yes. To yes. We work also with other NGOs, especially because they all see with society in the sea country is quite new, is something that started 15 years ago. And there is not, so let's say there is a lot of specialization in the NGOs. So we've, for example, *NAME OF ORGANISATION* has a strong competence on forest. Other NGOs bit less are more, let's say competent on wildlife or on protected area. And sometimes only on some areas of Romania. So in Romania we have, coalition "Natura 2000". So this is formally coordinated, but it has a very strong focus on wildlife. There is another coordination of energy and climate NGO, much smaller than the Natura 2000, so in this case, we try, for example, on the Natura 2000 on forest, we try to have the same position and send it through the coalition to the minister, or we send a letter to the minister on the worth on behalf of the coalition.

Speaker 2 (07:58):

In some cases, it's us that brings the topic in other cases it's another NGO. And then we, we join position. So, yes, definitely there is coordination. It is not as strong as in Brussels where there is a formal coordination on different topics, but it is happening. And on this, we don't have to discuss our national coalition with our not *EUROPEAN ASSOCIATION OF THE SAME ORGANISATION* and EPO offices, absolutely not. So we decide with whom we speak. Sometimes, for example, in this other coalition Natura 2000, *A big International Organisation* is not in, but in some topics, we work together, in other topics no. So it depends on case by case.

Speaker 1 (08:50):

But this is for civil society organisations, but you would not do it, would you also do that with business organisations?

Speaker 2 (09:00):

Yes, we work a lot with business, not on advocacy. Well, it's not true now that, there is this big fight on the forestry code, we are trying to work beyond the national NGO because sometimes we are perceived by the government as being, you know, the tree huggers. So we want to bring a case stronger outside of the environmental community. So we are trying to work with the productive sector and show how the forestry could impact, for example, the economic sector in the field of furniture, small businesses on furniture. So that's something we're not super strong on, but it's something we are trying to work more on in the forest sector yes. On others, we are trying to have this dialogue, but it's still a big ,

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Speaker 1 (10:03):

But interesting. What you described, and I know *NAME OF ORGANISATION* and the work you do, and your position is very policy advocacy insights of more technical terms. But would you also, what is your perception, of how *NAME OF ORGANISATION* Romania perceive strong outside advocacy? So, you do a lot of inside lobbying, but would you also do outside lobbying in a sense of organizing demonstrations in the national sector or how, why does *NAME OF ORGANISATION* Romania stand on that as it is?

Speaker 2 (11:10):

I think as a national office, we cannot do it outside of our national jurisdiction. So, I know that *NAME OF EUROPEAN ORGANISATION* is doing a lot with, let's say wider stakeholders. For example, on the nature restoration law, they try to speak with different organisations also * NAME OF AN ORGANISATION* For example, seek to also, be beyond definitely the NGO group. So,in the [advocacy lobbying], there are some parts of the productive sector that we cannot talk to, for example, you know, you can imagine big companies all oil and gas are not partnering. And we have a due diligence procedure to also check with whom we can work and with whom we cannot in those cases. Advocacy, I wouldn't say we have ever done advocacy with big companies. I don't think it happened, but definitely an economic group that has similar position to us on nature, yes. So, this is a lot. At the end, we are looking at the end goal. And if, you know, the politics can hear it from the economic sector and from us as beneficial. The nature law is definitely something we are doing also beyond Romania.

Speaker 1 (12:53):

And what are your challenges in the advocacy work you are doing? What are the problems? there are the burdens of where you reach, is it in contact with just the ministers or do you see institutionalised problems where you're always bumped into?

Speaker 2 (13:19):

So I think the main problem in Romania is the perception of the NGO and the perception of the environment. So this, as I said, is a new democracy. This is what you can find in other places of the world, let's say today, I was talking to the US embassy, so it's different there because of course the consultation is part, or even in Brussels consultation or part of the, policymaking process here is something new that you need to release your documents and everybody can comment. So, it's still something that they have to include in their mindset. I don't think it's voluntary, it's just something new and I mean 15 years is nothing in the history of a country.

Speaker 1 (14:15):

Yeah.

Speaker 2 (14:15):

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And then the other thing that is mainly on our side is to make an easier narrative that is talking also to the economic sector. That is why do you need nature. For example, is not just for itself, so for now they perceive the NGO as just being for the little birds, the little frog, the little. And we need a strong narrative on disasters, reduction of the economic benefit

Speaker 1 (14:54):

More overarching. Yeah.

Speaker 2 (14:56):

Because they don't feed, so they feel it's just the troublemaker coming with known problems while we are developing. And this is not just in Romania that is almost everywhere in the global south, I would say. So, it's not always easy to find this development environment, win-win narrative, but that's a challenge here. Stronger than somewhere else.

Speaker 1 (15:23):

I can imagine. Yeah. Well, what are the mechanisms you're using for policy advocacy? what would you say, what are your/the most important channels or mechanisms you're using? Is it mainly policy briefs or reports or?

Speaker 2 (15:44):

If you ask me what is the most important but best person, yeah. I think it's the relationship you build with the government. I think that with your interlock door that perceives you as a technical resource

Speaker 2 (16:04):

Instead of being just a lobbyist. So that's what I've been trying to say to all my colleagues beyond Romania. What I wish for *NAME OF ORGANISATION* is that we are technical advisors and that we are perceived this. Of course, we are trying to bring the bar higher on environment, but also you need to understand the other perspective, not just go, you need to stop doing this, but it is just pushing for

Speaker 1 (16:31):

They're the experts we can speak to. Yeah.

Speaker 2 (16:34):

Yes. Not the lobbyist, but the experts. And in some cases in Romania, it happened because of this, strong expert we have on forest. That sometimes they call them to ask what to do, and that's the strongest advice. Because they recognize this competence. And I think that's where you really change the game. Another thing that was strong that I did when I came is to bring international experts to look at Romania, because sometimes I think, okay, this is just our little NGO. And when it happened, for example, with the Danube Delta, when we brought the Ramsar Convention, the UN an ecosystem restoration to say, okay, this is valuable for everybody. It's not just as a little NGO, this is a biosphere

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close to an ecoside. So this helps a lot. So to show that this that what we have in Romania as a while, their interest than ours.

Speaker 2 (17:41):

And then yes, depending on where we are in the process, sometimes our policy brief, sometimes we just need to really put some pressure outside. So that's the first time that happened in my life where sometimes the position of the government, I cannot change the world. So we need to bring it to the next level, to the public opinion and show the government that people care. And in this year of election, this is what we are trying to do is the most difficult part. But I see that it's needed.

Speaker 1 (18:22):

Okay. So when a topic becomes more salient than, it's more important to put it outside. Okay, interesting. So you're saying that this is not informal, but a certain connection to the government to have the perception of being an expert is super crucial.

Speaker 2 (18:43):

Yes.

Speaker 1 (18:44):

But so you said public connotations or close connotations exist in Romania, but it's not as implemented, implemented in the use of it?

Speaker 2 (19:00):

Sometimes it's difficult. So they should do it by European Union,

Speaker 1 (19:09):

Standards or?

Speaker 2 (19:10):

Standard. Yeah. Sometimes it happened at the last minute. Sometimes we are invited, sometimes we are not invited. But I would say that the most important thing is to be invited to sit at those tables and be able to be, as I said, trusted technically. And that's why we are not pushing too hard on the government before it's, so once we know that the position is that and they say, okay, no wolf, no bears, forestry code as bad as you can, then okay, then we are pushing guard on the government, calling for writing to the commission for infringement. So using all the spectrum of activities we can have. But then, but only when it's clear that this is the position when we still see that we can still work through the parliament, which is the most difficult thing you can imagine working through every single person in the parliament, but still this is the preferred way go. So that comes from inside and not after.

Speaker 1 (20:20):

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This makes a lot of sense. I just have one more last question about, the communication between the Brussels office or the international office and your office. Would you say that your agenda setting is completely independent from the ongoing process in the Brussels office for example? can you set the agenda for the policy goals in Romania and then, you just communicated to the European *NAME OF ORGANISATION*?

Speaker 2 (21:04):

It's not complete. So in principle, yes, but we are trying, since it is a federation, we are trying to not have a voice outside, so there is a lot of struggle inside *NAME OF ORGANISATION* to say that there is a priority. I told you for example, the hydropower that is not a priority outside of Romania. Not because they haven't focused on it. I see my colleagues that are struggling a lot to bring this on board of the official *NAME OF ORGANISATION* position. If it doesn't happen, it might not happen. Then you can still, for example, talk to another NGO and say, okay, I'm doing this with another NGO outside of my circuit. But never against your main position is just , I also have this, but it's very rare. So we try to avoid this unless it's something so urgent and then we clarify: "Sorry, you couldn't bring it on board. We still need to do it." But it's not the preferred way.

Speaker 1 (22:15):

Okay, I see. We can do the one voice. But is *NAME OF ORGANISATION* also a member of umbrella organisations?

Speaker 2 (22:28):

Yes. It's a member of *NAME OF UMBRELLA ORGANISATION* for example.

Speaker 1 (22:33):

Okay. So there's also a certain top-down from there?

Speaker 2 (22:38):

From *NAME OF UMBRELLA ORGANISATION*? *NAME OF UMBRELLA ORGANISATION* doesn't really do advocacy through their members. But you know, I'm sure we are part of other things.

Speaker 1 (22:50):

I can see it in the transparency register. I can look it up. That's not a problem. But, I think my last question would be, because also with what, before that, I think on your LinkedIn I saw you were more global orientated, just your personal perspective, perception. Do you have the feeling that we seeing a development in how civil society organisations are prioritised or perceived in the European Union spectrum? Or , do you have the feeling that advocacy is more fruitful or has higher rate of success, of course, it's we're not measuring anything, just your personal experience and perception.

Speaker 2 (23:41):

Between different layers of advocacy? That's the question.

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Speaker 1 (23:46):

No, have you observed a change in the EU in how service society organisations are considered and their advocacy work?

Speaker 2 (24:03):

In the European Union? I think, yes. So what I've heard from my colleague in Brussels is that, especially on the commission, you can change radically. So, I know for example, the nature restoration law, the first draft was awful. And then because of the pressure that all the NGO together, then it came out much better. So I think that at that level, for the level of coordination that they have, it's really impactful because there are many NGOs. And then for example, on the wolf, there was 300 signatures on the letter signature from 300 NGOs to in the letter from the von der Leyen. The wolf, so this is powerful and can change things. Then when it comes to the council, you have to go back again and everything can be different. And then Brussel doesn't have any power anymore [in that lobby?]. But I think, yes, even my colleagues, told me many times that, we, the on hydropower known forest, we started the infringement so that when the commission received things from us take into consideration, I don't know if it happens with every NGO, but in the case *NAME OF ORGANISATION* until now, we knew that we could still go to Brussel and they would do something, not very quickly, but they would do. So, we have a couple of cases of infringement that started from us.

Speaker 1 (25:51):

That's great. That's very interesting because I do have the feeling, also I interview other people, and I kind of have a feeling this is the answer I hear more commonly of there's some change. On the other hand, just statistically speaking, they're more and more business lobbyists, every year in Brussels, the resources which are spent for private lobbying is increasing as well. But

Speaker 2 (26:22):

I think yes, but then the strength of Brussels is that they work together. So I know many times that my colleague says: "oh, this is coordinated by the *NAME OF UMBRELLA ORGANISATION*, or this is coordinated by *NAME OF UMBRELLA ORGANISATION*, so that they are really working on different topics and put their strengths and money together. And so I think, I mean it's difficult to counterbalance this. But it has been working, then my problem is more, to make it work at national level. And this year has been awful because the commission themselves with the election disappeared and the old political agenda became less green. So we talked for four years about this green deal and now everything. So it's in this specific moment of the election, we feel we cannot count on the commission. Because it's disappeared the whole agenda. But that's the political moment. Otherwise, I say,

Speaker 1 (27:35):

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But this probably stays until the new commission is formed. , it's going to take half a year until probably until

Speaker 2 (27:45):

Yes. But it can reopen the whole habitat directive. It can, it already did a lot of terrible things with these, renewable go-to areas. I mean, in this last year, too many bad things happened and we were , okay, we cannot come to the commission anymore. We, before we could, we could still

Speaker 1 (28:06):

Yeah. Do them. I can see that. And what is, what is the biggest project you're working on in Romania right now? for the next half a year? What is the biggest, what is the highest priority on that?

Speaker 2 (28:21):

I would say that for us, the forest code. That's we really can't remain without forest here. And it's such a little thing it's right devil the, you know, that little work that can change everything.

Speaker 1 (29:27):

Amazing. Thank you so much. Bye. Thank

Interview 3

Speaker 1 (00:00:00):

So the way the organisation is set up is that we have the director *Name Director*. And then I'm the below that I'm the research and policy coordinator. Also *Name Director* been off, we've been doing this for four years now. I'm building the organisation, but *Name Director* been off for two weeks. So I've had to cosplay director, So just if there's any questions that you feel that I haven't, you know, I maybe can't provide an answer for, I can just note it down and, you know. Send it to *Name Director*.

Speaker 2 (00:00:35):

That's sounds perfect. That sounds perfect. And it won't be too specific. Since when do you work there?

Speaker 1 (00:00:49):

I started January, 2021.

Speaker 1 (00:01:02):

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I was finished my law French undergrad, and I was doing an internship with Friends of the Earth, Northern Ireland. I was a legal intern there. So, I have got both of my law French undergrad and my masters in the Irish legal system. So, whenever I had some Northern Ireland and Ireland, the Southern Ireland, they have two very different judicial systems. So, that was kind of a learning curve, you know, doing the a legal intern at *Name of an Umbrella Organisation* , but in a northern Irish judicial system working with that. And then *Name Director* just got my name through the lawyer there, so I started as a research assistant then for *NAME ORGANISATION* I think it was the end of 2020.

Speaker 2(00:01:45):

Sounds great.

Speaker 1 (00:01:47):

Been a wild journey.,

Speaker 2 (00:01:50):

But since 2020, you said?

Speaker 1 (00:01:52):

Very end of 2020

Speaker 2 (00:01:54):

So full on pandemic.

Speaker 2 (00:01:57):

Okay, great. So; I want to keep it short and then just, it's divided in kind of three different blocks. usually when I interview people, they kind of jump between because, the questions are somehow connected anyway. So it's not a full on stiff structure. But the one block is more about your, the general actions of your organisation and how you, how you do advocacy work. Then the second bloc is about coalitions with other actors other organisations. And the third bloc, super short, is just about public participation mechanisms in general and which of them potentially your organisation would use. So I was reading a lot about *Name of Organisation* but, what would you say, what are the three most important issues you advocated for in the last five years?

Speaker 1 (00:03:20):

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That's a great question.

Speaker 2(00:03:21):

If you have to prioritize them,

Speaker 1 (00:03:29):

But I'd say priority wise, I feel our website does reflect that. But access to justice is obviously at the core of a lot of different projects. We work, so we, we two core funders, JRCT, and that's more of our national work in Ireland. And then we have the, we work with the *Name of as Foundation*. So a lot of our work with the *Name of as Foundation* is kind of aligning national climate policy mechanisms with European limate policy mechanisms. And access to justice is, you know, throughout kind of all of those project streams for the *Name of as Foundation*. I'd say the strategic climate litigation has been a really important one.

Speaker 2 (00:04:22):

yes

Speaker 1 (00:04:23):

Because we have, we've been able to kind of act as a coordination point. because We're not litigating, we're not a litigating organisation. That's not our role whatsoever.

Speaker 2 (00:04:35):

Yes

Speaker 1 (00:04:35):

And I feel the past four years we've tried to kind of figure that out, you know, what is our role with communities? What is our role in policymaking and climate litigation? And I feel we've definitely, with strategic litigation, it's, but that project we kind of understand our role more as a coordinating mechanism. A platform where we can bring together lawyers, NGOs, and academics and produce these different outputs.

Speaker 1 (00:05:05):

So you see yourself as a coordination organisation and not as an umbrella organisation.

Speaker 1 (00:05:12):

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No. We're not an umbrella. I know initially we started out and on our website, we had, you know, kind of members of *NAME of ORGANISATION*, but we redirected our website in a different direction because we think it's more reflective than we're not an umbrella body. But we are the Northern Irish environmental link dor organisations. Two organisations that we work very close with. And we worked very close with on the link in the Irish Environment report, which is another huge, important priority and project that we've engaged in over the past few years. So we worked very closely with those two umbrella organisations. But I wouldn't, I'd say we're in between them in a way.

Speaker 1 (00:05:57):

Interesting

Speaker 1 (00:06:02):

I was just reading the EU transparency register of your organisation and, I don't want to pinpoint anything, but, there is written that you're not a member of any umbrella organisation. Would you say, is that true?

Speaker 1 (00:06:19):

So, no. That's a great point. And we've discussed at a lot of steering grips, whether to join these umbrella organisations. You know, *Name Umbrella Organisation 1* is a great one. And we work very closely with *Name Umbrella Organisation 1* especially on a communication side. So, for example, recently an important climate policy mechanism we've been working on is the National energy and climate plans. So, as an umbrella body *Name Umbrella Organisation 1*, you know, their communications mechanisms are incredible. And we just kind of support that. They send out what they need. When they write reports to the commission, we would be the Irish contribution to those reports. So we would, do you know what I mean? So we would write the Irish contribution for them because they kind of, they provide this kind of member state landscape of the stages where National energy and climate plans are at. So, we've talked a lot in board meetings about memberships, this aspect of memberships, but I guess we haven't rushed to do it because we're still figuring out.

Speaker 2 (00:07:24):

You're also quite young organisation.

Speaker 1 (00:07:26):

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We're still, Exactly, we're still a very young organisation. I'm very proud of what we've done the past four years, and we have accomplished a lot. But these types of questions are important then, because it's, do we join umbrella organisations or would that potentially affect our role as a, you know, that we do coordinate kind of, what's the word? That we're not aligned too strongly to, you know what I mean? We want to keep, neutrality is the wrong word, but kind of you know.

Speaker 2 (00:07:59):

Do you perceive joining an umbrella organisation as a potential danger? Do you feel a certain need or pressure could arise to follow the alignment with the hat umbrella organisation.

Speaker 1 (00:08:16):

Yes. And even, there's, we're not an umbrella organisation, but we work with a lot of bodies. We work with a lot of partners. We have a lot of partners and collaboration is so important to us. And we've, you know, collaboration's kind of at the core of what we do and with national partners in Ireland and partners in Europe. And so we're very pro collaboration But, no, so it's less maybe about the danger, but more just that we do work with so many partners that we're, we're not really sure of, what they would maybe align with if they would have certain issues with stances, things that. It, that is very technical and I think we just kind of enjoy our stance as a coordinating body as a kind of assembling, based on projects. So,we would have a project and then we'd find the right partners for those projects, and then we collaborate and it's kind of co-produced.

Speaker 1 (00:09:11):

I see.

Speaker 1 (00:09:13):

If that makes sense. You can ask more questions if I'm being too vague. But the membership is definitely a question that we've considered. And I am going, I'm applying currently for *name of Council* in Ireland. I'm happy to be a member in the *Name of a Council*. They've just set up a strand of work called Feminist Communities for Climate Justice. They're doing fantastic work And I work, you know, closely with them. We haven't, we don't have a project that we've worked on together yet, but that seems it makes sense for us to join. As a member because they really keep us up to date. You know, their networking, the networking aspect of *name of council* is excellent. You know, they've brought us in touch with a lot of different people

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They've reached out multiple times for membership. So it felt the time. But those kinds of bigger, massive umbrella bodies. We haven't come to a conclusion yet, we've had a look at the application forms and things that but we haven't come to a conclusion

Speaker 2 (00:10:14):

That makes so much sense. You share a lot of information on your website of the reports, the policy briefs do you do strategic share of information with other civil society organisation or with business organisations besides the ones who are already members in your network? Because, if I understood correctly, you also have people from private industry in your network, don't you?

Speaker 1 (00:10:48):

Well, we don't, I feel private, I feel the private industry is a tricky one.

Speaker 1 (00:10:54):

I see

Speaker 1 (00:10:55):

For sure. I don't think, because I don't think that's our role. I feel *Name of Umbrella organisation* and potentially *Name of national Organisation* in Dublin, they would work more with private sectors. But we, I would say that we work less. I, we done a massive project on climate laws. I wrote a huge report on national climate laws and just kind of the benefits of adopting a national climate law and the mean, you know, constructs of a climate law the important factors. But I remember the, the London School of Economics, the Grant Institute who do amazing work, they reached out for an interview and they wanted more insight into kind of the private sector. They reached out for an interview in regards to national climate laws. And because the project I'd done. They interviewed me and the private sector was the one part where I was, mmmm. Obviously an important part of our work is accessibility. So putting it on our website, carrying out our communications. We hope that the outreach is far beyond the, our kind of, you know, not our members. don't have members, but our partners, I refer more as Partners. So we hope that the outreach Is far beyond our partners. And obviously we do a lot of work with, in, as part of our advocacy. We would, we do a lot of behind the doors kind of working with climate committees MEPs um things that. You know, trying to share our research findings with the policy makers. So that would be an important part of our advocacy that would

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go beyond. Do you know our partner outreach, of course, on our partners to read our research findings

Speaker 2 (00:12:47):

On the European level then? Or does this more happen on a national also MEP?

Speaker 1 (00:12:52):

It happens both. Both. It happens both.

Speaker 2 (00:12:57):

I also wanted to ask in the beginning where would you describe your level of involvement? Because, you do have, the EU aspect, you have the national aspect, the local aspect. is there, you doing now, you're mainly doing EU work? If I understood correctly

Speaker 1 (00:13:16):

On national, no, I'd say it's, I'd say it's pretty equal. On the national and European level.

Speaker 2 (00:13:22):

But it's, is it more when you do your advocacy or, I also, I don't know how you feel about it. I also say lobbying in the sense that I'm more in favor of claiming the word back because now, no one's really saying lobbying anymore.

Speaker 1 (00:13:38):

People feel, people feel very uncomfortable when we're lobbying. we don't we don't say it. We don't say it for sure. Because I feel a lot of there's the lobbying is, I don't know why it's turned into a word, but.

Speaker 2 (00:13:52):

I see, Now we only say lobbying to bad things, but we also have to lobby for, common goods and environmental justice, but policy advocacy also works of course. When you do the advocacy work for the European level, is it always linked to the national one or is it sometimes also straight advocacy work of, we want to shape agenda setting in the European Union?

Speaker 1 (00:14:30):

Oh, yes. No, we have done work on that. We've done work directly on the effort sharing regulation. We've done a huge advocacy campaign, day of action campaign just to amend

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certain legislative aspects of the Effort Sharing Regulation. For example, *Name from staff* our access to justice expert in *NAME ORGANISATION* has done a lot of direct advocacy to amend amend European files, especially the huge fit for 55 package. You know, that was the time that we engaged directly in, you know, just the European level legislations. Is that, does that answer your question?

Speaker 2 (00:15:10):

Okay. Yes, it's that answering my question because other organisations, for them it's more, okay, they're always going on the national level and then the national level is going to the European level. But, they're also organisation was going directly and I'm just interested how this is linked.

Speaker 1 (00:15:29):

With the NECPs for example, I'd say that aligns with what you've initially said because that was us using European governance mechanisms to improve national, you know, climate ambition. That was, do you know what I mean? And that was definitely work where yes. We're, that it is the NECPs our European governance mechanism, but we were working directly with only Irish national partners. And not lobbying, but, trying to you know, getting in touch with the Department of Climate Communications, sending all of our research, telling them our asks, telling them what needs to be amended in the NECP. And then, you know, *Name Umbrella Organisation 1* reached out to us last week and said, we are submitting a report to the commission and we're asking them, you know, per member state, these are the three practical suggestions that need to be improved. And each member state's NECP, and so the National Energy Climate Plans, so I wrote up those B already. It was easy work because we'd already done, you know, we'd already know what needs to be fixed. But that, so that would kind of be the European level work. But you said, it's still aligned with the national advocacy work. But no, definitely I'd say Alison does as well. She does a lot of direct.Obviously work in the European levels, just with a lot of access to justice aspects of different files and things this. But I get very confused with all the different.There are so many, many of them.

Speaker 2 (00:17:02):

So how would you, how would you describe the biggest challenges if it comes to, doing that? Especially as a young organisation not sitting, I hate that phrasing, but “not sitting in Brussels”?

Speaker 1 (00:17:20):

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Yes. That's a great question. It does seem sometimes that we're far away from it. We had a retreat to say this, but we had a retreat. This is all anonymous, isn't it? But no, we had a retreat with *NAME OF A EUROPEAN ASSOCIATION* couple of weeks ago and, you know, we, we were there with a lot of different organisation that work in the * NAME OF A EUROPEAN ASSOCIATION *. So there's NAME OF A EUROPEAN ASSOCIATION, and these are all the kind of of organisations that're working at, and we're one of them. And we're the Irish organisation. And I did feel a lot of them are a lot closer the action. A lot of them that do work in Brussels. A lot of them. You know, we can't, we're not, we're not there. We can't go with the drop of a hat advocate right there and then and respond as quickly. But it's,.So that's, I'd say it's a challenge. I'd say one of the main challenges is that a lot, if I'm being honest, a lot of the European mechanisms, no one cares in Ireland. So we really want to make an impact and we want to raise awareness and importance of the, kind of the role of the European climate law, and all of these different aspects of climate action. And it's hard to kind of communicate why, you know, the green deal is important, why, you know, all these things., I do think it's harder in Ireland, we've kind of found that there's a deep interest in national level climate policymaking that the European climate policymaking, it's kind of box ticking, it's kind of of a box ticking exercise almost that it's treated So we find that a challenge in trying to advocate in that regard.

Speaker 2 (00:19:13):

So you would say it is not even a challenge to find the access on the European level. It's harder to communicate what happens on the European level in the national level.

Speaker 1 (00:19:26):

Yes. It's hard to get, it's hard to make an impact.

Speaker 2 (00:19:28):

But you never felt, as such a young organisation and then covid and everything that you just don't really know where, where to start accessing. Because they are those public participation mechanisms of, like ‘have your say’ portal or this ‘synapse’ different policy, policy platform. But, they're not really used views and part this is part of my Research.

Speaker 1 (00:20:03):

I mean, I think public participation is in itself, is across the board is very inadequate. Do you know what I mean? We've struggled to even the way that public participation is related, the way they only give you a hundred words or something to respond to, do you know, a really

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important thing? They're not accessible. You know I don't think they're. We find that at national level, but at the European level its even worse. Because obviously I'm a junior consultant and *name of the director* would have more insights into the European level type of, you know. Where to go, where do, how do we know where to go. But obviously as part of a really amazing hub, the climate governance hub, as part of that, we're guided in a lot of ways. Do you know, it really, really helps the kind of collaboration between *Name Umbrella Organisation 1*, *Name Umbrella Organisation 2* all these, incredible climate environmental organisations. They really, at the start of *name of our Organisation*, you know, when we first got, you know, our first grant from *NAME OF A FOUNDATION*, the, one of the first things we did work on was, you know, the Effort Sharing Regulation and coming up as a very new organisation and not really being engaged in European level advocacy. Before it was very, intimidating. And it was very confusing, Who do we talk to? Where do we go? What does this word mean?, I remember there was loads of acronyms.

Speaker 2 (00:21:28):

I can imagen

Speaker 1 (00:21:30):

So many acronyms in mean, *Name Director* would just be, is it a name? Is it a person, a place, a thing? Doing my master's in environmental and climate law really, really helped with that. The kind of that really helped with my understanding of European level advocacy as well. But I'm trying to think. It's more strategic level. we don't directly lobby, if you know what I mean. It's more, I think we play a more think tank role. And more and more and more we're playing a think tank role where we create the research, we get the best people in, we create a team, we collaborate, we assign, you know, you know, the most about just transition, you know, the most about, you know, high human rights correlate with climate laws. Do you know what I mean? And then we get these people together and we create that research. And then at the end it's, we find the right targets. We find the right targets, we find the right people, whether it's government, whether it is partners, whether it's civil society. Again, that's kind of our process. If you know what I mean. But we don't, I feel the governing the governance regulation that's coming up, the revision of the governance regulation that would be something that we're going to be heavily involved in. Do you know, even at a European level, the kind of amending of the governance regulation. But I can't go directly, you know, it's not the EGI directly. God, we've emailed the commission a billion times about loads of different things, loads of different aspects. And *Name from staff* does amazing work. Work in regard to the Our House

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convention and the A CCC. So those type of avenues as well are being used. So we use the commission avenues, we use the, you know, the advocacy national level avenues. We're exploring strategic litigation. So there's different, you know what I mean? There's different types of advocacy pathways that we use. But it's very rare that it would be us, you know, alone being, we want this, here's our asks. It's a collaboration,

Speaker 2 (00:23:43):

It's an interest interesting intersection. So you, you're not, you know, an organisation who would say, okay, let's organize that demonstration., not participatory, outside advocacy work. So also, not an organisation who would start a European citizen petition or petition the EP or something. You wouldn't, you wouldn't do that either.

Speaker 1 (00:24:11):

No but we'd engage in these things. But no, we don't, we definitely engage with them. We definitely support them. Even at national level, we are not the ones, you know, organizing, you said, the demonstrations. We are not the ones, you know, devising the campaigns even. But we will, we'll have all the research. We give evidence, you know, we give evidence to the committees. We have all the research backing the communities asks. So the communities have our, their asks and we have the research that supports their asks. If that makes sense but it's definitely, it's definitely something we've had to really, really work out. And we, you know, we support even financially, a couple of very local community groups in Northern Ireland, hile they explored, you know, for example, the rights of nature, you know, that's a kind of budding movement in Ireland. And that's something we've explored and what our role could be in that. And campaigning is not our role. It's research think tank, and then advocacy, but targeted strategic advocacy, if you know what I mean.

Speaker 2 (00:25:23):

Definitely. You really thought it through and all of that were very strategic decisions of what to do and what not to do. Is that right?

Speaker 1 (00:25:36):

Also, I feel it's definitely some question. We've had a lot of conversations, me and *Name Director*, we've had a lot of conversations. But it also kind of naturally, we also kind of naturally fell into this more research platform. We explored the kind of campaigning aspects and things that. But we just felt our role was far more suited as a coordinating body a on the

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island of Ireland. So that's something in itself. That was lacking. There was a big gap in that where we're the sea in bio geographic island, and there was almost zero communication between the north and the south. So I'd say that's one of our main priorities. That's one of our top main priorities is to raise awareness of the kind of shared island environmental challenges. And that kind of goes across everything. That's our link in the Irish environment. That's strategic litigation, obviously with Brexit divergence *NAME ORGANISATION* started just, you know, after Brexit, so we had lost our MEPs. So we can't lobby for, you know, Northern Irish MEPs, but we, we not lobby, but, we, you know what I mean? We continue our carried our advocacy with Southern MEPs. We're working on a lot of, we've, we've worked on various European legislative files, but that's not relevant to the north anymore. So I'm not saying that we can have a shared island approach to every environmental or climate issue because it's not possible. But when we can, you know, we do, there's no project where we can, where we're not, we have to always find, well, what's the northern counterpart to that? What's the southern counterpart to that? And something that has been a huge positive step is that Northern Ireland adopted their own, adopted a climate change act. Before the government collapsed, obviously.,ut, but adopted the Climate Change Act. And, you know, that's a great opportunity to align a lot of, you know, climate action with the south because they have their climate change act too. So, you know, the south, they're introducing a just trans, they're in the, the process of developing a just transition commission, the north it's prescribed in the legislation. They also have to develop a just transition commission. So things that where, you know, there's a lot of work that needs to be done in terms of collaboration.

Speaker 1 (00:28:02):

Sorry, I'm rambling. Pretty much.

Speaker 2 (00:28:03):

Pretty much sounds it is very important to have a body yours to communicate because there are a lot of things to help.

Speaker 1 (00:28:12):

So many.

Speaker 2 (00:28:15):

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We were just saying. You emailed the commission multiple times, but also in the, in the transparency register, I kind of saw, you never got officially invited by the commission or by a director general?

Speaker 1 (00:28:32):

Yes, I guess so. Let me put that in my notes actually. because I think that's a really, because I know *Name Director* has definitely been in the room with the commission before. But it's, we probably weren't the ones invited. Do you know what I mean?.So I'll put, there's no, we're re we're, it says we are registered on the, there's a transparency thing that comes in my emails. Do I look at it? No. But I will try and find out what it says to me. Oh, it actually says here, environmentalists is registered in the Transparency Register.

Speaker 2 (00:29:06):

You are already registered. Oh, it just in the Transparency register is written that you never, you never had a meeting with a commission and never got invited for a commission or, were never part of a commission expert group that you never participated in public orpublic consultations.

Speaker 1 (00:29:30):

Oh, no public consultations that the commission has put out.

Speaker 2 (00:29:37):

Yes.

Speaker 1 (00:29:39):

Well, do you know what, maybe I'm actually going to clarify this with *Name Director* because I think this is so interesting. This is really interesting for me. But I feel is that, is there potentially, you know, if that we collaborate with a lot of the European organisations and they would submit it as part, do you know what I mean?

Speaker 2 (00:29:58):

It's from, I think it is. No, it's last updated in February, 2024. I'm not sure. I think I, I think they they submitted it. It's not your task as a organisation to update it.

Speaker 1 (00:30:21):

So this is public consultations that the commission has put out. Is that right?

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Speaker 2 (00:30:30):

Yes

Speaker 1 (00:30:32):

If loads of us have worked in one consultation together and maybe one organisation submits it, or is it, would it still show our name even if we were [..]

Speaker 2 (00:30:58):

I want to write this down as well.

Speaker 1 (00:31:07):

A list of contributions to public consultation "non available".

Speaker 1 (00:31:13):

Okay.

Speaker 2 (00:31:13):

. And also list of contribution to roadmaps "not available", on your new profile. So you halso did amendments and contributions worked together in public consultations with other, with other organisations and submitted something, didn't you?

Speaker 1 (00:31:44):

Well, I feel I'll chat to *Name Director* about public consultation because that seems *Name Director* could have done loads of stuff that I'm not aware of. Do you know what I mean? She's the senior, the senior consultant but from my perspective, it's I've worked with, you know, a lot of different organisations in the climate governance hub on specific legislative files. So research reports, advocacy with MEPS setting. We've had a lot of meetings. We've set up a lot of meetings with MEPs. MEPs just us and the MEPs. And that's kind of our type of work that we do. Whenever there's amendments to be done to European, climate, environmental, legislative files. I'm just thinking,

Speaker 2 (00:32:27):

No, but it just, it's, this is the one thing. I definitely would very, very agree that if you would ask her about it.

Speaker 1 (00:32:34):

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Love to.

Speaker 2 (00:32:35):

Because there's also a list of meetings you had with of Parliament and they're just two, just with *name MEP 1* and *Name MEP 2*

Speaker 1 (00:32:49):

But there's nothing with *Name MEP 3* the last, there's *Name MEP 4*.

Speaker 2 (00:32:56):

No.

Speaker 1 (00:32:57):

There was not?

Speaker 1 (00:32:59):

So *Name MEP* What did say the name again?

Speaker 1 (00:33:02):

Name MEP 4.? No,

Speaker 2 (00:33:04):

No. Only these two. So about increasing all island environment cooperation and energy performance of building direct buildings directive.

Speaker 1 (00:33:15):

So what does that, so I'm fascinated it because no joke, I, I would say that my role at *NAME OF A FOUNDATION* is, I'm mainly a researcher. I would be, do you know what I mean? I would of course help with the communications and the advocacy, but it's I've done, you know, my expertise in national climate laws Andthings that. And it's just, it's so and so it's a minefield to me. the European mechanisms, and this is maybe what your research is on, which is great, the kind of public participation mechanisms that we can get involved in. Yes, we are registered, but it's, how does that get logged? Do you know what I mean?So say we have meetings with the MEPs, obviously there's more in my head that we've had, right?.So how does that get logged in there? Who logs that?

Speaker 2 (00:34:08):

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That's a great question., I'm going going to go more into that because I kind of thought that that MEPs have to declare that beforehand. But , it really depends. If it, if you just meet in a restaurant, it, it's not, it's not going to be logged anyway. But, is it in form of info session? It has to be registered since a while, but

Speaker 1 (00:34:33):

Oh, that's very, very, that's so interesting.

Speaker 2 (00:34:35):

, it's very interesting. But I was just more speaking about those public participation mechanisms. Is there, I'm not sure what you just said about maybe you think as a researcher you don't have a perfect overview about it, but is there a specific point in the legislation you would love to access, but you cannot, if there is, if you would create a public participation mechanism for civil society organisations, is there something you could think about?, okay, if you would have those, this kind of mechanism, this would be so beneficial if they would, if it would be mandatory for the commission to answer us, or I don't know.

Speaker 1 (00:35:19):

Well, that's a great one. The kind of mandatory aspect, I think. I think would be amazing. Do you know, we wrote a lot of times to the commission, so maybe some sort, unless we're missing something. you said, we're still a young organisation, so I'm really interested in the different ways that we can advocate at the European level. because I think we've got it kneeled at the national level We really understand the national landscape. And we really, we know who to go to. We know what partners to work with. We know the process, we know the media. We know where to put our press releases. We know, you know what I mean, on the national landscape. we've really, you know, it's, I feel I've got a clear understanding of, you know, we do the research and then what type of advocacy we want tocarry out. I feel we'd get that. I know I would know what to do. But with the European level,.I feel we have written to the commission and it's..,

Speaker 2 (00:36:19):

Have you ever, have you ever met with, members of committee of the regions or the economic and economic and social committee?

Speaker 1 (00:36:36):

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Name Director, I would be surprised if *Name from staff*, who's our access to justice who works for us and she's the access to justice expert. I'd be so surprised if she hasn't been to every single one of those. Do you know what I mean? She's a really engaged, but to the point where me and *Name Director* just, go around and be free. Do you know what I mean? she's really engaged. But I feel I could definitely ask, so that's the committee regions. because I kind of want toknow this too, the committee region, the Economic and Social Committee. And what are the other examples?

Speaker 2 (00:37:05):

EECS, economic, what is the second word? Just another, the second is

Speaker 1 (00:37:13):

I feel any national questions you have for me, I've got the European level stuff is kind of more..

Speaker 1 (00:37:35):

A mandatory response, sorry. The public participation mechanism, it would, the mandatory response aspect of it I think would just that. I don't, I don't know how it would, I don't know what type of, I, for example, with the NECP one, we had serious problems on our national level. Just using a national example, we had huge problems with the public participation because it was one page and it allowed you to talk for 300 words. And the report, the end, the National Energy and climate Plan is 300 pages long. It had serious inadequacies and failures and it breached the governance regulation. And we had a lot to say. And I submitted a freedom of information request because I was, where is this stuff?, I was, where's the admissions pathways? Where's the data? Where, where is all this stuff? Do you know? And because we'd already emailed them. They didn't get back to us. So I'll just write a freedom of information request and put it in. They phoned me. I put it in at 4:00 PM they phoned me the next morning, the, the government, the Department of Crime communications, they phoned me the next morning and they were,.So,we don't have that data. We're using last year's statistics. It's not finished yet. We'd already submitted it six months late. We were the last of three countries to submit the draft necp. We were six months late already. And they were, we don't have it, blah, blah, blah. And I said, in terms of public participation, I said to 'em, I'm really concerned about public participation on this because you don't have any of the information that the governance, you know, you are missing a lot of data, but you've put you, but you're considering putting on a public consultation I said, how can you have a meaningful public consultation when you don't have the information. And he was, I declined to answer on that. Whenever I hung up the phone.

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They published the public consultation immediately. And it was garbage. The consultation itself, the exercise was not meaningful. It did not align with, the Aarhus Convention, requirements, nothing. It was just one page and it was, what do you think about this? And it wasn't, do you know what I mean? It wasn't, didn't provide a level of engagement, the awareness raising of it as well. There was, there was one press release on, oh, there's a consultation on the NECP, but with our National Climate Action Plan.Which is our national, you know, the yearly, the yearly climate action plan. There was so much awareness raising, there was so much communications. Alison, the person I keep talking about is actually doing a research paper on how,the government responded to European governance mechanism, the NECP versus how it acted about its own national climate action plan. She wants to explore that from a public participation standpoint perspective, which is I was, oh my God, that's such a helpful. Do you know, research paper? So I'm happy to put you in touch with her. I'm sure she would nail your European level. Great. Great.

Speaker 2 (00:40:46):

But was this, was this the only time you used the Freedom of Information Act?

Speaker 1 (00:40:50):

ME: yes, *NAME ORGANISATION*: No. But I feel no, it's definitely the first time I used it. And I felt I was just not going to get a response. And then another amazing thing is I reached out to *Name MEP 5*, the MEP, and I said, they're not responding to us. what? This is so important. And we got a couple of, you know, hooks and, I think we've got one in the Irish Times, I think. And Kevin O'Sullivan, he's the climate correspondent. And I said to him, but the government still aren't responding to us. And *Name MEP 5* reached out to them on his own as well and told me what to do and was, don't email him, email this guy. Do you know what I mean?, it was really, so, and obviously we, we built a good, a good relationship with *Name MEP 5* because of those, the different files we worked on. Do you know what I mean? the Effort Sharing and the, that one with the the EPBD The what did the one that, I think it was on the transparency register the buildings

Speaker 2 (00:41:52):

Yes.

Speaker 1 (00:41:52):

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Directives. We tried to put, we tried to advocate for an access to justice me in the EPBD. And that did not get a lot of support, I feel I feel in general, the European, just the European advocacy stuff, it's a minefield. It's much, it's obviously naturally much harder.

Speaker 2 (00:42:17):

But what, no, no, it is. And, this is exactly, this is exactly what I'm doing my research on it is especially hard for civil society organisation and NGOs. that's the focus. It's hard in general. It's very complex.It's not very easily structured in the fact that the European Union is complex is of course very understandable and also necessary. And it's such a big supernational organisation.

Speaker 1 (00:42:48):

There's so, there's so much. I still, I have two law degrees I've done, I've been a consultant for *NAME OF A FOUNDATION* for three years and I still don't understand. a huge portion of it. I remember I was in a communications,a, it's another hub, *NAME OF A FOUNDATION* love their hubs, but it was, it's about, we call it, you know, communication officers. We don't have a designated communication officer. So I kind of carry that. When I can. And that's something that if when we expand and you know, when we figure more stuff out, that's one of the main things I would love is a communications officer. Because I feel that's where it's at. And I feel it's really, it's one thing creating amazing research and collaborating with the best people. And then there's the next level of, you know, communicating that and getting it out there.

Speaker 2 (00:43:35):

Compared to other civil society organisation, your budget or what I can see in the register and everything is quite low. It's not a big, a big, big budget.

Speaker 1 (00:43:51):

Can you only see the *NAME OF A FOUNDATION* stuff? Or does it just say our total? What's our total?

Speaker 2 (00:44:04):

No, no, I see total budget. here it's written 214,000. But it's more, this is only until end of 2022.

Speaker 1 (00:44:19):

Now it would be more, no,

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Speaker 1 (00:44:21):

I see the *Name of different Foundations*

Speaker 1 (00:44:30):

Yes. Oh my God, this is so cool. I love the transparency. No, we definitely accrued more since 2022. But you're, you're right, the low end. So is your, what was your question?

Speaker 2 (00:44:42):

My question was: Do you have the feeling that the financial resources have a major impact about how much advocacy work or efficient or successful advocacy work people can do? And not only speaking about more staff, more in general. Not as a cliche, but the condition that usually that civil society organisation have less money than private businesses for lobbying. Do you see how big the aspect of the financial resources is?

Speaker 1 (00:45:27):

Weirdly I feel we're, you know, how young we are, I feel we're happy with, you know, the level of financing that we're getting because ours is more of an in issue of staff, if that makes sense. Where it's we have, and we also we pay consultants. It's a very, you should try and hear our accountants trying to understand this. They're, we what? Because it's we get these budgets from the funders and we make sure that the people that are working on the project get paid. That's our number one priority. So we, we get the best consultants that we have used over and over again, *Name Director* all these amazing top of their field people that we've done a lot of projects with and there's a lot of trust built there. And we've done a lot of stuff with them. The level of trust is important. And we want tomake sure that we have enough for the, the people that are engaged in the project, but I feel it's not enough, you said, to fully engage with the advocacy. Do you know what I mean? To fill? It's we have enough to produce the research. To produce the evidence to. That sort of work. It's we have, you know, I'd say that we have enough for that. But beyond that, the financial restraints for advocacy I'd say that's definitely. Because I feel if we'd have a communications officer by now and an advocacy officer if it was possible. Do you know what I mean? And an admin officer. Because what's happened is me and *Name Director*, we, it's me and her. In this organisation as in the core people. We recently got our research assistant, which has been helpful. But it's us and then anyone else that's involved in the projects, they've been hired as consultants, but they're usually, you know, part-time lecturers, they usually have other jobs and we just buy them out of their time. Do you know what I mean? Outta their lecturing time. But it's just us. So I feel the capacity ends with us. So

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it's there's financial constraints, but there's also, what's the correct way of saying it?, there's only so much we can do me. You know what I mean? And it's, there's only so much we can do. And I feel, you know, it's, we have our own jobs. She as the director, as the research and policy coordinator, but then she does a lot of stuff that an admin officer would, should be doing. And I do a lot of stuff that a communications officer should be doing.

Speaker 2 (00:48:14):

Yes.

Speaker 1 (00:48:14):

. Do you know what I mean? So it's, I feel, I don't know, I, I mean I hope to rectify that because I feel that would really improve our advocacy work big time. But I feel our model's very unique.

Speaker 2 (00:48:28):

Sounds it. It was so interesting. your model really is unique.

Speaker 1 (00:48:32):

It is very, it, I don't know how she came up with it. It's very, very unique.

Speaker 1 (00:48:36):

I spoke to other organisations in the environmental sector as well.It's interesting to see the, the differences.

Speaker 1 (00:48:44):

Yes, The different hats.

Speaker 2 (00:48:46):

Well thank you so much for your time. Is there anything else you want to share?

Speaker 1 (00:48:54):

I feel I definitely want to, I'm going even just for my own, even having this conversation, I feel about the transparency register and everything. I'm, I haven't really seen our European advocacy work from the outside yet. Do you know what I mean?, it's kind of interesting seeing it from the outside and I'd love to chat to *Name Director* about that and *Name from staff* about the, because she's an access to justice guru and she's obsessed with public participation. And I'd love to ask her even, if you could have your question, do you know, if you could have any

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public participation, the best public participation mechanism, what would you have? because I think that's a really great question. It just seems European level advocacy. There's just a lot of big heavy doors that just, you're, in there. And obviously the outcome of the European Parliament elections will dictate a lot of.

Speaker 2 (00:49:54):

As well, knock on wood.

Speaker 1 (00:49:56):

I'm trying to think if there's anything else. Sorry if I was babbling, I feel *Name Director* definitely would've been, *Name Director* would've been a lot more articulate, but she's off for two weeks and I know what it's when you're trying to get this information and you're trying to get interviews and stuff. So I'm trying to think of what else. , just the three priority questions. The all island aspect is super important to us and our uniqueness is in model, but it's also the kind of our environment as well. Do you know? Setting up an organisation in Northern Ireland, which has a different judicial system to the south, but our European work obviously only affects, you know, the work in the south. So yes, our organisation has a unique model. It's not an umbrella organisation. We don't have members, we have a lot of collaborated collaboration partners that we've built up over time, you know, in regards to certain specifically funded projects. Which has been brilliant. And , I'm really, I'm excited. I'm excited.

Speaker 2 (00:51:09):

Are you afraid in the sense of the European Parliament election going to change? It probably is going to mean your work even harder, just in general terms, but also losing MEPs.

Speaker 1 (00:51:27):

I said this to Donal, who's head of communications for *NAME OF A FOUNDATION*, I said to him the other day this week, I said, look, the European Parliament elections even confuse me. You know, the whole the way there's different seats for different countries and all the different, the whole polling, do you know that it's going to be more right wing than ever before? All these different things. I'm so confused. But I did say to him the main thing I'm worried about is we've spent the past few years building relationships with certain MEPs So that's going to be on an advocacy level, we've done a lot of yet not life changing. You know, we've lost a lot. We did. There's amendments we never got. Do you know what I mean? That we worked really hard for it. And the modernization fund as well. We tried to put in, you know, they have to have a

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net zero climate, you know, neutrality target that didn't go through it. We blocked. Do you know what I mean?, a lot hasn't worked, but what has worked is the kind of relationship building that we built with MEPs through this type of advocacy work. And we've had the same ones for the past three years. So I'd say selfishly, I probably should be looking at the bigger consequences of the European Parliament elections. But from an organisational point of view it'll be annoying to have lost those relationships and to kind of have to start from scratch again to be, hi, we have something important to say. Here's our, this is what our organisation does, this is who we are.

Speaker 2 (00:52:53):

And I think that's the big question of right now, so much advocacy work really functions over network building and personal connections and some of those official public participation mechanisms this "have your say" portal or Petition the EP, but they're not used because they're not efficient. Or civil society organisations don't really have the time. This is so sad because if there would be participation mechanisms, which would function also means it would save time for civil society, organisation time and money and resources to not start networking all over again. And just running behind the MEPs.

Speaker 1 (00:53:46):

Yes. Oh my God. So true. And I think as well that there wouldn't be a loss of evidence. if there was that type of public participation mechanism, and we know that saying the dream world, they existed and we know that it's being received and it's being used or it's being reviewed or it's whatever. Do you know what I mean? That it's actually efficient. Then you said, we wouldn't need to spend so much of our time. And money trying to get in these doors and speak to the right people. having that reliance on those type of mechanisms, the mechanisms can still exist, but you might feel there's no point even using them. Do you know what I mean? I feel there's, there has to be some sort of acknowledgement that, you know, that it's worth it almost.

Speaker 2 (00:54:35):

A mandatory answer?

Speaker 1 (00:54:40):

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Speaker 2 (00:54:41):

Or considering considering the amendment or acknowledgement.

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Speaker 1 (00:54:50):

I know, I'm sick of receipts, do you know? I'm sick of the "we have received your whatever." Do you know what I mean? And it's just, it feels we have to do a lot of the backdoor kind of stuff then, because that just disappears into the ether. Do you know what I mean? The mandatory thing is very interesting and could be explored more, I think.

Speaker 2 (00:55:20):

Yes

Speaker 1 (00:55:21):

But obviously the European Commission and all the different European institutions, they're so massive. They're so massive. And even that whole aspect, sorry, I'm going to start rambling. I'm sure you have a million places to go. But even that aspect of, I read this article that the commission is outsourcing its enforcement to NGOs. And it's a great article by Arthur Hoffman.

Speaker 1 (00:55:51):

Yes, I can't remember the title, but it was, but it was this idea. It shows you the statistics of the level of enforcement that the commission has engaged in. So this guy argues that the commission has started to outsource its enforcement. It feels that the NGOs and the CSOs and the member states are doing enough to, do you know what I mean? To push for enforcement that the commission has kind of took a step back and it shows you stats and how many infringement proceedings the commission initiated, you know, between this certain time period and how much it's done now. And it was, it just dropped. So I feel, let me try and find it for you. Sorry, hold on.

Speaker 1 (00:57:06):

That Two Fs in the second name I think. Okay.

Speaker 1 (00:57:13):

I see,

Speaker 1 (00:57:18):

I will definitely find it for you. It is, I just can't remember the title. But it is really, and I find that so interesting. because I feel there's a lot of disillusionment with the role of the commission

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because, not do, do you know what I mean? It's, are they even the right people to do the advocacy towards, because there doesn't seem to be a lot of, you know, commitment

Speaker 1 (00:57:47):

Or

Speaker 1 (00:57:48):

Enforcement afterwards.

Speaker 2 (00:57:49):

Do you know what I mean? But on the other hand, the, the council is even more in transparent., I heard from one organisation, they were saying for them it really seems they would love to do more advocacy work in the council because this just seems a black box for them.

Speaker 1 (00:58:10):

As in it's, they would love to do more work with the council, the ministers of the environments of every member state

Speaker 2 (00:58:15):

exactly. more, more being able to attend.

Speaker 1 (00:58:21):

Yes because It's what , what do they do? And we've, we've definitely written, you know, to the council as well and stuff that. But.No, I agree.

Speaker 2 (00:58:36):

The environmental sector is very interesting because you have this very, very big crossover between what you already said in the beginning between the national and the European mechanism.

Speaker 1 (00:58:51):

And it's obviously just natural in a way to kind of care about the national level. Do you know what I mean? Because it's just so much more accessible and it's just, you can kind of see your work having more direct effects. Whereas I feel at European level it's you just hope something sticks. Do you know what I mean?

Speaker 2 (00:59:11):

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This is also what I heard from other friends or colleagues of mine who just started to work somewhere in the big field of the European Union and being in the mid twenties, you're motivated. You have all those visions and then you just realize everything is so..

Speaker 1 (00:59:32):

Disillusioned. The bureaucracy of it. It's so intense as well. Do you know, when we were engaged in trying to improve those legislative amendments, it was just shaking someone..

Speaker 1 (00:59:59):

I hope it was helpful. I hope it

Speaker 1 (01:00:01):

Was helpful. It really was. It really was.

Interview 4

Speaker 2 (01:51):

So my title is policy advisor. And my role, I would summarize it in three main areas would be, first the policy monitoring. Policy monitoring in the sense that I'm part of the secretariat that is based in Brussels. We are five at the moment. And, we have member organisations that are 33-member organisation from 22 member states, but also the UK and Serbia. Policy monitoring means, monitoring what is happening, what is affecting young farmers, what are the type of legislative files that are in the discussion, but not only the legislative files, then there's more the capacity building that is coordinating the internal discussion to extend the mandate of our organisation to be able to speak on behalf of the farmers. And the last one will be lobbying - so more the advocacy work.

Speaker 1 (03:02):

Great. You already said the word ‘lobbying’ which I also use for NGOs, but I do realize that sometimes people are questioning or criticizing me for using that word. But I'm fully aware that that is also just my personal opinion. I'm fully pro of claiming this word back and it kind of it seems like you have a bit of a similar approach.

Speaker 2 (03:27):

We use both. We use advocacy and lobbying – those are the two.

New Speaker (03:32):

What are the three most important issues *NAME OF THE ORGANISATION* advocated for in the last legislative period of the EU parliament? What would you say were the three main topics?

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Speaker 2 (03:51):

If I had to choose only one that would be ‘generational renewal in agriculture’. Because at the moment we have a demographic challenge in the sector that we have less and less farmers in the EU. We have only 6.5% of farmers that are below 35 in the EU. And we also have a lot of farmers that are about to retire in the next few years. So that's a big challenge. Then if I try to summarize in three? First of all, the common agricultural policy was there to advocate our lobby on generational renewal, but there's a big main policy -. There was a big challenge for *NAME OF THE ORGANISATION* to have more instruments in this policy that are really targeted at young farmers: so higher budget, but not necessarily in terms of budget and envelope, but also the type of instruments like ‘how do you help land mobility’, for example, so from one generation to the other. ‘How to help having more access to finance and credit’. Because more young people try to go to their bank and then get rejection of their loan. With the CAP, in terms of five -, I would say the CAP, the farm to fork strategy -. There are so many others, I don´t know how to choose.

Speaker 1 (05:25):

These are already so many subpoints, thank you. But how would you characterize *NAME OF THE ORGANISATION*s advocacy actions towards EU institutions? It would be very interesting to hear your position of advocacy actions. How would you characterize those?

Speaker 2 (05:52):

I think it's similar to quite a lot of organisation here in Brussels, there are several ways to influence, I would say. So for us in *NAME OF THE ORGANISATION* it can be the use of those different type of tools. Over the last few years, we had some campaigns at some point, I remember a campaign on access to land because you have a lot of land-take at the moment. So when you have land that is artificialised, but then it means more competition to access land. So less available land for young farmers. We had a campaign on this. We had a campaign on gender equality in the farming sector. So things like this. Then it'll be also with direct contact with the institutions. We are regularly in contact with the European Commission. It can be DG Agri, but not only what we see as a development is that when it used to be only DG Agri, the main conductor for farmers' organisation. Now we discuss also with DG climate, DG environment, DG employment. And that is because farming is a horizontal sector.

Speaker 1 (07:05):

I saw on the transparency register that you're very active. I counted roundabout 33 meetings in the last five years, which is a lot compared to others. So now you were describing the campaigning side, so more outside lobbying. But from what I perceived of looking at your website of the organisation - can I say you mainly focus on inside lobbying strategies, so trying to go into the policy direction? What would you say is the most important tool for you? What is *NAME OF THE ORGANISATION* using for this policy advocacy?

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Speaker 2 (08:01):

I think it would depend. And that's why I started with campaigning, but of course not the main and not the only tool. We have participation in public consultation. That's still quite formal but there's also the more informal side where it's about being in contact with -, if we´re talking about the parliament you are in contact with MEPs, with their assistance and so on. So it can be through certain events that are organised. It can be through a bilateral meeting. So of course, it's also a big part of it and then it will really depend on where you are in the legislative process. Because at the early stage it would be contact with the unit of the DG of the European Commission that is drafting the next proposal.

Speaker 2 (08:49):

If it's later, it will be the co-legislator. But what I have to say is that, for example, on the council side we are less involved, but we also have our national member organisation that already talks to their ministry. And it's also because we have quite a limited capacity. Now that being said, we are still in contact. Because for example, every six months there's what we call the informal Agri fish council -, so you have an informal for each sector, for each ministry. And we are invited to provide a speech in front of the 27 ministers. That's quite a nice opportunity to have some high-level message being spread.

Speaker 1 (09:34):

This is a question I wanted to ask later, but it fits quite good right now. So you are the umbrella organisation and you have the national organisation. You're in Brussels and clearly on the EU level. I was wondering if you also encourage the national organisations to advocate on European Union level. Is there a communication of ‘we help all of us’ when you advocate on the national level and ‘we do the European level’ or is this more mix and match?

Speaker 2 (10:15):

No, it really depends on what member we talk about. Because membership of *NAME OF THE ORGANISATION* is very diverse. We have some organisations that are only relying on volunteers, for example in Austria and so on. Then we also have organisations where they have staff and for a very few of them - they are the youth section of a bigger organisation that also has staff in Brussels. So, in a way they are lobbying directly with their staff that is in Brussels. But these are also exceptions because I would say there are four or five maximum of our members that are also present in Brussels.

Speaker 2 (10:58):

And encouraging them? -Yes, of course. And it depends on what file, but for example, *NAME OF THE ORGANISATION* has more of an horizontal approach because we don't have the habits nor the capacity to work on sectoral issue. We don't work like: ‘olive markets now, what do we talk about?’

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But then we use *NAME OF THE ORGANISATION* as a platform for our members to sit, for example, in the – in what we call the civil dialogue groups.

Speaker 2 (11:24):

We have experts from our member organisations that are sent on behalf of *NAME OF THE ORGANISATION* to those expert's groups of the European Commission. Or also the market observatories. So they have an opportunity to kind of use *NAME OF THE ORGANISATION* to be present at EU level. Most of the time we encourage them to take the message of the EU level, also to use them at national level. For example, we published a manifesto for the EU elections, but the EU elections, we are aware that they aren't happening just in Brussels. It's happening everywhere around Europe because that's where people are voting. So we tell our members to please use it, feel free to translate it and send it to your candidates in your country.

Speaker 1 (12:08):

Thank you, that makes a lot of sense. But where do you see the biggest challenge for organisations like *NAME OF THE ORGANISATION* for lobbying or making policy advocacy on that European level? Because you sound very well connected. I mean *NAME OF THE ORGANISATION* is an organisation, which exists since the sixties, very old, very embedded. Where do you see the challenges? Is this all of it? Is this something you worked through connections or was this all very incremental? Is it still changing or are there just certain channels?

Speaker 2 (12:59):

If I talk about the challenge or even the threat to what we are doing, I always say that my job is not to spread my personal opinion. Most of the time they are quite aligned with *NAME OF THE ORGANISATION* but that's not the point. It's about the mandate. So one threat could be members involvement in the sense that at the moment everything we do has to rely on a mandate that is given by our membership. So the day we will have less involvement of our members, maybe because you have less farmers - so following the demographic trend I was talking about, or some of our members, have less and less funding because sometimes they rely also on public funding for just for their daily activities. So that could be a threat because then maybe we would see the quality of inputs that are provided in our working groups decreasing. Then it's less insight for us to bring this mandate to the EU. That could be an idea.

Speaker 1 (14:04):

From the institutional side?

Speaker 2 (14:10):

From the institutional side I would say that at the moment, it's hard to say. At the moment we're quite visible because we have a strategic dialogue on the future of agriculture that was launched by Ursula von der Leyen. Our president is going there. So it's quite a good moment. But what we keep in mind is

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- nothing is for granted. So we know that tomorrow, we could have a closed door and that's not what we want. We try to say that if we want to talk about farming, we have to include young farmers. But I also don't know what's going to happen after the EU elections, it's going to be a very different governance and that could mean maybe a different way to work in the EU institution, at least on the political side. I'm not sure. Maybe it also affects the capacity, not only in terms of mandate, but also what capacity can be there, because you need staff, you need budget. For example, if I talk about the strategic dialogue on the future of agriculture, it's a new forum that was created for all the stakeholders and for what our demands towards the commission want. Let's not allow the private company to be represented, because then you would have several companies - yet they can be represented through their umbrella organisation that is a federation. So it's also about how you take the different inputs from all the stakeholders but keeping in mind that farmers will be organised through farmers organisations. So they're not like Nestle or Coca-Cola going as a single company with people who work full time jobs, working on the dossiers and so on. For us it's more challenging.

Speaker 1 (16:10):

That's very interesting. And you made this possible, this worked out?

Speaker 2 (16:16):

Yes, indeed. We had two big demands on the methodology and independent chair which worked. And only EU and brand organisation.

Speaker 1 (16:27):

Great, congrats. Like you were saying - you did all of that. In terms of transparency - it's visible that you had 33 meetings, you're a part of an intergroup with the European Parliament and you have a lot of commission expert groups as well. So, all of that is already present but maybe you've heard that there are also other public participation methods -, for example the EU is providing to have at least the chance for political pluralistic approach. And just to make it super quick, I am just going to name some of those public participation mechanisms. And you can just tell me if you've ever heard about it and if you're aware about the fact if *NAME OF THE ORGANISATION* ever used those. So, for example, do you use 'Have your say Portal'?

Speaker 2 (17:37):

Yeah, we use it.

Speaker 1 (17:38):

How about the 'fit for future' expert group, have you ever been in contact with them?

Speaker 2 (17:46):

No, not to my knowledge.

Speaker 1 (17:48):

And 'Sinapse', which is also another policy platform?

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Speaker 2 (18:12):

I don't think so.

Speaker 1 (18:13):

Have you ever participated as experts in the European Citizen initiative or have you ever had contact with that? As you were part of open public consultations and also closed ones, if I understood correctly and also meetings with the commission expert group. Have you been experts on European citizen panels?

Speaker 2 (18:42):

Do you mean a specific area, like European citizen panels, so ECP or something?

Speaker 1 (18:47):

No, just in general?

Speaker 2 (18:50):

Just in general, yes.

Speaker 1 (18:52):

Has *NAME OF THE ORGANISATION* ever started a petition to the EP or was this not interesting for you? As I already mentioned, you're a part of intergroups. And you also have unofficial groupings, don't you? I mean these so-called friendship groups.

Speaker 2 (19:25):

This I’m not aware of.

Speaker 1 (19:26):

And were you ever represented as a member in the EECS?

Speaker 2 (19:41):

EESC?

Speaker 1 (19:43):

I mean the European economic and social Committee ?

Speaker 2 (19:47):

Yes, we are very much involved in this. And now that they are developing, we are especially involved in the NAT section and with their new system with which they want to involve more and more youth. Whenever they discuss a topic, they want to see it through the youth lens. So as a youth organisation, we are very much involved - through public hearing, written comments, written amendments -.

Speaker 2 (20:16):

And for the committee of the regions.

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Speaker 1 (20:18):

I guess this is quite specific for *NAME OF THE ORGANISATION*, so representing all those rural areas. But maybe also very specific to agriculture that they have such a strong connection with a committee of the regions.

Speaker 2 (20:43):

That is because if they draft a report on the future of the CAP for example.

Speaker 1 (20:49):

The contribution to roadmaps is also something that you're constantly concentrated on. As *NAME OF THE ORGANISATION how come you are invited to so many meetings with the commission , was this always intititiolused?

Speaker 2 (21:22):

I would say there are some units that we have more contact with. For example, if it's a unit that is more focused on policy perspective in the DG geography, for example, that would be more regular contact. Because when we look at the future of agriculture as young farmers and they look at the future of policy making in farming. So we have institutionalised in the sense that they have to put it in the transparency register, but it can be us going to DG agri. It happened recently that we welcomed them in our office. Then of course, you also have the high political level, where we have our presidency meeting the commissioners. So the Commissioner for agriculture, for health and for employment. That can be also the case. And then of course you can also have some other informal discussions that on the occasion of certain events, more in the corridor. But in general, it's nice and useful for us to have bilateral meetings because this is where you can really have - also for *NAME OF THE ORGANISATION* secretariat a more constructive discussion on the technicalities of the side.

Speaker 1 (22:34):

Is this perceived as way more useful as public participation mechanisms, like public consultations?

Speaker 2 (22:46):

Of course, there's a part of influence that comes to play whenever you speak to someone. It gives you a chance to actually influence. But for us it's also about, if you have a new legislative proposal -. when you have a meeting with the unit in charge. It provides a way to sometimes understand the logic behind that. You can’t really read in-between the lines of a legislative proposal because sometimes there was a, a certain political blockage on one aspect for example. But if you have a discussion, it´s makes it easier and better to understand.

Speaker 1 (23:21):

That´s very interesting because on the one hand you mentioned that you're a bit afraid of the doors being shut at any point of time. But then there’s also so much work happening -, which it's not informal, it is just not institutionalised -, in ways of policy advocacy. I wonder what you think about

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this. What should be done differently that it would be more interesting for you, as an organisation to use the institutionalized channels?

Speaker 2 (24:02):

I think it depends. Do you mean the commission or other institutions as well?

Speaker 1 (24:11):

Yes. And what kind of specific point of access in which point of the legislation would be very interesting for you? If your organisation could implement a new mechanism, an institutionalized mechanism that is open for every civil society organisation -, What kind of mechanism would you consider as useful, which is maybe not given yet and which point of legislation would be the most interesting in that sense?

Speaker 2 (24:49):

It's hard to say, but it has happened to me that for some dossiers we didn't have an answer from the commission to have a meeting. And this is a part of what already exists, so I'm not creating anything new, but asking for whenever young farmers ask for a meeting, having a reply even though that sounds obvious. Then I know this is not a *NAME OF THE ORGANISATION* stance, so l know it's going to be anonymous, but I know some of our members, for example, in Flanders, they were requesting a system where, you would have a young farmers test whenever you have a new legislation. So if you think of proposing a new legislation you already have -

Speaker 1 (25:34):

In the impact assessment?

Speaker 2 (25:36):

Impact assessment with an automatic focus on young farmers. And I know that some other organisations, even the European Youth Forum, they want to have it as a youth test. So whenever you have a new legislation, any type of sector -. But it's not necessarily something that *NAME OF THE ORGANISATION* has worked on.

Speaker 2 (25:58):

Giving you a bit more context concerning the council. As I was saying before, it's kind of a black box. We have a discussion with them once every six months. But I know it's also our efforts to be made, it's not about only about complaining. I don't want to just complain. It's our job to make these efforts. But that could still be interesting. I know that some organisations are invited to speak or have somewhat of an informal breakfast before some of the Agri fish meetings, for example - and *NAME OF THE ORGANISATION* is not invited. Just to give an example.

Speaker 1 (26:38):

I just a few more short questions more about coalition and about how you work together with other organisations. As agriculture is a very technical sector, I was wondering whether you share

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information with business organisations? Or do you consult with private companies in the sector to improve impact on decision making? Is there dialogue happening between your organisation and private companies?

Speaker 2 (27:24):

So there is a dialogue, but as I was saying before, it's with the federations of those organisations. One example is again, this famous strategic dialogue on the future of agriculture. *NAME OF THE ORGANISATION* was very involved in this at the beginning. We've even had a joint letter in which *NAME OF THE ORGANISATION* was at the initiative to gather other actors from the whole food value chain. By that I mean representatives of the consumers, of NGOs, of retailers, of food processors. There were no input providers I think. And there was no content in terms of demand towards the public institutions, it was more on the methodology of this upcoming dialogue where it cannot be politicized. It has to be with, as I was saying, a certain type of tools. So we have always tried to follow the idea of 'dialogue being key' if you want to advance. When we talked about animal welfare, we invited for example *name of company* that is a company which provides technological equipment for animal welfare, like the brushes for the cows or things like this.

Speaker 2 (28:37):

But we also had the NGOs defending animals rights. Of course we don't agree on everything - which was interesting - so from farmers to NGOs defending animal rights, but that is why you have this dialogue. Especially in *NAME OF THE ORGANISATION*, we really view it as an important thing. And then between secretariats, of course, we're in regular contact because at some point it's also about sharing information to navigate the crazy pace of work that we've had over the last few months. So there's also this informal calculation between the organisation. We tend to work a bit less with private companies. We have one that is a sponsor at the moment - *name of 'ecological' company*, the same I was mentioning. It's all about - if you start with one and if we start talking to *name of 'ecological' company*, then we're going to have *name of 'ecological' company*we're going to have *name of 'ecological' company*. So this is a very big example, but it would be the same for other type of companies.

Speaker 1 (29:38):

But do you strategically coordinate actions with other umbrella organisations?

Speaker 2 (29:47):

Yes. To give you an example - we had a campaign in 2019 where we had a joint manifesto with *other Umbella Organisation* and an other organisation. So it can happen. And quite recently, we had one on new genomic techniques, which is a very specific pile on the breeding techniques for plants. There we had a joint letter with *Name of an European Association* that is represents the breeders. And we had also had one with the other farmer's organisation, So it really depends on the topic. We even can have adhoc cooperations.

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Speaker 1 (30:28):

Talking about these like joint letters - and of course we don't want to speak about impact or efficiency, because it's way more complex than that and more of a personal subjective perception. Are joint letters an embedded approach? Something you've seen have positive repercussions?

Speaker 2 (30:56):

Yes, I think it's good because it really sends a message that - if you have the logo of several organisations, it's easier for decision makers to understand that there's quite an important issue there. And it's something that concerns everyone or a majority or several actors. So I believe it's quite an important tool that we try to use more and more. In general, within the EU, it's all about compromise. We come from certain national perspectives, I come from France, for example. So you naturally have different approaches, but in the EU people are used to compromise.

Speaker 1 (31:37):

Yes, compromising a lot. From what you said, I get the feeling that this whole networking aspect is super important. You, as an organisation have quite a lot of resources compared to other small civil society organisations, do you think a networking only policy advocacy strategy is something which can work if they don't have the networking in the sense of informal "going to -"? I only lived in Brussels for four months during my internship and it was already crazy to how many receptions I went to in that short amount of time. But is this something which you could consider as a policy advocacy strategy?

Speaker 2 (32:38):

You definitely need those - the network, the context and to some extent, you also need the capacity as an organisation in terms of budget, but it always comes with limitations. If you want to have a staff in Brussels, it comes with the fact you need a budget for this. But then having the biggest budget on the other hand doesn't mean you are going to be the most influential. But if you compare it with certain green NGOs and certain NGOs that have way more public funding -, because we used to have DG Agri funding, we don't have it anymore. So it's quite a limited part of the budget and you probably saw it on the transparency register. - the operating grant of the Erasmus plus.

Speaker 1 (33:31):

Yes, I understand.

Speaker 2 (33:33):

But the important thing is the combination of both. And it also just depends on what you represent in the end. At the moment, it's nice for a politician to show that you are speaking with a young farmer. And of course, this is not always easy but for us, that's the challenge. We are happy to use this technique, but at the same time, it's also about it not being used and bringing concrete propositions and not just being there for the picture.

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Speaker 1 (34:02):

I see that. I have one last question because you already mentioned a lot of very interesting facts and this is less about *NAME OF THE ORGANISATION*, it's more about your own perception and speaking from your experience in Brussels, as a policy advocate. Would you say you've observed a change in the EU between how the perceptions of civil society organisation and private businesses and how they are seen? Because the EU has the stereotype of only big companies, big private sectors being actually the ones who have been seen taking any part of the EU, but now the EU really tries to at least change that perception. But talking more about your insights - have you heard something about civil society organisations feeling like they are part of more political momentums, like their voice are getting heard more. What would you say, Is there less private sector dominance?

Speaker 2 (35:25):

I think there are quite a lot of NGOs that are very visible. Maybe it's hard for me to tell with only a bit more than two years of experience, compared to 10 years ago. But what I see from my experience is that you would take organisations such as *name of an European Association* that is representing the consumers or *name of an European Association*, for example. *name of an European Association*, is a bit more niche as it's quite an important area. But I think they have almost 50 employees in their staff. So I think there's quite a good recognition of NGOs which is good. And it's necessary to have a proper representation. Then for us, we have this specificity as *NAME OF THE ORGANISATION* that sometimes we're blamed for being like ‘we represent an industry that is business because it's farmers and the big farm lobby and so on.’

Speaker 2 (36:31):

And then we try to show what *NAME OF THE ORGANISATION* is exactly. It's actually an NGO. We don't represent people that have a business, but that doesn't mean that we represent their individual interests because it's more as a whole sector. It’s not like when you represent 15 companies - for us it's millions of young farmers. You cannot aggregate them in one specific interest. And for this we have been experiencing less and less support from the EU. As I was saying, we used to have more support and it's become a problem. For example, we recently had a training program for three days that was made for young farmers coming from all over Europe. They come for training on advocacy - so the young farmers who are maybe involved in their young farmers association at national level – so how to advocate.

Speaker 2 (37:30):

And we invited someone from the European Commission and she was very surprised to see how we financed it. The fact that we had to organize ourselves -, which a part of it is the operating grant, but if you look at what it's actually costing in terms of efforts -, it's way more money that should be granted for this. And we don't really have another program that we can use. And this makes us think about what we should do as an organisation. Should we go for private funding? But then you have the

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question of your independence. I would differentiate between the type of organisation. We are seeing a momentum for green NGOs and that's very useful. Again, I don't blame it, but sometimes for organisations such as *NAME OF THE ORGANISATION*, I feel like it's kind of an exception where it's like ‘farmers also have an economic interest.

Speaker 1 (38:22):

That´s a very interesting intersection, especially with your youth focus.

Speaker 2 (38:30):

But that's why we have the Erasmus grant which pretty much says it all - about the way we are. It's for the youth aspect. Also with *NAME OF THE ORGANISATION*, we try to represent the young farmers. So the youth aspect is really one of the two aspects. Rural youth and farmers. But still for the other part of it, we represent quite a relevant sector for our society in general. And we are not the worst because we have staff and we have people working. But last time when I was looking at the activity reports of our organisation 20 years ago, I was surprised to see that *NAME OF THE ORGANISATION* was covering the travel for hundreds of young farmers for a big gathering in this specific place in Europe back then. We would never be able to do that again with the budget we have now.

Speaker 1 (39:20):

To shortly add on to this - You, having had all these gatherings that would not financially possible, at least anymore. Which is also maybe due to all of your members being so spread across Europe. Especially spread in the periphery in rural areas, not even just urban areas. This classical outside lobbying - for *NAME OF THE ORGANISATION*, it would not be possible to create the demonstration?

Speaker 2 (39:57):

No! Interesting point because you probably witnessed the recent farm protest. Even in Brussels which was interesting. . So that was interesting because –

Speaker 1 (40:08):

Yeah, I’m German.

Speaker 2 (40:11):

We never protest as *NAME OF THE ORGANISATION*. On the day of the first demonstration in February, we had a communication as *NAME OF THE ORGANISATION* and also with the signature of our national members presidents. But still, it was not our tractors because *NAME OF THE ORGANISATION* has members that are not individuals. They are the organisations. But that’s definitely a good point on the way to analyze our lobbying action. We don’t use demonstration

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directly. It has to rely on our members. And the same was for other farmers organisation at EU level. For So that’s very specific to umbrella organisation.

Speaker 1 (41:01):

Very interesting. Thank you so much. Is there anything else you want to share or you had a thought about?

Speaker 2 (41:09):

Nothing specific, that´s all from my side.

Speaker 1 (42:39):

Thank you so much for your time again. If you´re interested, I can definitely send you an email of my thesis, once it's done and more structured. Maybe there`ll be some interesting insights for you. I'm also going to focus on the potential participation mechanisms for civil society organisations and ways to influence and to make lobbying. I am going to finish with some policy recommendations. That may be interesting for you.

Speaker 2 (43:20):

Definitely. I would be interest

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