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**Assessing Interest Groups' Influence on EU Climate Policy:
The case of the 2030 Climate Target Policy**

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Abstract

The presence of interest groups (IGs) lobbying EU institutions has grown significantly in recent years. This surge is related to the increasing competences that the EU has been granted in several policy areas. From the consolidation of the single market to the coordination of social, environmental, or health policies, the diversity of interests represented in the EU policy-making process has blossomed. In the middle of this phenomenon, the threat triggered by climate change has made the EU climate policy more relevant than ever. The presentation of the European Green Deal (EGD) in 2019 marks a milestone in the commitment of the EU with addressing this threat while pursuing climate neutrality by 2050. One of the policies that compound the EGD is the 2030 Climate Target Plan (2030 CTP). Its main objective is to reduce GHG emissions by 55% by 2030, in relation to 1990's levels. The plan demands a stronger pledge of EU companies and citizens with climate-related measures in order to achieve the expected goal. Consequently, this policy has got the attention of different actors aiming to influence its final design. Among them, business and environmental IGs are the most salient as they represent private and public interests in the policy debate. Accordingly, this thesis aims to assess whether business or environmental IGs were more influential in the 2030 CTP's policy communication issued by the Commission. Relying on content analysis as a research technique, the IGs' position papers are compared with the policy communication to find similarities in their texts. To illuminate the performance of these actors is crucial since the importance of the EU climate policies is set to endure.

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List of Abbreviations

2030 Climate Target Plan (2030 CTP)
Climate Action Network Europe (CANE)
Collective Action Dilemma (CAD)
Commission Expert Groups (COE)
Content Analysis (CA)
Greenhouse Gas (GHG)
Environmental Action Programme (EAP)
European Emission Trading System (EU ETS)
European Green Deal (EGD)
European Union (EU)
Interest Group (IG)
Non-Governmental Organization (NGO)
Single European Act (SEA)
Small & Medium Enterprise (SME)
World Wild Fund Europe (WWF Europe)

Introduction

In the last decades, the EU has seen an increment in the number of Interest Groups (IGs) looking for influencing its policy-making process. The rise is not only limited to the quantity of these organizations but also refers to the variety of themes – or policy concerns - that are now represented at the EU level. If in the past, these groups were mainly associated with the lobby that business groups exerted over the EU, today more and diverse groups compete for influencing policies and regulations issued by Brussels. This phenomenon is related to the expansion and deepening of the European integration project towards areas beyond the single market consolidation. Policy areas such as social policy, environment, health, among others, have become increasingly engaged with the EU regulation. This has prompted the involvement of groups with interests that deviate from the ones represented by business organizations. An important segment of these groups does not seek influence to benefit private actors but to improve the condition of the society as a whole. Relying on that difference, they are also known as public IGs.

The presence of diverse and contrasting policy interests at the core of the EU policy-making deserves to be studied since it contributes to understanding the way how the EU policies are shaped, and why some interests appear to be more influential than others. The union, committed to a pluralistic system of representation that ensures the same treatment for every group, encourages the participation of these organizations as a way to include the civil society in its policy-making process (Lelieveldt & Princen, 2011). This open and competitive setting contributes to challenging the traditional dominion that business interests enjoyed in the EU (Mahoney, 2007).

While the literature about the role and influence of IGs in the policy-making process has prominently relied on the US experience, in the EU context the topic has grown in importance after the strengthening of the EU as a supranational regulator (Hardacre, 2011). Most of the literature, however, has revealed the salience of business IGs in the design of EU policies as they possessed key resources useful for an effective lobby (Bouwen, 2004; Mahoney, 2007). They were pointed as one of the main providers of information and expertise to EU

bureaucrats (Chalmers, 2013). Relying on decades of collaboration, business IGs' knowledge about the functioning of the EU policy-making process is defined as superior, making it easier for them to sketch fruitful lobby strategies. Last but not least, business IGs enjoy a large budget that enables them to pursue their agenda effectively.

Nevertheless, this literature was mostly written in a period in which the main aim of the EU was to advance in the consolidation of the single market. In that context, other policy concerns were usually considered secondary. Given that the consensus among the business IGs was supportive of policies that strengthen the single market and boost the competitiveness of the European companies, there was a match in the positions that the EU and the business community possessed. That alignment is expected to have reinforced the influence of these groups in the design of policies within the EU. However, the centrality that market-related policies enjoyed in the EU has progressively been overshadowed by emerging concerns that have got the attention of both the EU public opinion and the authorities (McCormick, 2001). Recently, the protection of the environment and, especially, the fight against climate change have turned EU policies towards designing extensive regulations that tackle the perils of environmental degradation and climate change. In this new scenario, the capabilities of business IGs to be successful at influencing the EU are challenged by public IGs – as environmental ones – that better represent these novel concerns (Christiansen, Føllesdal, & Piattoni, 2003; Olsen, 2021).

This thesis contributes to fill the gap of research on the vie for influencing the EU policy-making that business and public IGs pursue amidst the emergence of climate change as a policy priority. The presentation of the European Green Deal (EGD) in 2019 represents a paradigmatic effort carried out by the Commission to lead the climate policy of the Union for the next decades. Within this effort, the 2030 Climate Target Plan (2030 CTP) stands out as it sets a reduction of 55% in the emission of greenhouse gases in the EU by 2030 in relation to 1990's records. Previously, the reduction was targeted at 40%, meaning that the new plan entails a larger commitment by different actors of the EU society to achieve the goal.

Consequently, this research aims to clarify whether business or environmental IGs got a larger influence in the elaboration of the 2030 CTP by the Commission. According to this

aim, the main objective is to assess the capacity of influence of both business and environmental IGs in a context in which climate policies have become a priority for the EU. Underpinned on the literature about IGs, three hypotheses will be tested to explain the results. The first hypothesis refers to the assumption that IGs possessing a bigger set of resources to conduct lobby effectively – funds, personnel, antiquity - will achieve a larger influence. The second hypothesis tests whether sharing the regulatory willingness with the Commission increases the influence of the IGs. Lastly, the third hypothesis seeks to prove whether the support of the public opinion towards one position reinforces the influence of the IGs defending that position in the EU policy-making process.

The research will use the position papers issued by six IGs – three representing business interests and three on behalf of the environment – and the 2030 CTP communication delivered by the Commission. These texts are analyzed in order to find parallels in the proposals, ideas, targets, and measures that these IGs suggest and the actual propositions offered by the policy communication. Influence will be assessed as the degree of text similarities between the IGs' position papers and the communication prepared by the Commission. Comparable approaches have been used in previous researches, assuring the correctness of this method (Klüver, 2009; Bunea & Ibenskas, 2017). The documents will be reviewed through the tools provided by content analysis. This technique enables the researcher to study any kind of text, favoring an analytical approach based on the utilization of codes and categories.

The thesis is structured in four chapters. The first chapter consists of a theoretical review about the concept of IG, the importance of its presence in the EU policy-making process, and how these groups have influenced EU environmental and climate policies. The chapter closes with the presentation of the hypotheses. The second chapter offers a contextualization of the 2030 CTP, explaining its importance under the frame of the EGD. Next, it introduces the six IGs chosen and concludes with an overview of content analysis as a research technique. The third chapter reveals the results of the research, presenting the data about which IGs attained more influence in the 2030 CTP policy communication. The results are contrasted with the hypotheses in order to evaluate the accuracy of each of them at explaining the results. Finally,

chapter four outlines the conclusions of the research, remarks some limitations of the results, and offers some recommendations for researchers interested to continue studying IGs in the EU context.

1. Interest groups and environmental lobby in the EU

In this chapter, the reader will find information about the definition of IGs, their activities, and how they participate in the EU policy-making process. In addition, information about the number of IGs present at the EU level is offered in order to highlight the importance of business and environmental IGs – the latter as representatives of public IGs – and justify the attention given to them in this research. Next, a subchapter reveals insights about the characteristics of the lobby carried out by these groups in environmental and climate-related policy discussions to illuminate which are the factors that strengthen or weaken the performance of these groups influencing EU policy-makers. The chapter concludes with the presentation of hypotheses focusing on the influence of business or environmental IGs in the EU policy-making process.

1.1. Interest groups: Definition and characteristics of its surge in the EU

Governments are susceptible to receive the influence of certain groups that have a particular interest at stake in the design of policies and regulations. Usually, these groups claim that they are entitled to participate in the process since they are in possession of relevant information or knowledge in the matter to be addressed, thus making them essential contributors to the drafting of effective policies (Chalmers, 2011). Democratic governments around the globe design different methods to welcome the participation of civic organizations. In those instances, governments listen to their opinions, requests, and recommendations about policies to be drafted (Bevir, 2010). In the European Union (EU) it is no different. Taken as a supranational government that is in charge of regulating several policy areas, the EU is exposed to the pressure of multiple groups that claim to be considered in the policy-making process (Saurugger, 2008; Heidbreder, 2012).

Interest groups (IGs) are long-lasting actors in the political field, even though they do not formally pretend to be named as political actors. Typically represented by business-related organizations such as business chambers or trade associations, they have permanently tried

to influence the policy-making in the EU and elsewhere. These groups, together with Non-Governmental Organizations (NGOs), or also called Public IGs because of their representation of the public interest, will form the center of attention of this research. Altogether, they make the case for the majority of external actors participating and seeking to influence the EU policy-making (Mahoney, 2007).

Following the definition of IGs used by the EU, these can be either a group composed of people or other entities - such as firms or any type of organization – in possession of a certain degree of internal organization that makes them act as a single body. Additionally, these groups must show a given preference over the outcome of the EU policy-making process, while refusing to formally participate in the political system (Council of the EU, 2013). This definition underscores a relative structural looseness of these groups in comparison to traditional political actors, such as political parties, since the formers do not have to compete in elections to be included in policy discussion nor they need an ideology or doctrine guiding their decisions. Its flexible organization and the few requisites they face to be engaged in the EU policy-making process make a significant part of their success at mobilizing either public and private and interests to the political sphere.

However, IGs are not only defined by what they are, but also by what they do. It is widely agreed that their main political objective is to influence the outcome of the policy-making process in favor of their preferences (Bunea, 2013). To attain this, IGs rely on formal and informal mechanisms that enable them to access and discuss their policy interests with policy-makers (Lelieveldt & Princen, 2011). The unraveling of these mechanisms helped to coin the concept of “lobby” that, from its inception, was attached to the activities carried out by IGs. Firstly studied in the US - a country in which IGs had an early development -, lobby was meant to refer to any attempt for influencing policy-makers by external actors (Andersen & Eliassen, 2001). While traditionally associated with the excessive influence of business and money in politics, lobby is nevertheless defended by its advocates as a cunning communication technique that helps anyone to achieve their purposes. Furthermore, institutions on behalf of the quality of democracy consider lobby as an integral element of democratic governance. Transparency International – a global NGO studying and reporting

about the state of democracy and corruption worldwide – points to the execution of lobby as a healthy symbol of freedom of speech, participation, and access to the government (Transparency International, 2015).

As the EU deepens its regulatory scope in the areas in which has the right to do so, European IGs have gradually moved from lobbying domestic governments to try to influence the institutions in Brussels. Important policy areas such as the functioning of the single market, the trade policy, agriculture, or the environment are handled by EU-level officials in charge of designing policies to be applied throughout the EU territory. Consequently, the interests at stake in Brussels are high, drawing the attention of several IGs aimed to advance their policy objectives in the new center of European politics (Hardacre, 2011). The arrival of hundreds of IGs to Brussels has contributed to the idea of the “lobbyfication” of the EU policy-making process (Andersen & Eliassen, 2001). This phenomenon does not only refer to the mushrooming number of IGs and lobbyists swarming about the EU policy-makers, but also to their alleged successfulness at directing the outcomes of the policy-making process. The results of this “lobbyfication” are contributing further to the formation and deployment of more IGs around the EU institutions since, through a mirroring effect, more groups sharing a policy purpose observe lobbying EU officials as an effective method to achieve their goals.

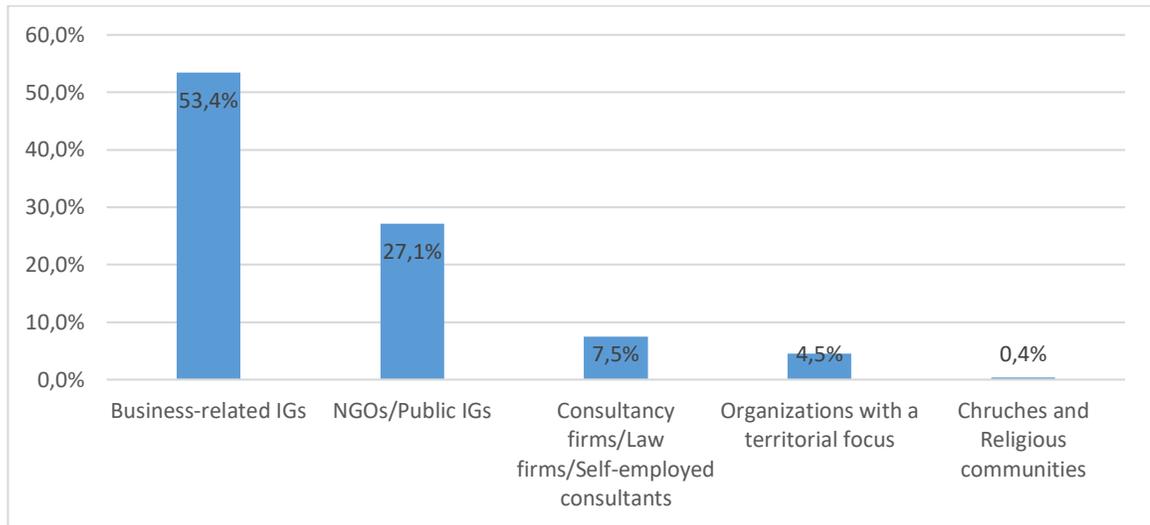
According to statistics presented by the EU, in February 2021, there are more than 12000 organizations registered to effectuate lobbying activities in the EU institutions (European Union, 2021). While registered, these organizations are formally recognized and can approach EU officials and institutions in order to effectuate their mission. The summary of these organizations – displayed in Graph 1 – offers a clarifying picture of the types of organizations that exert lobby-related activities at the EU level. More than 50% of these organizations are economy-related ones. This reveals the crucial and historical relevance that business-related interests have played in the EU. These groups pursue influence in different ways. Firms can autonomously seek policy influence. Big firms can assume the costs of traveling to Brussels and questing for a reunion with EU policy-makers to reveal their policy goals. Small and Medium Enterprises (SMEs) are less prone to have direct access to EU-level officials, then they mostly rely on the representation of their interests by trade or

business associations. These groups – in which large firms also participate – intend to be the business’ single voice on the relationship of the sector with the political field. However, considering the diversity of companies in different economic sectors, the task of conveying all their voices into a single message becomes formidable. Therefore, organizations focused on representing companies of specific economic sectors have blossomed.

Representing around 25% of the IGs registered at the EU, NGOs compose the second-largest conglomerate effectuating lobby activities in Brussels. While they can also seek influence through an individual effort, these groups join in Pan-European federations or umbrella-like organizations in order to reinforce their message and sum up resources that, taken individually, do not match with the capacities of well-supplied business groups. NGOs or public IGs oppose the dominance of business – or private – interests in the political sphere. These groups claim to represent the concerns of the citizens in contrast with the self-centered position that most of the business IGs perform. NGOs chiefly consist of individuals sharing a similar policy interest (it may be the protection of the environment, the enhancement of women’s rights, the promotion of cycling in urban areas, etc.) that get together to reinforce their message and approach to policy-makers. If the task of organizing citizens with similar views at the national level is already difficult, the organization of these groups at the EU-level faces multiple hurdles such as the lack of funding or the Collective Action Dilemma (CAD) – explained in details later - that may restrict their ability to influence the policy output effectively (Olson, 1965; King & Walker, 1992).

The presence of other groups carrying out lobby activities in the EU such as think tanks, universities, law firms, consultancy offices, territorial-focused organizations, and religious bodies points to the diversity of actors that are engaged with the policies drafted by the EU. Nevertheless, the number of these groups is still lower in comparison to business-related IGs and NGOs. This fact remarks the reason why these groups are commonly studied by the specialized literature. Building upon previous research, this thesis focuses its attention on business and public organizations at studying IGs influence in the EU policy-making process.

Graph 1: Interest Groups registered at the EU



Source: EU Transparency register, data as of February 2021

Since the onset of the European integration project, groups related to the representation of the EU industry and agriculture participated in the design of EU-level policies thanks to their knowledge of the matters being addressed by EU regulation. Additionally, the EU itself has supported the formation of Pan-European groups in order to reduce the alleged prevalence of business interests in Brussels. An example is the support that the European Environmental Bureau - one of the leading organizations on behalf of environmental policies in the EU – received. The group was granted EU political backing at its foundation (1974) as well as regular funds to persist in its labor of counterbalance business lobby on environmental regulation (McCormick, 2001). Similar support was assigned to public IGs on behalf of the health of the EU citizens against the powerful lobby deployed by tobacco firms in the discussion of stringent rules on the tobacco market (Boessen & Maarse, 2009).

The open relationship that the EU has with IGs is shaped by a pluralist system of interest representation (García Lorenzo, 2003; Lelieveldt & Princen, 2011). This system stands in opposition to schemes where organizations - on behalf of specific interests - are granted with strengthened prerogatives to participate in the policy discussion, configuring a system denominated corporatism. Pluralist systems welcome the participation of organizations

representing diverse interests in the policy-making process. According to this view, these organizations should be all treated equally, being granted the same rights to express their opinions and suggestions. No preferences are assigned to specific interests, and the regulation ought to be devised in order to fit every group. In general, this is the approach that the EU promotes concerning IGs. Whether some assistance has been granted to particular organizations in their development is justified by the ulterior goal of balancing the capacities of every interest to have the same possibilities to access and participate in the EU policy-making.

Even though the pluralist system appears to be fairer, the system prompts up the competition among IGs in order to be more aware and better prepared for the instances in which the EU receives external inputs. Although this competition is thought to be observed between organizations that have diverging viewpoints, it is also appreciated among IGs sharing the same position in the matter. IGs contend each other to be in the frontline of the policy-making process while trying to put their concerns on the top of the list for policy-makers. Generally, the earlier you access the political system and voice your comments, the more the probability that those comments will be taken into consideration by the regulator (Jones, 2010; Hardacre, 2011).

The pluralist system offered by the EU is explained by the increasing number of areas in which the EU regulation is involved. If at some point a corporatist-like model around business groups and trade unions was envisaged for the EU¹, now that model looks dated as more and more policy actors are constrained by the EU policy-making. The deepening of the integration process makes EU officials aware of several policy areas, although the number of EU civil servants is comparatively low in relation to the bureaucracy in the Member States (MSs)². A limited number of functionaries pressed by the necessity to deliver effective

¹ In the mid-1980s the EU designed the Social Dialogue, a corporatist-like programme seeking to maintain a regular encounter between three employers' organizations – led by BusinessEurope – and three employees' groups. The outcome of this dialogue served as an input for the Commission's future proposals (Lelieveldt & Princen, 2011).

² Around 32.000 people work on the European Commission, the executive branch of the EU (European Commission, 2021), in comparison 250.000 people work on the Italian central government (Borgonovi & Ongaro, 2011), and an even more impressive number of people is hired by the Portuguese government, 500.000 people approximately (European Commission, 2018).

policies to be applied throughout the EU territory justifies the welcoming approach that the EU has to the inputs carried by distinct IGs. In several policy areas, the knowledge, information, and data provided by IGs are crucial for clarifying the benefits and consequences of specific regulation in a determined policy sector (Council of the EU, 2013; Chalmers, 2013).

Authors have also pointed out that IGs help the EU in the implementation of the regulation throughout the EU territory (Christiansen, Føllesdal, & Piattoni, 2003; Kaya, 2018). As IGs have a solid presence on the ground – some of them in several MSs -, they can contribute to enhancing enforcement of EU regulation. Since the implementation of EU policies is vastly hanging on the willingness of national actors to comply with it, the support of as many organizations as possible strengthens the legitimacy of the EU regulation making it to be respected on the ground. This phenomenon is particularly visible in business-related regulation in which, without the contribution and backing of business IGs in the design of regulations, the implementation of EU-level policies would be weakened. Hence, the commitment to dialogue and work with these organizations benefits the EU in its aim to observe its policies implemented across the territory.

Similarly, the EU is concerned with the consolidation of a truly European identity among the citizens and actors that are present in Europe. The idea of having a supranational government ruling in many policy areas – the role of the Commission – is consubstantial to the forging of a common identity that justifies the effort for a deep and enlarged EU. In this vein, the EU favors activities and programmes that help people and organizations from every MS to get closer to each other, while reducing the value of internal borders. Ultimately, the solidification of a European identity underpins the long-term projection of the EU as a supranational polity. One of the examples in which this common European conscience is manifest is through IGs working at the EU level (Streeck & Schmitter, 1991; Greenwood, 2003). Organized as European federations of national-based groups, these IGs assume the task of assembling the voices of entities from different MSs about the consequences of EU policies in their territories. European IGs must then coordinate different positions and knit a common response to the EU's call for participation. In their internal dialogue, discussion,

and comprehension of national – and even, local – points of view, these European IGs play their part in the forging of common European identity (Knill, 2001).

1.2. The role of interest groups in the EU policy cycle

This subchapter turns to the activity of the IGs within the EU policy-making process, showing which institutions these organizations target and how. In general, policy-making in the EU follows the same stages as on the national level. In a nutshell, the policy cycle consists of five phases: agenda-setting, policy formulation, policy decision, policy implementation, and evaluation. Among these phases, the IGs will center their action in the policy formulation stage, while also playing distinct roles in other stages. Policy formulation implies the discussion and revision of different instruments in order to assess which one is the most suitable to tackle a certain issue. In this discussion, IGs will offer their points of view as well as trying to convince EU-level authorities about the suitability of their proposals.

Some IGs attempt to raise concerns to the EU-level to set off a policy discussion to address them. They seek to influence the agenda-setting of the EU. However, their success is often dependent on the willingness of the EU to modify its policy agenda. Commonly, the Commission – the body in charge of initiating and commanding the draft of EU policies and regulations – sets the EU's agenda and priorities. Therefore, the job of IGs at trying to put forward themes to be discussed will rely on the consent of the Commission to modify its policy agenda and including those concerns³.

It is in the policy formulation stage that IGs will play a large role in the EU policy-making process (Bunea, 2013; Klüver, 2013). This is explained because in this stage the Commission opens up its doors to receive feedback from diverse groups interested in contributing to the design of the policy. As it was mentioned, the Commission does not have enough personnel

³ Eventually, the policy agenda of the Commission can also change if an urgent situation emerges demanding its rapid addressing. Examples of this are demonstrated by the offshoots of wide crises such as the Eurozone debt crisis (2010) that obliged the EU to take actions for a closer monitoring of macroeconomic figures in the MSs and banks, or the COVID-19 pandemic (2020) that accelerated policies towards strengthening the collaboration on health issues among the MSs.

to cope with the growing number of policy sectors that are being handled at the EU level. Thus, to generate effective policies or regulations, it necessarily needs the cooperation of external actors providing expertise and suggestions. The opinion of these groups will vary as they represent different – often, contrasting – interests, however, the role of the Commission is to hear these groups and delineate policies to effectively tackle the issue concerned by the policy in question.

Generally, the work of IGs is facilitated by the EU-sponsored policy consultation periods. In these instances, the EU offers the possibility to anyone – from IGs to citizens – to submit their opinions, critics, or recommendations on the idea of drafting a policy to address a certain problem. The duration of these processes varies from few weeks until a couple of months. During this time, IGs issue a type of documents - called position papers - that summarizes the main points that the EU should consider before writing a policy proposal or regulation (Crombez, 2002; Klüver, 2009). Consultation periods add transparency to the work carried out by IGs, which has often been framed through opaque and informal procedures. In contrast, consultation periods are open and every organization can participate under the same rules. Moreover, position papers are meant to be public, so not only the Commission knows the stance of IGs, but also any organization may be informed about their counterpart's position as well as the rest of the citizens.

It is just to recognize that the activities of IGs amidst the EU policy-making process are not restricted to the submission of position papers under formal consultation periods. Lobbying also implies the organization of seminars, meetings, and the arrangement of reunions between representatives of IGs and EU policy-makers - leading to what has been named as the informal governance of the EU (Christiansen, Føllesdal, & Piattoni, 2003). Whereas seminars to discuss particular aspects of the EU regulation are progressively made public, the direct dialogue between IGs and EU officials is frequently kept private as both parties are afraid that the honesty revealed in those dialogues may be misunderstood whether the discussion is disclosed.

In the next stages of the policy cycle, the IGs have a limited role as much of their influence is expected to be considered by EU officials in the policy formulation phase. Whereas the

policy decision stage is anticipated by the discussion between Commission's policy-makers and representatives of the EU Parliament and the Council of the EU in order to achieve an agreement on the convenience of the policy tool, the evaluation stage is led by the Commission's role on following up which are the outcomes of the policy on the ground⁴. In between, the policy implementation stage offers an opportunity for IGs to be allied with the Commission in the task of transpose EU policies into the domestic regulatory framework of each MS. IGs may exert pressure on national governments and on the actors to whom the regulation is targeted to enhance the efficacy of the EU legislation (Hofmann, 2019).

1.3. The attainment of influence in the EU environmental policy

Before focusing on how IGs influence EU environmental policies, it is important to describe some structural advantages and disadvantages that two of the main groups discussing these policies – the business-related and environmental IGs – face.

Research on the organization of these groups has stressed the larger capacity of business IGs to access and influence the EU policy-making because of the vast experience this group has on European affairs after being among the first ones to be established at the EU level (Greenwood, 1997). As any sectorial group, the EU companies swiftly perceived the consequences of the regional integration. The shaping of the single market affected their competitiveness and strategies of expansion. The weakening of the internal borders set off a whole new scenario for companies that were used to cope only with national regulation. Therefore, business teams soon began to assemble a coordinated response to the building of the single market. They calculated the costs and benefits of the free movement of goods, services, capital, and people. They were agile to communicate their proposals to the EU and soon were recognized as a solid actor in the shaping of EU-level regulation (Vasilcovschi & Ilie Oanta, 2014).

⁴ Eventually, IGs may also contribute to the evaluation of EU policies when they collect data and information about the results of the policy and these are submitted to the Commission.

Additionally, the business IGs realized that despite the expanded regulatory arm of the EU, this has puny resources to enforce the application of policies and regulations throughout the territory. As long as the enforcement of EU-level legislation depended chiefly on the willingness of MSs governments - being the disciplinary actions triggered by the breach of it often lengthy and inexpensive -, business IGs astutely understood that they could assist the EU in its aim of implementing regulation thanks to the profound network of firms included in these groups (Kaya, 2018). The assistance would be offered if the policies were mutually agreed upon by the EU and the business IGs. The offer became attractive as it benefited both actors. The EU saw how the implementation of its policies was strengthened on the ground, and business IGs got a special place in the discussion of policies involving their regards.

On the contrary, public IGs - as environmental organizations - faced a tougher road in their way to improve their influence on the EU policy-making. First and foremost, public IGs suffer the CAD, a phenomenon observed when a public interest seeks to become organized (Lelieveldt & Princen, 2011). As it was early described by Mancur Olson (1965), public IGs – when successful – obtain benefits that are dispersed throughout the entire population, regardless of their participation or engagement with the policy process. Thus, the structure of incentives favors the decision of the citizen to not participate in these groups as the benefits will come anyways. By contrast, sectorial groups – as business IGs – enjoy a larger commitment from their members as the benefits of their success is strictly shared among the participants of the group.

In addition, public IGs find it more difficult to coordinate a common response to the EU policy-making process as they usually have at disposal fewer financial resources than their business counterparts. The lack of funding may debilitate their influence in the process as they have less staff to prepare effective documents or to arrange meetings with EU officials (Dür, Bernhagen, & Marshall, 2015). The literature assumes that the main resource of public IGs is their representativeness of the people's voice (Christiansen, Føllesdal, & Piattoni, 2003; Olsen, 2021). This is particularly salient in the EU context in which – in electoral terms – the people's voice is only heard to design the Parliament, but it does not have a role in the nomination of the Commission. Amidst the so-called democratic deficit that would affect the

EU, the presence and contribution of public IGs are essential for policy-makers as they have become effective carriers of the people's policy messages (Wiebke, 2016).

Among the literature that focuses on the way IGs influence environmental or climate policies in the EU the research led by Adriana Bunea (2013) displays features of the relationship between the Commission and IGs in this realm. Firstly, she confirms that lobbying activities occur mostly in the policy formulation stage and that these groups aim to translate their policy preferences into the policy outcome. Secondly, she finds that the groups that either have a median position regarding the policy debate or supporting the status quo, are more likely to succeed in influencing the Commission. This is understood as the EU would promote a consensual mode of policy agreement among the interests at stake (Mahoney, 2007). Considering environmental regulation, thus, business IGs show an advantage since they usually have a mild position towards this regulation. Bunea notices that the results of her research may have been affected by the political stance of the Commission led by José Manuel Barroso, which favored liberal policies. The acknowledgment of the importance of the political priorities of the Commission's leader opens the door to further considerations of the role that politics play in the EU policy-making process.

The fact that the EU seeks consensual points among the interests involved in the policy-making stands in clear contrast with other systems of governance. This was remarked by Christine Mahoney (2007) who compared the activities and rate of success of IGs in the EU and the US. Mahoney discovered that in both polities business IGs had leverage over other groups, however, the reasons behind that were different at each side of the Atlantic Ocean. Whereas the advantages for the business IGs in the US were related to the financial support that these groups granted to members of the Congress in the period of elections, in the EU their success was attached to the mediation that the EU pursues among rivaling interests. Oftentimes, the mediation ended up in a negotiation beneficial for the business interests.

While Pieter Bouwen (2004) also concluded on the key role that resource endowment plays in favor of business IGs in the EU, Daphne Biliouri (1999) stressed several elements that would benefit environmental groups in the policy negotiation. Some of her observations include the fact that these groups become stronger and more visible – both for the EU policy-

makers and the citizens – when working in alliance with similar organizations. In this way, they can sum up the limited resources at their disposal. In addition, environmental groups should choose high-profile issues to improve the likelihood of being influential in the EU. High-profile issues mobilize the people while adding pressure to EU officials to not go against the people’s will (Danielian & Page, 1994; Klüver, 2009). Then, the current emphasis on climate change would play in favor of these groups as the topic grows relevant in the last years.

1.4. Hypotheses

The first hypothesis claims that *the larger the capabilities of the IGs, the greater their influence on the drafting of the 2030 Climate Target Plan*. This hypothesis refers to the extent in which IGs’ capacities enable them to have a larger influence on the EU policy-making process. According to significant literature, the role of elements such as the experience of the group, the number of personnel working in the organization, and the funds available to carry out the lobbying activities are crucial to improve the likelihood of being successful at influencing governmental officials (Streeck & Schmitter, 1991; Blache, George, & Bulmer, 2011; Dür, Bernhagen, & Marshall, 2015).

The experience of the IG points to the history of the group and its presence in the political life of the state in which it has its roots. Older organizations have often more prestige and respect from both policy-makers and citizens, making it easier for these groups to be welcomed by authorities. In the EU, the oldest organizations are linked to industrial and agricultural interests. This is understandable since those were the economic sectors that were more affected by the early stages of regional integration. Considering this fact, two of the business IGs analyzed in this research are among the firsts to be ensemble at the EU level.

Along with the experience, the record of participation and productive engagement with the regulator are also important elements for IGs. Organizations in possession of a lengthy and satisfactory record of participation in the discussion and elaboration of policies are in a good

position to be well-regarded by the authority. This characteristic is observed when groups show their willingness to participate in the instances offered by the EU to do so. The mutual understanding for the role of both the IGs and the Commission generates a good rapport that crystallizes in the invitation from the Commission to enduring and trustable IGs to be stable members of Expert groups that permanently advise the Commission's policy agenda. A combination of experience and a long record of good relationships gives to these organizations superior expertise on the functioning of the policy process. For instance, they can identify which are the officials in charge of writing certain policies as well as the right timing to execute their lobbying activities (Greenwood, 1997; Blache, George, & Bulmer, 2011).

The availability of human and financial resources is essential for the work of any organization. In the case of the IGs this is particularly visible on the necessity for counting with enough staff to investigate, coordinate, and prepare common positions that represent the members of the group. Financial resources are necessary to fund travels, meetings, and other types of instances to promote their viewpoints. Regarding the personnel, the literature points not only to the number of full-time workers collaborating for IGs, but also to the quality of them. Well-trained and experienced employees make the elaboration of informative and persuading position papers easier. In addition, former government officials are particularly welcomed by IGs as they are versed in the know-how of the policy-making process while having colleagues and friends in posts of policy responsibilities facilitates the communication between the IG and the political power.

In the EU context, as it commonly happens elsewhere, business IGs have at their disposal more financial resources to underpin their activities than NGOs or public IGs (Hardacre, 2011; Best, 2016). Since the members of these groups are normally enterprises – or associations of them – directly touched by the regulation sketched at the EU level, they do not hesitate to transfer financial resources to the organization on their behalf. By contrast, public IGs – whose main members are individuals – have to struggle hard to commit the citizens to cooperate financially with the organization on their behalf. Victims of the CAD,

public IGs are typically in a detrimental position in comparison to business IGs regarding access to financial resources.

In definitive, a revision of the capacities of the IGs would justify a larger influence of business IGs over environmental ones, as the formers have at disposal more capacities and resources to strengthen both their influence within the EU policy-making.

The second hypothesis argues that *the closer the alignment of the IGs with the position of the Commission, the greater their influence on the drafting of the 2030 Climate Target Plan*. This explanation bases its model on the role that the alignment with the regulatory will or with the position of the Commission regarding certain policy has in the discussion of such policy instruments. The Commission – as national governments too - ends up favoring the groups that are aligned with them in the discussion of a policy, enabling a larger influence of those organizations in the definition of the content of the policy.

The pluralistic system of representation portrayed by the EU allows that every position should be heard by the Commission. However, the act of listening to all the actors can be daunting. Being pressured by the time – and sometimes by the urgency of issues that demand a fast policy response -, the EU will center its attention on the arguments, opinions, and suggestions that are aligned with the primary position of the EU in the matter analyzed (Wallace & Young, 1997; Blache, George, & Bulmer, 2011). This process can happen partly involuntarily as the EU endeavors to listen and integrate all the policy positions into a single and effective policy proposal. Therefore, the views that share the regulatory willingness with the EU will have an advantage as they offer information that is practical in the objective of the EU of addressing an issue in a certain manner.

Groups that do not share the original position of the EU around certain policies have fewer incentives to participate in the consultations offered as they know that their positions are distant to the Commission's one, making it unrealistic to consider their suggestions to be included in the EU policy proposal. Aware of this obstacle, many IGs that do not share the regulatory willingness with the Commission simply do not participate in the instances offered by the EU or publicly criticize the position of the EU. Unfortunately, these groups are

undermining their future influence in policy discussions because – as it was reviewed before – the record of good relationships between IGs and the authority is crucial to enhance the necessary trust between them (Lelieveldt & Princen, 2011).

In the case of the EU environmental and climate policy, it is usual to see how divergent is the position of business and public IGs. Whereas business groups try to contain the scope and profundity of such a regulation, environmental organizations support the establishment of a wide range of policy tools to limit the damage that nature and climate undergo by human cause (Long & Lörinczi, 2009). As the EU is increasingly committed to the regulation that protects the environment and citizens from threatening global warming, it is expected to find that environmental IGs will have an advantage in the reception of their opinions and recommendations since they are aligned with the position of the Commission. Therefore, environmental groups are likely to have a larger influence on the ideas presented by the Commission on the climate policy analyzed.

The last hypothesis states that *the better the IG represents the people's view on climate change, the larger its influence on the drafting of the 2030 Climate Target Plan*. The justification of this hypothesis lies in the relevance that public opinion has in the development of any democratic system of governance. In such systems, governments are aware of the main demands and necessities of the population, prompting up policies to address those issues and obtain people's favor (Munck, 2016; Freedom House, 2021). Attaining people's support is beneficial for the electoral aspirations of current authorities in their aim to remain in power. In the case of the Commission, even though electoral democracy does not play a significant role in the nomination of its President, it can be argued that the reasoning and source of legitimacy of the EU reside in the improvement of the welfare of the EU citizens (Pollack, 1997). Taking this into consideration, the Commission devotes substantial resources to assess the state of the public opinion and the main concerns of the EU citizens⁵.

⁵ One of the prominent instances in which the EU citizens are engaged with the EU is the series of Conferences for the Future of Europe. An initiative sponsored by the Commission that organizes seminars and talks around the EU territory in order to receive inputs from the citizens about the priorities in which the EU should focus on in its future (Commission, 2021).

According to this hypothesis, groups that have a position that is closer to the one that is predominant among the population will enjoy a larger influence on the Commission since they are representing the people's voice in the policy-making process. In the EU, elections are only limited to the conformation of the European Parliament, the Commission is devoid of competing groups portraying the people's preferences as political parties are supposed to be. In this scenario, organizations such as public IGs or NGOs replace the role of political parties and transmit people's views towards officials in charge of writing EU policies.

Furthermore, as traditional forms of participating in politics are weakening – partly because of the horizontalness promoted by the technology and partly because of the successive cases of patronage and corruption within them –, the preference for less institutionalized ways of civic engagement, such as the IGs, is increasing (Steffek & Nanz, 2008). Public IGs or NGOs are blossoming after the confidence that citizens are putting in them (Warleigh, 2003). These groups appear to be managed by citizens – in contrast to politicians – in an apparent more transparent way than any political party. The level of accountability of their leaders is presented as to be larger than the one offered by party senior members. These reasons reinforce the Commission's welcoming approach to these entities as legitimate vectors of the citizens' voice.

Focusing on the EU climate policy, the people's voice is expected to be closer to environmental groups than to business IGs. This is explained by the narrowness of the businesses' viewpoint in comparison to the one of environmental groups as representatives of public IGs. Frequently, business groups center their attention on the costs and benefits of the regulation for their economic sector and the companies belonging to it. Albeit they often include a concern on employment and the consequential effect on the people's wellbeing, this concern is mainly limited to economic grounds. On the contrary, environmental groups present their arguments centering on the effects of regulation on the sustainability of ecosystems but also on the improvement of the citizens' life. Going beyond a strict economic justification, these groups address health, educational, housing, or social troubles through the lens of climate regulation.

According to the increasing public concern on environmental and climate issues, it is expected that the public favors a strengthening of the measures destined to tackle environmental threats. In consequence, it is expected to see environmental IGs to be reinforced in their influence on the adoption of recommendations by the Commission's climate policy under study.

2. Case selection and research method

In this chapter, the reader will find a summary of the EU environmental and climate policies in order to understand how these have increased their importance in the EU political agenda. Then, the attention on the 2030 CTP will be justified as part of the all-embracing EGD. The 2030 CTP is described to make the reader aware of the number of economic sectors touched by the policy that justifies the attention of both business and environmental IGs in their intention of influencing the EU climate policy. Next, the chapter introduces the IGs considered for this research. Lastly, the chapter explains the analytical method that will be applied in this study -- content analysis -- including the reasons why it was chosen as an appropriate research technique to achieve the objectives of this study.

2.1. The importance of the 2030 Climate Target Plan within the EU climate policy

Even though the environment was a latecomer concern for the EU, it has gained an important place among the list of policy priorities for the institutions placed in Brussels. It was not until the Single European Act (1986) that the environment was formally included as a permanent preoccupation for the EU (McCormick, 2001). This fact was anticipated by a number of events that raised awareness on the matter. Groundbreaking publications as “The Silent Spring” by Rachel Carson (1962) or “The Limits of Growth” by the Club of Rome (1972) paved the way to solidify a public concern on the way advanced societies were depleting the planet’s resources to base their economic activities. A similar worry was showcased amid the Paris student manifestations that shocked the world in 1968. The political sphere – aware of the growing public sentiment about the environment – could not omit this issue anymore.

At the EU level, the first major program on the environment was released in 1973. Coined as Environmental Action Programme (EAP), it set broad guidelines to manage the relationship between industry and nature. Although considered superficial and reactive, it was the beginning of a series of EAPs and other policies that configured the EU’s proactive stance

regarding the topic. Progressively, the EU became one of the polities in possession of one of the strictest regulations regarding environmental protection and climate change worldwide. The regulatory body of the EU has then served as a model for foreign entities seeking to strengthen its green regulation (Kelemen & Vogel, 2009; Zito, 2011).

An actual cornerstone of the EU policy regarding environment and climate is the overarching European Green Deal (EGD). Conceived as the flagship policy of the recent Commission administration led by Mrs. Ursula von der Leyen, the EGD was announced in 2019, and it aims to cement the EU commitment to the fight against climate change while setting the grounds for respecting the pledge reached at the Paris Agreement of limiting the increase of world temperature to 1.5°C in relation to pre-industrial records (European Commission, 2021). The catastrophic consequences expected after a major rise of the world temperature urged the governments to take bolder positions regarding climate and, again, the EU has decided to set standards as the EGD's main promise is to achieve climate neutrality by 2050⁶.

As an all-embracing plan, the EGD consists of several policies and regulations which are expected to make a contribution to its main objective. The establishment of a European Climate Law (ECL) plays a key role as it aims to set the legal obligation to achieve climate neutrality by 2050, a goal that is expected to put pressure on the MSs, the business community, and the EU citizens about the necessity to respect and put forward measures destined to fulfill this objective (European Commission, 2020). Another salient program on behalf of the EGD is the 2030 Climate Target Plan (2030 CTP). This plan aspires to set a more ambitious Greenhouse Gases (GHGs) emissions reduction throughout the EU territory by 2030. Previously, the reduction was expected to be 40% in relation to 1990 but, under the new plan, the abatement is set to be 55% in relation to 1990 figures. Accomplishing the new target implies a profound commitment of different actors of the economy and society since their usual procedures and behaviors will have to be amended to cope with the target (European Commission, 2021).

⁶ Climate neutrality is a concept that implies that no net GHGs emissions are released to the atmosphere, being them neutralized or paralleled by the capture of carbon emissions or by its absorption through different methods. The concept also promotes the phasing out of carbon-related fuels as well as the usage of renewable sources of energy for the generation of electricity.

The depth of the changes to be set by the 2030 CTP is visible on the main policies that it proposes.

i. Revision and expansion of the European Emission Trading System (EU ETS)

The EU ETS is the first and major carbon market in the globe. It operates not only in EU countries, but also in Norway, Iceland, and Liechtenstein. It lists emissions of more than 11.000 heavy energy-using installations and airlines, amounting to 40% of EU GHG emissions. The system is based on a “cap and trade” principle. The EU sets a cap on gas emissions that is reduced over the years. Companies acquire emission allowances issued by the EU and they can be traded. As the cap for emissions diminishes yearly, the price for allowances goes up incentivizing the investment in low-carbon energies (European Commission, 2021). The EU aims to accelerate the rate at which the limit of emissions – or cap - is reduced annually. Now it stands at 1.74% but the EU wants to strengthen it at 2.2% (European Commission, 2021).

ii. New emission targets for sectors not included in the EU ETS

The EU ETS does not cover every sector of the European economy. It leaves out transport, agriculture, buildings, or waste management, being all of them important energy-consumption areas as well as polluters. Out of this concern, the EU has set targets for GHG emissions reductions in these sectors to each MS (European Commission, 2021). The targets were calculated regarding the wealth of each country, requiring higher efforts to rich countries. The EU goal is to reduce the emissions of these sectors by 30% in 2030 compared with 2005 levels. Even though the states are in charge of designing policies to accomplish their targets, the EU offers a list of recommendations in which it expects the MSs to work to attain comparable results. Some of the recommendations are the promotion of public transport, efficient heating and cooling systems, or climate-friendly farming practices.

iii. Integrating land use, land-use change, and forestry into the emission reduction effort

The EU strives to stop the destruction of the carbon sink areas and advance into a commitment in which emissions from land-use shall be compensated with equal

removal of CO₂ from the atmosphere, the so-called “no-debit” rule (European Commission, 2021). Carbon sinks are any reservoir that stores carbon-containing chemical compounds. The largest carbon sinks are the forest and sea, hence the EU's interest to enhance the administration of these resources across the continent. In addition, the EU pursues that farmers get more incentives to move towards greener ways of harvesting, including the allotting of biomass to be used as a source of energy. Lastly, the EU seeks ways to adopt the “polluter pays” principle into the food market, aiming to make more expensive the purchase of non-environmentally-friendly products (European Commission, 2020).

- iv. Legislation on renewable energy, energy efficiency, and fostering the governance of the Energy Union and Climate action.

Considering that the energy sector is responsible for 75% of the EU's GHGs emissions, the 2030 CTP aspires to reform the legislation on renewable energies to make it more accessible and convenient while accelerating the transition towards a more integrative European energy system (European Commission, 2021). The ambition is to reinforce the investment in renewable sources of energy, rolling out wind and solar projects, plus setting up the conditions for hydrogen development in Europe. The goal is that at least 32% of the energy produced come from renewable sources by 2030. In addition, the EU works on several strands involving different policy sectors in the objective of cleaner energy: the efficient usage of heating system in the industry and data centers; the integration of renewable energy to buildings; development of technologies that improve the usage of renewable energies in sectors hard-to-decarbonize, etc. (European Commission, 2020).

The number of areas involved in the 2030 CTP generates that different actors are aware of the discussion of the policy and its possible consequences for their fields. This research will focus on two groups of IGs, business, and environmental ones. Assuming the divergent positions that these groups traditionally embody, it is expected to see contrasting opinions about the necessity of increasing the climate ambition of the EU. Business interests should be more attentive to the costs that investing in new and cleaner technologies has for their

finances. These groups are expected to ask for less stringent targets as well as non-binding measures since the transition to a green economy would be a difficult challenge for several industries. Additionally, business-related organizations are expected to ask for more financial support from the EU in order to back the necessary investments to cope with the policy objectives.

On the other hand, environmental IGs are expected to endorse and support the renovated effort established by the EU in the 2030 CTP. They are likely to contribute with several measures that would improve and accelerate the consecution of the GHGs emission reduction goal. Furthermore, these groups would suggest that other economic sectors should do more for accomplishing climate-related goals. They are likely to back stringent and binding measures to limit the chance of non-compliance with the EU standards. Ultimately, environmental IGs are expected to emphasize the social benefits of the 2030 CTP. They would remark how advantageous is the plan for the EU citizens as well as how well the policy addresses not only the people's concern on climate, but also recurrent aspirations for better health, housing, and public transport.

2.2 Interest groups under study

As this research privileges a revision in-depth of the threads by which influence is noticed on the text of the policy, it was necessary to narrow the number of organizations to be included in the revision. Three groups were chosen on each category of IGs. Three business-related organizations, and three environmental groups. All of them have an EU-level scope view, with members scattered through the EU territory. They are active participants in the EU's policy consultation periods, demonstrating their interest in EU-level engagement. In addition, all the groups chosen are enrolled at least in one Commission Expert Groups (CEGs), which are continual instances of debate and dialogue about the state of specific policy areas and their potential need for regulation or reform. These instances that reunite Commission's experts with external actors, such as the IGs, serve the purpose of these groups to enhance their knowledge about the policy priorities included in the agenda of the

Commission in the areas of their interest. The groups chosen are among the oldest on behalf of their interests in order to be sure they have experience trying to influence the EU policy-making. One group in each conglomerate represents a particular concern within the business and environmental sectors, while the other two works as major voices on behalf of the sector as a whole.

Next, are presented the six IGs considered by this research to assess the influence of their policy sector in the drafting of the 2030 CTP.

- i. *BusinessEurope* is the result of an early attempt to join the industrial representatives of the six MSs reunited on the European Coal & Steel Community – the precedent of the EU. Born as the *Union des Industries de la Communauté Européenne* (1958), the group aimed to provide suggestions to fulfill the objectives fixed by the Treaty of Rome. Nowadays, BusinessEurope represents national federations and single companies across 35 European countries. From their headquarters in Brussels, BusinessEurope stands as the main voice to support policies fostering growth and competitiveness (BusinessEurope, 2021). Additionally, they claim representation of European business interests in the external arena.
- ii. *Eurochambres* claims to be the group representing national chambers of commerce and industry besides their local constituents in the EU institutions. Eurochambres aims to foster the competitiveness of European business as well as to strengthen socio-economic progress. To do that, Eurochambres strives to influence policy-makers on the necessity to draft policies supporting business interests, especially those of small & medium enterprises (SMEs). The organization bases its power on the density of the network of companies associated (Eurochambres, 2021). A salient example of the active agenda of Eurochambres at the EU level is the organization of the European Parliament of Enterprises, a biannual forum that convenes European entrepreneurs in the hemicycle of the EP to express their demands and requirements to EU officials and decision-makers (European Parliament of Enterprises, 2021).

- iii. The European Association of Mining Industries, Metal Ores & Industrial Minerals, commonly known as *Euromines*, was founded in 1996 to represent national associations of mining across Europe. Among their members are also individual mines, either large or small, which give a job to a total of 350.000 people. Euromines's office in Brussels aims to ensure an early consultation with the EU in the areas affecting the industry. The organization advocates for the mineral raw industry through the promotion of its benefits and the value it offers to society (Euromines, 2021).
- iv. *Climate Action Network Europe* (CANE) was founded in 1989 and functions as an umbrella organization representing over 170 groups from 38 European countries summing up a scope of 47 million citizens (CAE, 2021). CANE is the regional branch of Climate Action Network International, a worldwide network of more than a thousand NGOs that work on behalf of the fight against climate change. CANE's mission will focus mostly on influencing policies addressing global warming and climate change (McCormick, 2001).
- v. The *World Wildlife Fund Europe* was founded in 1961 as an international NGO aiming to contribute to the preservation of wilderness and the reduction of the impact of human activity on nature. It is known as the largest environmental organization with 5 million supporters worldwide, leading landmark initiatives such as the Earth hour. Its office in Brussels (1997) coordinates the national branches of the NGO in 18 EU MSs as well as advocates for environmental policies at the EU level. Usually, it works in alliance with CANE and other Pan-European environmental groups (World Wide Fund for Nature, 2021).
- vi. *Surfrider Foundation Europe* is a regional branch of a US-born environmental organization that seeks the protection and preservation of the world's oceans and coastal areas. The group was originally founded by a handful of surfers demanding safe access to coastal areas in California (1984). Gradually, the organization evolved to an advocacy group with several chapters around the globe. In Europe, it was established in 1990 demanding the protection of oceans, rivers, lakes, and the rest of waterways. Recently it has broadened its scope to

water quality and health, coastal development, climate change, and marine litter. It has 13.000 members across 9 EU countries (Surfrider Foundation Europe, 2021).

2.2. Content analysis as a research technique

This research uses the position papers issued by these IGs and the policy communication written by the Commission as the main texts over which Content Analysis (CA) tools will be applied. The list of these documents is presented in Table 1. The tools provided by CA are aimed to unveil similarities among the ideas suggested by the IGs and the Commission. A high degree of textual similarities – in proposals, standards, targets, measures recommended, etc. – shall be considered as a successful influence by IGs’ position papers on the Communication drafted by the Commission.

Table 1: IGs’ Position papers and the 2030 CTP Policy Communication

Organization	Title of the Document	Issuing Date
European Commission	Stepping up Europe’s 2030 Climate Ambition. Communication from the Commission to other EU Institutions	September 2020
EuroBusiness	European Business Input to the 2030 Climate Target Plan's Public Consultation	June 2020
Eurochambres	EUROCHAMBRES’ input to the public consultation on the 2030 Climate Target Plan	June 2020
Euromines	Public consultation for the EU climate ambition for 2030 and for the design of certain climate and energy policies of the European Green Deal	June 2020
Surfrider Foundation Europe	Surfrider Foundation Europe views on the EU Climate Target 2030	June 2020
Climate Action Network Europe	CAN Europe's Position on the EU 2030 Energy Targets	June 2020
World Wildlife Fund Europe	A new European Industrial Strategy	March 2020

Source: 2030 CTP Open Consultation

Position papers are useful texts to analyze as they contain the condensed opinion of IGs regarding certain policy. They synthesize proposals, suggestions, recommendations, but also critics. Nevertheless, the lobbying activities are not restricted to the submission of these documents. IGs can carry out several actions in order to achieve their goals. Unfortunately, access to these activities is not easy for the researcher as most of them have a private character. Therefore, the study of the influence of IGs is always affected by the lack of data reachable by the researcher. Amidst the discretion that characterizes lobbying, position papers are commonly used as the chief source of information for researchers studying IGs' influence on policy-making processes (Klüver, 2009; Bunea & Ibenskas, 2017).

CA is a technique used to analyze communicative data which is applicable to any sort of text (Smith, 1975; Berg, 1989). According to CA, a text is understood as any format involving a communicative intention, such as books, magazines, pamphlets, newspapers' articles, TV shows, interviews, speeches, etc. CA has been proved successful in communication sciences research, and it is generally considered an efficient alternative for social science investigations relying on textual-type of data.

The technique is chiefly about coding. Every text analyzed is screened through a coding operation based on some conceptual framework. Coding aims to reduce the vastness of a text into manageable categories related to variables (Babbie, 1989). Codes can be generated from inductive or deductive procedures. While inductive codes allow the researcher to underpin them on the content itself⁷, deductive codes are previously given to the researcher as they are mainly based on theoretical precepts. The scholar can also use a combination of both if needed (Abrahamson, 1983).

CA can be conducted at different levels of the text, being a decision of the researcher whether words, sentences, paragraphs, concepts, or semantics are going to be used as the basis for the analysis. The determination is taken after considering which level maximizes the suitability of the data with the objectives of the research (Berg, 1989). In this thesis, statements will be

⁷ The inductive approach resembles the method known as the grounded theory that was introduced by Anselm Strauss & Barney Glaser (1967). This method promotes the capacity to extract reliable data from qualitative sources – such as interviews, participant observation, or ethnographies - through methodic and sensitive processes of capturing the reality.

analyzed as a source of information. Statements have the advantage that are longer than sentences while shorter than paragraphs. In addition, they capture precisely the intention of the message. Sometimes sentences are too short to effectively describe the intention of the author, being common to take two or more sentences to have a clearer notion of the message transmitted by the author. As statements have a declarative purpose is easier for the researcher to tag statements into different categories.

The literature points out the efficiency and cost-effectiveness of CA as its main advantages (Harwood & Garry, 2003). Certainly, CA does not need a large staff to be conducted nor does imply the utilization of special devices to process the information as it can be carried out by hand. Moreover, CA stands out as an unobtrusive technique to extract data (Babbie, 1989). It is common to observe how the process of making interviews, surveys, or ethnographies may interfere with the spontaneity of our unit of observation, potentially leading to unnatural and nuanced responses. This is avoided while using CA as it works on texts already written, enabling the researcher to be certain of its role as a non-influential observer.

Conversely, CA has three major shortcomings. Firstly, it can only be carried out on existing material, limiting its aptness to the availability of valuable texts on the research topic. Secondly, authors have questioned the subjectivity of its procedure pointing to validity and reliability flaws⁸. To circumvent this, the researcher has to be very clear and transparent in every decision taken throughout the study, permanently checking the quality and appropriateness of the used codes. The assistance of colleagues reviewing the coding process reduces the risk of validity and reliability faults (Abrahamson, 1983; Babbie, 1989).

Lastly, the literature has undercut CA's capacities to lead successful causal studies suggesting its use in explorative and descriptive researches (Berg, 1989). However, several studies using CA have been done to reveal a relationship between variables using texts as a basis. In

⁸ In social sciences research, validity refers to the accuracy by which the variables handled by the researcher effectively measure the concepts expected to be explained. Reliability points to the consistency of the work done by the researcher as it is expected that equal results are going to be achieved if other researcher carries out the investigation following the same steps.

particular, the influence of certain actors or events in changing previous social patterns may well be uncovered by CA.

As the presence of sets of codes regarding environmental studies is limited⁹, this research relies mostly on inductive coding. This means that the categories to be displayed are going to be based on the information found in the texts. Relying on inductive categories has the advantage of making easier a dialogue between the position papers and the policy communication as both groups of texts are related. The use of theoretical codes would have hindered the relationship between texts as categories found in other environmental texts may have not been present at all in the discussion about the 2030 CTP. In this manner, the research leads a policy-focused CA that extracts its categories from the issues and topics that are relevant in this context.

After finishing the screening process that highlights which are the categories most found in each text, I proceed to sum up the statements of each category for each conglomerate of IGs. After having the total number of statements for each aggregate of IGs it will be possible to assess whether business or environmental IGs' position papers are more similar to the 2030 CTP communication. The degree of similarity will work as a proxy to measure the influence of IGs in the Commission's work.

⁹ The main set of coding categories found is the work developed by Jean-Frédéric Morin (2017) who wrote a thorough list of concepts relating trade and environment. Although extensive, the categories are mostly expected to be found in the environmental chapters of international treaties.

3. Assessing interest groups influence

This chapter displays the main results of the CA carried out. First, it reveals a descriptive review of the categories most stated in the business and environmental IGs position papers, and in the policy communication issued by the Commission. This level of analysis enables us to find whether the topics most covered by the IGs are the same as the ones most commented by the Commission. Then, the analysis turns to assess influence. To do this, a number of important categories for the development of the policy were chosen and the statements issued by each conglomerate of IGs were compared with the statements issued by the Commission to check whether business or environmental opinions or proposals were more likely to match with the Commission's ideas. Finally, the hypotheses were tested to verify which one is able to explain the results more convincingly.

3.1. Descriptive analysis

The Content analysis applied to the policy papers offers some light on the manner IGs seek to influence the content of the Commission's communication of the 2030 CTP. In the documents analyzed, both segments of IGs present their arguments regarding the main objective of the policy – strengthening the reduction of the GHG emission to 55% by 2030 in relation to 1990's emissions – and about the number of measures sketched by the Commission in order to attain it. Additionally, the position papers reveal suggestions, questions, and even some critics to the analysis carried out by the Commission – being the latter particularly noticeable in the business IGs' texts. In general, the content of the position papers is presented in a direct manner, using a simple structure that facilitates the comprehension of the IGs' message for the Commission staff.

Broadly, it is visible the distinct approach towards the policy that business and environmental IGs have. On the whole, business IGs seek to attenuate the ambition shown by the EU as they highlight the uncertainty and economic downturn that the private sector faces in the light of the COVID-19 pandemic. In comparison, environmental IGs embrace the ambition of the

EU climate policy, although they strive for even more stringent measures to make Europe coping with the commitments set up in the Paris Agreement – to limit the increment of the global temperature to 1.5°C.

The documents were divided into three groups. First, the Commission's official communication of the 2030 CTP, second, the position papers of the business IGs and, third, the position papers of the environmental IGs. The results of the analysis of the position papers belonging to the same segment – either business or environmental IGs - were summed up in order to create an overall view of the categories used by each segment of IGs. This step allows the comparison of the information offered by the Commission with the inputs provided by the distinct IGs taken as a whole.

The review of the texts got as a result that the Commission's policy communication was made of 326 statements which were classified in 42 different categories – being energy transition the most stated category. The sum-up of the business IGs' position papers reveals 147 statements divided into 22 categories – health crisis as the most enunciated category. Lastly, the three environmental IGs' position papers presented 147 statements that were classified into 29 categories – with energy transition as the top category, similarly to the Commission's communication. The complete list of categories of each group of texts is presented in the Appendix.

To guide the numerical analysis, it is important to reveal two assumptions. Firstly, it is assumed that having a fully balanced text requires the same number of statements per category. In this manner, there is no category or a specific topic that gets more attention or text coverage than others leading to an equilibrated document. Secondly, it is thought that the number of statements is associated with the importance of the category. This equals to say that the more statements a category has, the more important the category is in the text.

Considering these two assumptions I proceed to calculate the number of statements each category should have in order to have fully balanced texts in each group. Obtaining this number requires a simple mathematical operation. Per each segment of IGs, the total number of statements is divided by the categories found. To facilitate the comparison, I transposed

this number into a percentage. As a result, each category of the 2030 CTP’s communication should have 2.4% of the statements in order to have a fully balanced text. Categories with a larger percentage are expected to be more relevant for the Commission. In the case of the business IGs’ position papers, each category should have 6.7% to have balanced texts. Therefore, categories with more percentages are considered to be salient for this segment. Finally, for environmental IGs the percentage is 3.4%, meaning that categories with a larger percentage are significant for this segment’s viewpoint.

The categories with more percentage than the benchmark mentioned are displayed in table 2:

Table 2: Most significant categories for each group of texts¹⁰

2030 CTP Policy Communication	Business IGs’ Position papers	Environment IGs’ Position papers
*Energy Transition (12.6%)	Health Crisis (28.6%)	*Energy Transition (17.9%)
Transport Sector (9.2%)	Critics to the IA (16.3%)	Shipping (8.3%)
Land Use (8.9%)	Challenges to EU Businesses (8.8%)	Current Situation (6.9%)
*EU ETS & Carbon Pricing (7.7%)	*ETS & Carbon pricing (6.1%)	GHG Emissions (6.9%)
Climate Policy parallel to Economic growth (6.1%)	EU's global dependence (4.8%)	Industry Renovation (6.9%)
Urgent & Ambitious Action (4.6%)	Raw Materials (4.8%)	2030 CTP Not ambitious enough (6.2%)
Building Sector (4.6%)		Oceans' role (4.8%)
Green Investments (4.3%)		Circular Economy (4.1%)
The EU as global climate leader (3.4%)		*ETS & Carbon pricing (3.4%)
2030 CTP's Social benefits (3.4%)		Just Transition (3.4%)
Agriculture & Food production (3.4%)		

- *Communication of the 2030 CTP*

At observing the table is possible to appreciate that in the communication of the 2030 CTP five out of the eleven most important categories – including the top-three – are sectorial areas

¹⁰ The categories that are present in two or more lists are displayed with an asterisk (*)

(i.e. Energy transition, Transport challenges, Land use, Building sector, and Agriculture & Food production). This fact is explained by the character of the communication itself that aspires to enlist the measures and targets for each of the most crucial economic sectors in the fight against climate change.

On the other hand, the presence of EU ETS and Carbon pricing – the only category present in the list of the most important categories for each group – reveals the centrality that this carbon market policy implies for the functioning of diverse economic sectors as well as for attaining the reduction of GHG emissions aspired by the Commission.

The high position that the category for “Climate policies parallel to economic growth” gets on the communication of the 2030 CTP may illustrate the Commission’s intention to address the concerns of the business community that an excessive focus on environmental policies inevitably limits the businesses’ capacity to perform their activities sustainably. The Commission’s communication offers plenty of examples about the form in which well-designed climate policies may favor the competitiveness and sustainability of the European industry in the long term. Alternatively, the Commission appears to be receptive of environmental IGs in their quest for stringent policies and climate-related objectives as it assigns an important percentage of statements to underscore the urgency of the climate crisis and therefore, the necessity for ambitious proposals to reduce the risk of a climate disaster. The magnitude of the climate’s challenge faced by the European community seems to require bold measures, and the communication of the 2030 CTP acknowledges it.

The category about the social benefits handed by the 2030 CTP depicts an important aspect of the Commission as it performs the governmental role of the supranational European polity. The Commission must not only relate with organized stakeholders – as the business or the environmental associations – in the design of new policies, but it has an unavoidable duty to tie its policies and regulations with the advancement of the well-being of the EU citizens. Even though the Commission is not democratically elected, its role is not only judged by economy-related standards – as the GDP, or trade surplus – but by its capacity to improve the quality of living for the hundreds of millions across the EU territory.

With this in mind, the Commission's 2030 CTP stresses the benefits for the population of reinforced environmental and climate policies. From the Commission's perspective, the European society has an opportunity to build a better future underpinning its development on the strengthening of the climate policies. Elements as diverse as the new jobs generated by green technologies, the possibility of living in a cleaner and less polluted areas, and the improvement in health that the latter implies are all presented as examples of the social benefit of the 2030 CTP.

As the EU has been granted the right to exercise substantive areas of the MSs' foreign policy, in particular, the capacity to uphold trade negotiations with third states or entities, the Commission's communication underscores the salience of the EU climate policy at the international level. Eventually, the EU takes its ambitious climate policy as a tool to increase its influence on the global level. To do that, the EU is prone to be considered as a source of inspiration or "role model" either for states or regional entities in their effort to address pressing climate challenges.

In general, the communication written by the Commission recognizes and addresses the concerns of the two main stakeholders regarding environmental policy, the business community, and the environmental groups. These concerns are responded through the emphasis on the correlation between economic growth and green policies – in the case of the business community's fears - and the support for an urgent and bold climate – in the case of environmental IGs. Additionally, the Commission performs its governmental-like role as it highlights the social benefits that the policy brings to the EU citizens. This element remarks the importance that improving public welfare means for the policies drafted by the Commission. Finally, the international sphere is used as a field in which the EU can exert a global leadership benefitting the position of the bloc in future negotiations.

- *Business IGs*

The list of the most covered categories in the business IGs' position papers is composed of only one sectorial area, the raw materials. The list is visibly tilted towards elements that defy

the idea of a bolder climate approach. The top-three categories may be considered as putting into question the necessity of the 2030 CTP as they highlight the associated costs for EU companies of stringent climate policies in a period in which the health crisis has already significantly affected the financial condition of several firms.

The COVID-19 crisis is presented as wreaking havoc around the EU businesses. It is associated with a deep economic downturn, both from the supply and demand sides. It is also argued to be hitting equally both large and SMEs firms across the region. The pandemic has disrupted trade and supply chains, obliging firms to keep afloat only after swift measures to adapt to the unstable situation. Employment is mentioned as been hard-hit because of shutdowns in factories and shops. The business community stresses the question of whether jobs lost are going to be recovered since the pandemic appears to be driving a digital turn in multiple sectors. All these factors are referred to as huge obstacles that must be reckoned by the Commission before drafting the measures unraveled by the 2030 CTP.

Underscoring the way that the COVID-19 crisis alters the scenario for the European economy and how is this apparently downplayed by the Commission, serves as an example of several other critics made by the business community to the manner in which the Impact Assessment of the 2030 CTP was conducted. Many assumptions of the assessment are put into question since they would not represent an accurate description of the real condition of the European firms. An incorrect prognosis damages the impact assessment and it may lead to ineffective climate-related measures. The business IGs recommend to the Commission to re-evaluate the impact assessment in order to consider the situation of the European businesses through the lens of the health crisis and the prospects of uncertainty coming along with it.

In addition, the business IGs enumerate several challenges that EU companies shall face to fulfill the new objectives and goals implied in the 2030 CTP. Stringent climate policies are feared to add more pressure to already overburdened budgets for firms that are in the process of renovating their facilities and procedures to cope with the requirements of previous EU green plans. Therefore, the achievement of new GHG reduction goals seems to be excessive in the eyes of the business community.

The external role of the EU is also mentioned by the business IGs, however, they approach it from a completely different perspective than the Commission does it. Business associations do not focus on the leadership that the climate policy brings to the EU, but they point to the increasing dependency on external markets – either for energy supplies, medicines, or other goods - that the EU would be undergoing. Whereas free-trade and global supply chains were traditionally praised as a demonstration of the expansion of the liberal administration of the economy, the recent surge of a protectionist wave has come to make noticeable some flaws observed in the system. For instance, an over-reliance on external markets is troublesome in the middle of a global trade disruption caused by a pandemic. Thus, according to the business IGs, the EU should prioritize the competitiveness of the European firms and the strengthening of the regional industry. Moving in that direction would reduce the dependence observed by the European economy as well as improving the labor market as more companies would re-shore their facilities to European soil.

The counterpart of the business IGs' position papers is no other than the Commission itself. They try to make clear which are their concerns as well as their proposals to improve the condition of the European business landscape under the frame of a strengthened climate policy. No particular interest is assigned to address the comments of the environmental IGs nor to appeal to the EU public opinion in order to reinforce business' statements.

- *Environmental IGs*

Environmental position papers present four sectorial categories among the most stated – Energy transition, shipping, industry renovation, and oceans' role. One of them – energy transition - is also present in the list of the policy's communication and in both cases, it occupies the top position among the most commented topics. The top presence of energy issues suggests the centrality of the topic for climate specialists as it is affected by the lasting presence of heavily polluting sources, but also it offers possibilities to help in the green transition thanks to the development of renewable sources.

The presence of the Emission Trading System and Carbon pricing both in the environmental IGs' position papers and the policy's communication confirms the relevance of the mechanism in the EU climate policies. Environmental groups – aware of the efficacy of the mechanism but also about the nuisance it generates around the business community – bid for strengthening the ETS and expanding it to more economic sectors as they know its value as a policy instrument capable to accelerate the accomplishment of the GHG emission reductions.

However, it is salient to observe the presence of two categories that speak of the positioning of the environmental IGs in relation to the 2030 CTP and the climate crisis in general. First, the “current situation” category stresses the necessity of modifying the actual procedures and behaviors of the European firms and citizens in order to cause an effect in the benefit of climate. Second, the notion that the “2030 CTP is not ambitious enough” reinforces the view shared by environmentalists that green policy should override any other policy concern as there is no other bigger threat looming the society than climate change. In short, these two categories express the regulatory willingness that environmental IGs possess as they strive for measures and targets beyond the Commission's proposals.

The environmental IGs' texts analyzed show that their main interlocutor is the Commission in its role of policy-maker. Environmental groups stand behind the spirit of strengthening climate policies and demonstrate it while offering several proposals and targets that, in most cases, will end up being more ambitious than the 2030 CTP's ones. As part of the comprehensive view that environmental IGs have, they do not get fixed around traditional green concerns as preservation or protection of the biodiversity, but they move beyond that to touch upon other areas. Particularly relevant for these groups are going to be economy-related issues as they are aware of the crucial importance of these elements for achieving a successful climate policy in the EU and elsewhere. The number of statements about the Industry renovation, circular economy, and the EU ETS and Carbon pricing proves this.

3.2. Influence through textual similarities

To analyze influence from the IGs’ position papers to the Commission’s policy, I focus on the usage of particular words, concepts, ideas, or targets that either business or environmental IGs offer and are later found in the communication of the 2030 CTP. To limit the scope of the research, the analysis is firstly carried out on the categories that are present in the list of the most mentioned ones in the policy’s communication and either in the list of the most mentioned categories for business or environmental IGs. Only one category is present in the three lists presented, “EU ETS and Carbon Pricing”. Next, the comparison is made to “Energy Transition” as the unique category mentioned in the policy’s communication and in at least one list of the IGs – that is in the environmental IGs’ list. Later, the analysis compares several categories in relation to their importance for the spirit of the climate policy as well as for being representative of different areas touched upon by the draft of the 2030 CTP. After conducting the analysis, it is expected to reveal whether business or environmental IGs’ position papers had a higher degree of similarity with the policy’s communication, meaning that those IGs exerted more influence in the Commission’s policy drafting.

The summary of the categories revised is presented in table 3:

Table 3: Categories studied to measure the influence of IGs

Category present in the list of the most mentioned ones in the 2030 CTP’s Communication and in the list of both Business and Environmental IGs	Category present in the List of the most mentioned ones in the 2030 CTP’s Communication and in the list either of business or environmental IGs	Categories representatives of the Climate policy effort
EU ETS and Carbon Pricing	Energy Transition	Transport challenges
		Green Investments
		Industry renovation
		Just Transition
		The EU as a global climate leader

- *EU ETS and Carbon pricing*

The EU ETS is one of the flagship policies shaped by the Commission to tackle the emission of GHG cost-effectively. The system has been proved successful at reducing CO₂ emissions while putting forward incentives for the usage of cleaner sources of energy to the industries affected by it.

In the opinion of the environmental IGs the system needs to be strengthened and expanded to more sectors in order to achieve the expected GHG reduction target. The idea of strengthening the EU ETS is depicted through a reinforced annual cap reduction, the elimination of free emission allowances, and the obligation of investing auctioning revenues on climate projects.

“A reform of EU ETS will have to include increasing the pace at which pollution is reduced annually, mandating 100% auctioning revenues to be used towards climate action and phasing out free allocation of emission allowances” (WWF Europe, position paper, p. 3)

The expansion of EU ETS is suggested to begin with the shipping sector, a concern that is raised by groups preoccupied with the sustainability of the maritime environment.

“Extending EU ETS for it to include shipping is a crucial step, but it should not be considered as a right to pollute and should be accompanied by both legislative and non-legislative incentives for the sector to reduce emissions” (Surfrider, position paper, p. 4)

On the other hand, business IGs put into question the necessity to strengthen and expand the EU ETS. Strengthening the system will likely cause a substantial rise in the cost of using coal, oil, or natural gas as energy sources, being this detrimental for the finances of the European companies which may lose competitiveness against less-regulated firms from other regions.

“Higher carbon prices will represent an additional burden in particular for companies that operate internationally and face competition from less regulated economic actors” (Eurochambres, position paper, p. 2)

Regarding the expansion of the system to more economic sectors, business IGs hesitate about the convenience of the idea. Again, the argument of losing international competitiveness is played. Business IGs seem focused on raising awareness about the potential harm that EU companies may suffer in the long term if the system is enlarged significantly.

“Due to differences in abatement costs and exposure to international competition between ETS and non ETS sectors, adding new sectors to the current EU ETS should be considered with caution” (BusinessEurope, position paper, p. 2)

Additionally, the business community argues that the mere idea of overhauling the EU ETS is an erroneous decision since the system was amended recently and several firms are still adapting themselves to the latest changes. A permanent revision of the EU ETS – as it happens with a constant revision of any significant regulation – means an additional burden for companies trying to cope with the legislation.

“The EU should refrain from a rushed revision of the ETS Directive, which has been adapted only recently for the upcoming trading phase IV. The ambitious implementation of existing legislature should take precedence” (Eurochambres, position paper, p. 3)

The communication drafted by the Commission seems to agree with the position of the environmental IGs since the consideration of reforming the EU ETS is explicitly mentioned and includes both strengthening and expanding the system. The EU remarks the convenience of the method to achieve the 2030 CTP’s targets, then it is logical to advance into further decarbonization of other economic sectors through a reinforced and larger EU ETS mechanism.

“Increasing the EU’s 2030 Climate ambition will also require a strengthened cap of the EU ETS to create the necessary long-term carbon price signal and drive further decarbonisation” (Commission, policy communication, p. 15)

“The Commission has assessed carefully the possibility of reinforcing and expanding emissions trading as a tool to achieve greenhouse gas emissions reductions at the EU level” (Commission, policy communication, p. 14)

Overall, the strengthening and expansion of the EU ETS appear to be a topic in which the position expressed by the environmental IGs got more influence in the Commission than the caution posture expressed by business IGs. The similarity of ideas reveals that in this topic environmental IGs were more influential than their business counterparts.

- *Energy Transition*

Energy transition is present in the list of the most mentioned categories for the policy’s communication and the environmental IGs. This situation seems to underscore the salience of the topic at the time of forcing a reduction in GHG emissions. If such an agreement links the environmental organizations with the Commission, business IGs appear to be detached from this concern as their chief focus on the topic will be related to regulatory issues.

Environmental IGs stress the relevance of promoting efficient usage of energy to reduce consumption and avoid wasting resources. It is because of this that these groups back a strengthened position towards the EU regulation overseeing energy efficiency having in mind the principle of Energy Efficiency First.

“Revise and implement the Energy Efficiency Directive and make it the driver of a comprehensive policy framework that widens, deepens, and implements the Energy Efficiency First principle in order to reduce energy demand in all sectors” (CANE, position paper, p. 3)

Additionally, environmental organizations suggest the imposition of a target for energy savings across the EU. This target ought to be binding if it aspires to effectively contribute to the climate effort:

“A binding target is needed to drive energy efficiency measures” (CANE, position paper, p. 3)

Renewables are an unavoidable concern for energy transition. The preoccupation about the supply and demand for renewable energy is present in the position papers issued by environmental IGs as they know its importance to reduce the EU carbon footprint. They recommend that the EU should revise the regulation on renewables to make it a catalyzer for its generation, distribution, and consumption across Europe.

“Revise and implement the Renewable Energy Directive and make it the driver of a comprehensive policy framework supporting the further development and uptake of renewable energy” (CANE, position paper, p. 3)

Finally, according to these groups, the EU should do more to phase out the utilization of fossil fuels in the generation of energy. These elements are highly polluting and their usage releases GHG that accelerate global warming. Determinedly, environmental IGs envisage deadlines for phasing out these fuels in the EU.

“The EU must abandon all fossil fuels – oil, gas and coal – and switch to energy sources with lesser impact” (Surfrider, position paper, p. 3)

“Agree on phase out dates for the production and use of all fossil fuels. For coal power this means a phase out by 2030 or earlier, for fossil gas by 2035 and all fossil fuels by 2040” (CANE, position paper, p. 3)

In the communication of the 2030 CTP, the Commission covers all these topics being supported in different degrees by the drafted policy. In the first place, the Commission reinforces the need for improving energy efficiency in all EU sectors:

“The higher ambition level will also require to better promote energy efficiency wherever cost-effective in all areas of the entire energy system as well as in all relevant sectors where activity affects demand for energy”
(Commission, policy communication, p. 20)

If the environmental IGs proposed a binding target for energy savings, the Commission agrees partly with the idea while putting forward a goal of energy efficiency that is non-binding. Nevertheless, the policy communication offers a horizon towards the European community should move in order to fulfill the aim of the 2030 CTP.

“The Impact Assessment shows that energy efficiency improvements will need to be significantly stepped up to around 36% in terms of final energy consumption” (Commission, policy communication, p. 19)

The generation of renewable energy is overtly backed by the Commission as a way to achieve climate targets and contribute to a cleaner and sustainable supply of power for businesses and households. The commitment to clean electricity is embodied in the goal of reaching two-thirds of the electricity generation by renewable sources by 2030.

“By 2030, the share of EU Renewable electricity production is set to at least double from today’s levels of 32% to around 65% or more”
(Commission, policy communication, p. 8)

Regarding the proposed phasing out of fossil fuels, the Commission is less ambitious than environmental IGs. Even though the policy communication assumes the need for a strong reduction in its utilization, aspiring for certain deadlines in the reduction of its usage, the targets are less severe than the proposed by the environmental organizations.

“By 2030, coal consumption would be reduced by more than 70% compared to 2015, and oil and gas by more than 30% and 25% respectively” (Commission, policy communication, p. 9)

Business IGs appear to be less interested in details about energy efficiency and a rapid phasing out of fossil fuels. Their few statements addressing energy-related topics are rather

focused on EU regulations that would be hindering the convenience of renewable energy or increasing its cost for EU companies.

“Existing hurdles to self-consumption of renewable energy have to be removed” (Eurochambres, position paper, p. 2)

Concerns like this appear not to be directly addressed by the Commission, although the viewpoint of the EU is that an ample transition to renewable energies should not mean a bureaucratic and costly scenario for businesses or households.

In short, energy transition as a category appears to favor the influence of environmental IGs which successfully introduced the urgency of amending and reinforcing the regional regulation on energy efficiency and renewable energy generation. This concern is followed by consequent support from the communication of the 2030 CTP. However, the ambition of environmental IGs to set stringent phasing out deadlines for fossil fuels is only partially backed by the Commission that, while agreeing that fossil fuels should be gradually abandoned, puts forward less challenging deadlines for these combustibles.

- *Transport challenges*

Transport is a sector that is going to attest several changes in the next years in order to make it contributive to combat climate change. This is a reason why it is worth checking whether the recommendations of business or environmental IGs were more influential on the Commission.

Environmental IGs put the accent on the necessity to electrify the distinct modes of transport and in the production of zero-emission vehicles. These objectives are proposed to be accomplished aligned with a strict ban for sales of fossil fuel vehicles and the promotion of public transport and non-motorized alternatives within the European cities.

“Put in place a zero emission automatic Roadmap, aiming at banning the sale of fossil fuel based vehicles in the single market at least by 2030 and

promoting a shift to public transport and non-motorized transport modes”
(CANE, position paper, p. 3)

The Commission recognizes the overall necessity for reforming the transport sector through lines that resemble the ones depicted by environmental IGs. For instance, advancing towards zero-emission vehicles and supporting public and sustainable modes of transport is part of the 2030 CTP objectives.

“Mobility will have to be made substantially cleaner, with zero emissions vehicles on their way to replace conventional ones, strong development of public transport and greater use of sustainable transport modes and multi modal solutions” (Commission, policy communication, p. 3)

The banning of fossil fuel vehicles promoted by the environmental IGs is not entirely backed by the Commission since the policy communication does not mention a banning of these vehicles but a progressive decline in the number of them that can be extended until the year 2050.

“The Impact Assessment indicates that to reach the overall climate neutrality target in 2050, nearly all cars on the roads must be zero emissions by that time” (Commission, policy communication, p. 21)

Even if an ambitious banning of fossil fuel vehicles seems to be discarded by the Commission there is, instead, a clear backing to further use of cleaner fuels in the sector, especially through a larger presence of electric vehicles on the European roads.

“The transport sector had the lowest share of renewable energy in 2015 with 6%. By 2030, this has to increase to around 24% through further development and deployment of electric vehicles” (Commission, policy communication, p. 8)

Surprisingly enough, business IGs do not make statements regarding transport challenges. The involvement of the automotive industry in Pan-European business federations is less intense than other economic actors, favoring a sectorial representation or an individual lobby

carried out by the biggest manufacturers of road vehicles in Europe. Something that is in line with previous findings on the characteristics of the automotive lobby in the EU (Wagner, 2012; Haas & Sander, 2020)

As a result, environmental IGs have got the most influence in the drafting of the policy by the Commission. The emphasis on the electrification of automobiles, and the support for public, sustainable, and clean transportation modes, are shared by both groups. Stricter regulation on the sale of fossil fuel vehicles is partially backed by the Commission that, while remarking the necessity for a gradual decline of these vehicles, it rules out a banning in its sale in the short term.

- *Green Investments*

An enormous effort in investments is deemed necessary for the success of any climate plan since new infrastructure, procedures, and materials are required to face the changes that businesses, citizens, and organizations are entitled to endure to cope with stricter climate-related goals.

Marking a difference over the previous categories, green investments show a closer correlation between business IGs' inputs and the content of the 2030 CTP communication. As an example, business IGs reckon the current shortfall in investments observed in the private sector. They also specify the deficit undergone on research and development as a sector that is determinant for the competitiveness of businesses.

“Europe could face an €850 billion shortfall in private sector investments in the next couple of years, of which an estimated €22 billion loss is in total research and development” (BusinessEurope, position paper, p. 1)

To remediate this problem, business IGs demand that the investment programs at the EU and MS levels be used to boost the money that is required for the fulfillment of the 2030 CTP.

“The financing instruments at EU and MS levels should continue to be present and to facilitate investments” (Euromines, position paper, p. 3)

The Commission's response is aligned with this requirement as it enlists the programs available to palliate the lack of private resources to be spent in climate action. Moreover, the Commission also addresses the deficit of investment in research and innovation, an area particularly sensitive for the business community.

“The EU Green Bond Strategy and Climate benchmarks will play a crucial role in fostering invest closer to the needs of the real economy” (Commission, policy communication, p. 21)

“The European Regional Development Fund and the Cohesion Fund will support complementary investment in energy efficiency, renewables, innovation and research” (Commission, policy communication, p. 21)

By contrast, environmental IGs do not mention a current deficit in investments needed to comply with the climate agenda, albeit they underscore that every EU financial programme must be intertwined with climate-related goals, meaning that the money allocated should be assigned only to environmentally-friendly programs.

“Ensure all EU and national financial institutions and instruments are fully climate proofed so that no funding shall be used for climate harmful activities” (CANE, position paper, p. 3)

Regarding this request, the Commission does not seem to fully agree with a profound marriage between investment programs and climate-related projects. The next statement reveals that less than a third of the money disposable is attached to climate objectives:

“The Invest EU programme focuses on attracting private investment, and it has been proposed to use at least 30% of its overall financial envelope to contribute directly to achieving climate objectives” (Commission, policy communication, p. 21)

Overall, the category of green investments appears to be more beneficial for the position of the business IGs whose suggestions for a list of EU level programs underpinning the investment effort held by the private sector as well as the emphasis on leveling up the

resources allocated to research and development, appear to be taken by the Commission. The dismissal of the proposal from the environmental IGs to tie EU investment programs to climate-related projects reinforces the influence that the business community had on this category.

- *Industry renovation*

The category of Industry renovation observes a larger influence of business IGs over their environmental counterparts towards the communication of the 2030 CTP. To begin with, business IGs highlight electrification as one of the key challenges that the sector faces to fulfill strengthened climate targets. In addition, the business community is concerned with the integration of stakeholders in the design of plans and strategies to cope with the climate policy.

“Electrification is key for many industries to reach their climate targets which requires access to fossil-free electricity at competitive prices” (Euromines, position paper, p. 3)

“Stakeholders along the value chain should work together on a sustainable plan delivering the 2050 climate neutral objective while guaranteeing that the industry is shielded against carbon leakage” (Euromines, position paper, p. 2)

The Commission’s communication mentions electrification as part of a comprehensive plan to decarbonize European industry which also contains support to the circularity of resources, sustainable resources, and clear sources of energy.

“To allow industry to fully decarbonized after 2030, zero or very low carbon technologies and business concepts, including system integration, access to sustainable resources and increased circularity, medium and high heat electrification, hydrogen and carbon capture, utilization and

storage, will need to be developed and tested at scale this decade”
(Commission, policy communication, p. 10)

Clearer is the Commission’s stance on pressing for reforms in the governance of companies to make them internalize the relevance of shifting the paradigm of businesses from one centered on profits to one that considers the environment and climate sustainability as pillars of the performance of the company. This change in the way of managing businesses is expected to be appreciated in large and SME firms regardless of the economic sector to which the company belongs.

“Changes in corporate governance rules and practices, including on sustainable finance, will make company owners and managers prioritize sustainability objectives in their actions and strategies” (Commission, policy communication, p. 10)

Environmental IGs, in contrast, focused their demand on the urgency to establish targets for the industry to verify its compliance to objectives for decarbonization and clean technology deployments.

“The EU Industrial Strategy should set clear decarbonisation and technology deployments targets for 2030 and 2040” (WWF Europe, position paper, p. 2)

Unfortunately for these groups, the Commission does not put forward any specific target for the European industry concerning decarbonize or usage of renewable energy. The category, then, is assumed to be prone to the influence of the ideas and suggestions carried by the business IGs about the future of the European industry amidst the wave of green policies sketched by the EU.

- *Just Transition*

An important policy attached to the 2030 CTP is the Just Transition Mechanism. This tries to address the particularities that affect certain regions or economic sectors in their transition

to climate-friendly procedures. The social relevance of the mechanism as well as the significant amount of resources destined for its development makes it worth studying whether business or environmental IGs achieve a larger influence on the Commission's comments about the policy.

The analysis reveals two remarkable takeaways. While the suggestions of environmental IGs are strongly considered by the Commission, the business IGs do not deliver any specific statement about the mechanism, keeping a rare silence over a policy that directly affects the fate of dozens of industries that may be constrained by the unfolding of the EU climate policy on the ground.

Environmental groups emphasize two elements for a successful application of the Just Transition Mechanism, its social concern and its focus on regions that will suffer the most after the transition to a green economy. Typical examples of sectors damaged by the environmental policy are areas or cities in which the extraction or elaboration of products based on coal, minerals, and other polluting fuels is crucial for the local economy.

*“The Just Transition Mechanism has to ensure a socially just transition”
(WWF Europe, position paper, p. 4)*

“All three pillars of a Just Transition must exclude fossil fuels instruments, whilst empowering regions and municipalities to design bespoke Just Transition plans and projects” (WWF Europe, position paper, p. 4)

Both concerns are echoed by the communication of the Commission that promises the Just Transition Mechanism will address social consequences of the rapid transition to a greener economy, and that EU regions that are vulnerable to this transition shall receive special consideration by the Commission in the form of investments and tailor-made policies.

“Adverse social consequences need to be addressed and adequate policies be deployed both at EU and MS level” (Commission, policy communication, p. 3)

“In regions where carbon intense industry is currently of greater importance, focused policies and investments are needed, supported by the Just Transition mechanism” (Commission, policy communication, p. 6)

Although the passiveness of the business IGs on the Just Transition Mechanism might be understood as a tacit acceptance of its principles, it also implies the refusal to submit further comments and recommendations about its design and application that may alleviate the fate of several firms and workers affected by the more ambitious EU climate policy. Overall, the silence of the business IGs matched with the support shown by the Commission to environmental advice defines the influence that the latter got on the policy communication.

- *The EU as a Global Climate leader*

The leadership of the EU in the global battle against climate change was reinforced after the presentation of the EGD and the number of policies coming along with it, like the 2030 CTP. The acknowledgment of this reality is better reflected by the position of the environmental IGs that stress the duty of richer countries – the EU considered – to move forward in the adoption of climate-related policies. Behind this statement, a sort of moral duty justifies the development of such policies in states that have the financial capacities to endure the transition challenges after decades of building up their global leadership onto carbon-intensive and highly polluting industries.

“All countries need to contribute to this global challenge, but rich countries, such as the EU, are expected to do more and faster” (CANE, position paper, p. 1)

Crucially, the Commission recognizes its moral duty to exert global influence over the design of effective measures to tackle climate change as well as its commitment to support international agreements on the matter.

“The EU has the possibility – as well as the moral obligation – to influence global GHG trends and increase resource efficiency, within and beyond

the international climate negotiations” (Commission, policy communication, p. 22)

Meanwhile, business IGs do not question the leadership of the EU in this field, however, they put an accent on the way the EU should exert that leadership. In this case, the business groups favor the advancement of international market-related mechanisms as the preferred ones. Market instruments are usually applauded by private actors as this community trusts the market’s capacity to impartially assign the resources – and costs – of achieving a certain goal, in this case, climate neutrality. Notwithstanding, while privileging internationally agreed market mechanisms, the business community offers a lengthy and rocky manner to face climate change since multilateral agreements are frequently difficult to consolidate.

“The EU’s climate policy must remain global at its core. The EU and MS should, therefore, make use of international market mechanisms to achieve their own climate goals” (Eurochambres, position paper, p. 3)

Even though the Commission highlights the relevance of multilateral cooperation in order to make global partners strengthen their own climate policies, it does not concentrate its efforts solely on market mechanism but on the whole range of diplomatic tools available to work along with other nations in the pursuit of reinforced climate ambition.

“The EU will continue to foster multilateral rule-based cooperation, using its green, climate, and energy diplomacy – and the full spectrum of its external policy instruments – to enhance the ambition of its partners” (Commission, policy communication, p. 23)

This category, therefore, is mainly supported by the viewpoint portrayed by environmental IGs which do not only underscore the necessity for an EU leadership on climate-related policies, but they also notice the so-called moral duty of the EU – and other rich countries – to lead the efforts in the battle for reducing GHG emissions. These groups support this view without pressing for any particular type of instrument as the business community does with market mechanisms.

In summary, out of the seven categories studied, environmental IGs were more successful in five of them at transmitting their message to the Commission. Whereas business IGs maximize their influence on two categories which are closely related to the spirit of the business activity – “Green investments” and “Industry renovation” -, environmental groups attained large influence in categories related to different areas, from one strongly linked with the achievement of GHGs emission reduction as “Energy transition”, to the wider and compensatory-oriented “Just Transition Mechanism”.

While the overall results may be appreciated in Table 4, its clarification points to the fact of the readiness and preparation that environmental IGs have attained recently. Even when its foundation as a vocal group is relatively new, its work has been perfected and its knowledge has expanded from a sole focus on nature protection and conservation to a number of areas that play a significant role in the relationship between society and the ecosystem. The realization of the threat of climate change has accompanied the growing importance of climate-related policies in the EU policy agenda, a movement that is expected to be reinforced by the assertive work of these groups.

Table 4: Summary of categories and the type of influence observed

Categories	Larger Influence
ETS and Carbon pricing	Environmental IGs
Energy renovation	Environmental IGs
Transport challenges	Environmental IGs
Green investments	Business IGs
Industry renovation	Business IGs
Just Transition	Environmental IGs
The EU as Global Climate leader	Environmental IGs

3.3. Explaining influence – Testing hypothesis

- *Hypothesis 1*

The first hypothesis states that *the larger the capabilities of the IGs, the greater their influence on the drafting of the 2030 Climate Target Plan*. Then it refers to whether specific capabilities at disposal of the IGs make them exert a larger influence on the Commission. The literature remarks the salience of the experience working within the political system and closely to policy-makers as crucial assets that give more expertise to the groups that have been long in the job. In addition, financial resources are considered as an important factor that enables an IG to hire more and better-prepared personnel as well as to conduct more activities in order to maximize its capacity to be heard by policy-makers. Finally, the presence of an IG in multiple and diverse commission expert groups grants it a first-hand knowledge of the functioning of the EU policy-making as well as it symbolizes the trust the Commission assigns to the groups.

To compare the possession of these capabilities among the IGs, the next two tables enlist four variables that are related to the resources IGs have at disposal to conduct their work effectively.

Table 5: Characteristics of the Business IGs studied

	Eurochambers	BusinessEurope	Euromines
Foundation of the group	1958	1958	1996
Number of CEGs in which the IG participates	18	50	10
Personnel hired full-time	18	30	4
Estimated costs of the activities (annual)	€1.25M - €1.5M	€4M - €4.25M	€0.2M - €0.3M

Source: EU Transparency Register (2021)

Table 6: Characteristics of the Environmental IGs studied

	Climate Action Network (EU)	World Wild Fund (EU)	Surfrider Foundation Europe
Foundation of the group (year)	1989	1961 (1997 for EU affairs)	1984 (1990 in Europe)
Number of CEGs in which the IG participates	8	20	2
Personnel hired full-time	6	0 ¹¹	2
Estimated costs of the activities (annual)	€0.9M - €1M	€2.75M - €3M	€0.1M - €0.2M

Source: EU Transparency Register (2021)

The comparison of the tables reveals the overall advantage that the selected business IGs have over environmental ones as the formers have, on average, more time working at the EU level, participate in more commission expert groups, and lead activities involving more financial investments.

While business interests were from the onset part of the European integration landscape, environmental concerns got EU political attention only after the launching of the SEA in 1986. Eventually, it was not until the 1990s that environmental IGs consolidate their position in Europe. This difference means a lot in favor of the expertise and knowledge about the EU system that business IGs have grabbed. Hence, it is expected that business IGs possess a solid and reliable relationship with EU politicians and civil servants after decades of working along in countless policy projects. Business IGs would have got enough time to understand and master the EU policy-making process, leading to a better design of plans and strategies that maximize their influence.

Reinforcing the previous argument, it is also noticed that business groups participate, on average, in more CEG than environmental ones. This can be explained by the broader scope of issues in which business associations are interested, or because the EU itself favors the

¹¹ Albeit no worker is recognized to be hired in full-time basis, World Wild Fund Europe declares to have 35 people working 75% of the day for the group's activities.

creation of more and increasingly specific groups on economy-related affairs because of the importance that the area has for the EU, which is enshrined in the exclusive competencies that the union possesses regarding the managing of the single market. Whatsoever the reason for the highest number of CEG related to economy, this fact underscores the inside character that oldest business IGs have, and how this can be used for both reinforcing their familiarity with the EU policy-making process – including the tracking of the EU policy agenda – and their influence even at early stages of the policy formulation phase.

Business IGs also have an advantage in the financial resources at their disposal to conduct lobbying campaigns. A large budget allows business IGs to design better strategies to increase the likelihood of being heard by the policy-makers. Financial resources help in the recruitment of skilled personnel. In addition, an adequate number of professionals working full-time gives to the organization the possibility of being constantly monitoring the EU agenda and responding to every process of public participation opened by the Commission. Furthermore, an experienced and well-trained team can make a difference in the drafting of explanatory and enticing documents that may be adopted as important inputs by the Commission's staff.

Considering all these elements, business IGs should have had a large influence on the communication of the 2030 CTP due to their possession of superior capabilities that may have given them a clout in the presentation of comprehensive and persuading position papers. Nevertheless, the results demonstrate that the larger sum of resources and experience embodied by the business IGs were not enough to surpass environmental IGs' arguments on the categories analyzed. Therefore, the hypothesis is not confirmed by this research.

- *Hypothesis 2*

The second hypothesis states that *the closer the alignment of the IGs with the position of the Commission, the greater their influence on the drafting of the 2030 Climate Target Plan*. In order to check the alignment of business and environmental IGs with the Commission, I focus on the proper statements found in the position papers issued by these groups. In these

documents is possible to observe their position regarding the Commission's aspiration of expanding and strengthening the climate-related targets in the EU.

In the case of business IGs it is possible to observe a limited willingness to revise the EU climate policies, meaning that they are mostly playing an antagonistic role in the Commission's intention to strengthen the regulatory framework regarding climate. This reality can be noted in two arguments displayed by business associations: the perception of already strict EU climate policy in comparative terms, and the damage brought by the COVID-19 crisis with unanticipated effects for businesses and citizens.

The perception of strict EU climate policy not only means a comparison with external blocs or countries but also implies a claim for enforcing the compliance with the current targets instead of passing new regulation.

“Eurochambres suggest intensifying the efforts to reach the current 2030 objectives before debating an increase” (Eurochambres, position paper, p. 1)

“The [current] emission reduction target of 40% by 2030 means that the EU has the strictest climate goal worldwide” (Eurochambres, position paper, p. 1)

With statements like these, the business community highlights the effort that businesses are undergoing to overhaul their procedures to cope with current GHG emission targets. Compliance with these targets risks a reduction of the competitiveness for EU companies against businesses overseas that face less stringent regulations. Hence, the message of business IGs seems to privilege a further assessment of the 2030 CTP in order to limit the affectation to European businesses.

In addition, the COVID-19 crisis is presented as a daunting obstacle for the European business community that has to deal with a health crisis that has unpredictable consequences.

“The Commission should use the current situation to make the Impact Assessment more robust, especially given that it is uncertain what the

longer-term impacts of the crisis are for jobs, economic growth, and investments” (BusinessEurope, position paper, p. 1)

“The exact impact of the COVID-19 crisis on consumer choice related to other parts of the energy transition (eg. Demand for green products, including willingness to pay an additional price or premium for such products) should be further studied” (BusinessEurope, position paper, p. 8)

These groups try to make the EU aware of the dramatic way COVID-19 would have changed the scenario for companies. In particular, they seek that the Commission amends the 2030 CTP’s Impact Assessment in order to internalize this new scenario. Business IGs aim that the Commission imposes less stringent climate-related measures while giving more free-way to European industries to cope with the effects of the current economic downturn.

By contrast, the environmental IGs show manifest support to the revision upwards of the climate targets unfolded by the 2030 CTP. With a stronghold on the protection of the environment, biodiversity, and sustainability in general, the environmental community stresses the risks that climate change brings to the planet. According to their view, strengthened green regulation appears to be central as no commercial activity, job, nor industry can be successfully held in a planet that depletes its resources and moves to a catastrophic climatic future.

Moreover, the alignment of these IGs gets clearer after noticing the way they emphasize the necessity of climate-related goals that go even beyond the ones introduced by the Commission. Through the lens of these groups, achieving the Paris Agreement’s temperature goal requires the setting up of more ambitious GHG emission reductions across the EU territory.

“As action in the next 10 years will be most decisive in reaching the 1.5°C objective, the EU will need to increase its 2030 domestic GHG emission reduction target under the Paris Agreement from at least 40% to at least 65% compared to 1990 emissions” (CANE, position paper, p. 1)

*“We advocate for an even more ambitious goal of 65% emissions cut by 2030, required to meet the 1.5°C target of the Paris Agreement”
(Surfrider, position paper, p. 1)*

The demand for stricter climate policies, including more ambitious targets, reveals the regulatory willingness that environmental IGs perform in the policy-making process of the 2030 CTP. Relying on the Commission’s spirit of putting climate at the center of the EU policies for the years to come, environmental groups are thus aligned with the Commission. This alignment refers to the large influence that environmental IGs attain in the drafting of the policy studied. The majority of categories show similarity between what is proposed by environmental groups and what is finally offered by the Commission. The second hypothesis is then proved accurate to explain the outcome observed in this research.

- *Hypothesis 3*

To evaluate the accuracy of the third hypothesis, *the better the IG represents the people’s view on climate change, the larger its influence on the drafting of the 2030 Climate Target Plan*, it is necessary to study which was the position of the European public about climate change and green policies at the time of the 2030 CTP’s policy-making. To gauge this, I rely on the special Eurobarometer survey conducted in 2019 that focused on the people’s stances and attitudes towards climate change. Eurobarometer is a well-known survey that periodically tests the vision of EU citizens in a number of public affairs. The survey is endorsed by the Commission, and its results are deemed representative at EU and national levels.

The results of the survey are indubitable as the EU citizens tag climate change as a grave problem that needs to be addressed. Indeed, 79% of the respondents think climate change is a very serious problem, reaching at least two-thirds in almost every EU country. Moreover, 60% of the public thinks climate change is the most serious issue that is affecting the world – an increase of 17% from 2017 - only behind poverty, hunger, and lack of drinking water (71%).

The EU citizens do not only recognize climate change as a problem, but they are taking measures to address it. 60% of them declared to have done at least one activity related to the protection of the environment – a jump of 11% in comparison to 2017. The activities that got more mentions are the reduction of waste and its separation for recycling purposes (75%), and the reduction of disposable items whenever possible (62%).

In addition, 49% of the respondents affirm that the EU level should be responsible for tackling climate change, a percentage slightly below national governments (55%) and businesses (51%) which are the two top responses. This fact reveals that the public is thinking of shared responsibility between distinct but mutually supportive levels of governance and social actors. This can imply citizens' support for comprehensive and intertwined policies executed at different levels of government and with the crucial cooperation of the private sector.

Finally, the Europeans seem to strongly back the climate turn of the Commission when 92% of the respondents agree with the reduction of GHG emissions in order to make the EU climate neutral by 2050. Being this the main objective of the EU climate policy – enshrined in the EGD –, the public's support means an important recognition of the legitimacy of this goal and the measures that need to be taken to accomplish it. The Commission's viewpoint is then echoed by the society reinforcing the necessity to move forward with the climate agenda.

It is possible to affirm that most EU citizens are aware of the seriousness of climate change as they demand measures to address it. Public opinion is, therefore, better represented by the position of the environmental organizations than by the business IGs. Consequently, environmental IGs would have political clout over the business community as they represent the people's position regarding climate issues. This advantage would make environmental groups more relevant for the Commission, and eventually leading to their proposals and suggestions to be better received by the Commission. This appears to be the case of the 2030 CTP in which environmental IGs' position papers are more similar to the Commission's communication than the business IGs texts are in the categories revised. The third hypothesis is then proved correct.

4. Conclusion

The objective of this research was to assess the influence of business and environmental IGs in the presentation of the 2030 CTP by the Commission. The results showed the success of environmental groups in influencing the Commission's policy communication as five out of seven categories under study were similar to the proposals and suggestions presented by these groups in the position papers reviewed. These results reflect that environmental organizations have been successful at capitalizing on the new context in which the EU climate policy is shaped. Nowadays, the climate policy has taken a central place in the EU policy agenda, being traditional concerns about the functioning of the single market, the competitiveness of the EU companies, or the economy in general, depending upon their complementarity with the climate objectives. Environmental groups have developed sufficient capabilities to put forward insightful proposals and recommendations in areas such as energy, transport, or the global role of the EU climate policy, demonstrating the expanded knowledge they have acquired and the persuasiveness of their work. On the contrary, business IGs appear to have reduced their influence over the EU policy-making process, and their views are, in general, distant to the Commission's ones regarding climate policies. The larger resources at disposal of these groups were not enough to balance the environmental arguments, revealing how important can be to share the alignment with the Commission's position and to carry the public's message to the policy-making process.

It is expected that the centrality of climate policies will endure in the EU agenda. This would reinforce the role that environmental IGs play in the policy discussion. It is likely to be observed how these groups will gradually achieve a larger responsibility and prominence in the policy-making process, especially considering that several policy sectors shall be considered through the lens of the climate agenda. In this scenario, business organizations must adapt their strategy in order to not appear outplaced by the influence attained by environmental groups. An alternative for these groups would be to establish dialogues and encounters with green organizations to understand their concerns and try to approach positions before any policy consultation by the Commission. Although the incentives for

following this scheme lean towards the business community, environmental groups could also benefit from it as they can use it to expand their knowledge about the condition of the EU industry and its requirements to cope with stricter climate policies.

It is time to remark some warnings about the character of the results found in the research. Firstly, the results obtained are limited to the IGs considered. The results are not representative of the population of IGs nor to the sub-group of business and environmental organizations. The sample of IGs chosen was purposeful and selected after checking their experience working at the EU level and, foremost, because of the availability of their position papers about the 2030 CTP. The author is aware of the several other organizations participating in the policy's open consultation period that may also have been influential on the Commission, but that are not included in the research. Therefore, the conclusions extracted here are only illustrative of the groups studied.

Secondly, the results obtained are based solely on the data analyzed. That is to say to the review of position papers through CA techniques. Any other activity, document, dialogue, or meeting among the selected IGs and members of the Commission kept out of the research's scope. This limitation is understood because most of the lobby activities happen to be distant from the attention of the public and researchers. Hence, the majority of the literature studying these groups bases their findings on the available data or information, such as the position papers. Keeping obscure diverse and important lobby activities may affect the accurate assessment of the IGs' influence, making it complex for researchers to establish the validity of their findings.

Thirdly, results are limited to the understanding of influence based on the text similarities between IGs' position papers and the communication issued by the Commission. Influence, however, is an intricate concept that can be observed through many variables. Measuring IGs' influence has been a tricky challenge for researchers who have dealt with scarce data and limited access to the policy-making process (Chalmers, 2011; Dür, 2008). IGs' influence may not only be limited to the policy outcome but it can be perceived in the capacity of certain groups to manage the policy agenda and push for certain priorities that were not previously considered by policy-makers (Skorkjaer Binderkrantz & Rasmussen, 2015).

Influence can also occur in the policy decision stage, as IGs persist in their lobbying activities in order to convince decision-makers on the appropriateness of a particular method to reach an agreed goal. Furthermore, influence can be subjectively evaluated. It may be assessed through the perception of the actors involved in the policy-making process (Ulbig, 2008). In this research, environmental IGs were proven to be more influential in the drafting of the 2030 CTP communication, but the perception of these groups may be different and they can still refer to the business lobby as preeminent in Brussels. In definitive, the work on influence opens several paths to the researcher, none of them fully comprehensive of the porosity of the concept, being the decision about in which way to observe and measure the concept taken in accordance with the objective of the study.

Finally, I would like to delineate some recommendations for future research on the role, participation, and influence of IGs in the EU policy-making context. Firstly, it is imperative to continue studying the IGs' influence on EU climate policies as more and crucial policies are expected to be introduced to tackle global warming. Further research should pay attention to the real strength that environmental IGs appear to have in this matter. The upcoming negotiation of the European Climate Law seems to be the right scenario for a closer look into this subject. In addition, this research area could gain a lot if comparative analyses are sustained. Comparing the influence of organizations in the EU level with the one that is observed at the national level – either in MSs or foreign states – can improve the understanding of which are the fundamental EU-related characteristics that make some sort of IGs more influential at this level than in the domestic sphere.

Moreover, a further look at how IGs relate themselves to the transposition of EU regulation across the territory is worth researching. The support in transposing EU policies or regulations can be used as a tool to increase IGs' influence on the EU policy-making process. As it was noted, some business groups seek to gain influence in the EU policy-making while pledging their assistance in the compliance of the regulation on the ground. By contrast, environmental IGs have tried to increase their importance in the eyes of the Commission since some of these groups act as informers of the non-compliance of companies or local

governments with the EU regulation. These groups have become watchdogs of the fulfillment of EU policies across the EU territory (Hofmann, 2019).

Ultimately, the observed success of environmental IGs at influencing the 2030 CTP reinforces the necessity to study these groups profoundly. If in the past the research on IGs was almost monopolized for studies focusing on business-related organizations, today public IGs and NGOs deserve a closer look since they are attaining an important role in politics and increasingly influencing policy-making processes. How do these groups work? Are they truly vectors of the people's voice? How transparent are their functioning and funding? These are questions that need to be comprehensively addressed since traditional representatives of the people's voice – such as political parties – suffer low levels of participation and widespread mistrust, leaving the political floor fertile for the inclusion of new actors to represent the citizens. The aptitude of these groups to stand up to this responsibility merits fresh research.

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Appendix

Appendix 1: 2030 CTP Policy Communication: Categories and their statements

Percentage	Number of Statements	Categories
12.6%	41	Energy transition
9.2%	30	Transport challenges
8.9%	29	Land use
7.7%	25	Emissions Trading System & Carbon pricing
6.1%	20	Climate Action as parallel to Economic growth
4.6%	15	Urgent & Ambitious Action
4.6%	15	Building sector
4.3%	14	Green Investments
3.4%	11	The EU as a Climate global leader
3.4%	11	2030 CTP Social benefits
3.4%	11	Agriculture & Food production
2.4%	8 (approx..)	Mathematical mean
2.1%	7	Just Transition as Inclusive transformation
1.8%	6	Current situation
1.8%	6	EU citizens' involvement
1.8%	6	Differences among MS
1.8%	6	Commitments from the MS
1.8%	6	Industry renovation
1.5%	5	Climate Crisis
1.5%	5	Clean air policy
1.5%	5	GHG Emissions
1.2%	4	Further consultation and IA
1.2%	4	Health Crisis
1.2%	4	Climate & Digital transition
1.2%	4	Low-income households
1.2%	4	Green Infrastructure
0.9%	3	Carbon Border Adjustment
0.9%	3	EU Citizens' aims
0.9%	3	International cooperation
0.9%	3	Climate Neutrality by 2050
0.9%	3	Reinforce the Paris Agreement
0.9%	3	Waste sector

0.6%	2	European Climate Law
0.6%	2	EU Budget
0.6%	2	Research & Innovation
0.6%	2	Circular Economy
0.3%	1	"Do not harm" principle
0.3%	1	EU's global dependency
0.3%	1	Nature & Biodiversity
0.3%	1	2030 CTP challenge for EU businesses
0.3%	1	Regulatory Framework
0.3%	1	Certification & Standards
100%	326	TOTAL

Appendix 2: Business IGs Position papers. Categories and their statements

Percentage	Number of Statements	Categories
28.6%	42	Health Crisis
16.3%	24	Critics to IA
8.8%	13	2030 CTP challenge for EU businesses
6.1%	9	Emissions Trading System & Carbon pricing
4.8%	7	EU's global dependency
4.8%	7	Raw Materials
4.6%	7 (approx.)	Mathematical mean
4.1%	6	Endorsement to Commission's Efforts
4.1%	6	Against 2030 CTP Ambition
3.4%	5	Climate Action as parallel to Economic growth
3.4%	5	Green Investments
2.7%	4	International cooperation
2.7%	4	Energy transition
2%	3	Differences among MS
1.4%	2	The EU as a Climate global leader
1.4%	2	Industry renovation
1.4%	2	Green Infrastructure
0.7%	1	Gratitude to the Commission's Effort
0.7%	1	Lack of opportunities to participate
0.7%	1	Carbon Border Adjustment
0.7%	1	Reinforce the Paris Agreement
0.7%	1	Regulatory Framework

0.7%	1	The Red Tape
100%	147	TOTAL

Appendix 3. Environmental IGs Position papers. Categories and their Statements

Percentage	Number of Statements	Categories
17.9%	26	Energy transition
8.3%	12	Shipping
6.9%	10	Current situation
6.9%	10	GHG Emissions
6.9%	10	Industry renovation
6.2%	9	2030 CTP Not Ambitious enough
4.8%	7	Oceans' role
4.1%	6	Circular Economy
3.4%	5	Emissions Trading System & Carbon pricing
3.4%	5	Just Transition as Inclusive transformation
3.4%	5	Mathematical mean
2.8%	4	Ecological Education
2.8%	4	Urgent & Ambitious Action
2.8%	4	EU citizens' involvement
2.8%	4	Research & Innovation
2.8%	4	Waste sector
2.8%	4	Plastic Production
2.1%	3	Low-carbon solutions
2.1%	3	Green Investments
1.4%	2	Carbon Border Adjustment
1.4%	2	Reinforce the Paris Agreement
1.4%	2	Transport challenges
1.4%	2	Building sector
0.7%	1	Endorsement to Commission's Efforts
0.7%	1	The EU as a Climate global leader
0.7%	1	2030 CTP Social benefits
0.7%	1	2030 CTP challenge for EU businesses
0.7%	1	Certification & Standards
0.7%	1	Mitigation Actions
0.7%	1	Raw Materials
100%	145	TOTAL